

# Development Management Sub Committee

Wednesday 24 September 2014

## Application for Planning Permission in Principle 14/01509/PPP At Site North Of, Ferrymuir Gait, South Queensferry Residential development with associated accesses, roads and landscaping.

Item number	4.1
Report number	
Wards	A01 - Almond

### Summary

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The application site is identified by the Rural West Edinburgh Local Plan as being within the Housing Allocation site HSG 5. Local Plan Policy H1 supports residential development on the site. Road safety/junction capacity, education capacity and affordable housing concerns can be addressed by securing financial contributions through the delivery of an appropriate S75 legal agreement. The proposal is acceptable in principle. There are no material considerations that outweigh this conclusion and detailed matters including design, layout, unit location and height will have to be considered as part of a further application for approval of matters specified in conditions.

### Links

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#### [Policies and guidance for this application](#)

LPRW, RWH1, RWE1, RWE2, RWE3, RWE4, RWE15, RWE20, RWE22, RWE26, RWE30, RWE31, RWE41, RWE41, RWE42, RWE46, RWH1, RWH5, RWH6, RWH7, RWH9, RWTRA2, RWTRA1, RWTRA3, RWTRA4, RWTRA6, NSG, NSDCAH, NSESBB, NSGD02, NSP, NSGESS,

# Report

## **Application for Planning Permission in Principle 14/01509/PPP At Site North Of, Ferrymuir Gait, South Queensferry Residential development with associated accesses, roads and landscaping.**

### **Recommendations**

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1.1 It is recommended that this application be Granted subject to the details below.

### **Background**

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#### **2.1 Site description**

The application site is located within South Queensferry on the former site of the Corus Hotel. The site is currently vacant land and is largely covered with scrub vegetation following the demolition of the previous hotel. The site slopes substantially towards the Firth of Forth and there are established trees in the north-west corner of the site. Vehicular access is from the south via Ferrymuir Gait, which is a private road. Residential properties surround the site to the north, south and east. The Forth Estuary Transport Authority (FETA) facility and compound bounds the site to the west.

#### **2.2 Site History**

22 January 2003 - an application for the erection of 117 dwelling houses and associated works was withdrawn (application reference: 02/00926/FUL).

5 November 2003 - the Committee was minded to refuse an application for a residential development comprising of 121 units and associated car parking (application reference: 03/00113/FUL).

12 February 2004 - an appeal against non-determination of the application for residential development was dismissed (appeal reference: P/PPA/230/559).

The site has also been subject to applications relating to the previous use of the site as a hotel.

### **Main report**

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#### **3.1 Description Of The Proposal**

This application seeks planning permission in principle for a residential development comprising up to 125 dwellings, of which 25% will be affordable homes. The proposal also includes the creation of a new pedestrian and vehicular access into the site, new public open space and landscaped areas. The design and access statement submitted

with the application indicates that the residential units proposed will range from two bedroom flats to five bedroom family homes.

The masterplan includes the following features in the indicative layout:

- Two vehicular accesses to the site from Henry Ross Place/ Canmore Street and Hugh Russell Place/ Canmore Street.
- Pedestrian access from Loch Place.
- The principle area of open space includes a public green landscaped area.

### Supporting Statement

The following documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Pre-application consultation report;
- Design and access statement;
- Transport statement;
- Archaeology assessment;
- Drainage strategy;
- Environmental risk assessment;
- Traffic noise assessment; and
- Ecology report.

### **3.2 Determining Issues**

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

### 3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) The principle of the proposed development is acceptable;
- b) The landscape impacts and design are acceptable;
- c) The proposal is detrimental to existing amenity and provides sufficient amenity for future occupiers of the development;
- d) The proposal raises issues in terms of traffic or road safety;
- e) The proposal will affect local biodiversity or the historical environment;
- f) The proposal raises any flooding and drainage issues;
- g) The proposal is acceptable in respect of education infrastructure, affordable housing provision and other local services;
- h) The proposal meets sustainability criteria;
- i) Any impacts on equalities or human rights are acceptable; and
- j) Comments raised have been addressed.

#### a) Principle

The application site is located in the centre of South Queensferry and is identified by the Rural West Edinburgh Local Plan as being within the Housing Allocation site HSG 5. Local Plan Policy H1 supports residential development on the site. In the second proposed Local Development Plan (June 2014), the site lies within the Urban Area of South Queensferry. Although the site is not identified as a housing proposal, Policy Hou1 supports housing on suitable sites within the urban area.

The proposed housing development of the site is supported by both the Rural West Edinburgh Local Plan and the proposed Local Development Plan, and as such the proposal is acceptable in principle.

#### b) Landscape and Design

The application is for planning permission in principle with a view to establishing the acceptability of the proposed use on the site. The indicative master plan aims to create a development which offers an area of central open amenity space, providing new connections to the existing cycle, footpath and road network, and which respects the existing residential neighbourhood through sympathetic density, road pattern and landscaping.

The layout and unit mix proposed is broadly supported in design terms as it generally provides sufficient land for all the site requirements including open space and SUDS, and also connects well with the surrounding roads and pedestrian footpath network. Furthermore the applicant has evidenced through the submission of indicative visual illustrations that the development of the site, in the manner proposed, will not have an unacceptable impact on important views, including those of the Forth Rail Bridge.

Should the Committee be minded to approve the application, detailed matters including design, layout, unit location and height will have to be considered as part of a further application for approval of matters specified in conditions.

#### c) Amenity

An air quality assessment has been submitted which has concluded that there will be no adverse impacts on residential development in this location and the proposed development would not have an adverse impact on the surrounding local environment in regards to local air quality.

A consultation response from Environmental Services offered no objection to the application, concerning the amenity of future occupiers and surrounding land use, including the proximity of the A90, with respects to air quality and noise impact. The response also raised no concerns regarding the impact of the proposal on neighbouring properties.

The landscape framework for the proposed development includes areas of public open space within the proposed layout. The landscaped areas will provide an acceptable overall proportion of public space within the development scheme.

The assessment of details in respect of privacy, daylight and sunlight provision and private amenity space would be assessed at the detailed application stage.

#### d) Transport

A number of objections have been received to the application in relation to transport issues. The objections raised largely relate to the impact of the traffic generated by the development on surrounding roads, including Varney Estate and Kirkliston Road, particularly at peak times, as well as related road safety and parking issues. The potential for alternative vehicular access via Ferrymuir Gate is also raised in a significant proportion of the representations.

The conclusions of the Traffic Statement submitted by the applicants are that additional traffic associated with up to 125 units will have a minimal impact on the local road network or on road safety. Whilst there would appear to be an alternative, or ideally additional, access to the site via the private access to the FETA offices, Ferrymuir Gate, this would have required the agreement of the owners to allow access and to upgrade this road to a standard capable of adoption onto the Council's list of public roads. It is understood, however, that the developers were unable to secure such an agreement.

