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SOUTH QUEENSFERRY
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Planning & Strategy
City of Edinburgh Council
Waverley Court
4 East Market Street
Edinburgh
EH8 8DH

4th January 2020

Attention of Sean Fallon

Dear Mr Fallon

18/08266/AMC Residential development comprising 125x dwellings (Approval of Matters Specified in Conditions of consent 14/01509/PPP) | Site North Of Ferrymuir Gait South Queensferry

I am writing on behalf of Queensferry and District Community Council in our capacity as a consultee and accordingly comment on application 18/08266/AMC.

QDCC wishes to place on record with the Planning Authority our vexation with the unusual “planning process” that has been adopted with this application. QDCC contests that the agents acting on behalf of Corus have flexed the system to their advantage and to the detriment of the Queensferry Community.

The Applicant Corus and their agents have generally been obstructive in approach, haven’t engaged in meaningful terms with the Community Council nor the community of Queensferry. This is contrary to good planning principles. In this present day generally there is obligation on agencies and service providers to consult with their end user, their customers and stakeholder groups. Corus and EMA have actively avoided consultation and should be called to account. At this late stage of the planning process we should not be looking to resolve outstanding issues. For these reasons alone the plan should be outright rejected and not be accommodated by planning officers.

The present plan is so far removed from the approved plan, that had timed out and a new application should have been lodged, re-advertised and local consultations held in line with the Council Concordat agreement with Community Councils The fact that this request was refused is completely unacceptable. Further that QDCC has written to the Direct of Place and no reply or satisfactory answers have been offered brings the planning process

into disrepute. The role of a community council is to represent the views of the community it serves and QDCC seeks recourse such that the community is consulted about this revised plan. By allowing the applicants agents to circumvent due planning process denies QDCC its right to represent the communities' views.

The application for the approval of matters specified in conditions shall be made before the expiration of 3 years from the date of the grant of planning permission in principle. The decision letter for 14/01509/PPP was dated 8th October 2015 and on the 3rd October 2018 18/08266/AMC application was submitted just 5 days prior to the 3 years time limit allowed expiring and with no detailed documents. QDCC takes the view that the developer agents were ill-prepared for this application and submitted just enough documentation for the AMC application to be registered so that that the PPP would not be dismissed and to provide them more time to work on the required documents. Fact being it then took over a year for the required detailed documents to be finally added to the portal on the 4th November 2019. It was over 5 years since 14/01509/PPP was submitted and over 4 years since this was approved. QDCC feels this should not have been allowed to happen and the application should have been refused. QDCC noted also that in the 14/01509/PPP application there was correspondence added to the portal on the 28th May 2018 regarding renewal of consent advice given to the agent and verifies QDCC's concerns that the developer wasn't ready to proceed and were needing to extend the timescales attached to the original consent. A further two extensions of time were given in February and July 2019.

QDCC did request further consultation events because of the time which has passed and the alterations to the original plan. AMC applications are linked to Planning Permission in Principle that was granted previously (14/01509/PPP) - in these cases the applicant is only required to address the conditions specified in the PPP decision. QDCC feels this decision was wrong and as our role as stated is to represent the views of the community QDCC contests that the whole of the Queensferry community should have been given the opportunity to view and discuss the new plans with the developer to understand the reasoning behind the significant changes in the plan and comment accordingly

A precedent was set in Queensferry in 2014 when Bellway Homes were instructed to conduct a public consultation when lodging their revised application to build homes on the Ferrymuir site. They had increased the number of homes by eleven more than the previous application, and altered the layout primarily necessary due to delays to the development caused by the building of the Queensferry Crossing.

QDCC together with many in the Queensferry community are opposed to just housing on this site and a mixed development would have been more favourable, creating jobs, leisure facilities and much needed tourist facilities. QDCC is concerned that this plan puts at risk the Forth Bridge Tourism Strategy that CEC signed up to. This is a unique site and we feel that this is a missed opportunity not just for Queensferry but for all of Scotland where else is there such a unique setting with views of three bridges built in three different centuries, so much more could have been done at this location for so many more people to enjoy.

Our comments and concerns on the application presented are as follows:

