



Queensferry & District Community Council

www.queensferrycommunitycouncil.org



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Planning & Strategy
City of Edinburgh Council
Waverley Court
4 East Market Street
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16th June 2014

Attention of Mr John Bury, Director of Planning CEC

Dear Sir,

LOCAL DEVELOPMENT PLAN - SECOND PROPOSAL

I am writing on behalf of Queensferry & District Community Council (QDCC) to place on record our views on the second Local Development Plan proposal presently being considered by The City of Edinburgh Council Planning Committee.

Queensferry & District Community Council (QDCC) does not directly oppose considered and measured housing developments which can bring benefits to the town of South Queensferry. What QDCC does oppose is indiscriminate housing developments which are ill considered and have little or no benefit to the community or surrounding area. Whilst the LDP might meet the needs of the urban capital city of Edinburgh then it certainly doesn't meet the needs of South Queensferry. What South Queensferry needs within the LDP is a strategic economic development plan for measured development which considers the needs of an urban town. QDCC considers the LDP in its present form is not fit for purpose and should be rejected.

South Queensferry is a distinct and separate town within the Edinburgh area and should be treated in the LDP as such, and not as simply overspill housing space!

There is no considered plan for the growth of South Queensferry as a town, rather than as housing overspill – and this will have a strong negative impact on 'community', with all the social and economic disadvantages associated with a declining community.

The principles stated for the assessment criteria used to support regeneration; to have good accessibility to public transport and does the

locations have good infrastructure capacity would deem the sites proposed in the LDP for South Queensferry as unsuitable. Queensferry's infrastructure is already under pressure and with the potential additional 1000 homes held on account will seriously stretch the infrastructures to the point where South Queensferry will not cope.

Another question asked; can the site be integrated into and is it in keeping with the character of the settlement and local area; it is questionable whether this can be achieved as the developments are on the spatial boundary of the town which changes the boundary permanently. The question doesn't arise, Queensferry is within the boundaries of Edinburgh but it is a separate town, still with a character of a village or small market town. It has one of the finest high streets in Scotland. The proposals if approved would make it just into another suburb of Edinburgh. How many suburbs does Edinburgh want or need?

QDCC contests that the use of brownfield sites and surplus office accommodation has not been fully or adequately explored and that it is difficult to support statements made for more housing land due to the concern over accuracy of extrapolated trend data, about the surplus office stock which could be used for housing.

It would seem that this LDP hasn't considered the economic needs for Queensferry and that the nearest local employment is the proposed West Edinburgh Development which has few direct links to Queensferry and involves travelling on the M8/9 road corridors that is already congested. Nor are public transport links which are limited and not close to the housing developments locations. The LDP refers to the Economic Strategy for 2012 - 2017 but Queensferry doesn't feature in this document. QDCC opines that Queensferry should have its own economic strategy and that housing should be directly linked to local employment opportunities and that it should be incumbent on The City of Edinburgh Council to encourage businesses to locate to Queensferry where presently CEC directs businesses to the South Gyle. To date we have seen the demise of businesses in Queensferry such as Agilent who have relocated to the Gyle.

QDCC concerns are on record about the impact new housing has on the capacity of healthcare.

We note The City of Edinburgh Council's intention to make available after approval the Second Proposed Plan for a period of representations. However the question arises whether QDCC will be able to influence any significant changes to the LDP and suspect it will be a done deal. We would like to have that confidence but to date feel ignored.

The sustainability impact element of the LDP makes interesting reading purporting to deliver the following;
A reduction in the carbon emissions; this assumption is fundamentally flawed as I would suggest the carbon footprint for Queensferry will increase significantly as the number of car journeys will increase by the thousands! The LDP proposal will increase the city's resilience to climate change; again QDCC questions this statement in relationship to the proposal for Queensferry.

The proposal in this report will help achieve a sustainable Edinburgh because it is one of the stated aims of the Second LDP to support the growth of the city economy; but QDCC asks what will it do for the Queensferry local economy and we advocate “very little”.