Notwithstanding this Transport Planning raised no objections to the proposal in terms of roads layout, parking provision, junction locations, junction capacities, emergency vehicle access, pedestrian safety, road safety, parking or the impact on the National Cycle Network Route.

Subject to a suitable Section 75 legal agreement securing the sum of £25,000 for the upgrade of the puffin crossing on Kirkliston Road and for the applicant to pay for any waiting and loading restrictions through a Traffic Regulation Order that may be required within or outwith the development, (the cost of which is £2,500), the proposal will not have any detrimental impact on road or pedestrian safety.

#### e) Biodiversity and Archaeology

##### Biodiversity

The site was surveyed for notable habitats and protected species, in particular bats, badgers and great crested newts. None of these species were found to be using the site, however, it was noted that the trees and boundary planting have the potential for bat foraging. The application site is of limited biodiversity value and the proposed redevelopment of this brownfield site will not have any unacceptable impact on local flora or fauna. The submission of detailed landscape proposals at the AMC stage will provide the opportunity to further consider biodiversity enhancement opportunities.

##### Archaeology

This site has been identified as occurring within an area of archaeological potential, therefore the application must be considered in relation to the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Local Plan policy E30. The aim is to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

The City Archaeologist advises that the application site could contain a wide range of significant archaeological remains and that the proposed development could have a significant affect upon any surviving buried remains. At this stage, development of the site must be considered as having a presumed moderate archaeological impact and it is recommended, by the City Archaeologist, that a programme of archaeological work be undertaken prior to submission of any subsequent AMC applications, in order to quantify the archaeological resource and the potential impact of any subsequent development.

The submission of this survey at the AMC stage will allow for the production of further mitigation strategies and the detail, if required, of any subsequent archaeological planning conditions to be attached to AMC permission. This will ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains prior to development.

#### f) Flooding

Scottish Water expressed no concerns regarding the capacity to service this development. However, it is advised that the developer would be required to fund any additional works required to service the development.

The applicant has provided Drainage Calculations and a Surface Water Management Plan and neither SEPA nor Flooding raised any objections to the proposal regarding surface water drainage or flooding.

Surface water management and SUDS will form part of any detailed design and will be considered further as part of any application for reserved matters.

#### g) Local Services, Education and Affordable Housing

##### Local Services

Concern has been raised that increasing pressure will be placed on local services including leisure facilities and healthcare. Growing demand for such services may enable operators to remain in South Queensferry and to plan for expansion. Extra demand for these types of services would not merit a reason for refusal.

##### Affordable Housing

The applicant proposes up to residential 125 unit units and the Local Plan requires that 25% of the proposed dwellings will be allocated for affordable housing provision. It would be appropriate to provide this allocation over at least two locations within a site of this scale, in order to ensure the affordable housing is integrated with the mainstream housing provision. However, the exact details of the mix and location of the proposed units would be considered at the detailed application stage and a section 75 agreement would be required to ensure the delivery of the relevant housing.

##### Education

A consultation response from Children and Families estimated that the pupil generation, based on the pupil generation ratios in the Education Infrastructure Appraisal prepared in line with the second proposed Local Development Plan, indicate that the proposed residential development of 125 units would generate 28 additional pupils for Queensferry Primary School, 4 for St Margaret's Roman Catholic Primary School, 18 for Queensferry High School and 3 for St Augustine's Roman Catholic High School.

Children and Families has advised that the proposal would require one additional classroom at Queensferry Primary School at a cost of £135,000 and a financial contribution of £525,000 for additional secondary school accommodation provision.

Subject to a Section 75 Legal Agreement securing the appropriate monetary sum towards the educational contribution, Children and Families has no objections to the proposal in principle.

#### h) Sustainability

The proposals are not at the detailed stage in terms of building design and consequently a sustainability form has not been submitted. Sustainability measures will require further consideration when a detailed application comes forward.

#### i) Equalities and Human Rights

The proposed development will create an environment where public spaces can be used safely and securely. The proposals will offer a good standard of living with access to transport and public spaces including green spaces. The proposal will have a positive impact in respect of rights.

A range of living accommodation is likely to be provided that will support different users and the site is accessible for people with mobility issues. The proposal includes an element of affordable housing to assist those who cannot access traditional housing markets. The proposal will have a positive impact in respect of equalities.

In summary the proposal will have a positive impact in respects of equalities and human rights.

#### j) Public Comments

##### **Material Representations: Objection.**

- The principle of housing at the proposed location - addressed in section 3.3 a)
- A detrimental impact on local traffic and parking with particular reference to Varney Estate, Kirkliston Road, South Queensferry and local road junctions - addressed in section 3.3 d).
- The number of houses to be accessed off a single junction (i.e. >200) - addressed in section 3.3 d).
- A detrimental impact on road and pedestrian safety resulting from increased traffic on local roads, with particular reference to pedestrians, school pupils, cyclists and children using the local playpark - addressed in section 3.3 d).
- Possible difficulty for emergency vehicle access - addressed in section 3.3 d).
- A detrimental impact on local services/amenities including schools, health centre/services and public transport - addressed in section 3.3 g).
- Design Quality inappropriate - addressed in section 3.3 b).
- Flats inappropriate for this location - addressed in section 3.3 b).
- Loss of neighbouring residential amenity through increased levels of pollution, light pollution and noise resulting for the proposed development - addressed in section 3.3 c).

- The SUDS proposal is inappropriate given the site topography - addressed in section 3.3 f).
- A detrimental impact on the National Cycle Routes - addressed in section 3.3 d).
- The sustainability of proposed buildings - addressed in section 3.3 h).
- Loss of privacy/daylight/sunlight to existing properties - addressed in section 3.3 c).
- Inadequate surface water drainage - addressed in section 3.3 f).
- Proposed footpaths and public safety, with particular reference to secure by design and the impact on Loch Place - addressed in section 3.3 b).
- A potential loss of trees and detrimental impact on bats - addressed in section 3.3 e).
- The possibility for access off Ferrymuir Gate. - addressed in section 3.3 b).

### **Non-Material Representations**

The letters of representation raised the following non-material issues:

- The pedestrian access to Loch Place is unsafe as it is currently unpaved.
- Potential alternative uses of the site.
- No leisure centre in South Queensferry.
- Housing detracts from the setting of the Transport Scotland building.
- Issues arising from the construction process.
- Land ownership disputes.
- Alleged inaccuracies within the submitted Design Statement.
- Impact on neighbouring property prices.
- View of existing neighbouring residents.
- The need for care homes and a cemetery in South Queensferry.
- Previously consented development site in the locality.
- Details of previous application and discussions concerning the site, including the suggestion that a 'landmark building' is required for the site.
- The loss of the site as recreational space i.e. for dogwalking.

