**Fountainbridge Development**

**Application 22/04045/AMC**

**Comments from the Fountainbridge Canal Development Trust**

**Introduction**

1 Fountainbridge Canalside Community Trust (FCCT) was recently formed as an amalgamation of the Fountainbridge Canalside Initiative (FCI) and Re-Union Canal Boats, both of which had a long history and track record of advocacy, activity, and community engagement along the canal at Fountainbridge stretching for more than ten years.

2 The newly formed FCCT now has a growing membership of over 150 people and the feedback provided for this proposal we feel articulates the views, opinions, ideas and hopes of both local people now involved in the Trust and people interested in the canal and the canal side as a community asset. Feedback has been gleaned over a wide variety of events, workshops, consultations and surveys organised by both FCI and Re-Union over the last ten years.

3 There is a widespread community interest and involvement in Edinburgh’s Canal and its canalside, as a precious community recreational asset, that is why this is not just another development. FCCT has tried to reflect this interest in its own key objective which is to help through its activities to create a viable and sustainable canalside community at Fountainbridge.

4 Before commenting specifically on the application FCCT would like to take the opportunity to commend the Council and in particular its local Councillors and the Canal Champion in taking the lead in pro-actively engaging with FCI / Re-Union and other groups, over its plans to regenerate Fountainbridge in a sustainable manner. Both FCI and Re-Union and now FCCT, have also participated fully in the Council-led Fountainbridge Sounding Board to take forward proposals.

**Comment on the Consultation process**

5 Given the above statement regarding the mostly positive dialogue with the Council through the Fountainbridge Sounding Board it is with some disappointment that we feel the detailed pre-application consultation process on this particular application by the newly formed Development Partnership was rushed and is badly flawed. Given the rushed timetable (over the summer and Edinburgh festivals period) between the end of the pre-application consultation process and the submission of this detailed application it is clear that the process allowed no room or appetite for any substantial changes as a direct result of the pre-application process.

6 Accordingly many of the questions, comments or concerns we had at the pre-application stage have not been addressed directly or discussed with the Development Team itself. A reading of the detailed response we made to make to the pre-application consultation process indicates that whilst we have critical comments to make, we are both strongly supportive of the concept of a sustainable mix used development at Fountainbridge and the Councils pro-active involvement in trying to make it happen, and we have said so.

7 We strongly support the provision of a significant element of social housing on this city centre site, and we support the introduction of a proposed element of affordable housing. We share the Councils concern that the city centre is being “hollowed out”, with growth in Air BnB and student developments making Edinburgh a city to visit but not to live in for many people.

8 We understand that the affordable housing on W4 will be set at Mid-market rent. Whilst we understand there will be a commercial element here, we feel it would be useful to begin to identify what this will mean in actual rentals. This could then be considered in relation to local people’s incomes to judge affordability in relation to various income groups. This is relevant as a very common question asked over the years at events is what the rent of the proposed homes will be. A question we have been unable to answer, the ensuing comment to this is frequently “well then they won’t be for the likes of us then”.

 9 Rental Model. We note that these types of rental developments (build to rent) are flavour of the month. We would be interested to hear, both about the rationale for the current models and how they impact on community cohesion and mix. Also, further details as to what this model consists of in practice. Is it short / medium / long term leases? Is there security of tenure? What is the market sector such a model is aimed at? Will such a model generate transient residents and excessive churn of occupiers? Is there any opportunity to move from rent to buy? Will there be just one major landlord or is it likely that blocks of properties will be passed on? Will renters be able to sub-let? We believe all these aspects are likely to influence social sustainability for the area and are therefore of planning concern.

 10 We support the now mostly pedestrian related priority and design, with the creation of an active people centred quayside and community square, with further community spaces. We also note that a variety of housing types and forms have been deployed across the site with town houses in the interior of development.

 11 To what extent has it been possible to take cognizance of the local population profile / needs, with the example of provision for increased single occupancy. It is suggested an over pre-ponderance of say two bedded flats would impact negatively on a sustainable community diversity and mix. We would also suggest that the Planning authority should now seriously consider the overall sustainability of areas like Tollcross / Fountainbridge in terms of pressure on services and infra-structure of student/short term let/AirBnB tenures.

 12 During the ongoing discussions that FCI have had over at least the last ten years there has been a recognition that the brewery site represents a transition area from the lower density tenement areas to the south and west to the evolving high density city centre to the north and east. We are not convinced this subtle but important transition is reflected in the overall density of the proposal.

13 Whilst it is recognised that the bulk of the site sits within the city centre with the resultant expectation of reasonably high density, there are a number of areas where the proposed block structure and height is considered over-bearing and is over-developed. Overall we consider the density of the development to be too high, putting resultant strain on urban design and quality.

14 In particular, we feel the quayside frontages of five and six stories, in W1 and W2 loom over the quayside and the canal, and in our opinion are at least one, if not two stories too high. This Quayside frontage appears overbearing and unattractive when viewed in relation to its siting alongside a linear historic monument, namely the Union Canal.

