

## **CITY OF EDINBURGH COUNCIL (PORTOBELLO PARK) BILL COMMITTEE CONSIDERATION STAGE - ADDITIONAL EVIDENCE**

### **Group 2 Correspondence to Transport Scotland on Road Safety and traffic concerns**

We are a Local Resident Group which is objecting to the Portobello Park Private Bill. Our objection was accepted by the Parliamentary Bill Committee and we gave evidence at the Scottish Parliament on 26 March 2014.

One of our key grounds for objection was based on road traffic and safety grounds. We first met with City of Edinburgh Council (CEC) Project Management Team and Transport Consultant in August 2010 before the original planning application and shared both in discussion and writing our traffic and road safety concerns with them.

Our major concerns were

- road safety on the A199 Milton Road and adjoining local road network for 1400 school pupils (the second largest school in Scotland), local residents and drivers and passengers (including public transport passengers) of the 18000 vehicles per day on Milton Road where there are currently a significant number of personal injury accidents (twice the average accident rate for all A Class Roads in Lothian and Borders Roads – Reported Road Casualties 2012)
- a lack of safe pupil drop-off locations on the adjacent network. There is no provision for pupil drop-off on Milton Road as the bus lanes would be in operation at morning and evening peak periods – this would lead to confusion and potential conflicts with drivers dropping-off school pupils, school pupils walking to school and local residents
- increased traffic congestion on A199 Milton Road. Every morning during the peak traffic flows the westbound (citybound) traffic currently queues back from the Duddingston Park signalised junction to Hope Lane, a distance of 620 metres or thereby. The increased traffic movements on Milton Road, many of which will be right turning movements, resulting from the proposed new school and the constant demands during the morning peak by school pupils on the pedestrian signalised crossings at Duddingston Park, Hope Lane and the new Toucan crossing would cause additional congestion and queues likely to reach the Milton Link/Harry Lauder Road signalised junction, a distance of 865 metres or thereby. This would inevitably lead severe congestion along Milton Road, Sir Harry Lauder Road and the A1 – these are major transport corridors for public transport, commuters and goods vehicle travelling to and from the south and east into and out of Edinburgh.
- In light of these issues we strongly recommended that City of Edinburgh Council should carry out a Stage 1 Road Safety Audit in accordance with their Movement and Development Design Guide for Developments and develop a traffic model, in accordance with the guidance in Planning Advice Note 75, to demonstrate whether the traffic movements generated by the proposed new

school could be safely accommodated without significant impact on the A199 Milton Road strategic transport corridor

CEC did not address these 3 key issues in their TA for the original or renewed Planning Applications. CEC received around 300 objections to both planning applications with road safety and traffic congestion being one of the key reasons for the objections.

We contacted the Lothian and Borders Police in December 2010 and spoke to one of their Road Safety Team and discussed the need for a Road Safety Audit for the proposed new Portobello High School. He agreed that a Stage 1 Road Safety Audit should be carried out and referred to recent road safety problems at a newly built school in Edinburgh where no Road Safety Audit had been carried out. However the Promoter of the proposed new school had not invited the Lothian and Borders Police, to be part of the team to carry out a Stage 1 Road Safety Audit for the proposed new school.

At a meeting held in Portobello Town Hall in November 2013 and Chaired by Tom Wood, ex Deputy Chief Constable of Lothian & Borders Police, there were a number of road safety questions raised by both supporters and objectors to the proposed new school. However as the CEC Project Management Team could not adequately answer many of the road safety questions the Chairman decided to refused to accept any further road safety questions at the meeting.

CEC did not carry out a Stage 1 Road Safety Audit or develop a traffic model and overruled all the objections and granted themselves Planning Approval to build the new school on Portobello Park.

The Portobello Park Private Bill has given us the first real opportunity to debate the road safety and traffic congestion issues with the CEC.

The Local Residents were both disappointed and seriously concerned that that CEC as both Planning Authority and Sponsor of the proposed new Portobello High School with 1400 pupils have not carried out a Road Safety Audit in accordance with their Movement and Development Design Guide for Developments.

The Local Residents therefore took the exceptional action to commission an independent road safety report by a qualified Road Safety Auditor. The report was commissioned independently to assess the requirement for the proposed development of Portobello High School to undergo a Road Safety Audit and to identify potential road safety conflicts and problems which would be raised in a Stage 1 Road Safety Audit.

The Road Safety Report is attached as part of the Traffic and Road Safety Evidence.