## **Representations - Support**

- The principle of redevelopment of a brownfield site.
- Appropriate density.
- The roads layout and connection with existing roads.
- Increased overlooking and safety of playpark.
- Lack of access via Ferrymuir Gate supported on road safety grounds.
- Increased connectivity to local area.
- Proposed unit mix.

## **Community Council comments**

Community Council objects to this application on the following grounds:

- Inappropriate design contrary to Policy E41.
- Lack of appraisal of cumulative impacts of other proposed developments.
- Pressures on schools and other services.
- Poor pedestrian connections to schools, health centre, library and facilities.
- Increased traffic congestion.
- Prematurity of application in relation to the Proposed Local Development Plan.
- Lack of consideration given to the future needs of the community contrary to ED11.
- Impact on local traffic and parking with particular reference to Varney Estate, Kirkliston Road and local road junctions.
- A detrimental impact on local services/amenities including schools, health centre/services and public transport.
- Design does not mitigate potential detrimental impact of the Forth Road Bridge on the amenity of future residents.
- Views towards the Forth Bridge obscured.
- Loss of privacy to existing neighbouring residents.
- The possibility for access off Ferrymuir Gate.

## **Non-Material Representations**

- Potential for alternative uses, including retail, not explored.
- Suburbanisation of South Queensferry.
- Form of community engagement undertaken by the applicant and the extent to which the Community Councils views informed the scheme submitted.
- Land ownership disputes.
- Issues concerning the construction process.
- Potential unacceptable privacy levels for future residents.
- The Community Councils list of sought after 'Development Gains'.

## Conclusion

The proposal is acceptable in principle and it is recommended that the Committee approves this application subject to the conclusion of a suitable legal agreement concerning developer contributions towards affordable housing, education and transport infrastructure.

It is recommended that this application be Granted subject to the details below.

### **3.4 Conditions/reasons/informatives**

1. Before any work is commenced details of the undernoted matters shall be submitted to and approved in writing by the Planning Authority; the submissions shall be in the form of a detailed layout (including landscaping and car parking) and shall include detailed plans, sections and elevations of the buildings and all other structures.

Approval of Matters:

a) design and external appearance of all buildings, open space, public realm and other structures;

b) detailed site layout;

c) boundary treatments (overall site and individual plots);

d) car and cycle parking;

e) detailed design of roads, footpaths and cycle routes;

- f) surface water management plan and SUDS;
  - g) waste management and recycling facilities;
  - h) full details of sustainability measures in accordance with Edinburgh Standards for Sustainable Building;
  - i) existing and finished site and floor levels in relation to Ordnance Datum;
  - j) external lighting, including floodlighting and street lighting, arrangements for the development;
  - k) landscaping:
    - (i) detailed landscaping plan,
    - (ii) a schedule of all plants to comprise species, plant size and proposed number and density,
    - (iii) inclusion of hard landscaping details,
    - (iv) landscape management plan including schedule for implementation and maintenance of planting scheme:
    - (v) tree protection measures:
  - l) Site survey (including intrusive investigation where necessary): and
  - m) Archaeological evaluation up to 10% of the site.
2. The details of the matters specified in condition 1 pursuant to this permission shall be substantially in accordance with the Design Principles as defined in the Masterplan prepared by EMA Architecture and Design accompanying this planning application.
3. Prior to the commencement of construction works on site:
- (a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
  - (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning
- Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.

4. That the site layout to be submitted as part of the AMC application required under condition 1 above shall include full details of the location and design of the surface water drainage scheme to be installed within the application site and shall be submitted for the approval of the Head of Planning, and for the avoidance of doubt the scheme shall comply with the Scottish Environmental Protection Agency's (SEPA) principles of Sustainable Urban Drainage Systems (SUDS) and contain a surface water management plan.
5. The maximum number of residential units on the site shall be restricted to 125 units.
6. Prior to the commencement of any development, a detailed plan outlining the final design of all hard and soft landscaping including planting species, location and quantity; tree protection measures and a maintenance schedule shall be submitted to and agreed in writing by the Head of Planning.
7. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

**Reasons:-**

1. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
2. In order to ensure that the development proceeds in accordance with the parameters used as the basis of assessment
3. In order to protect the amenity of the occupiers of the development.
4. In order to enable the planning authority to consider this / these matter(s) in detail.
5. In the interest of the capacity of the supporting infrastructure including education, drainage and the road network.
6. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
7. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.

## **Informatives**

It should be noted that:

1. a) 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, unless an earlier application for such approval has been refused or an appeal against such refusal has been dismissed, in which case application for the approval of all outstanding matters specified in conditions must be made within 6 months of the date of such refusal or dismissal.

b) The approved development shall be commenced not later than the expiration of 3 years from the date of grant of planning permission in principle or 2 years from the final approval of matters specified in conditions, whichever is later.

2. The development should comply with the Designing Streets policy document.

3. Vehicular and cycle parking should conform with the Council's December 2009 parking policy document.

4. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent.

5. The development hereby permitted shall be commenced no later than the expiration of two years from the date of this consent or from the date of subsequent approval of matters specified in conditions, or three years from the date of planning permission in principle, whichever is the later.

6. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation to transport infrastructure.

7. Consent shall not be issued until a suitable legal agreement has been concluded to make a financial contribution to Children and Families to alleviate accommodation pressures in the local catchment area.

8. Permission should not be issued until the applicant has entered into a suitable legal agreement to ensure that affordable housing is provided in accordance with Council policy.

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

The application is subject to a legal agreement for developer contributions.

## **Risk, Policy, compliance and governance impact**

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5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

## **Sustainability impact**

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### **7.1 The sustainability impact has been assessed as follows:**

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

The proposals are not yet at the detailed stage in terms of building design and as such sustainability measures have been listed within the recommended conditions as a matter that will require further consideration when detailed applications come forward.

In summary, the master plan embraces a sustainable approach but specific measures will only be identified at the detailed stage.

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

Pre-application discussions took place on this application.

### **8.2 Publicity summary of representations and Community Council comments**

This application was neighbour notified on 27 May 2014 and attracted 134 letters of representation, 129 letters of objection, two letters of support and three comments. Letters of objection include those from the Queensferry and District Community Council. A petition with 160 signatures from the Varney Residents Association was also received, objecting to the proposal.

The following material issues have been raised:

- Principle of residential development;
- Road and pedestrian safety;
- Scale and design;
- Residential amenity;
- Infrastructure capacity;
- Sustainability; and
- Landscape and biodiversity.

A full assessment of the representations can be found in the main report in the Assessment section.

The Queensferry and District Community Council, as a statutory consultee, formally objects on the following grounds:

- Scale and design;
- Infrastructure capacity;
- Road and pedestrian safety;
- Principle of residential development;
- Residential amenity;
- Land ownership; and
- Consultation process.

