

City Plan 2030 and City Mobility Plan

This document gives comments submitted on 25 March 2020 by Friends of Cammo on City Plan 2030 and the City Mobility plan. Friends of Cammo comments are restricted to things that affect Cammo Estate and its visitors, directly or indirectly.

The consultation for Edinburgh's City Plan 2030 (the new Local Development Plan) is structured around 16 "Choices" grouped in four themes. Not all are relevant to Friends of Cammo, but we structured our comments around the relevant choices. For clarity, the comments shown below include some text from the questions not repeated in our online response. The Choices consultation and supporting documents are available from the website <http://www.edinburgh.gov.uk/cityplan2030>

In parallel with the consultation on City Plan 2030 there is a consultation on the City Mobility Plan. Also relevant to this is the Edinburgh Strategic Transport Strategy (Oct 2019), one of the supporting documents for City Plan 2030. Friends of Cammo comments were all submitted on the vision for 2030; no additional questions were answered. <https://consultationhub.edinburgh.gov.uk/sfc/city-mobility-plan/>

City Plan 2030

Choice 1: Sustainable, active and connected city

- We support " a new policy which will help connect our places, parks and greenspaces together as part of a multi-functional, local, city-wide, regional, and national green network. ... develop and maintain a city-wide network of high quality and beautiful multi-use green spaces to increase our health and wellbeing, encourage more walking, cycling and sport, address climate change, have a positive impact on biodiversity and air quality, manage the water environment and create opportunities for food growing.

- We support "a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces". We think this should go further, and also recognise the importance of even larger greenspaces

Regarding Map 1:

- We support extending the River Almond Walkway active travel route from Cramond Brig to Kirkliston. Action also needs to be taken to ensure that it is an effective active travel route between Cramond and Cramond Brig by action on the Salvesen Steps bypass.

- We recommend an additional "extra large green space" (ie 5ha+) on the north side of Craigs Road. This is part of the area identified as "Cammo Southern Parkland", assessed as not being suitable for development. Open space and woodlands on this site would provide recreational opportunities within walking distance of new developments around Turnhouse, and the site would also provide a potential location for allotments. Connecting paths can easily be provided from the site to Mauseley Hill and the Water Tower (key features of "Cammo Southern Parkland") and on to Cammo Estate.

Choice 7: Supporting the reduction in car use

- We support enhancements of the city's park and ride infrastructure. As indicated in the City Mobility Plan there should be an additional P&R for traffic from Queensferry and beyond, not shown in Map 4 of this document; a suitable location would be Burnshot in the A90 corridor. Public transport from P&R sites should serve more destinations, not just direct to city centre (see also our comments on City Mobility Plan).

Choice 8: Delivering new walking/cycling routes

- We support extension of River Almond Walkway from Cramond Brig to Kirkliston (see also Choice 1) , but Map 5 only shows the section from the Fife Railway/River Almond Bridge east of the Airport to Kirkliston, not the section to Cramond Brig correctly shown on map 1.

- We recommend more clarity on a cycle and footpath link from the A90 to the A8 corridor, to enable those from the Barnton/Cramond area to travel to employment (eg Edinburgh Park) and transport links, also of use to those travelling from Queensferry by cycle route 1. There is some provision for cycle and footpaths in the plans for housing developments at Cammo fields and Turnhouse/West Craigs, but not joined up.

Choice 12: Building new homes and infrastructure

- We support priority being given to building on urban land, to make use of the infrastructure that already exists in urban areas, and to avoid the unnecessary use of greenfield land. We understand that City Plan 2030 is required to meet the regional demand forecasts, and accept that if demand is as forecast then urban land can be supplemented by some greenfield land. However we would urge changes to the Scottish planning systems so that they guide us to more sustainable futures, rather than meet demand based on current behaviour - given current rates of ecosystem collapse and global warming, then perhaps throwing houses up everywhere is not the best strategy. The blended Option 3, with totals of 11000 units on urban land and 6600 units on greenfield over 13 years, looks more acceptable than the extremes of options 1 and 2. However this only uses the current rate of release of urban land, and it would seem possible to stimulate it given adequate priority.

- We have no specific knowledge of the large greenfield site identified south of the A8 (Norton Park), but it seems to fit well with the priority given to that corridor (IBG and towards Newbridge), with good public transport links. This seems much better than the strategic area identified in the previous LDP, limited to areas north of the A8 and distorted to include Cammo fields with no transport links. (Comment also submitted at Choice 14)

- The Housing report correctly identifies that Cammo Estate is not appropriate for housing development. In addition to the consideration in the assessment, weight should be given to its designations of Historic Garden & Designed Landscape, Special Landscape Area, and now Local Nature Reserve. This large area of greenspace will be increasingly important for the new housing planned for Maybury/Turnhouse and now proposed for the urban sites above.