The report recommended that

- Due to the significant material changes proposed to the existing road layout, it is our recommendation that a Stage 1 Road Safety Audit on the Outline

Proposals be commissioned to ensure that the full road safety impact of the scheme proposals can be assessed at this early stage in the project

- The importance and urgency of commissioning the Stage 1 Road Safety Audit cannot be overstated as likely mitigation measures to the problems identified in this report are likely to recommend significant alterations to the existing road layout in order to reduce or remove the adverse safety impact of the scheme
- It may also be required (as recommended in Planning Advice Note 75), to undertake traffic modelling to fully assess, and ultimately decide, whether to adopt mitigation measures recommended in a Road Safety Audit. Also, the impact of these measures on the wider scheme proposals and the likely redistribution of traffic on the A1 Milton Road strategic transport corridor and surrounding road network would further add to the urgency of commissioning a Stage 1 Road Safety Audit.

At the Parliamentary Bill Hearing on 26 March 2014 we received a response from the CEC Project Management Team to our main concerns namely road safety on A199 Milton Road and local road network, lack of safe drop-off points for school pupils, the need for a Stage 1 Road Safety Audit and the need for a traffic model.

In summary their response was as follows

- the A199 Milton Road and local road network will be safer because CEC plan to introduce a 20 mph speed limit and extended bus lane operation during school starting and closing times on the A199
- it is not CEC's policy to identify safe drop-off locations adjacent to schools in Edinburgh
- a Road Safety Audit will be carried out when contractor starts on site
- Transport Scotland supported all our proposals in their letter of 28 October 2013

We were very disappointed with these responses for the following reasons

- On a section of road which has a personal injury accident rate of twice the average for A class roads it is naïve and irresponsible to believe a 20 mph speed limit and extended bus lane operations would make the adjacent road network safer if a new school with 1400 pupils was built in Portobello Park. This is highlighted in the Road Safety Report.
- CEC's policy not to provide safe pupil drop-off locations is not acceptable for the proposed new Portobello High School as pupil drop-off on A199 Milton Road is prohibited because of the bus lanes. It is also not safe to drop-off pupils on the adjacent road network because of turning movement difficulties in accessing and egressing the adjacent network because of congestion on the A199 Milton Road and the pedestrian/vehicular conflicts on the adjacent road network. This is highlighted in the Road Safety Report.
- Having previously denied there was a need for a Stage 1 Road Safety Audit, CEC are now stating the correct time to carry out a Road Safety Audit is when the contractor starts on site. This, of course is not correct as HD 19/03 clearly states in Chapter 2.21 'Stage 1 Road Safety Audits will be undertaken at

completion of preliminary design .....’ and in the case of the proposed new Portobello High School, the Stage 1 Road Safety Audit should have been carried out before detailed Planning Approval was first granted in February 2011. This was highlighted in the Road Safety Report.

- Our interpretation of your letter of 28 October 2013 was that you noted that CEC had carried out the correct procedures including an Environmental Statement and a Transport Assessment. However as the proposed Portobello High School was more than 3.2 kilometres from the nearest trunk road at A1/A720, there would be no significant traffic or environmental impact on the trunk road network which was Transport Scotland’s main concern. CEC did not accept our interpretation of your letter, however it was interesting that no members of the CEC Project Management Team at the Parliamentary Bill Hearing knew where the nearest trunk road was to the A199 Milton Road!

The Local Residents strongly consider that that the City of Edinburgh Council, as both Planning Authority and Sponsor, has been irresponsible in refusing to consider the serious road safety and traffic issues associated with the new school. This decision would inevitably affect the 1400 pupils who would attend the new school each day, the local residents, and the 18000 drivers and their passengers who drive along the A1 Milton Road strategic road corridor each day.

The next Hearing of the Portobello Private Bill is on Wednesday 23 April and all new evidence has to be submitted to the Committee by Wednesday 16 April.

We would appreciate your comments on the following

- Road safety on the A199 and adjacent road network in light of the personal injury accident rate on Milton Road which has not been addressed in the Transport Assessment
- CEC’s policy of not identifying safe pupil drop-off locations on the adjacent road network for the proposed Portobello High School where the existing personal injury accident rate is currently twice the accident record for A class roads
- The need and timing of a Stage 1 Road Safety Audit for the proposed Portobello High School
- The need for a traffic model to demonstrate whether the traffic movements generated by the proposed new school could be safely accommodated without significant impact on the A199 Milton Road strategic transport corridor
- With regard to your letter of xx November 2013, could you confirm that you carried out a detailed review of the Environmental Impact Assessment and Transport Assessment and fully supported the CEC proposals or that you noted that CEC had carried out the correct procedures including an Environmental Impact Assessment and a Transport Assessment. However as the proposed Portobello High School was more than 3.xx kilometres from the nearest trunk road at A1/A720, there would be little or no traffic impact on the trunk road network which was Transport Scotland’s main concern.

We trust that you will be able to respond to these issues at an early date and we look forward to hearing from you.

Jennifer Peters

10 April 2014