

# Northfield and Willowbrae Community Council



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12 December 2016

Dear Sir

PLANNING PERMISSION: 16/05399/FUL

STUDENT ACCOMMODATION AND RETAIL UNITS: 235 WILLOWBRAE ROAD

1. I refer to your letter of 22 November and now write on behalf of the Northfield and Willowbrae Community Council to convey the views of our community on this application for planning permission for development on this site.

Our Consultation

2. The Community Council has only recently formed and has yet to develop the full range of systems for community engagement that it would wish to use and are enjoyed by neighbouring community councils.

3. In order to gauge public reaction, we sought views via Facebook, with a request seen by almost 1700 people with 38 reactions. These reactions were substantially about alternative uses for the site so are not directly relevant to this application.

4. We convened a public meeting, open to all, which was attended by a number of local people – none of whom supported the application. We have received no representations of support. Community council members also consulted within their own neighbour networks and received no representations of support for the application.

5. Therefore, while we would have preferred a stronger community response, the views we have received are consistent in opposing the development.

6. We propose to consider the application under these headings:

- The Willowbrae area
- The site
- The effect on adjacent properties
- Conformity with Local Development Plan Policies

- Parking
- Listed Buildings

### The Willowbrae Area

7. Willowbrae and, indeed, the whole of the community council area, is primarily a residential area of moderate density with a mixed population of retired or elderly people and families. As the application shows, it has very few higher education students and those who are here are likely to be living at home. There is little or no student community nor the facilities that students would expect to find.

8. There are 4 primary schools and a denominational high school, the Portobello High School having recently moved out of the area but its catchment covers much of the area.

9. There are few development sites and those that become available tend to be used for private housing. There is a perceived need for social housing. We suggest that the proposed of student accommodation does not reflect local housing needs; the introduction of a transient student community does not sit with the established character and residential amenity of the locality.

### The Site

10. There have been garages, including filling stations, on this site for many decades reflecting that the road is the A1 trunk road out of Edinburgh and carries substantial traffic at all times. Although the filling station has gone, the traffic has not. The flow past the site is heavy and is made more difficult to negotiate because of the bus lane and imminent traffic lights. It is already hazardous because of cars stopping in the bus lane to make quick purchases at the adjacent shops.

11. The retail units in the proposed development will attract a higher volume of car traffic, given the parking spaces to be provided. The significant flow of traffic leads to concerns about increase in cars turning into and out of the site. In our view, there will be more traffic for the expected retail offering than the limited number of visits to the current specialist retail operations. It is difficult to see what can be done to make this traffic safer.

12. The site is sloped – falling away to the flats of Northfield Grove and the cottages of Duddingston Mill. It has been artificially levelled, presumably to provide underground space for fuel tanks in the days of the filling station. The natural land levels can be appreciated from the way the cottages in Duddingston Mills are well below the current level of the application site.

### Effect on Adjacent Properties

13. The size and bulk of the building is greater than anything nearby. To one side the pubs and shops are two storey, the Northfield Grove flats (some distance behind) are 5 storey but built on much lower ground and do not impact on Willowbrae Road. From behind the building will present as its full 7 storey mass. From Willowbrae Road it will

create a canyon effect. Overall the proposed building is well out of scale with its surroundings.

#### Conformity with Policies

14. The Local Development Plan has a number of policies which need to be considered in relation to the proposed development.

#### Policy Hou 8 Student Accommodation

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

- The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport
- 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 housing. Increasing the amount of purpose-built student accommodation assists the growth of the universities and the attractiveness of the city as a centre for Higher Education. In general such provision can take place at relatively high densities. Open space and car parking provision can be tailored to reflect the nature of the proposed use. However these considerations should not compromise design quality.

236 Developments should be close to the universities and colleges and accessible by public transport. In assessing the degree of concentration of student accommodation, 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. Further advice is provided in Council guidance.

15. It is not clear that there are any higher education establishments which meet the transport requirement, the walking and cycling routes to city centre facilities are not evident nor safe. Paragraph 235 carries the clear intention that purpose-built student accommodation would be in the city centre given its reference to improving “the attractiveness of the city as a centre for Higher Education”. Willowbrae is not in any sense close to universities and colleges.

