

Living Streets Edinburgh Group

Response to City of Edinburgh Council Powderhall Consultation

September 2018

1. Please accept these comments from Living Streets Edinburgh Group (LSEG) in response to the Council's Powderhall consultation.
2. Living Streets Edinburgh aims to promote walking as a safe, enjoyable and easy way of getting around Edinburgh and to achieve this we want to see:
 - Walking given the top priority over other forms of travel in all Council transport and planning policies
 - Reduction in the volume of motorised traffic and its impact on people using the street
 - Better designed and maintained pavements, road crossings and other pedestrian facilities
 - More effective and joined-up monitoring and inspection of the walking environment by Edinburgh Council
 - Planning policy which encourages dense, sustainable housing over car-dominated development
 - More effective implementation of pro-walking policies 'on the ground'.
3. Given its ownership of the entire Powderhall site, and the fact that this will be maintained post-development, the Council is in the position of being able to set an example by planning and implementing development of the site to reflect these objectives in accordance with national and local planning policy.
4. Scottish Planning Policy (SPP) has clear statements on *reducing reliance on private cars and prioritising sustainable and active travel choices* (para 46) and promoting *opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars* (para 273).

5. The aims of the Local Development Plan (LDP) include:
 - help ensure that the citizens of Edinburgh can get around easily by sustainable transport modes to access jobs and services
 - look after and improve our environment for future generations in a changing climate

6. The Transport Section of the LDP states that the relationship between land uses and how people move between them is fundamental in promoting sustainable development and its objectives include:
 - to minimise the distances people need to travel
 - to promote and prioritise travel by sustainable means i.e. walking, cycling and by public transport
 - to minimise the detrimental effects of traffic and parking on communities and the environment.

7. The Council's Design Guide states that greater emphasis has now been placed on creating places that support the development of a compact, sustainable city. There is support for walking, cycling and public transport, revised parking controls in new developments and encouragement for high density to make public transport more viable.

8. The Council has recently resolved to consult on a prospectus – 'Connecting Our City, Transforming Our Places'. The prospectus builds on existing national and local policy and states, *inter alia*:

'By 2040, Edinburgh's population will be close to 600,000, an increase of 100,000, and the city-region is also growing, accounting for a quarter of the Scottish population. This growth and the potential strain on the transport network and city spaces needs to be managed to improve access to public transport, increase journeys on foot and by bike, and prevent unsustainable increases in car travel.'

We must join cities like Copenhagen, Oslo, Barcelona and other leading cities in *reshaping how our city works and become synonymous with urban innovation if we are to meet the economic, social and environmental challenges we face.* “

9. Within this context it is clear that there is both a requirement on and a commitment by the Council to make a break from the traditional car based approach to development and put people first. Powderhall is an ideal location for this approach to be put into practice as it is close to the city centre and is well served by walking and cycling routes, public transport and car club bays at Powder Hall, Dunedin Street and multiple points on McDonald Road.
10. An additional opportunity exists at Powderhall as St. Mark's Path, which bisects the site, is an important walking route as part of the active travel network, linking Broughton Road/McDonald Road/Leith Walk to The Water of Leith, St. Mark's Park, Warriston and the established path network beyond. This path is part of the Council's Quiet Route 20 Craigleith-Leith Walk-Restalrig on City Centre/North Edinburgh Map. The Council seeks to consolidate and enhance the network of Quiet Routes. A well-conceived development at Powderhall will contribute to this.
11. The Council has a delayed programme of works to upgrade Quiet Route 20 at McDonald Road, including new crossings outside the school and a four-way controlled junction with Broughton Road. This should be completed as soon as possible and be in place before the Powderhall scheme is ready for occupation.
12. Furthermore, the existing rail line to Powderhall is now redundant and there is the opportunity, in conjunction with redevelopment at Meadowbank (also under the Council's control), to expand the walking route to Leith Walk, Easter Road and beyond and, in the other direction, over an upgraded Water of Leith bridge to St. Mark's Park, and established paths to the northwest.
13. In addition to the opportunities presented within and adjoining the site, there is also potential to capitalize on the ease of access to Redbraes Park/Community Garden (which abuts the site), Pilrig Park and the Royal Botanic Garden.

14. Bus services currently exist on Broughton Road, Rodney Street and Pilrig Street. A car free development at Powderhall offers an opportunity to enhance these services, as well as increase in car club provision, to benefit new and existing residents.
15. Further improvements on Broughton Rd at Redbraes and the railway bridge are already needed, especially pavement widening which would assist with traffic calming on the approach to the school. This development can provide the catalyst for these works and they should be costed into the plans.
16. It is understood from Council staff at the August 2018 consultation events that the current intention, following earlier consultation, is to pursue a nursery/community use on the bowling green site to the south of St. Mark's Path and rented housing on the former waste transfer station site to the north. The housing component will be a mixture of social, mid-market and open market rent with no private developers and no houses for sale. The Council will lead the development and retain ownership.
17. This approach is entirely logical given the proximity to Broughton Primary School, the residential character of the surrounding area and the opportunity it presents for the Council to exercise direct control over the creation of an exemplar for sustainable living in an urban context.
18. Given this background, a car free development becomes an attractive proposition. There will be costs associated with removal of buildings/structures and contaminated material from the existing Waste Transfer Station. A car free project will enhance development viability and offset costs by reducing the level of provision for access roads/parking and allowing a higher density development with more units.
19. In addition to the economic benefits, this approach gives greater scope for an imaginative layout with less constraint on the relationships between buildings, greater potential for creating high quality shared spaces and safe walking and cycling links through the site to the existing network. There will be minimal additional traffic generated onto the surrounding road network, which will mean that the objectives of the Quiet Route are not compromised and impact on established development will be less.

20. Having identified the opportunity that exists at Powderhall a radical approach is justified based on the following:
- Taking a starting point that the development will be car free (as allowed for by Policy TRA2 in the LDP) apart from provision required for disabled residents/visitors and essential servicing.
 - Create an attractive and safe environment for pedestrians and cyclists within the new development with links to the surrounding walking and cycling network.
 - In association with the above, identify and implement improvements to off site walking routes. The redundant rail line in particular offers a unique opportunity, especially as development at Powderhall will be within a similar timeframe to the Council's Meadowbank redevelopment.
 - Take advantage of the location to enhance access by walking to the series of major green spaces via the active travel network.
 - The area enjoys a reasonable level of bus services, which must be enhanced and made an even more attractive proposition.
 - Use the project as an opportunity to enhance off-site management and secure improvements to the surrounding road network, including Broughton Road and McDonald Road/Quiet Route 20, to improve air quality and create a more attractive environment for walking and other active travel.
 - Promote the development as car free, make it clear that parking permits will not be granted for adjoining streets, and introduce incentives for walking, cycling and public transport.
21. There is a real opportunity in Powderhall and other sites within its control for the Council to take a lead and create exemplars for urban living that reflect Edinburgh's position as a major European city. Within this context Living Streets Edinburgh would be extremely happy to work with the Council and others during the forthcoming master planning stage and beyond to ensure that Powderhall gets a development that we can all be proud of.
22. When progress on Powderhall next comes before the Council we respectfully request that this submission be reported in **full** without editing or précis.

LSEG 10 September 2018