 15 Also of concern in this regard is the corner of W2, where it meets both the canal and Viewforth, and Boroughmuir High School. Here on a sensitive junction, the end of W2 appears to have been brought forward somewhat in a six-storey format and therefore dominates this corner. This corner is substantially beyond the building line of the school opposite and will clearly be an unwelcome dominant feature looming over the canal bridge and along the Quayside in front of the school.

16 We do not believe the proposed arrangements to manage flows of traffic, quayside pedestrians, pupils and cyclists will be effective here.

 17 Also there is a constricted access underneath the bridge which is already the source of pedestrian/cyclist conflict, it is unclear here how circulation and conflict between traffic, pedestrian and cyclists is satisfactorily managed by actually bringing forward the block end rather than creating more space by recessing it.

 18 It is worth noting here, perhaps for the last time, that previous planning design guidelines suggested a new canal basin at this location with the resultant open aspect, and new pedestrian/cycleways around it, clearly enhancing the canal side environment. Unfortunately, these exciting and creative proposals can be contrasted with the forwarded block end now proposed and the likely creation of an unsatisfactory “pinch point”.

 19 As well as the W2 corner, we are also concerned that the forward place of the end of the block will also exacerbate the developing formation of a significant “canyon effect” along lower Viewforth. We appreciate that the primary cause of this is the over-powering and unattractive side elevation of the new school. Perhaps further thought will be required to consider how this unfortunate effect can now be mitigated.

 20 On a positive note we strongly welcome the introduction of substantial and significant tree lines along the key frontages of Viewforth, Quayside, and Dundee Street to soften what are major building facades. We would ask that the proposed “Avenue” trees are of sufficient maturity and size to achieve this objective. We consider it is absolutely essential that these tree lines are all composed of substantial semi-mature feature trees, if they are to have sufficient impact.

21 It is noted that an underground car park and parking area is proposed for the rear of W2 with a connecting road through the site and exiting onto Dundee Street and Gilmore Park. We have strongly supported, the pedestrian/people priority of the development, and we are now concerned to see what is effectively a loop road treading its way through the development and even impacting on the northern side of Leamington Square. We are assuming the proposed landscaped islands on the north of Leamington Square are sited to screen the transit of vehicles which will travel through the square.

22 Despite our requests at the Sounding Board, there has been no discussion of vehicular access for the development and we are not convinced now that the proposed vehicular access solution, i.e. the traditional loop, road, which we are seeing for the first time , is the best solution to maintain a mainly car free environment, whilst enabling the appropriate access. We understand this road layout will also be classed as a shared space.

 23 Given surrounding activity generating new developments in the locality from hotels, flats and the school, it is important to understand how this development interfaces with these other developments. We would like to see a clear strategy for monitoring and managing this traffic flow, something that has been lacking on Viewforth adjacent to the Boroughmuir School. Here, the disabled parking bay is misused and the adjacent pavement, created wide for pedestrian safety reasons, is frequently used by coaches serving the school. Whilst the provision of a very limited number of car parking spaces may discourage car ownership for residents, it would appear blasé to suggest that any new cars will just spill onto existing surrounding streets without some major impact to existing residents.

 24 In respect of the overall building design and layout, we accept that the proposals, in our opinion, are an improvement on other surrounding new developments in the area which are predominately squat and square. However, you will pardon us if we say we are not “wowed” by them. Whilst the blocked building forms do have some variation in detail and heights, some balconies, and rooftop use, on the whole, we feel everything is built to a formula, no doubt predicated on cost considerations.

25 We do not consider that the overall generic architectural design, i.e. “it could be anywhere” adequately reflects the considerable discussions and debates which have taken place over the years, or suitably rises to the challenge of a unique and important canalside site (which is a listed structure). Here for instance, we would contrast the proposal with the new housing developments beside the Royal Mile, where more care has been taken to reflect the importance of the historic linear route with traditional materials, and mansard or pitched roofs and varied roof profiles to maintain and increase character.

26 FCI, through public consultations, exhibitions, and even design workshops have always reflected the overall community view that pitched/mansard roofs, variation in heights, density and detailing would be appropriate to create an exciting and attractive quayside character of quality.

 28 During FCI workshops and development consultations over a long period of time, there was a consensus that as far as possible flatted residential development on the site should as far as is possible and reasonable reflect local and traditional forms, so that the area could be seen as recognisably part of the distinctive Edinburgh we all know. Also, examples both locally and within the UK and abroad of attractive Quayside developments were considered. Overall, there was strong support for pitched roofs to soften the skyline and to reflect more traditional quayside locations. We are not convinced even with some variations and design features, that the proposed flat roofs are attractive, although they appear to be the new architectural norm in new developments.

29 We note that now any reference to new or enhanced water space has disappeared from the proposals, we would refer you back to the previous planning guidelines and briefs and we have stated on many occasions we also consider this a permanent loss of a great opportunity to create something special here.

