

21/00217/FUL Proposed new airport access road

<https://citydev-portal.edinburgh.gov.uk/idxpa-web/applicationDetails.do?activeTab=dates&keyVal=QN4EJ4EWKTZ00>

Objection from Spokes, the Lothian Cycle Campaign, March 2021

We object to this application, firstly on general grounds of need, secondly on specific cycling issues.

1 General

In view of the uncertain future of the airport and indeed of air transport in general, the existing routes to the airport are more than adequate.

The climate emergency is the main issue. Scotland is hosting COP26 in November. It will not look good if Edinburgh's contribution is not just more road building - which in itself involves heavy carbon emissions - but facilitation of the most harmful and energy-inefficient modes of transport (air and road). Instead, we should be looking to the more energy-efficient modes - rail for example is at least 8 times more efficient than road; active travel even more so.

There is the possibility of aircraft being powered by hydrogen in future, when fossil fuels are phased out; but hydrogen requires vast quantities of (electric) energy in its production; in view of the overall shift from fossil to electric, where is all the power to come from? There is an overwhelming need for the 'green' power we generate to be used to best effect.

As for 'need', international air travel is mostly tourism, or for education (eg students from China and SE Asia). Tourism by air is hard to justify when there are so many opportunities for local and land-based tourism, potentially bringing benefits to Scotland, and, if rail travel is improved, to Britain as a whole. Much air *freight* transport is basically importing goods which are not seasonally available or which could be transported by sea.

Thanks to Covid, we have managed largely without air travel or transport for a year now.

The documentation supplied with this application makes no mention of the climate emergency, or of the need for plans and projects to be modified accordingly. The documentation, throughout, gives the impression that nothing has significantly changed in the past ten years; the assumptions are that the airport will continue to expand, in both passengers and freight, until at least 2045. Thus, the whole basis of the application is completely outdated.

Secondly, air travel is widely blamed for the spread of Covid. If air travel is allowed to re-establish, the whole nation is put at risk of the rapid spread of new variants. Stricter measures of testing and quarantine are needed, for the foreseeable future.

Third, if air travel does return, the new road would attract more people to access the airport by car instead of public or active transport. This is:

- a) counter to current council policies
- b) means more traffic going through congested/polluted Corstorphine town centre
- c) is also counter to the new government target in the Climate Change Plan Update, that car km will be reduced by 20% by 2030;

Fourth, Edinburgh is committed to achieving net carbon zero by 2030. That is only 9 years away. Construction of this road would be a step in the wrong direction. The two major contributors to carbon emissions from construction, are *cement* and *steel*. Road building uses both in great quantities.

In sum, the likelihood is that if air travel/transport continues at all, it will be in much reduced form, thus obviating the need for a new road connection. The future of transport infrastructure should be rail-, not road-, based. These are obviously major issues, but the time for taking the right decisions is right now.

We believe that, because of the high levels of emissions involved both in construction and in operation, Local Authorities and the Government should come together to prioritise major infrastructure projects nationally, on the basis that we can no longer engage freely in carbon-heavy projects.

2 Specific

If this project is given approval despite the objections above, Spokes is concerned about several aspects as regards cycling:

- 1) outdated designs;
- 2) the impact of the new road on the junction of Myreton Drive with the A8 at the Gogar Roundabout;
- 3) various deficiencies in the proposed cycle routes

1) the design of the cycle-route is based on outdated principles. It is disturbing that professional designs for a completely new cycle route have come up with shared pedestrian/ cycle use and a layout in which cyclists give way to motor traffic at side-road entrances, even minor ones. The designers make no mention of the major shift in Transport Scotland's policies, in reaction to the Climate Emergency, which has ushered in a new transport hierarchy where active travel is to be given precedence over motor vehicle traffic;

2) Junction of Myreton Drive and QR9 at Gogar Roundabout

At present, a major east-west cycle route connecting the city to RBS HQ and many other destinations to the west, runs along the north side of the Roundabout, where the only junction to be negotiated is Myreton Drive. This road at present serves only the trams depot and has little traffic, and hence represents little danger to cyclists passing in both directions. This cycle route is designated QR9; the application's transport statement (para 3.4.3) mentions a single-day count of crossings: 55 morning peak, 78 evening.

