

Grange/Prestonfield Community Council Planning & Development Report – February 2012

Local Developments

There were few applications of wider interest this month. The clutch of applications by BT Open Reach for footway cubicles for fibre-optic broad band communications was approved by the Development Management Sub-Committee.

Cameron Toll Shopping Centre – proposed extensions

The Section 75 Agreement for contributions by the developer to improvements to the 38 bus service was finalised during January, which means that the consent to application 09/01141/FUL can be issued, about a year after the application was approved by the Development Management Sub-Committee.

Royal Edinburgh & Astley Ainslie Hospital Sites

Members of the group of south Edinburgh Community Councils interested in the future of these sites held a further meeting on 23rd January which concentrated on health and welfare issues. A separate meeting of those interested in taking forward planning, access and development issues which may arise from the redevelopment of these sites is to be arranged.

Site at 64 Mayfield Road leased from Scottish Water

The matters raised at the last meeting have been referred to the planning enforcement team and a response is awaited.

Changes to Householder Permitted Development Rights

New permitted development rights for householder development came into force on 6 February, but these do not apply to conservation areas, which in effect have strengthened provisions. The main changes to householder development rights include:-

The principal elevation is to be used to judge when planning permission is needed.

There are separate rules for decking, porches and access ramps.

There are some limited permitted development rights for flats.

More generous permitted rights for extensions.

The concept of a 1m permission “bubble” around the house which means that consent will not be needed for satellite dishes or solar panels in some cases.

There is to be a seminar about these changes commencing at 5.30pm at Waverley Court on 21st February. Anyone wishing to register should email nancy.jamieson@edinburgh.gov.uk or there is a webpage with details of the changes at www.edinburgh.gov.uk/householderdevelopment.

Edinburgh Local Development Plan – Main Issues Report (MIR)

As arranged at the last meeting a group met on 24th January and a response was drafted, with the final version forwarded to the MIR Team by the closing date. This response has been acknowledged and we will be informed when the Proposed Plan is published and how any further representations can be made at that stage. A copy of the GPCC response is attached.

Tony Harris

Edinburgh Local Development Plan – Main Issues Report Response by Grange/Prestonfield Community Council (GPCC)

The numbers below correspond to the 20 Questions set out in the MIR

1. We agree with the Strategic Aims of the LDP. However we would like greater clarity about the periods during which these priorities and aims will apply. The Foreword just refers to guiding the growth of the City for the next five or so years. It is not at all clear from studying the LDP documentation what time horizons apply to which aspects of development and SESplan also has different longer term periods for different aspects of spatial strategy.
2. No views on the options for housing in West Edinburgh
3. We agree with the Preferred Option for housing sites in South East Edinburgh, but both the sites included as Reasonable Alternatives could also be included later in the LDP period if there is a demonstrable housing need, subject to limits to mitigate any adverse impact of housing on visual amenity. None of the sites listed under Other Options should be put forward for housing.
4. Preferred Option supported, that is there should be no proposals for housing on small greenfield sites outwith West and South East Edinburgh. We go further to add that no other greenfield sites in South East Edinburgh, except for those listed under the Preferred Option and Reasonable Alternatives should be identified for housing. (See also 3 above).
5. We agree with the Preferred Option to deal with housing in the built up area, but point out that a substantial proportion of the built up area of the City has Conservation Area status and therefore we would like the LDP specifically to commit to the maintenance of respect for the character of these areas particularly in housing density and infilling. There may also be cases where the traditional built form is of high density which could be maintained in a new development especially if this permitted some green space. The character and context of any new build are therefore crucial.
6. Leith Docks is outside our area and hence our views are offered tentatively, but we find the Reasonable Alternative attractive in view of the recently expressed desire of the owners of Forth Ports and therefore support trying to utilise the north eastern part as a business and industry area, which if successful would help to diversify economic development and provide local employment opportunities. If industries concentrating on the off-shore and renewables sectors are to be successful they will have to be established quickly to take advantage of a fast moving market which may be quite short term and therefore this need not preclude the site being re-used for housing after the plan period. Therefore in view of this possibility we do not think that alternative sites for the long term housing provision thereby displaced need be identified now.
7. Preferred Option supported but we have reservations about the inclusion of Curriemuir End Park for housing. However this is outside our area and therefore local consultation is vital on the future use of these sites.
8. We do not support either the Preferred Option or the Preferred Alternative and we consider that the MIR and supporting documentation have not adequately addressed HMOs. The Monitoring Statement (2.1.8) points out that planning has little influence on the number

and concentration of HMOs but it does not necessarily follow that they should be removed from the planning process. It might be that the planning process should be made more effective in conjunction with licensing and be better aligned to it giving a clear policy steer to the licensing process. We suggest that the LDP Team consults the HMO Working Party, which has been doing valuable work in this area, and then reconsiders its approach to HMOs.