## **Background reading / external references**

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- To view details of the application go to
- [Planning and Building Standards online services](#)

### **Statutory Development**

#### **Plan Provision**

The proposal site is designated as Housing Proposal Site HSG 5 by the Rural West Edinburgh Local Plan.

#### **Date registered**

28 April 2014

#### **Drawing numbers/Scheme**

01,

Scheme 1

## **David R. Leslie**

Acting Head of Planning and Building Standards

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## **Links - Policies**

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### **Relevant Policies:**

#### **Relevant policies of the Rural West Edinburgh Local Plan.**

Policy H1 says that new development will be supported on sites which already have planning consent and those which were previously identified in the 1999 Finalised Local Plan.

Policy E1 seeks to prevent development which would be inconsistent with local plan objectives for sustainable development.

Policy E2 states that development proposals affecting Air Quality Management Areas (AQMA's) should not impede the achievement of National Air Quality Objectives.

Policy E3 encourages all new development proposals to incorporate features in their design and layout to maximise energy efficiency and minimise waste.

Policy E4 states that development proposals should fully take into account the likely effects on the environment and include measures to mitigate any adverse effects.

Policy E15 seeks to ensure the survival and retention of healthy mature trees as part of development proposals. Where the loss of woodland, trees or hedgerows is unavoidable, the developer will be required to undertake equivalent replacement planting.

Policy E20 says that outwith the area identified in policies E17 and E18, the Council will seek to maintain and improve the nature conservation and biodiversity value of the countryside when considering development proposals.

Policy E22 says that development proposals which have the potential to harm a protected plant or animal species or its habitat will not be permitted unless the protection of species can be secured through the appropriate design and construction methods.

Policy E26 aims to protect and, where appropriate, improve existing rights of way and will seek to create a network of linked walkways/cycle/horse riding routes throughout the local plan area.

Policy E30 says that any planning application affecting a site of archaeological significance will require an archaeological field evaluation to be undertaken in consultation with the Council's Archaeologist

Policy E31 says that the Council will seek to negotiate management agreements with landowners of archaeological sites to provide for their future preservation and where appropriate for access and interpretative facilities

Policy E41 encourages high standards of design for all development and its careful integration with its surroundings in terms of scale, form, siting, alignment and materials. New development should improve energy efficiency and reduce noise pollution.

Policy E41 encourages high standards of design for all development and its careful integration with its surroundings in terms of scale, form, siting, alignment and materials. New development should improve energy efficiency and reduce noise pollution.

Policy E42 requires new buildings to make a positive contribution to the overall quality of the environment and the street scene, making provision for high quality landscaping and, where appropriate, new open spaces.

Policy E46 states that planning applications should demonstrate that proposals will not result in a significant increase in surface water run-off relative to the capacity of the receiving water course in flood risk areas.

Policy H1 says that new development will be supported on sites which already have planning consent and those which were previously identified in the 1999 Finalised Local Plan.

Policy H5 states that all new housing should harmonise with and reflect the character of its surroundings and should adhere to the criteria set out in the policy.

Policy H6 says that development which would significantly damage residential amenity will not be permitted in residential areas within the defined settlement boundary.

Policy H7 states that planning permission for residential development, including conversions, consisting of 12 or more units, should include provision for affordable housing amounting to 25% of the total number of units proposed.

Policy H9 says that the Council will encourage and promote developments designed to increase the range and type of housing available within the local plan area.

Policy TRA2 states that proposals will not be permitted where it would have an unacceptable impact on the existing road network; public transport operations; air quality; road safety, residential amenity and walking and cycling

Policy TRA1 says that development with the potential to generate significant levels of personal travel should be located on sites which minimise the need to travel and are easily accessible by foot, cycle or public transport

Policy TRA3 says that a transport assessment will normally be required for significant development proposals

Policy TRA4 says that development proposals should make specific provision for the needs of cyclists and pedestrians and provide convenient and safe access to existing or proposed networks where practicable

Policy TRA6 says that the Council will support the development of a comprehensive network of cycle and pedestrian routes, including on-road provision and off-road cycleways and footpaths

### **Relevant Non-Statutory Guidelines**

**Non-statutory guidelines** on Developer Contributions and Affordable Housing gives guidance on the situations where developers will be required to provide affordable housing and/or will be required to make financial or other contributions towards the cost of, providing new facilities for schools, transport improvements, the tram project, public realm improvements and open space.

NSESBB **Non-statutory guidelines** Part B of 'The Edinburgh Standards for Sustainable Building' sets principles to assess the sustainability of major planning applications in Edinburgh

**Non-Statutory guidelines** Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings and landscape, in Edinburgh.

**Non-statutory guidelines** on 'PARKING STANDARDS' set the requirements for parking provision in developments.

**Non-statutory guidelines** 'The Edinburgh Standards for Streets' sets out principles and guidance whose aim is to achieve a coherent and enhanced public realm.

# Appendix 1

## **Application for Planning Permission in Principle 14/01509/PPP At Site North Of, Ferrymuir Gait, South Queensferry Residential development with associated accesses, roads and landscaping.**

### **Consultations**

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#### **Strategy and Investment - Affordable Housing**

##### *1. Introduction*

*I refer to the consultation request from the Planning Department about this planning application.*

*Services for Communities have developed a methodology for assessing housing requirements by tenure, which supports an Affordable Housing Policy (AHP) for the city.*

- The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more.*
- This is consistent with Policy Hou 7 Affordable Housing in the Edinburgh City Local Plan.*

##### *2. Affordable Housing Requirement*

*This is an application for Planning Permission in Principle and although the applicant has not confirmed the number of homes to be built, the site is allocated for housing within the Rural West Edinburgh Local Plan with an estimated capacity for 117 dwellings. As such the AHP will apply. The applicant has made a commitment to provide 25% tenure blind affordable housing on this site and this is welcomed.*

*This is sufficient detail for an application such as this for planning permission in principle.*

*However, in any future detailed application this department would require the following further information to improve integration:*

- The location, mix and range of house types and sizes of the affordable housing showing a representative mix of the homes across the development, in the interests of achieving a mixed sustainable community.*

- *The affordable housing contribution should be delivered at the earliest possible opportunity within development and follow the principles of blind tenure construction.*
- *Due to the size of this development we would require that the affordable housing will be delivered on site across at least two locations, which will guard against any concentration of affordable housing.*
- *The applicant will be required to enter into a Section 75 Legal Agreement to assure delivery of the affordable housing.*

*We would welcome early engagement by the applicant with this department and a potential Registered Social Landlord regarding the delivery of the affordable housing element of this proposal.*

## **Police Scotland**

*I would recommend the architects and client consults with Police Scotland and considers Secure by Design accreditation, currently there is limited information to provide comment on. The site will be accessed via Henry Ross Place and Hugh Russell Place. There is pedestrian access from Loch Place and another one that finishes in Stewart Terrace. Due to open areas around the site this will allow easy access to boundary or property lines for the proposed homes.*

