



Leith Harbour and Newhaven Community Council

LHNCC

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11 September 2018

David Leslie
Head of Planning and Transport,
PLACE,
Waverley Court,
4 East Market Street,
Edinburgh , EH8 8BG

Dear Mr. Leslie

Re: 18/04332/FUL: 106 - 162 Leith Walk Edinburgh EH6 5DX, Demolition of existing buildings and erection of a mixed use development including 53 affordable housing flats, student accommodation (523 bedrooms), hotel with 56 rooms (Class 7), restaurant(s) (Class 3) and space for potential community and live music venue (Class 10 & 11), retail (Class 1), public house (sui generis) or commercial uses (Class 2 & 4). Includes associated infrastructure, landscaping and car parking.

Applicant: Drum (Steads Place) Ltd.

Agent: Hamilton Fraser Munro

Objection: Grounds for comment

A section of this development lies within Leith Harbour and Newhaven Community Council (LHNCC) boundary and it was, therefore, decided to Consult with Committee members and draw up a response and submit on behalf of LHNCC. There were particular concerns relating to design quality and context, housing and community facilities, conservation and daylighting

The proposal is contrary to the following: (Edinburgh City Local Plan (2010); Student Housing, final version (2016); Edinburgh Design Guidelines (2017))

Local Development Plan (2016), 5 Housing and Community Facilities

Policy Hou 2 Housing Mix:

The Council will seek the provision of a mix of house types and sizes where practical, to meet a range of housing needs, including those of families, older people and people with special needs, and having regard to the character of the surrounding area and its accessibility.

223 It is important to achieve a good mix of dwelling types and sizes to avoid the creation of large areas of housing with similar characteristics. This approach supports more socially diverse and inclusive communities by offering a choice of housing and a range of house types to meet the needs of different population groups, from single- person households to larger and growing families.

Policy Hou 8 Student Accommodation

Planning permission will be granted for purpose-built student accommodation where:

a) The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.

235 It is preferable in principle that student needs are met as far as possible in purpose- built and managed schemes rather than the widespread conversion of family

Student Housing Guidance, Finalised Version (February 2016)

The criteria in ECLP Policy Hou 10 and LDP Policy Hou 8 will be applied to proposals for student housing using the locational and design guidance set out below:

b) Outwith criteria a) student housing will generally be supported on sites with less than 0.25ha developable area. Consideration should be given to the cumulative impact of student housing, and other land uses which contribute to a transient population, where these uses will have a detrimental impact on character.

c) Outwith criteria a) and b) sites identified as a high probability of delivering housing within Map 5 taken from the LDP Housing Land Study (June 2014) and sites with greater than 0.25ha developable area must comprise a proportion of housing as part of the proposed development, to balance the mix of land uses and to contribute to housing land need. On these sites the new build residential gross floor area shall represent a minimum of 50% of the total new build housing and student accommodation gross floor area.

Policy Hou 4 Housing Density

The Council will seek an appropriate density of development on each site having regard to:

- a) its characteristics and those of the surrounding area
- b) the need to create an attractive residential environment and safeguard living conditions within the development
- d) the need to encourage and support the provision of local facilities necessary to high quality urban living.

Local Development Plan (2016), 2 Design Principles for New Development

Policy Des 1 Design Quality and Context

Planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a sense of place. Design should be based on an overall design concept that draws upon positive characteristics of the surrounding area. Planning permission will not be granted for poor quality or inappropriate design or for proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance.

151. This policy applies to all new development, including alterations and extensions. The Council expects new development to be of a high standard of design. The Council's policies and guidelines are not to be used as a template for minimum standards.

Policy Des 3 Development Design – Incorporating and Enhancing Existing and Potential Features

Planning permission will be granted for development where it is demonstrated that existing characteristics and features worthy of retention on the site and in the surrounding area, have been identified, incorporated and enhanced through its design.

Policy Des 4 Development Design – Impact on Setting

Planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to:

- a) height and form
- b) scale and proportions, including the spaces between buildings
- c) position of buildings and other features on the site
- d) materials and detailing

Edinburgh Design Guidelines - October 2017

2.10 Daylight, sunlight, privacy and outlook

Design the building form and windows of new development to ensure that the amenity of neighbouring developments is not adversely affected and that future occupiers have reasonable levels of amenity in relation to:

- daylight;
- sunlight; and
- privacy and immediate outlook.

Local Development Plan policies • Des 5 a) - Development Design

Local Development Plan (2016), 3 Caring for the Environment

Policy Env 5 Conservation Areas – Demolition of Buildings

Proposals for the demolition of any building within a conservation area, whether listed or not, will not normally be permitted unless a detailed planning application is approved for a replacement building which enhances or preserves the character of the area or, if acceptable, for the landscaping of the site.

Policy Env 6 Conservation Areas-Development

Development within a conservation area or affecting its setting will be permitted which:

- a) preserves or enhances the special character or appearance of the conservation area and is consistent with the relevant conservation area character appraisal
- c) demonstrates high standards of design and utilises materials appropriate to the historic environment.

Policy Tra 2 Private Car Parking

Planning permission will be granted for development where proposed car parking provision complies with and does not exceed the parking levels set out in Council guidance. Lower provision will be pursued subject to consideration of the following factors:

- d) the availability of existing off-street parking spaces that could adequately cater for the proposed development.

- f) whether complementary measures can be put in place to make it more convenient for residents not to own a car, for example car sharing or pooling arrangements, including access to the city's car club scheme.

Scottish Human Rights Commission: Article 14 Protection from Discrimination and requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

Discrimination: The Human Rights Act makes it illegal to discriminate on a wide range of grounds including 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, **property**, birth or other status'.

Yours sincerely

Jennifer Marlborough (Mrs)
Secretary, LHNCC

cc: Kenneth Bowes, Case Officer