

Application Reference: 16/03356/PPP

Address: Former 9 - 21 Salamander Place Edinburgh Proposal: Residential development and commercial development (Class 1 (Retail), Class 2 (Financial, Professional and other services), Class 3 (Food and Drink), Class 4 (Business)), open space including extension to the allotment facility, and all ancillary development.

Case Officer: Bruce Nicolson 16/03356/PPP

From: Leith Links Community Council

Re : 16/03356/ppp

I am writing on behalf of the Leith Links Community Council, representing the views of elected members and local residents. In order to inform and consult with local residents, we have held 2 widely advertised public meetings with the developers (one in June and one in November 2016) at which Teague explained the plans and answered questions from local residents.

Sally Millar

Secretary, Leith Links Community Council

Preamble

We originally welcomed development of this brownfield site, presented as a 'mixed' development, in order to provide housing and new facilities locally. However we now note with regret that the latest plans have changed significantly in that apart from two units designated for possible commercial use, essentially all other proposed 'mixed use' features have disappeared, and only housing and green space remain. Exclusive emphasis on housing means maximum profit for the developers but also maximum impact on the local community. Loss of the 'mixed' element means the loss of new services and facilities that could potentially have enhanced the local community.

We would argue that for two reasons, this application must be considered in a wider context than just on its own terms: (1) because it is so large - and constitutes, in effect a massive 'change of use' (from light industrial to residential) - the effect it will have on the local demographic and on the surrounding area is very large and extends beyond the bounds of 'immediate neighbours'; and (2) albeit now modified and being built very slowly and partially / piece by piece, this application in essence forms part of the original Leith Waterfront Area of Change Development plan (ECLP) and should be considered in that context.

The original plan, of which this would have been a part, considered infrastructure, and made provision for education and leisure facilities, commercial facilities etc. and public spaces for the Leith Waterfront as a whole. However, since that plan fell away, planned provision for such facilities have been lost. Individual applications for planning permission such as this one at **9 - 21 Salamander Place** can clearly not be expected to provide ALL the facilities lost by the loss/ modification of the overall plan - but they should be expected to provide at least

SOME of them, within their application itself (that is, not just through Section 75 Developer Contribution).

The local community (and the public space / common good resources that we rely on for quality of life and seek to protect) deserves assurance that that new housing developments are not exploiting local resources without contributing to them in meaningful ways.

We would like to see commitment from City of Edinburgh Council to explore and address infrastructure concerns and to demand firming up of some of the details of planning for each phase of the site, before granting planning permission.

Having said that, we welcome the fact that the developers have apparently listened to the concerns of local residents and have revised the original plans in line with those concerns, at least in certain respects. We are impressed by the commitment of the developers to provide well-designed and good quality buildings, plus green space, but are not entirely convinced that their proposed overall contribution to the area is adequate.

A number of both general and specific issues continue to cause concern, see below:

Policy-related, Environmental and Infrastructure Concerns

Housing Needs

Policy HOU 2 , HOU 6, HOU 7

There is an urgent need locally for *truly* affordable housing (i.e. for young people, people on low incomes, and for essential workers who need to live locally, e.g. Health, Social Care workers, Police etc.). That means (ideally) building social housing or at the very least for accommodation to be made available (and ring-fenced!) for affordable long term rent, through a housing association or similar arrangement. Although it meets minimum standards (25%), the proportion of so-called 'affordable housing' proposed for this site is insufficient to meet local housing needs. By including the Scottish Housing Trust flats already built as part of the overall affordable housing, the proposed new affordable housing to be added is actually very small indeed (50 units). **We would like to see this reviewed, and increased substantially.**

Furthermore, the developers admit (word of mouth, public meeting 14.11.16) that they have not yet finally decided where or how in the overall site design, the additional affordable housing is to be. That appears to indicate that affordable housing is a low priority 'afterthought' for the developers and risks being either 'negotiated out' in future, or else perhaps 'shoe-horned' in wherever in the site seems least profitable to the developers and/or left to the very end of the development.