- *When trees and shrubs are being planted in common areas, trees should be crowned above 2.2 /2.4 metres, whilst low level planting is kept below a metre (including any planter). The common areas have to be well maintained to ensure these standards are maintained.*
- *Pedestrians have easy access to parking areas, it is not known what the natural surveillance, illumination and other factors may be without more detailed information.*
- *The parking that runs perpendicular to Loch Place may be vulnerable and consideration should be given to moving the parking to an area where it would have greater natural surveillance from properties directly overlooking the area.*
- *All properties should have 'private' areas that are not accessible by passing members of the public.*

## **SEPA**

*Further to Scott Bennett Associates' confirmation that the surface water from the site will ultimately be discharging to transitional waters, we are satisfied with the drainage scheme proposed and offer no objection to the planning application.*

## **Transport Scotland**

*The Director advises that the conditions shown overleaf be attached to any permission the council may give (see overleaf for reasons). In issuing planning permission the applicant should be informed that the consent does not carry with it the right to carry out works within the trunk road boundary (see overleaf for details of any works to be carried out within the trunk road boundary) and that permission must be granted by Transport Scotland, Trunk Road and Bus Operations. To obtain permission contact the Route Manager through the general contact number below. The Operating Company have responsibility for co-ordination and supervision of works and after permission has been granted it is the developer's contractor's responsibility to liaise with the Operating Company during the construction period to ensure all necessary permissions are obtained.*

*Trunk road modification works shall, in all respects, comply with the Design Manual for Roads and Bridges and the Specification for Highway Works published by HMSO. The developer shall issue a certificate to that effect, signed by the design organisation. Trunk road modifications shall, in all respects, be designed and constructed to arrangements that comply with the Disability Discrimination Act: Good Practice Guide for Roads published by Transport Scotland. The developer shall provide written confirmation of this, signed by the design organisation.*

*CONDITIONS to be attached to any permission the council may give:-*

- Building heights shall be restricted to a level below the direct line of sight between Transport*
- Scotland's Control and Education Centre and the Forth Rail Bridge, Forth Road Bridge and the Queensferry Crossing.*

*REASON(S) for Conditions:-*

*To ensure that the view from the Control and Education Centre to the three bridges is maintained for visitors.*

## **Archaeology**

*(Further to your consultation request I would like to make the following comments and recommendations concerning this application in principal for residential development with associated accesses, roads and landscaping.*

*The site occupies a ridge of high ground overlooking the Forth and South Queensferry. Archaeological evidence from the adjacent Echline area has demonstrated that this high ground was the focus for occupation and funerary activity since early prehistory. The recent excavations carried out in a similar geographic location during the construction of the new forth Bridge unearthed remains of medieval, Bronze Age Neolithic and early Mesolithic occupation, the later comprising the very rare survival of a Mesolithic house dating to c.8300BC.*

*Accordingly this site has been identified as occurring within an area of archaeological potential. This application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Rural West Edinburgh Local Plan policy E30. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

*The archaeological evidence as outlined above demonstrates that the application site could contain a wide range of significant prehistoric archaeological remains dating back to the mid 9th Millennium BC. Any proposed development of this site will require significant large scale ground breaking /engineering works which would have a significant affect upon any surviving buried remains. At this stage in principal residential development of this site must be considered as having a presumed moderate archaeological impact.*

*Accordingly it is recommended that a programme of archaeological work must be undertaken prior to submission of any subsequent Full or AMC applications, in order to quantify the archaeological resource and the potential impact of any subsequent development. This will require the undertaking of an archaeological evaluation up to 10% of the site. The results of which will allow for the production of further mitigation strategies and the detail if required of any subsequent archaeological planning conditions to be attached to ful/AMC applications. This is in order to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains prior to development.*

*It is therefore recommended that if this consent is granted that the following condition be attached to ensure that a programme of archaeological works is undertaken.*

*'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'*

*The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.*

## **Historic Scotland**

*We have considered your consultation and have no comments to make on the proposals. We confirm that your Council should proceed to determine the application without further reference to us.*

## **Environmental Services**

*The applicant proposes developing up to 125 residential properties on land that is bounded to the north by Stewart Terrace, to the east by Loch Place and Canmore Street, and to the south by a small park. The A90 is, at various distances, to the west of the land.*

*The applicant has submitted a support noise impact assessment due to the proximity of the A90. This assessment advises that no specific mitigation measures will be required. The applicant has also submitted a local air quality screening assessment which has advised that no further air quality assessment analysis was required. Environmental Assessment can concur with the findings of these reports.*

*The applicant has submitted a desk top study in regards to contaminated land which has highlighted that the site has previously been used as a hotel with the presence of a substation onsite, therefore it is agreed with the reports recommendation to undertake a degree of further site investigation on the site. Therefore Environmental Assessment recommends the following condition is attached to any consent;*

*Prior to the commencement of construction works on site:*

*(a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*

*(b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning*

*Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.*

## **Flooding**

*I have reviewed the proposal and have no comments to make.*

## **Queensferry & District Community Council**

*I am writing on behalf of Queensferry & District Community Council (QDCC) to lodge an objection to the plans lodged by the applicant for the reasons stated below.*

*The previous application lodged in 2003 solely for housing was the subject of appeal and the appointment of a reporter by the Scottish Executive who determined that the refusal by the City of Edinburgh Council be upheld. (ref 4769/Planning/SJP dated 12/02/2004 Farningham McCreadie Partnership) I ask that the Planning Department take cognisance of some of the points made by the reporter at the time as QDCC believes them still to be pertinent to this proposal.*

1. *Site Universal Value because of the site's elevated position at the top of a marked northward slope, the former hotel site has commanding views along the Fife side of the Firth of Forth in both directions and to the distant hills in the west and northwest, a comprehensive panorama of Queensferry. For these reasons QDCC believes the site to be of outstanding universal character and value and warrants a sustainable plan that is in context with and supports World Heritage Status nomination for the Forth Bridge and all that World Heritage Status brings with it. The location is pivotal, as a "gateway" beside the Forth Road Bridge and on the edge of a well persevered medieval burgh town. The site demands a very high standard of mixed use sustainable development that meets with the communities requirements to cater for tourist and visitors and be of a very high standard of design.*

2. *Environmental Health function was concerned that any necessary mitigation should be undertaken to protect dwellings from noise and future occupants from ground contamination - what has changed?*

3. *The Archaeological Officer mentioned that the coastal ridge had been a focus of occupation in late prehistory and the site must be treated as having archaeological potential.*

4. *West Edinburgh local Plan that the applicant had been notified that the City of Edinburgh Council had determined that "The proposal was contrary to Policy E41 of the finalised plan as it was not of sufficiently high quality of design for this gateway location. QDCC opines that this is the case with the proposed plan so little has changed.*