The LDP 2 states that it satisfies the coalition pledges:

- P4; “To draw up a long term strategic plan to tackle both over crowding and under use of schools” well the LDP doesn’t do this for Queensferry but it should, the strategic plan should drill down to have a local strategic plan for communities.
- P8 “Make sure the city’s people are well housed, including encouraging developers to build residential communities, starting with brownfield sites” The brownfield sites have not been adequately explored and developers don’t built communities, communities are created when good facilities are built in locations with infrastructures in the most suitable of settings and the facilities adequately serve the needs of the community!

The desired Council outcomes;

- CO23 “Well engaged and well informed- communities and individuals are empowered and supported to improve local outcomes and foster a sense of community” QDCC implores The City of Edinburgh Council to revisit this plan as the LDP does not meet the needs of Queensferry residents. This revised LDP exacerbates the lack of infrastructures and amenities further devaluing the quality of life for Queensferry residents.

The Single Outcome agreement: SO1 & 2 cannot possibly be delivered SO3 will be compromised and how the LDP can deliver SO4 that Edinburgh Communities will be safer beggar’s belief.

Section 3 states; A plan to provide jobs, homes and services in the right locations. Under Economic Development the councils economic strategy seeks sustainable growth through investment in jobs – focusing on development and regeneration. Inward investment, support for businesses and helping unemployed. QDCC notes that it is an admirable strategy, but not one the town of Queensferry recognizes. Jobs and growth are restricted to the designated locations within the city to the detriment of others. This strategy is one that should be applied in Queensferry so that housing growth is directly linked to business growth and jobs. Queensferry’s growth should not be just limited to being a dormitory transit town for Edinburgh, Fife and the Lothians. Further the plan states that Edinburgh has many economic development opportunities so can Queensferry have its share please as all seem to go to the Special Economic Areas.

Existing Housing Proposals

Whilst the LDP notes the existing homes held on account; Springfield and Agilent it doesn’t note the Ferrymuir Site nor Port Edgar which are conveniently omitted but potentially a total of a 1000 homes could be built on these sites. Consideration must be made of the impacts on the town from these developments as well as the demands from developments from Kirkliston that puts pressure on the schools, health services and the limited

amenities that the town has. QDCC reflects upon the development proposal for SCH10 on the 2 hectares of land on the south side of Builyeon Rd and despairs at the limited facilities proposed being one new primary school, and some landscaping and street furniture for Builyeon Road! A casual mention of some business development is eluded too. QDCC does wonder if the planners who compiled this plan have spent time in Queensferry to get an appreciation and understanding of how the town functions and what its limitations are.

Transport

The aims are to reduce the need to travel and to promote the use of sustainable modes of transport, the key principles underpinning the LDP strategy. QDCC opines that only limited housing should be built as this statement is contradictory if employment opportunities are not going to be created for Queensferry. Then no homes should be built.

Further the LDP states that there is a clear link between new development and impact on transport network and that a transport appraisal has been undertaken yet Queensferry appears to be missing from the map.

Transport and New Development

257 states All planning applications involving the generation of person trips should provide information on demands that will be made on the road network and transport system. It further states for non city centre sites the effects car journeys will have. In general applicants should demonstrate that the location proposed is suitable with regard to access by public transport, the point is how accessible and affordable is public transport to the passenger then the location proposed for development in Queensferry should be discounted.

Presently the existing local service provision and weak and decaying infrastructure with poor public transport connections within the context of a rural community within the City of Edinburgh Council area being five plus miles from our neighbouring communities of Barnton and Cramond. This places a greater burden on our existing infrastructure because alternative service providers of schools, medical services, etc are not easily accessible and leads to increased social exclusion for the unemployed, elderly and disabled citizens of South Queensferry.

Transport safeguards

T19 the Barnton Junction is noted and increased capacity is to be accommodated by increasing the efficiency of the traffic lights. QDCC suggests that what with the proposed developments in Queensferry, Cammo and Maybury that it will be more than a tweak to the traffic lights that will be needed as the junction, Queensferry Rd and the surrounding road network will be grid locked!

A plan that can deliver;

- 98 The growth of the city; These are the very concerns that QDCC has for Queensferry that the only increase will be housing with no new business creating local employment, congested roads, poor expensive public transport with no direct links other than to the city centre, no leisure amenities and having to travel outside Queensferry.