That is not acceptable. We would like to see plans that show exactly what and where the additional affordable housing is to be, and hopefully that some is incorporated into each phase of the site development, so that it can be made available at the same time as other properties , not left to the very end.

Air Quality

Small Particle Pollution

Salamander Street is already designated as the very TOP of the list of the most dangerously polluted / polluting streets in Scotland (not just Edinburgh)¹.

In 2015, in terms of the concentration of small particles (PM₁₀) it scores 23, thus failing the Scottish air quality objective (18 (µg/m³)). (The Air Quality (Scotland) Amendment Regulations 2002 required this objective to have been met by 2010 – it hasn't been.)

Fine particulate matter is amongst the most dangerous of all pollution, affecting in particular young and old people and those who are vulnerable because of respiratory conditions such as asthma.

In the past the immediate surroundings have traditionally been more industrial rather than residential. However this new development changes all that by introducing a large new residential population very close by. What plans do the Council have to address this? Has Salamander Street been designated an "air quality management area" (PM₁₀ AQMA) yet? If not, when will this happen?²

An investigation by Greener Leith, based on a Freedom of Information Request in 2014³ revealed a lack of conclusive evidence about the specific cause(s) of the high level of fine particulate pollution. Activities in Leith Docks have been implicated (amongst other possible sources) and the responsibility of SEPA highlighted.

Greenhouse Gases

Adding journeys by 750 - 1,000 more cars from the new development to the daily traffic around Salamander Street will make air quality significantly worse. SEPA states an expectation that the new site will add greenhouse gases pollution including CO (Carbon Monoxide) and NO₂ (Nitrogen Dioxide) caused by increased numbers of car journeys due to the distance of the development from local amenities⁴.

Charging points for electric vehicles will do little to offset this, in real terms. Built-in renewable energy generation (e.g. from solar panels) would be more effective.

In short, there are already serious air quality concerns here, which the Council and SEPA need to address, if planning permission is to be granted.

¹ <http://www.foe-scotland.org.uk/most-polluted-streets-2015>

² Section 3:16-3:25

[file:///C:/Documents%20and%20Settings/Sally%20M/My%20Documents/Downloads/Item 7.10 Improving Air Quality in Edinburgh FINAL.pdf](file:///C:/Documents%20and%20Settings/Sally%20M/My%20Documents/Downloads/Item%207.10%20Improving%20Air%20Quality%20in%20Edinburgh%20FINAL.pdf)

³ <http://greenerleith.org.uk/blog/air-pollution-salamander-street-3851>

⁴ "We note that the development is located some distance from local amenities, therefore there is likely to be an increase in the number of journeys made by car. Whilst this figure may appear to be insignificant, when considered alongside other developments across Scotland, the cumulative increase in the distance travelled by car – and subsequent emissions of carbon dioxide – could undermine the Scottish Government's commitment to reduce emissions of greenhouse gases." SEPA, Ref: PCS/147956 17.8.16

Transport, Access, Road Safety and Traffic Congestion

TRA 1, Tra 2, Tra 3, Tra 4

We are relieved that there is now no vehicular access to the new development site via Links Gardens, protecting the safety of school pupils.

We are pleased to see good pedestrian and cycle access to the site, and linking with the cycle path along Leith Links.

We appreciate the efforts made by the developers to create a design of new roads though the site that hopefully should discourage 'rat-run' behaviour by motorists.

However, main access to the new development via Salamander Place will massively increase traffic in that street, which is already a busy thoroughfare used not only by local residents but by lorry traffic to and from Leith Docks.

We foresee the need to address road surfacing, road safety, and traffic congestion issues particularly on Salamander Place (although quite possibly also elsewhere around the outside of the site). This should not be left for years until the end of the development of the site, forward planning is needed.

The Links Place end of Salamander Place is particularly problematic, especially for larger vehicles turning out into Links Place/ Gardens, a narrow, car-lined street further blocked by street-narrowing 'chicanes', and other traffic calming measures. School children need to cross at the Links Gardens corner. There is a large amount of illegal parking at times (school run) and the No. 12 bus runs along here. Additionally, the cycle path crosses the road here. Adding in a significant amount of extra road traffic right here is could be dangerous. Traffic lights and pedestrian/cycle crossings may need to be considered here. It might be necessary to look at making Salamander Place one-way (north only).