5. *QDCC objections in 2003 noted by the reporter and upheld by the City of Edinburgh Council; the site is crucial and development must reflect the character of the historic town. Queensferry is now in 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. QDCC appeals to the planning authority don't make Queensferry a suburb of Edinburgh!*

6. *Concerns were expressed by the reporter that the proposal includes no pedestrian linkage from the northeast to the direction of the town centre. QDCC's concerns remain, the plan does show a pedestrian link, however it is essential that the developer fully engages with stakeholders, FETA, TS, QDCC and City of Edinburgh Councillors to ensure that a core pathway is developed such that visitors to the "Bridge Head" and the FRC Contact and Education Centre can walk to the High St.*

7. *Historically QDCC wrote on 28th February 2003 and little has changed; The points of objection included: lack of appraisal of the cumulative effects with other proposed developments; pressure on schools and other services; worsening of congestion at a busy set of junctions; absence of any community gain; poor pedestrian connections to schools, health centre library and facilities.*

*QDCC asks the question of the Planning Authority as to what has changed that would allow permission be given for this development. In the past 10 years the matters noted have only been further exasperated, so the plan should be rejected.*

*WERLP v's New City Wide Plan The application is premature and is being rushed through by the owner Corus encouraged by their agents, to bestserve their shareholders to maximise the sale of the site, to gain from the favourable terms of the WERLP. They have grasped the opportunity that this situation presents to lodge this application under the WERLP as opposed to the New City Wide Plan yet to be adopted. Whilst this point might not be seen as a planning matter it should be put into context with the pending adoption of the new City wide plan. It's an irony that instead of looking forward, which reflects the best interests of the Community of South Queensferry in planning terms then The City of Edinburgh Council Planning has to look back. In the new City Wide Plan then the site is reserved for mixed use development. QDCC does not believe nor is there any evidence that any work has been done in exploring retail development to support the location and future Forth Bridge Visitors Centre, built by TS and the aspiration for the FRC Contact and Education Centre to become a visitors centre. QDCC has consulted with Economic Development and does not accept their reasoning that the site has no unique selling point. For these reasons alone the plan should be rejected. QDCC opines that if we are to consider this application within the terms of WERLP then the plan is contrary to the WERLP for the following: Local Plan Strategy 2.25 The Nine core principles of the WERLP strategy, Design of New Development 3.72; "It is important that the physical environment meets the needs of the whole community." and ED11 that the developer has made no consideration of the communities future needs.*

*Pan 52 Planning in Small Towns reads; Small towns are therefore experiencing significant change. The effects of these changes, individually and collectively, are evident in many towns. The scale of population growth in some settlements has undermined their identity while new development has generally not been sensitive to the sense of place or character of towns. The traditional role of many of the towns has been altered by general changes in the employment structure and through specific changes in local economies. The fabric of most small towns has suffered from the general growth in traffic and, in a number of towns, particularly those of historic or architectural merit; the conflict between vehicles and pedestrians can be particularly acute.*

*The future for small towns does not involve turning the clock back but it should involve an appreciation of their historical development and an understanding of how market forces and social trends can be harnessed. Planning for small towns should be underpinned by 3 elements:-*

- examining and, if necessary, redefining their key functions*
- identifying, safeguarding and reinforcing sense of place and local assets*
- involving local communities and business organisations in decision making.*

*The most important resource in a small town is its people. The importance of early and regular community involvement and commitment to shaping the future of their town cannot, therefore, be overstated. Effective public involvement should lead to a better understanding of the consequences of action (or inaction) and a greater willingness to participate in the management and implementation of change; in fact individuals, groups or organisations may wish to be at the forefront of projects or initiatives which contribute to the well-being of their town.*

*An important first step is to identify who can best represent and articulate the community interest; community councils, local traders and business organisations, amenity groups and societies are the obvious starting point but wider participation may bring additional benefits. The form of community involvement also needs to be considered. While press advertisements and public meetings have their place in informing local communities, less formal means such as workshops or group discussions should be considered. Councils will also need to consider how best to present information and alternative strategies / policies / proposals; lengthy reports and 2-dimensional plans are likely to be less effective than photographs, sketches and other 3-dimensional material. QDCC places on record that they see no evidence that would suggest that PAN52 Planning Advice for Small Towns has been considered and used in compiling this planning proposal, nor have we been involved in meaningful discussions. The above paragraphs could have been specifically written for South Queensferry. We have been informed, not consulted, and any contributions we have made have been politely ignored!*

*Site ownership and access issues remain and QDCC are very concerned that this application is being allowed to be presented to the Planning Department when it is clear that the issues have not been resolved and remain the subject of legal debate. The one meter boundary strip owned by the residents of Canmore Street and Loch Place and the constraints placed on the developer by not being able to gain access from Ferrymuir Gait are significant problems that need to be overcome should this proposed development be approved.*

*Construction Access Issues. Construction traffic should not be allowed to access the site from the B907, Kirkliston Road. This would be hazardous to users of National Cycle Network Route 1, which passes through the junction with Viewforth Place, along Viewforth Road and into Hugh Russell Place. These streets also form a popular pedestrian route for children attending Queensferry High School from the Echline estate. In the interests of safety, construction access should be taken via the B800 and Ferrymuir Gait. On consultation with FETA and local residents, QDCC was advised that FETA does not intend to give approval for any access to the development by Ferrymuir Gait. The developer HAS NOT resolved this matter. The developer should be asked to gain access by a route other than Kirkliston Road and NCN 1. Further that there will likely be construction traffic from three developments; Ferrymuir Gait, Ferrymuir and Agilent resulting in converging traffic management and related Health and Safety issues that the City of Edinburgh Council officers should be assessing for risks when considering this application.*

*Post-Construction Traffic Management. Data from Transport Scotland's traffic counter JTC6003 indicates Kirkliston Road carries 10,000 vehicles per day at the Viewforth Place junction. Motorists in the Varney estate regularly experience delays and near misses at this busy junction, which is also heavily used by schoolchildren and cyclists on NCN route 1. If additional traffic from the development is routed onto Viewforth Place, arrangements for existing and proposed parking restrictions, crossing patrols, bus stops, traffic calming and the Toucan crossing should be thoroughly reviewed. The case should be carefully considered for 3-way traffic lights at Viewforth Place to replace the Toucan crossing currently allowing access to Rosebery Avenue.*

*As outlined in the plan submitted, it is imperative that some access is available to the development from the B800 and Ferrymuir Gait. As a minimum, this allows access for emergency vehicles to the site and South Queensferry. QDCC has little expectation when the new Queensferry Crossing is opened and that little will change with traffic congestion in South Queensferry's road networks, during an accident or incident when trying to cross the new Queensferry Crossing. This access could be a life saver when trying to get emergency services into South Queensferry!*

