

Dear Ms Ross,

Objection to Planning Application 23/06949/FUL: Erection of purpose built student accommodation (PBSA) with commercial space at ground level, associated amenity space, access, landscaping, and cycle parking at 229 Willowbrae Road, Edinburgh EH8 7ND

After recent discussion of the above proposal by members of Northfield & Willowbrae Community Council (N&W CC), as the next scheduled meeting of the Community Council is due on 16th January 2024 (and as the application was lodged on 5th December with comments due for Boxing Day), while we acknowledged the developers Agent had tried to set up a meeting w/b 11/12 with the community council about the application, but due to the timescale and the Festive period it was not possible to arrange a meeting at short notice; and hence after review of the submission documents it was agreed to **object** to the proposal to build student accommodation at 229 Willowbrae Road, Duddingston.

This is also confirmed by the public meeting about the application organised by Tommy Sheppard MP on 21st December at Northfield Community Centre to which over 50 local residents attended and more indicated they would like to have attended, but it was a workday afternoon. An informal vote at the end of the meeting, after people had raised questions and made points, confirmed that there was no-one in favour of the purpose built student accommodation on this site and that there was unanimous opposition.

Consequently, the Northfield & Willowbrae Community Council consider that the proposal:

- undermines the City of Edinburgh Council (CEC) recently declaring a 'Housing Crisis'. The recent residential approval on this site, along with its contributions towards affordable housing, would help towards alleviating this crisis. Historically, the Northfield area has been developed as good quality, low-density affordable housing.
- raises concern that the introduction of another large number of students would place further strain on local services such as Doctors and Dentists (of which there is a particular dearth of places in local surgeries). This would compound the recent student accommodation at Meadowbank and also the recent decision from the DPEA to uphold the appeal for a similar PBSA development at nearby Jock's Lodge for c200 student spaces.
- site, where planning permission for a similar proposal of student flats, including the adjacent car showroom (17/01565/FUL), was refused in 2017 and we don't believe surrounding conditions or issues have changed much in the intervening 6 years. That earlier application was refused for student flats as it did not meet four LDP policies, although we accept the current proposal is for a smaller site and on a slightly reduced scale.

In addition, the community council feel the proposal does **not** meet a number of Local Development Plan policies:

- **Policy Hou 7: Inappropriate Uses in Residential Areas –**
"Developments, including changes of use, which would have a materially detrimental effect on the living conditions of nearby residents will not be permitted."

This development would have a materially detrimental effect on the living conditions of surrounding residents due to altering the recently approved use of mainstream residential / affordable housing to student accommodation which will lead to increased noise pollution due to the nature of the accommodation and availability of existing resident parking due to demand from the new PBSA users and visitors, some of whom are bound to have cars.

- **Policy Hou 8: Student Accommodation –**

"Planning permission will be granted for purpose-built student accommodation where: b. the proposal will not result in an excessive concentration of student accommodation in any one locality."

Supporting para 236 indicates, *"the Council will take into account the nature of the locality in terms of mix of land use and housing types, the existing and proposed number of students in the locality"*.

The Planning Statement already indicates (Page 6 - table 1) that there are nearly 2,000 students places granted in the surrounding area. Along with the recent Meadowbank PBSA and the approval of the major Jock's Lodge student accommodation referred to above, this proposed development will result in an excessive concentration of students in this part of East Edinburgh. The figures quoted relate to 2011 Census and as over a decade old are out of date and are likely to under represent the current student population in the wider area.

- **Policy DES 1: Design Quality & 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".

Along Willowbrae Road, the predominant character is of buildings of not more than two storeys. Although there are high blocks of flats set back in Northfield to the east, these are very distinct from the area around Willowbrae Road. A PBSA at 4 storeys fronting Willowbrae Road, will be out of context.

The current proposed elevation with a flat facade and a parapet roof is dominant and non-contextual with little visual interest. There are key views of the proposals from a distance from Willowbrae Drive, Northfield Drive and Northfield Broadway that would be good to see to assess the true scale of the proposals within its overall neighbourhood context.

The proposed material palette is not a true reflection of the local built context and surrounding vernacular style. Referencing similar designs elsewhere in Edinburgh demonstrates a lack of place-specific design. There is an opportunity to build upon the existing style of the Northfield area. Incorporating and enhancing existing and potential features. Adaptability into residential use may be more suitable for this area.

- **Policy DES 8: Public Realm & Landscape Design, - criteria "a)**

the design and the materials to be used are appropriate for their intended purpose, to the use and character of the area generally, especially where this has a special interest or importance".

Due to the prominence of the site frontage along the A1 / Willowbrae Road the scheme is deficient in respecting the Broadway street trees design aspect and including any public art (See more detailed comments below).

Finally, there are a number of other specific points that we would wish to raise should CEC consider granting planning permission for this PBSA use on the site:

- **Commercial Unit** - We note that the application contains a commercial unit and the drawing nominally indicates a *'coffee shop'* and the community welcome this replacement unit for the demolished shop and Post Office which were a major loss to the community. While previous proposals have indicated the (Ex-'Barracuda' / now 'Northfield Fry') chip shop could have leased these new premises, it is noted the existing takeaway is outwith the application site. As there is limited retail space in the surrounding area and that which is available is occupied and there are no empty shop units, could the proposed single commercial unit be designed as two units? This may allow for a wider range of commercial or retail businesses to serve the wider local community around Duddingston Crossroads.

There is a reference to 'Drop off' on Drawing '(P)005', but this is the bus lane. Can it be clarified that this is for deliveries to the unit? However, Drawing '(P)004' shows the Drop Off set back from the pavement behind the existing bollards and Post Box which would make manoeuvring very difficult.