- We welcome the absence of any proposed developments for the area north of Craigs Road, identified as part of "Cammo Southern Parkland". As assessed in the Housing report, development of this area would be inappropriate, affecting the setting of Cammo Estate that is important for its designation, and without suitable access to transport and other infrastructure.

- We agree with the prioritisation of the A8 corridor for development in west Edinburgh. We note that this has excluded development on the site of the Craigiehall army base and surrounding land, for which a recent planning application was refused. Although we are not urging development of that site on the scale that was proposed, consideration should be given to what to do with the site. This may not be classified as urban land so not shown in maps 7-11, but is an area with existing buildings that should receive similar consideration. As noted elsewhere, part of the site could be used for a new P&R at Burnshot (Choice 7), and a small part for the continuation of the River Almond Walkway (Choices 1 and 8), upstream from Grotto Bridge, with a possible link from there towards Craigie Farm. Uses for the large house and other army housing need to be considered.

Choice 14: Delivering West Edinburgh

- This states that "We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. This doesn't mean that all the land within that area would be allocated for development or for specific uses but allows City Plan 2030 to take into account the findings of the West Edinburgh Study, and future decisions by the Scottish Government on uses within West Edinburgh."

- The area of search in map 21 has been drawn to include Cammo Estate and Cammo Southern Parklands, as well as the existing housing at Cammo and Strathalmond and the current development in Cammo fields. It extends well beyond the area that is stated to be well served by public transport including the tram line. So although we agree that City Plan 2030 should take account of the West Edinburgh Study findings when available, it will be important for it to be interpreted in consultation with local communities, so that it properly reflects differences across the area.

- We have no objection to the major urban sites identified, on industrial land near the Maybury junction (950-1665 units), and the "Crosswinds" site currently part of Edinburgh airport (1000-1500 units). However they will add substantially to the numbers of new housing already proposed for Maybury/Turnhouse (HSG19), increasing the need for infrastructure and access to greenspace. These increased numbers strengthen the case against all traffic from the area exiting via Craigs Road to Maybury Road, as in the existing proposals for Maybury/Turnhouse; an alternative exit to the A8 must be provided.

City Mobility Plan

Friends of Cammo comments are limited to things that affect Cammo Estate, directly or indirectly, although the recommended actions can be linked to wider benefits. The aspects affecting Cammo Estate are to:

- a) Reduce car and freight traffic on Maybury Road and related congestion.**
- b) Improve cycle and foot access to Cammo Estate from existing areas of housing and new developments.**
- c) Clarify the future of Cammo Walk and Cammo Road, which are important links to the south from Cammo, but also potential rat-runs to avoid Maybury Road congestion.**

a) Reduce car and freight traffic on Maybury Road

The Local Development Plan decided to change the character of Maybury Road, with new housing next the road, additional junctions and reduced speed limit, but made no proposals to reduce the amount of through traffic using it, indeed adding to it by bringing all airport freight and traffic from the Turnhouse developments out along Craigs Road to Maybury Road. This omission should be addressed in the City Mobility Plan and City Plan 2030, and the need is strengthened by proposals in City Plan 2030 for new developments in west Edinburgh.

The flows of through traffic on Maybury Road include:

- between north Edinburgh and M8/M9, city bypass, Edinburgh Park and airport;
- between west Edinburgh (eg Corstorphine) and Queensferry/Fife.

The flow between north Edinburgh and Edinburgh Park and beyond is identified in the Edinburgh Strategic Transport Strategy as part of strategic corridor 10, for which it recommends a focus on orbital bus services on the corridor and active travel connections (e.g. Edinburgh Gateway). We support the provision of such bus services and connections. The introduction of the Airport 200 service was a missed opportunity to serve Maybury Road, taking an alternative route already well served by buses. A regular bus service that linked through Cramond and Silverknowes to the Gyle, Edinburgh Park etc could persuade many to switch from car use for these journeys - previous attempts to provide such a service were too infrequent and hours too limited to be attractive to many.