16. We believe that Policy Hou 8 is not met.

#### 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:

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

154 This policy applies to all new development of one or more buildings. Where the built environment is of high quality and has a settled townscape character, new development proposals will be expected to have similar characteristics to the surrounding buildings and urban grain. Where the surrounding development is fragmented or of poor quality, development proposals should help repair the urban fabric, establish model forms of development and generate coherence and distinctiveness – a sense of place. The siting and design of development should also be guided by views within the wider landscape and an understanding of local landscape character, including important topographical features, e.g. prominent ridges, valleys and patterns of vegetation.

17. It cannot be said that putting a 7 storey modern building within a few metres of single storey buildings which are on the level of proposed building's basement meets any part of this policy.

18. We believe that Policy Des 4 Development Design – Impact on Setting is not met.

#### Parking

19. The 2009 Parking Standards for Development Management suggest that for student accommodation there should be 1 space per 10 beds in Zone 4. The proposed building does not provide this specifically for students – the bulk of the parking is for the use of the retail units. Furthermore, Policy Hou 8 presumes that student accommodation would be in the city centre, where students would be much more likely to walk, cycle or use public transport. For Willowbrae, one of the attractions for students would be using a car – for which there would be almost no parking. The local area is already used as informal “park and ride” making life difficult for residents – adding in students to the mix would be very difficult.

20. Providing 120 cycle spaces is worthy – but the bike is unlikely to be used to anything like that extent.

## Listed Buildings

21. Centred on Duddingston Forge (listed Category B) is a group of buildings including the Duddingston Mill Cottages (listed Category C). The single storey cottages, in particular, will suffer heavily from the presence of a 7 storey neighbour – the context is destroyed. It may be said that the context is already marred by the housing developments in Duddingston Mills but in reality the cottages, which form a single entity can still be appreciated as they were intended. This will be lost entirely when the backdrop is a single slab of building rising to 5 or 6 times their height. This puts their designation at risk.

22. Some adaptation to modern life have been made to the cottages with extensions to the rear. It is difficult to see that the enjoyment of these home can continue with a large commercial development so close. While they are north-facing the light available is important to these rear rooms.

23. Given the slope of the site, there are concerns about drainage into the gardens if the lie of the land is changed. There are also concerns about the effect of construction on the more fragile buildings of Duddingston Mills.

## Mitigations

24. The size and form of the proposed building is so incompatible with the surrounding area and its effect on traffic and road safety so uncertain that is hard to see what could be done to make this application acceptable. However, were the Council minded to give approval, we suggest the following should be included in the conditions applied:

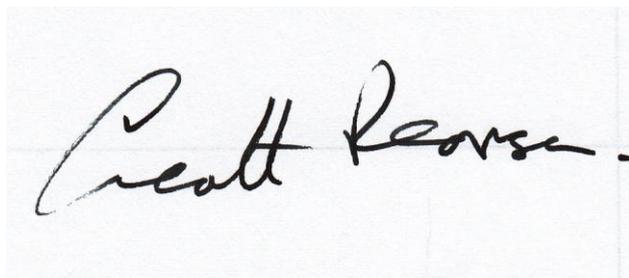
- The height should be reduced to five storeys – visible as only 4 from the road.
- Careful consideration should be given to the boundary with the cottages, averting overlooking. Landscaping may be required.
- The site should be managed to require that students may not reside there and own cars – as has been done in some parts of Gorgie/Dalry
- A Planning Obligation should be imposed to fund a Road Safety Audit and implementation of ensuing recommendations to improve cycle safety and traffic access to and egress from the site. This might involve traffic lights linked to those at the Duddingston Crossroads. Preferred routes for cyclists, to Holyrood Park, Jock's Lodge and Queen Margaret University should be marked and signposted.
- Further study should be undertaken of how the retail space should be managed. While the application has hopes of quality retailers, it is not clear that such businesses would be interested in this location. Fast or hot food outlets should not be permitted.
- During vacations, when the rooms may be let to people other than students there should be no relaxation of the rules applied – so limited numbers of cars allowed and a presumption that access will be by public transport.

## Conclusion

25. We conclude that the Council cannot approve this application as it clearly contravenes the planning policies adopted in the Local Development Plan, intended to apply specifically to this kind of development.

- The location does not meet the guidelines for student accommodation of this type (Policy Hou 8 Student Accommodation).
- The building is alien to the area and takes no account of the existing community and environment (Policy Des 4 Development Design – Impact on Setting)
- The building is damaging to the context of the adjacent listed buildings.

Yours faithfully

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Geoff Pearson".

Geoff Pearson  
Secretary