*QDCC has sought to engage with CEC Transport Officials to discuss our points in detail but they have ignored our requests to meet. This is a common occurrence and is not a new phenomenon!*

*Primary & Queensferry High Schools. QDCC is extremely concerned that Queensferry Primary School, school roll is near capacity and will not be able to accommodate children of primary school age from this proposed development. Further we are led to believe that children from Kirkliston may well be accommodated at Dalmeny Primary School. The City of Edinburgh Council has recently approved the application by CALA Homes for 450 homes on the former Agilent site which needs to be considered alongside this proposal. So the unanswered question is where will the primary age school children from this development be educated? Whilst it would appear that theoretically Queensferry High School (QHS) can accommodate the additional capacity of secondary pupils arising from the Kirkliston and the Agilent CALA developments it is unlikely in practice that QHS will easily accommodate pupils for the Ferrymuir Gait development. QDCC is aware that the corridors and staircases are narrow and presently with just over 700 pupils then the teaching staff has had to implement a one-way system to ensure that pupils are safe. It is the case that the time of teaching staff and prefects is taken up supervising safe movement of pupils from class to class.*

*Community facilities and infrastructure South Queensferry has few Community facilities such as leisure amenities and what little facilities the town has are already under pressure. Further that this development will bring unbearable pressure on our Health Centre and Health Services in general.*

*QDCC has concerns that the Mitigation works has not been fully considered nor addressed;*

- 1. QDCC is concerned that site design does not mitigate future residents from the environmental impacts from works being carried out on the FRB being; vehicle noise, construction noise, dust, light pollution, etc.*
- 2. The design is in conflict with Planning "View Cones" policy the view is obscured from the CEC looking east to the Forth Bridge World Heritage listing.*
- 3. That the homes behind Stewart Terrace sight lines look into one another presenting a privacy issue.*
- 4. That visitors viewing from the CEC can look directly into the homes in front presenting a privacy issue.*

## *QDCC seeks reasonable Development Gain*

- 1. QDCC seeks development gain to upgrade and improve the play equipment located on the Varneys site to suit infants and children.*
- 2. That the immediately land behind 1 - 4 Stewart Terrace on the west side of the FRB is landscaped and maintained.*
- 3. That QDCC receive a contribution towards the Community Facility set aside in the S75 agreement that we have with the Forth Bridges Business Park Developments Ltd for a community facility.*
- 4. That should Echline Primary be intended to be used for primary school education that a proper footpath of adoptable standard be built across the triangular open space located west of the FRB, north of Stoneyflatts and east of Echline Grove.*
- 5. Affordable Housing - QDCC expects that a reasonable proportion of the 25% of affordable housing allocation will be suitable for Adults with "special needs" as determined in the "Long and Winding Road" report commissioned by Queensferry Care in the Community. The principle was established more recently at Kirkliston where special needs accommodation has been built by Share Scotland at Maude Close Kirkliston. The principle of housing suitable for special needs adults had been established previously within the outline plan for the Ferrymuir Site lodged by Evans of Leeds.*

*Finally QDCC wishes to bring to the Planning Authorities attention to a "Planning Charette" that was led by Queensferry Ambition (QA) sponsored by the Scottish Government and QA which looked at the West End Realm of Queensferry; Shape the Future of Queensferry, West End Streets and Parks. The background is that perennial development pressures have led local business and community groups to call for a proactive approach to planning for the future of Queensferry. QA will be launching this report in the next couple of weeks and as the workshops looked at the locations surrounding the site of this planning application. QDCC urges the Planning Authority to look at the findings from the work carried out by WT Architecture. There is total of 63 projects listed along with solutions and recommendations. For the reasons stated QDCC seeks to have this application refused as it is premature, doesn't meet with the needs of the community and is at odds with the plans and legislative documents that I have referred to.*

## **QDCC Response to Transport Statement**

*Paragraph 1 - The previous Access Study is not available as part of the application. QDCC have had no visibility of the original information when compiling this response.*

*Paragraph 2 - No comment, as no visibility of original study*

*Paragraph 3 - Disputed, as there have been changes to the general land use since 2012; development of nearby sites is already underway in 2014 and plans for further change have been submitted which may affect journeys on Kirkliston Road. Examples are*

- (i) Construction of 450 dwellings on the former Agilent site, underway in 2014*
- (ii) Proposals for construction of around 400 additional dwellings at South Scotstoun and Ferrymuir*
- (iii) Primary school travel issues relating to new developments and possible catchment reviews (e.g. new residents may attend Echline Primary School)*
- (iv) Development of the Forth Replacement Crossing and intended redeployment of the Forth Road Bridge to carry mostly pedestrians and cyclists. Traffic levels on Kirkliston Road are being monitored by Transport Scotland due to concerns raised regarding travel pattern changes*
- (v) Improvements to National Cycle Network Route 1 (Viewforth Place), the primary access to the Forth Road Bridge following FRC opening*
- (vi) Parking restrictions have been introduced on Kirkliston Road by marking out standard length bus stop boxes*
- (vii) Further parking restrictions have been proposed around the junction of Kirkliston Road with Viewforth Place. These are currently held pending a dispute being resolved*
- (viii) Increase in bus movements at the Viewforth Place junction of Kirkliston Road from 4 buses per hour in 2012 to 12 buses per hour in 2014.*

*Furthermore, the entire access route should be assessed, not just the junction with Kirkliston Road. The report has completely ignored the effects of additional traffic on Henry Ross Place, Canmore Street, Hugh Russell Place and Viewforth Road. The latter two streets form part of NCN Route 1, where cyclists are expected to use the main carriageway because the footways are too narrow.*

*Development Proposals*

*Both paragraphs and figure agreed*

*Trip Generation Analysis*

*Paragraphs 1&2 and Tables 1&2 - No comment, as no visibility of original study. New trip figures are simply a direct scaling of the 2012 supplement by  $(125 \div 100)$  using a trip per house factor derived from count figures divided by 150.*

*Paragraph 3 - Disputed. What constitutes "low"? The simplistic calculation for new trips shows Viewforth Place traffic increasing by 83% at peak times. This is likely to be an underestimate because it is based on a traffic count for the existing 150 Varney houses for two peak hours on a February weekday. The Varney estate now houses a large number of retired people without school age children nor much reason to travel during the surveyed hours. The new development is likely to attract younger families with different travel patterns.*

*Paragraph 4 - No comment as PICADY 5 (TRL) is not explained in the report nor its relevance to the junction in question.*

#### *Junction Assessment*

##### *Background*

*Paragraph 1 - No comment*

*Paragraph 2 - Disputed. It is very generous to suggest that Kirkliston Road is 7 metres wide and it probably never attains that width. In most locations it is greater than 6.0 but less than 6.7 metres wide.*