- This development will have a significant impact on the community of Queensferry because of its unique location. Being on the boundary of the conservation area for Queensferry and because of its unique character and location which is pivotal as a gateway beside the Forth Road Bridge the design and build should be of a high standard of design. The design is just another 124 home housing development which could be built anywhere in Scotland is out of context with the locality. Corus are being allowed to offload this site and not being held to account.
- The traffic study is no longer relevant and out of date. Six hundred and fifty homes have been built and occupied in Queensferry since 2014, with another development for over 300 homes in progress at South Scotstoun, the Queensferry Crossing has opened and Queensferry has seen a model shift in traffic movement. This has placed additional traffic on Kirkliston Road which is the first point of access through the Varney estate to this development.
- Trip generation and queuing analysis is based on a traffic count from February 2012. There will have been changes in the existing Varney estate residents since then, with different travel patterns now applying to reflect its changing demographic profile and the new development is likely to attract younger families with different travel patterns. The 2019 proposal's estimate of vehicles numbers hasn't changed (33/ hour morning peak. 43/hour arriving in the evening peak. QDCC feels that a further assessment is required together with an assessment on the impact of the additional traffic in the other streets within the Varney estate such as Viewforth Road and Loch Place. The review is flawed quote; "being based on observation that on-street parking isn't common and most homes have driveways" how convenient and condescending is this statement! The study should be dismissed
- For congestion we now have more stringent parking restrictions at Queensferry Primary School, bus stop boxes on Kirkliston Road and more parking restrictions planned for the future which will possibly displace some parked vehicles into the Varney housing estate.
- Main vehicle access once in the Varney estate to the site has been changed to via Loch Place, the applicant Corus Hotels Ltd asked for this change but we do not know the reasoning behind it. There is emergency access only via Ferrymuir Gait. The most logical choice would be for the main access to be via Ferrymuir Gait as the vehicle access route via the Varney Estate encourages more traffic through Queensferry's roads especially Kirkliston Road and the Loan whereas the access via Ferrymuir Gait would negate that with a more direct route from the arterial roads but QDCC is led to believe that there has been no progress in being allowed this access. QDCC cannot understand how the emergency vehicle access only via Ferrymuir Gait will operate. Will this road be open but with no entry signage stating except for emergency vehicles. Two residents have also claimed they own a strip of land at Loch Place where the access road to the development is to be situated, it is said it is in their title deeds and they will not sell

this land therefore access via Loch Place will not be possible at this location.

- Pedestrian connectivity through the development linking both east and west to other parts of Queensferry needs to be encouraged, enhanced and progressed in line with the authorities Active Travel Strategy. Connectivity from the South West is poor and doesn't provide easy access to the High street shops from the Forth Road Bridge. Pedestrian access from the development to the Hopetoun Crossroads bus stops is also required.

Housing Types

In the PPP application we were given the impression that housing would be two storeys high but with the AMC application we now have two 5 storey blocks of flats plus town houses. The views of the bridges were not to be restricted from the Contact and Education Centre

- QDCC seeks that housing styles are sympathetic to the unique location and surroundings QDCC totally objects to having 5 storey flats built here

QDCC would like to bring to your attention a Reporters paper dated 12 Feb 2004 by the Scottish Executive Development Department a Mr Stephen Partington who comments; "The former Hotel though unattractive was relatively low and unassertive in its form. In contrast the proposed flats would dominate the skyline from all directions". So what has changed; the Forth Bridge is UNESCO World Heritage listed and QDCC believes that the five-storey flats impacts on the views of the Forth Bridge and sister bridges from the south west. The views are protected and if the view was important before UNESCO listing then the view is even more important now!

Open Space

There is little usable open space and the plan is dependent solely on the present open space available. The amount of open space should be increased per populace not decreased. The present plan doesn't conform to the authorities open space policy

Inchcolm Play Park

The existing Inchcolm Play Park will form the south edge of the development, with housing overlooking the park. This will integrate the park to the surrounding residential area and will no longer be isolated.

QDCC seeks that substantial investment is made on upgrading the park to give play opportunities and equipment for children of different age groups. Taking also into consideration CEC's Play Area Action Plan(2016), which states houses and flats should have access to at least one of the following:

- a play space of good play value within 800 metres walking distance
- A play space of very good play value within 1200 metres walking distance
- A play space of excellent value within 2000 metres direct distance

The existing Inchcolm play park does not make it into the Good category in the latest play park audit. Dundas play park was classed as good at the time of the audit but is some distance away and Echline play park was classed as very good but the most direct access to this would be via the underpass at the Forth Road Bridge and across a grassy field. Good/very good play park facilities are required as near as possible to this development.

QDCC asks that should this application be approved that construction traffic does not use the streets within the Varney Estate and all construction traffic use Ferrymuir Gait as access

QDCC supports the comments received from residents:

- Oppose access from the Varney estate
- Ferrymuir Gait access preferred
- The Varney Estate was never intended as a through route it has narrow streets, cul-de-sacs and tight junctions
- Access problems via Loch Place as two residents own a strip of land where the access is required. The Reporter in 2003 raised concerns about land ownership and this matter remains unresolved. The developer agents have done little to resolve the issue such that questions remain
- Questions asked about pedestrian accesses at both Henry Ross Place and Hugh Russell Place
- Objection to the inclusion of 5 storey flats in the plan
- Safety issues for children using this route to and from school and cyclists regarding the extra traffic the development will bring through the Varney Estate
- Validity of traffic study as it was taken so long ago
- Concerns regarding the junction from Viewforth Place onto Kirkliston Road
- Concerns that construction traffic will use the Varney Estate access
- Ferrymuir Gait as access for construction traffic

QDCC's objective in writing this letter is to have this plan rejected and revisited.

Yours sincerely

Diane Job(Mrs)
QDCC Planning Convener