The flow from Queensferry/Fife is identified in the Edinburgh Strategic Transport Strategy as strategic corridor 9. It identifies an opportunity to develop a new Park and Ride site (in addition to expansion of existing sites in Fife). This is also suggested by the Spatial Vision on page 19, although the arrow and label do not seem to indicate a plausible location. However the draft City Plan 2030 does not include any P&R on this strategic corridor. We would support the provision of a new P&R site, for which a site at Burnshot would seem suitable, as in the Craigiehall development proposal now withdrawn. This could be used by commuters from new developments at Kirkliston, Winchburgh and Queensferry poorly served by public transport, as well as those travelling from further afield. It would be desirable for bus services from this P&R to serve Edinburgh Park and locations on the A8 corridor, as well as providing services to the City Centre and the Strategic Development Area of north Edinburgh.

We are aware of a proposal for a new road link between the east of Edinburgh Airport and Gogar Roundabout, although this does not seem to be mentioned in the City Mobility Plan or City Plan 2030. This would seem to be a much better route for airport freight, and for developments around Turnhouse, rather than requiring it all to travel on Craigs Road to join Maybury Road. We would support the inclusion of this new link in the plans and its use to reduce pressure on Craigs Road / Maybury Road.

Even with greatly improved public transport in the area, there will still be through traffic between north Edinburgh and the M8 corridor, for which at present there is no good alternative to Maybury Road. An alternative could be provided by an enhancement to J1 of M90 near Dalmeny, enabling traffic travelling out of Edinburgh to turn left onto M90 and from there onto M8 and M9, and the same connection in reverse direction. This would also reduce traffic flows on the A904 through Newton linking to M9, reduce the attraction of "rat-running" on the minor road from Burnshot to Kirkliston and extend the area of potential traffic origins served by a P&R at Burnshot,

b) Improve cycle and foot access to Cammo Estate

The Spatial Vision on page 19 includes improved walking and cycling provision to local centres. We recommend more clarity on cycle and footpath links from the A90 to the A8 corridor, to enable those from the Barnton/Cramond area to travel to employment (eg Edinburgh Park) and transport links, also of use to those travelling from Queensferry by cycle route 1. There is some provision for cycle and footpaths in the plans for housing developments at Cammo fields and Turnhouse/West Craigs, but not joined up.

It will also be desirable to improve walking and cycling provision to large areas of greenspace like Cammo, and to improve connections between walking and cycling routes. The numbers of dog walkers has greatly increased in the last 20 years, and there will be increasing demand with the new housing developments approved and proposed in west Edinburgh. On-site surveys have found many dog walkers travelling relatively short distances by car, and one factor is likely to be the lack of off-road walking routes to Cammo Estate. There will be a role for improved on-site parking, but this must be accompanied by alternatives that can persuade more walkers to come on foot.

Specific measures that would improve access to Cammo Estate include:

- Extending the River Almond Walkway from Cramond Brig to Kirkliston, as proposed in City Plan 2030. This needs to be accompanied by action on the Salvesen Steps bypass to improve access from Cramond.
- More direct access to Cammo Estate from the housing developments south of Craigs Road. For those at the western end of the development, a new access route from Craigs Road to Cammo Estate past the Civic Amenity Site would be about 600m, compared with about 1.7km by Cammo Walk. This could be combined with the creation of a new large greenspace to the north side of Craigs Road, an area not suitable for housing development, to be commented upon further for City Plan 2030.
- Ensuring good access to Cammo Estate from the Cammo fields development (HSG20) and from the existing housing beyond (Barnton, East Craigs, etc).

c) Clarify the future of Cammo Walk and Cammo Road

Cammo Walk and Cammo Road are important links to the south from Cammo, but also potential rat-runs to avoid Maybury Road congestion. There is uncertainty about the future of both roads, and a decision needs to be taken about both after consultation with local communities affected.

Cammo Walk runs from Cammo Road next the east gate of Cammo Estate to Craigs Road next the junction with Maybury Road; the first 450m runs round the edge of Cammo Estate to the entry to the south car park, and the southern part is one-way for motor vehicles. The previous LDP indicated a walking/cycling route on the southern part, but despite repeated requests there has been no clarity from Council planners on whether it is proposed that this would be parallel to the road or involve closure of the southern part to motor traffic.

Cammo Road continues round the north edge of Cammo Estate to the new car park and forest kindergarten base, and then south-west to link to Turnhouse Road. There is a risk that its use as a rat-run will greatly increase, including traffic from the western part of new developments around Turnhouse Road.

The speed limit on both Cammo Walk and Cammo Road should be reduced from 30 to 20, from their junction at least as far as the Cammo south and north car parks. It makes no sense for cars to speed up after the junction, especially when there are speed bumps. If the speed bumps are retained on Cammo Walk, they should be maintained so as to be more visible to drivers. Action should also be taken to make the junction safer, by preventing parking on the corner.

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Secretary
Friends of Cammo
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