- **Roof line** – the proposal has a flat roof, but the surrounding 4/5 storey building all have pitched roofs. While a 'green roof' proposal is to be welcomed, this flat roof does not accord with the current streetscape and in the changing wetter climate a pitched roof would be much better sustainable design than the flat green roof even if it was a false pitch that still allowed the air source heat pumps and Drawing '(P)007' also mentions *'Zone for Photovoltaic Panels'*, but it is unclear whether such panels are actually proposed, or are to be introduced at some later date.
- **Street Trees** – the Northfield Broadway was designed in the 1920's early inter-war period as a wide boulevard with houses set back from the roadway and street trees along the pavement. Many of these are now mature and contribute to the streetscape. The council have been replacing these trees where they can in the wider area and the community council is considering a wider programme of street tree replacement as part of the preparation of their forthcoming Local Place Plan.

Given the development site is at the southern end of the Broadway and opposite the fenced open space with numerous mature trees, the proposed building line should be marginally set back to allow for the planting of a curved row of heavy standard street trees (with metal grilles and metal guards to aid establishment and prevent vandalism), as part of the scheme to enhance the streetscape.

The elevation drawing merely indicates one proposed street tree near the commercial unit. This is insufficient to contribute to the streetscape at a key junction. These new street trees can be located opposite doorways, at breaks in the elevation and not obscure windows. The building set back could also aid the defensible space of lower ground floor bedrooms / Light well area. We note that no landscaping plan has been submitted.

- **Bus Stops** – with the potential increase of large students users at the two bus stops immediately closer to the development at Willowbrae Road (North-bound by Paisley Drive junction & South-bound opposite Tesco) and potentially becoming more over crowded than they currently are at peak times, the pavements are narrow at these two

locations, so they should be widened by the developer at these locations. (There is less of an issue at the other nearby stops on Northfield Broadway).

- **Sustainable Transport Routes** - With regard to 20 Minute Neighbourhoods and encouraging people to spend more of their daily lives within their local area, the justification for proposing student accommodation on this site highlights the need to travel by bus, or by bike to reach universities across the city.

This will increase dependency on existing bus routes and bus stops, specifically at Paisley Drive. The No' 12 Bus Service while linking to Edinburgh University King's Buildings is over 40 minutes away from the site and is an hourly service and does not run after 8pm or on a Sunday so unlikely to assist students. In addition the cycle routes, specifically to Queen Margaret along the A1 are not continuous, are not well maintained and should be reviewed in conjunction with this proposal.

- **Road Junction** - The junction at the south end of Northfield Broadway is particularly wide and has an awkward fork down onto Northfield Drive. While there is currently a traffic island allowing crossing of the wide road, this should be widened to accommodate the safe crossing of any potential increased footfall of residents from this development trying to reach the adjacent bus stops.

Planning conditions should be inserted in any permission to reflect the need for the developer to work with CEC Transportation to redesign this junction to improve pedestrian safety and the adjacent bus stops.

- **Parking** – while the extensive provision of cycle parking is laudable, one disabled parking space within the development site is considered to be insufficient. There is the need for other spaces to cater for visitors, parents, warden / maintenance operatives who visit the site. There is scope to redesign the area around the telecommunication mast and associated 'amenity areas' to incorporate some more parking spaces without impacting on the proposed 'rain garden'.

It is understood that students in similar development at Meadowbank have to sign a disclaimer in their lease that they do not have a car. Although difficult for CEC Planning to enforce this measure, are similar arrangements intended for this PBSA? The parking road space available nearby at the south end of the Broadway is already regularly used by overspill parking from the Northfield Estate and also commercial vans and trucks.

- **Public Art / Blank Gable elevations** – the two gables onto the Enterprise Car Hire and also Northfield Farm Drive are blank and uninspiring. They are broken merely by the corridor windows. This is particular poor as viewed from the A1 / Willowbrae Road entrance to the city from Duddingston crossroads. This has been compounded by the recent American-style, excessively large T-shaped advertising sign for the new Enterprise Depot.

Both elevations would benefit from a planning condition that the developer incorporates public art into the façade of the building. This does not necessarily have to be a mural. They could utilise the local artist at the Arts Workspace at nearby St Margaret's House. The community council would assist in preparing the Design Brief that the developers would commission as there are plenty of local / heritage aspects that could be reflected in any new build on this site.

- **Bin Store** – while we realise these are located away from the main building / bedrooms, behind the adjacent takeaway, is their sufficient space for a bin lorry to manoeuvre and turn within the layout when emptying the bins?

- **Proposed Building Facilities** – we note from the proposals that a small gym is incorporated into the ground floor of the development. Again, while difficult as a planning condition, would there be scope by the operators for allowing local access to use this gym (at a small charge) in addition to the residents?
- **Rear security Fence** – the students may benefit from a (locked) security gate being provided in the north boundary that would allow residents more direct access to the adjacent green space outwith the development or if they wish to become involved in the adjacent allotments, rather than the circuitous route around by the takeaway. The key to any gate could be managed by the warden / maintenance operative.

In conclusion, while Northfield & Willowbrae Community Council recognise that the site is brownfield and requires development and we note the reduction in height and scale of this proposal, the community would much prefer mainstream residential development, with an affordable housing element, on the site that could contribute to the community in the long term, rather than introducing a large, transient student population.

Could you acknowledge receipt of this objection to:

secretary@northfieldandwillowbrae.org.uk

as we understand the closing date is Tuesday 26th December and we await the outcome.

Thank you,
Northfield & Willowbrae Community Council.