

## New Town & Broughton Community Council

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From: John Knight  
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Edinburgh EH3 6SE.

Karen Robertson  
City Development,  
Planning and Strategy,  
Waverley Court,  
Edinburgh EH8 8BG.



29 November 2011.

Dear Ms Robertson

**Reference No.11/03374/FUL**  
**Application re: 14-26 Beaverhall Road, Edinburgh**

Thank you for your letter of 9 November granting statutory consultee status to the community council on this application.

The scheme now seeking planning permission by Springfield Properties deviates from that on which the pre-application consultation was undertaken. The most significant change, which we believe we should have been notified about if not consulted upon, is the loop road running through the entire site. This is not good practice in a residential area where traffic speed can put children at risk as well as allowing its potential use as a racetrack.

We are concerned at the suppression of the existing tenement (no.18 Beaverhall Road). The developer seems intent on ignoring it on the over-simplistic basis that it is not on his land, but it is there, fully occupied, and must be 'planned' into the project. The new road layout will bring Block E/D substantially nearer the rear of the tenement with the consequent reduction of amenity through overlooking etc. It also results in the loss of the greater part of the central landscaped area which would have given the whole development a focal area for residents. The applicant's Design and Access Statement calls this a "strongly defined central space". It was in the previous scheme but has now been reduced to a strip. We requested the developer to provide a children's play area in this location but this has not been taken up.

More critically we note that Blocks A and B are now shown on the plans as higher than the previous drawings. On the former (see Annex A) the adjacent wallhead of Block A is shown as a little below that of the tenement, while on the application drawings (Annex B) it is markedly higher with the projecting flat roof bay at the front now higher than the ridge of the tenement! The computer realisation (Annex C) shows the tenement relating well in townscape terms to the new blocks either side, but the effect of the amended drawings will be to push it down between them with further loss of amenity. The Design and Access Statement mentions trying to achieve a "robust 'street' frontage" on Beaverhall Road but this will not be achieved if the tenement is diminished.

...../over

The document states that the adjacent blocks are now higher due to drainage constraints but we suspect that this is more likely due to the increased height of the business units on the ground floor. We asked the developer to enlarge the needlessly narrow gap between the south wall of the tenement and Block A to allow for easier maintenance of both buildings as well as improving an undesirably dark foot passage (now even more forbidding) but this was rejected.

While the removal of the northmost townhouse from the terrace proposed for the gap site in the Powderhall Road crescent (necessitated by the discovery of a storm sewer culvert) will prevent the windows in the existing gable being obscured, we are still of the opinion that a footpath link should be provided here as it will be a natural desire line north-east south-west. The change of level is not excessive and it could become an attractive feature.

Finally, we cannot state too strongly our disappointment at the outturn of events here which illustrate that at present the PAC process seems far more weighted in the interests of the developer.

For our part, we attended the public exhibition of the proposals in Broughton Primary School on 28 July 2011. The applicant's architect presented their scheme to the full community council on 1 August to which we invited residents of No.18 as required by the Concordat we signed with the CEC. A letter to the applicant was sent summarising our comments on 9 August, and a reply received indicating their intention to make little if any change on 6 October.

The amended scheme has in our opinion compromised all this effort. The CEC policy guidelines on Effective Community Engagement on Planning Projects state on page 5:

“For engagement to be meaningful any changes to the development proposals resulting from the engagement should be subject to a further round of consultation. Significant changes may require an additional public event and parties that commented on the original scheme should be re-consulted facilitating the opportunity to say whether they feel earlier concerns have been addressed.”

We believe this should have happened with this application or at least a further round of correspondence undertaken. Despite a disclaimer (“And Lastly”) stating that the “proposed planning application may alter in some way before the final proposal is submitted”, it seems to us quite incorrect to publish letters etc in support or otherwise of a scheme to which such a fundamental change has been made. We therefore formally object to:-

- 1) The revised road layout and consequential resiting of Blocks E/D with loss of central space.
- 2) The very apparent increase in height of Blocks A&B adjacent to the existing tenement.