30 We welcome the creation of an improved and enlarged Quayside, which we would hope will integrate effectively the development with the canal and the current neglected quayside. We support the three zones proposed, the addition of both quality planting and seating, and the creation of a line of mature trees along the quayside. We support the provision of an under croft or gallery along the frontages of W1 and W2 to enhance the quayside, provide shelter and animate the area.

 31 Clearly the boundary/interface between the development and the canal is a vital one and we are assuming that as part of the development, agreements are in place with Scottish Canals to maintain and manage the enlarged quayside.

 32 There is considerable support and excitement around the creation of a new public square at the centre of Fountainbridge which we agree is key to the sustainability and vibrancy of the area. FCI have engaged constructively over the potential design of this new space and has proposed many ideas and opportunities for other green initiatives in both public and private open spaces.

33 We are not convinced regarding the raised island design proposed. We also note a road is now proposed to intersect the Square itself. We would suggest that much further discussion is required as to how the proposed raised island design can enable the use of the space for events, markets, and social gatherings, and how the new road will impact on what was meant to be a purely pedestrian square.

 34 We would welcome the clock central feature as a reference to the traditions of the area and as a centre piece, however we note the “Old Man” and the “Cavalier” figures are missing from the clock. We feel permission would be given by whoever now owns Scottish and Newcastle for these iconic ex-brand figures to be included. We also note with disappointment that the creation of the Archimedes Screw water-feature has now been deleted from the proposal.

35 We would welcome the provision of a designated community space as a community hub as being vital to provide a base for the development of a wide range of community activities. However, as a community organisation which has delivered a wide range of canal side community activities in the area over the last ten years, we feel it is absolutely essential that such a facility should be located on the Quayside to maximise its effectiveness.

36 We note the proposed provision of a community garden/growing space. The idea of a growing space was to encourage more community engagement and active recreation and interesting green space. We would urge that developers liaise with and involve the existing Fountainbridge growers’ group, The Grove, to ensure that existing momentum and expertise is not lost.

37 FCI and Re-Union have already worked collaboratively with the Council in promoting “meantime” green uses. FCCT and its members look forward to future projects which can bring direct community engagement in developing and managing green space and add value whilst the development takes shape.

 38 We note there is significant provision of ground commercial space. Centring on the Quayside, Leamington Square and Dundee Street. This is despite long standing empty units at Lochrin Basin and the forthcoming provision of substantial new space at Haymarket. To animate the Quayside and establish sustainable commercial and local economic activity we would suggest a pro-active approach/strategy to the ground level. With a new approach to provision and mix of uses, to encourage local trading, local businesses, third sector, social enterprises, and community involvement, including;

* Providing greater access to quality spaces at discounted and affordable rates to local enterprises, with a range of sizes and services.
* Identify and encourage alternative and subsidiary local productive uses such as artists’ studios, crafts, incubators, small offices, and, where appropriate, makers workshops. Variety and local colour and connections will enhance the attractiveness of the canalside and the long-term sustainability of its street level.

39 We consider this activity very much a planning issue and would suggest a condition on any approval to bring forward an active frontage strategy. The alternative being the dead space we have seen for too long at ground floor level at the Lochrin Basin.

 40 It is noted that following the Councils lead, the Development is intended to be net zero carbon with all electric solutions and have no fossil fuels on site. This is supported.

41 It is also noted that this will be achieved by a range of measures including Micro-Air-Source Heat Pumps. We understand that heat pumps will form the basis of domestic heating.

42 We note with disappointment that the idea of District heating has been rejected. We believe that had the idea been taken up more pro-actively and nearby partners also engaged such as the school and the new hotels that this innovative approach would have been feasible.

 **Conclusion**

43 People in the area love the canal and recognise its value as a recreational asset but also know it needs to be regenerated and cherished.

44 To maximise the undoubted potential and opportunities at Fountainbridge we would like further discussions as part of the ongoing planning process on some key aspects of the development, namely;

* The development of the Quayside as an Edinburgh-wide community recreational asset, and the crucial key interface between the Council, the Developers and Scottish Canals to achieve this.
* Further detail on the tenure model and how it will sustain residents’ commitment to the area and allow a range of local people to access the new homes.
* Details of the management and future maintenance and care of the public open spaces created.

45 We understand that Fountainbridge is an urban site, and that there will be lengthy discussions with the Council in its role as the Planning Authority, as opposed to its role as a joint developer, on issues such as height, density, and design quality . We applaud and support lower internal densities, a mix of tenure and house types, however there are a number of sensitive locations which in our view illustrate a measure of over-development. These pressure points are, Quayside height, the corner of Quayside and Viewforth, and possible canyon effect on south Viewforth.

46 We also believe a pro-active ground floor animation/occupation strategy will be required if dead spaces at this level are to be avoided.

47 FCCT hopes itself to continue the track record of Re-Union/FCI in successfully delivering a wide range of canalside activities, including boat trips, events, festivals, advocacy and community engagement at Fountainbridge in the future, to help create the vibrant and sustainable canal community that we all want to see at Fountainbridge.