

## Leith Central Community Council

8 Middlefield Edinburgh EH7 4QW

[24/02439/FUL](#)

Erection of extension to student housing and associated works

### OBJECTION to the proposal

We, Leith Central Community Council, strongly object to the proposed extension of the student accommodation block at 8 Middlefield. This development will significantly and unacceptably impact the neighbouring residential properties, particularly concerning daylight and overall outlook.

This application represents a second attempt to extend the accommodation on the same site, albeit under a different address. Previously registered in 2022 as 7 Shrub Place, this change makes it challenging for the public to compare with the previously refused application.

The primary issue with this proposal is its proximity to neighbouring windows, which would profoundly affect the quality of life for nearby residents. The minor reduction in height does not sufficiently mitigate the adverse effects on the neighbouring properties. This impact would be even clearer if the application included a site section through the block at 6-24 Shrubhill Walk.

After thorough review, we object to the planning application for the following reasons:

#### 1. Student Housing Guidance

##### **The application is contrary to the Student Housing Guidance 2016**

- As stated in the original application ([06/05371/FUL](#)), the total site area is 0.44ha, therefore greater than 0.25ha. However, the extension proposal fails to acknowledge this and to comprise a proportion of housing as part of the overall development, to balance the mix of land uses and to contribute to housing land need.
- The extension application would encourage Student Housing applications where applicants can avoid providing a minimum 50% required residential floor area for sites larger than 0.25 ha by conveniently shifting site boundary lines in their applications and by applying for additional student bedrooms at a later stage on the same site.
- The cumulative impact of the extra proposed 20 student bedrooms and the associated land uses would contribute to increasing a transient population with a detrimental impact on the Leith Walk community.

Leith Central Community Council

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## 2. Edinburgh Local Development Plan

### **The application is contrary to the Edinburgh Local Development Plan Policy Des 1 Design Quality and Context**

- The proposal would not create or contribute towards a sense of place.

### **The application is contrary to the Edinburgh Local Development Policy Des 4 Impact on Setting**

- The extension would be approx less than 10m away from windows at 6-24 Shrubhill Walk
- The extension would have a negative impact on the outlook of the neighbouring properties and does not take fully into account Policy Des 4

### **The application is contrary to the Edinburgh Local Development Policy Des 5 Development Design - Amenity**

- The proposal does not demonstrate that the proportion of space between buildings is appropriate and there will be a detrimental impact on the outlook for neighbouring residents.
- Internal Daylight in existing properties:
  - A comprehensive Daylight Analysis to determine the effects upon the daylight amenity of the existing, surrounding buildings which may arise from the proposed development, made by an independent specialist, has not been submitted.
  - Such an analysis should include scope of analysis, assessment criteria, limitations & conclusions.
  - Instead, the applicant has only submitted 2 separate drawings and collated ad hoc unsourced data and tables in the Planning Statement.
  - The Planning Statement indicates that four existing neighbouring windows (10% of the analysed relevant windows) at 6-24 Shrubhill Walk would fail to meet the daylight targets specified in the daylighting assessments. This shortfall would have significant and detrimental consequences for current residents.
  - The proposed development will therefore have an adverse impact on the existing daylighting or sun lighting to the immediate residential properties.
  - **The Planning Statement fails to clarify whether the affected existing flats are single or double aspect.** Instead, it vaguely asserts that “*the occupants do have other rooms they can use where there is no adverse impact.*” This vague assurance is inadequate and unacceptable. Clear, detailed information on the aspect of the flats is essential to accurately assess the potential impact on current residents.

### **The application is contrary to the Edinburgh Local Development Policy Des 6 Sustainable Buildings**

- The application has no Environmental Statement.

### **The application is contrary to the Edinburgh Local Development Policy Hou 10 Student Housing**

- The 20 student bedrooms proposal would further contribute to an excessive concentration of student accommodation around Leith Walk to an extent that it would be detrimental to the balance of the local community.

**The application is contrary to the Edinburgh Local Development Policy Env 20 Open Space in New Development**

- The proposal would be detrimental to the current provision of open space on site at the expense of the community.

**The application is contrary to the Edinburgh Local Development Policy Tra 3 Private Cycle Parking**

- Cycle storage is not integral to the building and has been provided for only 14 bicycles.

**3. National Planning Framework 4 (NPF4)**

**The application is contrary to NPF4 Policy 12 (Zero Waste)**

- Insufficient information has been provided to demonstrate adequate integration of refuse and recycling facilities.

**The application is contrary to NPF4 Policy 21 (Flood Risk and Water Management)**

- Insufficient information has been provided to demonstrate that the site can be drained in a sustainable manner.

**4. Major concerns about the submitted information**

- The level of information provided with the application is extremely concerning as it creates confusion (inc boundaries, daylight impacts) and is well below standards for this scale of proposal and for the city of Edinburgh.
- A comprehensive Daylight And Sunlight Amenity report is missing.
- The site boundary line appears to be incorrect as it fails to include the existing student accommodation being extended by the proposal.
- No site section through 6-24 Shrubhill Walk, where the most significant issues are present, has been provided.
- Top levels indicated on elevations cannot be directly compared with levels used in the Daylight drawings as they are not provided on the drawings. This can leave considerable space for errors.
- No photomontages have been provided to assess the visual impact of the proposal on its close context and nearby residents.
- No existing photos have been provided.
- The proposed site plan + 3D views drawing is extremely confusing due to its abstract nature, random colours and general absence of details.
- The proposed elevations are not loading properly on the Planning Portal, preventing most viewers from being able to comment on them.
- The landscape plan is truncated, which the drawing very difficult to read.