9. In general we support the Preferred Option to developer contributions, but a difficult balance has to be struck so as not to deter developers from investing in Edinburgh's economic growth and housing needs by seeking unsustainable amounts. Visible infrastructure or transport contributions near to a development site are preferred over more generic improvements further away. Once agreed developer contributions must be gathered in as prescribed.

10. We support the Preferred Option for office development.

11. We do not think that the Preferred Option for small business provision will address any failure of the present policy and we point out that a 2Ha site is a Major Development and may not commercially attract to it the type of small business envisaged. We therefore support Reasonable Alternative 2 recognising that this is a difficult policy area in which to be successful.

12. We support the Preferred Option for new retail development, but have concerns about the proposed deletion of a target for the city centre, as we cannot see how this is justified by the supporting documentation and no reasons are presented other than perhaps one of failure if the target is not met. We would still feel that a target, even in a time of reduced retail spending, is valuable in assessing how Edinburgh is performing compared with elsewhere. We agree to retain the existing sequential approach to locations for new retail development, ie city and town centres first and are concerned that in practice this policy has sometimes been breached.

13 & 14. On non-shop uses in Princes Street and other town centres, we support the Preferred Options, but the range of non-retail uses which might be permitted needs to be carefully defined. This could be done through supplementary guidance. We do not express a view on where in Princes Street this change should be permitted.

15. We agree with the Preferred Option to remove from the Green Belt the larger settlements listed and strongly oppose any removal from the Green Belt of those smaller settlements, eg Swanston, listed in the Reasonable Alternative. We have misgivings about government policy on the green belt, but understand that the LDP has to reflect this.

16. We support the Reasonable Alternative because we do want the LDP to identify the proposed green network as part of housing proposals. This is the best hope of actually implementing the green network which we wish to see expanded into the green actions and links identified in the Open Space Strategy which, in being referred to only as a part of Chapter 9 Other Possible Changes, we think has not been sufficiently emphasised in the MIR. (See also 20 below)

17. We support the Preferred Option to encourage a diverse mix of sustainable uses for local centres some of which could face a fragile future. Helping elderly and disabled people to continue living in their own homes may depend on access to local shops and services.

Sustaining local centres supports the Edinburgh Partnership Single Outcome Agreement , which we think should be explicitly referred to in the documentation.

18. On Sustainable Building Design we support the Preferred Option noting the concern about risk of confusion over targets and hope that this can be resolved before the LDP is approved. We fully support measures to reduce carbon dioxide and conserve energy by whatever is the most effective route, planning policy or building standards. A specific requirement for green roofs in the circumstances set out may result in an inappropriate building form for its setting and locality and such a measure will need to be very carefully managed so as to avoid bizarre and costly solutions, although we understand the reasons for the proposal.

19. On waste management we have struggled to understand fully what is meant in the Monitoring Statement and the MIR and feel we do not have the expertise to offer a view on the Preferred Option or Alternatives.

20. On other possible changes referred to in Chapter 9 and Question 20, we wish to emphasise our support for the Open Space Strategy (see 9 above) and how the green actions set out in the Strategy are to be carried forward for implementation in the LDP and others identified as opportunities arise. We wish to see an emphasis on creating “green connectivity” as space making opportunities arise.

Additional Comment on Conservation Areas

We refer in 5 above to the significant proportion of the City (23% of the urban area) which has Conservation Area status and yet how the ECLP policies on conservation areas are working is not addressed in detail in either the Monitoring Statement or the MIR. We have concerns about how some of these policies and related guidance are being interpreted, for instance on parking in front gardens, tree removal, villa areas and although conservation area policies have been upheld on appeal in some cases (as quoted on page 55 of the Monitoring Statement) it is the detailed application of these policies in the assessment of planning applications which concerns us. We ask that conservation area issues be reviewed in detail in the MIR and Monitoring Statement.

These comments and responses have been prepared by the Planning Group of GPCC together with representatives of the Grange Association

Tony Harris
GPCC

21 Mentone Terrace
Edinburgh EH9 2DG

planning@grangeprestonfieldcc.org.uk