*Paragraph 3 - Disputed. The crossing is 25 metres away but no pedestrian traffic figures have been presented. Furthermore, no cyclist traffic appears to have been monitored or researched as part of any study. Considering Viewforth Place forms part of NCN1, this seems a major omission.*

*Paragraph 4 - Note that CEC have commenced roll out of 20 mph speed limits in all residential areas, without installing physical traffic calming measures. The junction in question may be affected by a new 20 mph speed limit but its impact has apparently not been assessed. It may be worth pointing out that although both roads do have footways for pedestrians, cycling is not permitted on footways, nor are these footways suitable for cycling on an informal basis.*

##### *Traffic Flows and Distribution*

*As previously stated, the basis for this analysis is flawed.*

##### *Capacity Analysis*

*Paragraphs 1&2 and Table 3 - No comment as PICADY 5 (TRL) is not explained in the report nor its relevance to the junction in question. The term RFC is not explained, nor how it affects queuing.*

*Paragraphs 3 & 4 - These statements seem logical, within the very narrow remit of the report and the naïve assumptions.*

##### *Summary and Conclusions*

*Paragraph 1 - As previously stated, the 2012 Access Study is not available as part of the application and no longer appears fully relevant*

*Paragraph 2 - Agreed, but note the existing development of 150 houses contains no terraced or flatted properties, further illustrating the weakness of traffic projections which take no account of local demographics*

*Paragraph 3 - As previously stated, the 2012 Access Study is not available as part of the application and no longer appears valid due to several changes affecting traffic levels and types using Kirkliston Road. Concentrating solely on the number of vehicles queuing at the junction with Viewforth Place during two hours out of the full day does not seem like a rigorous access study. The impact of additional traffic on other road users, at other junctions and in other streets (such as Henry Ross Place, Viewforth Road and Hugh Russell Place) has not been considered.*

*Paragraph 4 - While not necessarily disputed, this statement is subjective and no supporting data offered. The effect of additional vehicle trips (which are at the core of the study) on sustainable travel opportunities has been completely ignored in the report.*

*Paragraphs 5 & 6 - These statements appear logical from the study's rather thin content, which only reports on vehicle queuing at Viewforth Place. They are based on a PICADY 5 (TRL) assessment and RFC figures. The meaning and relevance of each is not made clear in the report. Restricting the study to this single topic appears rather negligent. Effects of the new housing scheme on other factors and other streets have been ignored.*

## Transport Planning

*I have no objections to the application subject to the following conditions and informatives:-*

*Prior to the issuing of consent the applicant to enter into a suitable legal agreement to make provision for the following:*

- a) *Contribute the sum of £25,000 for the upgrade of the puffin crossing on Kirkliston Road.*
- b) *The applicant to pay for any waiting and loading restrictions, through a Traffic Regulation Order, that may be required within or outwith the development. The cost for this type of Order is £2,500. All costs associated with this Order will be met by the applicant.*

### *Informatives*

- 1) *The development to comply with the Designing Streets policy document*
- 2) *Vehicular and cycle parking to conform with the Council's December 2009 parking policy document.*
- 3) *National Cycle Network Route 1 is located on the south side of the development. At present it is not an adoptable route therefore this route to the development boundary should be brought up to an adoptable standard and be incorporated within the site boundary.*
- 4) *All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent.*
- 5) *Whilst there would appear to be an alternative access to the site via the private access to the FETA offices this would have required the agreement of the owners to allow access and to upgrade this road to a standard capable of adoption onto the council's list of public roads. It is understood however that the developers were unable to secure such an agreement.*

## Children and Families - Education

*Please find below consultation response from Children and Families on the above application*

*Planning Application Number 14/01509/PPP*

*Site Description Residential development with associated accesses, roads and landscaping. at Site North Of, Ferrymuir Gait, South Queensferry*

*Estimated No of Dwellings: **Total:** **Houses:** **Flats:**  
**125** **100** **25***

*The estimated pupil generation based on the pupil generation ratios in the Education Infrastructure Appraisal prepared in line with the second proposed Local Development Plan indicate this development would generate the following number of pupils.*

*Catchment School Predicted Pupil Generation*

<i>Queensferry PS</i>	<i>28</i>
<i>St Margaret's RC PS</i>	<i>4</i>
<i>Queensferry HS</i>	<i>18</i>
<i>St Augustine's RC HS</i>	<i>3</i>

*A four class extension at Queensferry Primary School is currently planned as a result of the redevelopment of the former Agilent site for housing. This development would require this extension to be increased to five classes. The EIA and LDP Action Plan already included a requirement for a 2 class extension to St Margaret's RC Primary School which should be sufficient to cope with the additional 4 pupils noted above. Capacity at the High Schools will also be fully utilised in forthcoming years to cater for rising rolls from existing development.*

*Based on the new action programme process which we now require to follow we are required to provide you with actions which would be as follows:*

*Additional 1 class at Queensferry Primary School (taking current commitment from 4 to 5 classes): £135000*

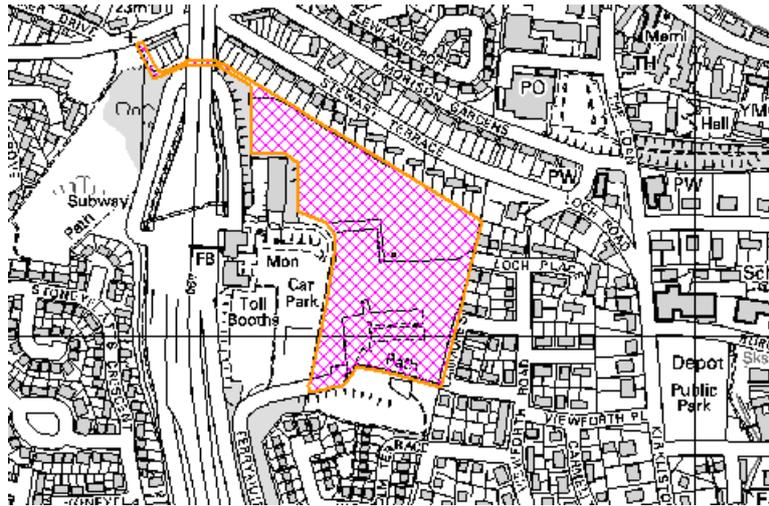
*Contribution of £525,000 for secondary school accommodation provision (in addition to the amount already indicated in the EIA associated with the second proposed LDP)*

*All costs are based on those outlined in the Education Infrastructure Appraisal recently completed for the second proposed Local Development Plan. The costs are based on Q1 2014 and should be subject to future inflation. The costs do not include land costs; abnormal or any site specific costs (e.g. remediation requirements, external infrastructure requirements).*

*The planning policy team should be consulted in terms of how these requirements relate to/are added to the second proposed Local Development Plan action programme, the associated contribution zones and advise on value of the actual developers contributions to be requested.*

# Location Plan

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**END**