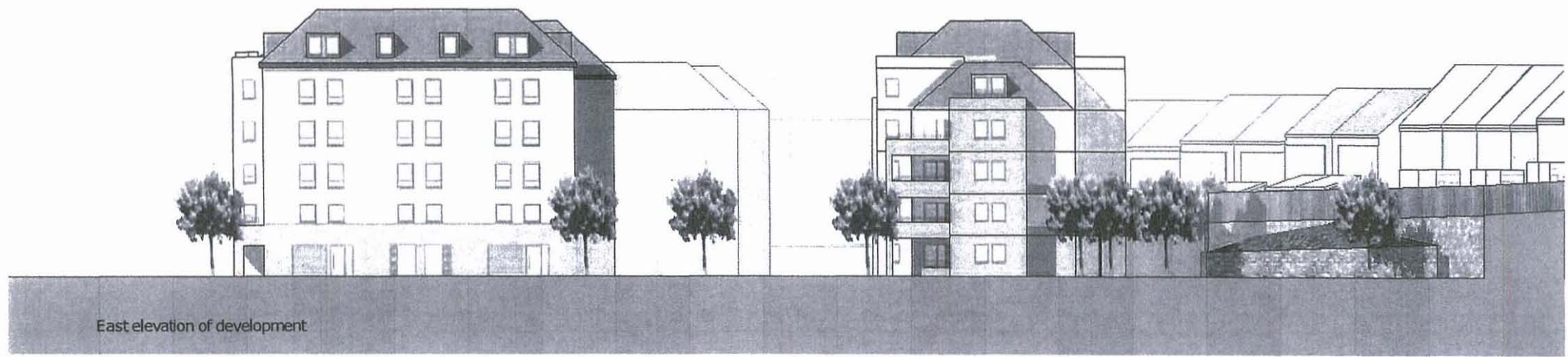
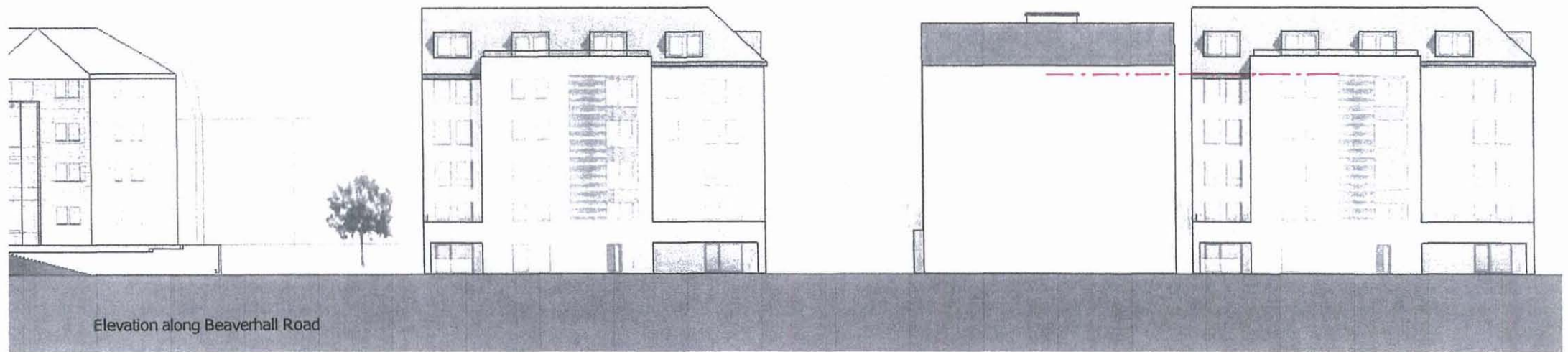
We regard this application as a test case for the efficacy of the new Planning Act.

Yours sincerely

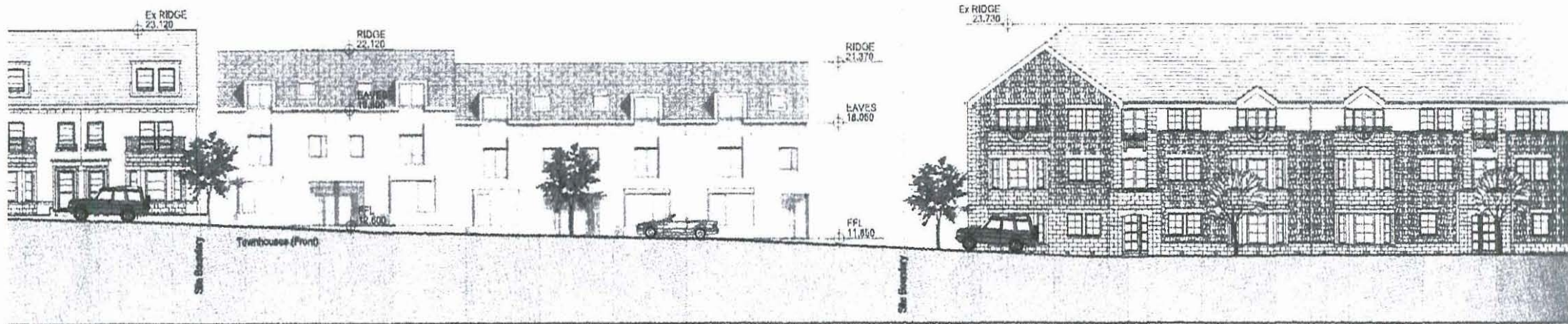
  
John Knight  
Planning Convener

c.c. Jo-Anne Laidlaw, Community Engagement Officer)  
Cockburn Association ) without annexations  
AHSS )

Annex (A) (JUSV scheme)



# Amex (B) (amended scheme)



ion - A



Annex (c)



Street level view from south (juv scheme)