If the new road were built, there would be a substantial increase in traffic turning into and out of Myreton Drive. The cycle route is two-way, ie cyclists will approach the junction from the east (unexpected) as well as from the west. The junction must therefore be re-designed, and possibly signalised, to ensure cyclists can continue to use it in safety.

The application includes nothing on this. It is therefore in flat contradiction of CEC's LDP policy TRA9, which requires no detriment to existing (cycle) routes from new developments;

3) Deficiencies in the proposed cycle routes

The omission of a segregated cycleway in the application is a critical failure and without the inclusion of this, the application must not be approved. Without a segregated cycleway, the application fails to comply with several CEC and national policies, commitments, and aspirations.

The application fails to comply with the Edinburgh Local Transport Strategy, specifically **PCycle2**: "cycle lanes, or where appropriate physically segregated cycle infrastructure, in all schemes involving main roads (except where this may not be necessary if the speed limit is 20mph)". The application also fails to provide Advanced Stop Lines at any signalised junctions, a further failure to comply with PCycle2 and the Local Transport Strategy.

The application fails to satisfy the West Edinburgh Transport Appraisal Refresh (WETA). The WETA clearly states: "Sections 1 and 2 should include a fully segregated cycleway." This has not been achieved, and is unacceptable. A shared use footway **does not achieve this** and trying to claim that it does is simply misleading. There is a clear distinction between segregated facilities and shared use facilities in the WETA.

The application fails to comply with the City Mobility Plan, specifically **Movement 15**: "Expand and enhance the citywide network of cycle routes to connect key destinations across the city, including increased segregated cycle infrastructure on main roads." and **Movement 23**. "Mitigate conflict in shared spaces; Mitigate conflict between those walking, wheeling and cycling on shared paths and spaces through infrastructure design, signage and awareness campaigns." By proposing a shared use footway, this will lead to built-in conflict between pedestrians and cyclists, directly opposing the policy goal to reduce this conflict.

The application fails to support the Edinburgh Active Travel Action Plan (2016) by significantly degrading the comfort, safety, and quality of QuietRoute 9. This application will negatively impact the attractiveness of the route and reduce the potential for modal shift.

There is a consistent failure throughout the proposals for crossings to be on the desire line. The Transport Statement alleges: "These facilities are direct and on the main walking and cycling desire line, where appropriate." **This is categorically untrue.** Numerous proposed crossings, both controlled and uncontrolled, are located far from the desire line. This shows a clear failure to acknowledge the Transport Hierarchy.

In addition to the policy requirement for a segregated cycleway, these further changes should be considered:

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Gogar Roundabout:

A toucan should be included crossing the entrance onto the roundabout arm. This can easily be included within the proposed signalisation at no detriment to capacity. Hatching should be added in line with the existing block paving to minimise the vehicle radii. It should be explored whether a fully signalised crossing could be included. This would enhance QuietRoute 9, which is said to be an aim of this application.

Edinburgh Gateway Access:

A raised table should be introduced to prioritise active travel. The junction radii should be reduced.

First signalised junction:

The crossing point for north/south cycle traffic is offset significantly from the desire line – this directly contradicts the claim in the Transport Assessment that the cycle routes are “direct and on the main walking and cycling desire line”. This crossing point must be moved to the desire line. Additionally, there is no crossing point on the west side of the junction. This is unacceptable for a new signalised junction.

Second Signalised Junction:

Again, the north/south crossing point is unnecessarily offset from the desire line.

Third Signalised Junction:

Yet again, the north/south crossing point is unnecessarily offset from the desire line. If active travel provision on the east side must end at this junction, it should be continued further north so that only a single stage crossing is required. If this is not possible, consideration should be made for a diagonal crossing point to reduce the number of crossing stages required.

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Roundabout: Uncontrolled crossing points should be provided on the north of the roundabout.

New Car Park Junction:

The width of this junction is excessive and will pose a barrier to those walking and cycling. In addition, no attempts have been made to prioritise active travel. The junction width should be reduced to a single lane entry/exit, the radii of the junction should be reduced and a raised table should be introduced.

Existing Access Junction:

The width of this junction is extremely large and will have the same effect as the previously mentioned junction. The width and junction radii should be reduced and a raised table introduced.

All the points above form part of our objection.

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