- 99 The plan will help in two ways; no it won't as Queensferry is being short changed for housing only, there is no overall strategic development plans looking at education needs, is there a need for a new high school, where best would it be located, the provision of health services, the road network and infrastructure, public transport links its just more of the same from Edinburgh's planners. Short term thinking with no long term vision for Queensferry. It's a one size fits all policy of inflicting a capital urban city's policies wants and needs on a small rural town that has completely different needs.

Elsewhere across the LDP area

- 119 The LDP states; "An area where significant change is expected in Queensferry. In addition to the Queensferry Crossing to be opened in 2016 and development on a number of existing sites". One asks what does the author of this LDP mean with significant change. QDCC interprets this as; In real terms, more congestion, no change to public transport services, more crowded trains, pressure on the health services, increased waiting times at the GP's, over crowded schools, primary school children being bussed from Kirkliston to Dalmeny Primary School.

So what it means for the residents of Queensferry is a gradual erosion of the quality of life!

Development principles

- Builyeon Road to change the character of the A904, upgrading bus shelters responding to new pedestrian cycle routes, reducing speed limits – is the author not aware that some of this is already work in progress through the Queensferry Crossing. To supplement planting, provide a green corridor linking Echline to Ferrymuir, Landscape effects, all nice to have but what about community facilities, no cognisance of the effects on the town and no mitigation suggested. And a through away comment "opportunity for commercial use in north west part of the site including relocation of the petrol station. What an affront to the residents of Queensferry that this is the capitals finest planning for the future.
- South Scotstoun fairs no better than Builyeon Road. Vehicular access from Kirkliston Road and Provost Milne Grove. Once Ferrymuir (215 homes) Agilent (450 homes) and the Ferrymuir Gate (105 Homes) Developments are complete and the additional traffic is using this road network then QDCC seriously doubts this road can cope with anymore traffic. Further the author states landscaping improvements and provision of greenspace, some significant shortfalls in what Queensferry really needs. QDCC despairs about how little thought has been put into these proposals.
- Dalmeny HSG34 is noted for access constraints and is unsuitable.

Policy Hou 10 Community Facilities

- "States the policy intention is to ensure that new housing development goes hand in hand with the provision of a range of community facilities" Then QDCC enquires why there is no community facilities included in any of the developments for Queensferry.

Entertainment & leisure facilities

There are no facilities in Queensferry and had a strategic plan been developed then suitable locations could have been set aside for the future. QDCC asks it to be noted that generally Queensferry residents travel to Fife, West Lothian and Edinburgh for leisure facilities often incurring car journeys as public transport is limited and costly and doesn't compare with the City who have access to Lothian Buses.

West End Charette South Queensferry

I wish to bring to the attention of Planning Officers a "Charette" that was held in South Queensferry in March this year sponsored by QA and part funded by The Scottish Government and The City of Edinburgh Council. I particularly wish to bring to your attention the feedback report that identified the needs during the public workshops and surveys.

The web link is;

http://www.queensferryambition.co.uk/images/Report_1_Draft_140408sm_no_appendix.pdf

For some considerable years QDCC and the former QA advocated that a strategic plan was needed for any future development that was to be considered for Queensferry.

The Charette introduction reads

Queensferry's public spaces are suffering through wear and tear and decades of under investment. While the town has expanded the working town centre has effectively shrunk and the infrastructure which connects it to residential areas has become woefully inadequate. As tourist and visitors numbers to the town have grown the historic core has become choked with cars and coaches and the infrastructure has not been developed to help cope. The key findings of this report, supported by the views of more than 600 participants in workshops and surveys, are that the infrastructure is in desperate need of investment in order for Queensferry to be a sustainable whole-life town.

The LDP revised proposal is at complete odds to the findings of this charette and if the Scottish Government and The City of Edinburgh Council believes in the power of local consultation and it's a matter of fact and record that both stakeholders have funded the consultation work, then it's abhorrent and a nonsense that the revised LDP proposal should be considered at all.

QDCC seeks The City of Edinburgh Council Planning Committee to reject this revised LDP outright as being unfit for purpose.

Yours faithfully,

Diane Job (Mrs)
Treasurer & Planning Convener QDCC