In addition to concerns about Salamander Place, there is a worry about overall traffic congestion locally. This is likely to affect Salamander Street, of course, but also, as residents try to find easier routes - Links Place, Links Gardens, Restalrig Road (already horribly congested), Queen Charlotte Street, Constitution Street, Claremont Park, Gladstone Place, East Hermitage Place, Hermitage Place.

Road Surface, Salamander Place

The road surface in Salamander Place currently is in poor condition and no doubt it will be much worse by the time construction lorries have been going in and out. This needs to be fixed - a City of Edinburgh Council responsibility, not the developer's responsibility, we recognize. **Salamander Place is cobbled and should be repaired to enhance the entrance to this new development.**

Buses

The developers claim that local public transport links are very good, and that 'you can walk in 5 minutes' from the bottom of Leith Walk or Easter Road (for main bus routes) into the development. But actually, it's a 20 -30 minutes walk for most people.

- Older or disabled people cannot easily make that trip on foot, especially if carrying shopping etc.
- Parents may not feel it is safe for their children to be crossing the Links on foot alone in the dark.

Apart from the No. 12 which goes along Links Place / Links Gardens in one direction and along Claremont Park in the other direction (and the 12 is pretty few and far between except at peak times), there is no current bus route serving the new development site directly. Simply re-routing the 12 along Salamander Street will not work as that would leave the whole east end of the Links and all its hinterland (Pirniefield, Prospectbank, Claremont etc.) without any bus service. **It is therefore very likely that new steps will have to be taken to enhance public transport provision to the new site. Developer contribution in respect of transport will be needed to go into bus services to serve the new development from Phase 1 (i.e. not into future tram works, see below). An increase in the frequency of Bus 12 at Links Gardens will be required for an increased demand on the service by new residents from the development. This would encourage them to use our public transport rather than using their own cars.**

Tram

It is not acceptable that contributions for transport from the developer all go to Tram works, since (a) the tram is not currently available in Leith and won't be for many years, and (b) there are other more pressing and immediate enhancements needed to roads and transport near the site, i.e. (see above)

Policy TRA 4, Tra 5

Car Parking

We like the design that puts private parking spaces out of sight under a raised garden deck, although this may raise some security issues.

We have examined the proposed car parking for the new development. If we have understood correctly, in total this amounts to 530 spaces (273 private spaces, 253 spaces (on-street,) and 6 allotment spaces. Extraordinarily, this seems to be a reduction on the original number of car parking places planned. While this number may meet minimum Council standards (?) we are of the view that this overall number of spaces is inadequate for the number of new homes (635 plus the existing 145 flats at Sailmaker Road). Some owners will not own cars, of course, but realistically many / most will – and many may own two or even three cars. We are potentially looking at around 1,000 cars altogether once the complete site is developed.

Where will the parking overflow go? Salamander Street is not a possibility. Obviously, residents will park their cars onstreet in the nearest streets, i.e. Salamander Place, Links Place, Links Gardens, Claremont Park, Claremont Road, Gladstone Place, Restalrig Road, East Hermitage Place, Hermitage Place. **This is not acceptable to local residents.**

The developers are keen to stress that this is a top class development and the new residents in the new development will not want to look out on car parks. Indeed. But the existing local residents do not want to look out on their own streets and car parking spaces occupied by overflow parking from the new development!

We recommend therefore that the developers think again and increase the number of parking spaces within the development, i.e. exceeding the minimum parking standards Alternatively - and perhaps preferably - the developers and/or the Council could look into purchase of some extra land between the development and Salamander Street, in which to locate an additional car park.

We are in favour of the proposed spaces for electric car charging and maybe City Car Club, integrated within the development. However, these facilities reduce the space available for private car parking, hence the need to take steps to counter-act by providing more car-parking elsewhere in the development.

The City Car Club should not be given parking rights within the development unless the developers are prepared to enter into planning agreements to create a 'car reduced' housing scheme, and to provide inducements or penalties to ensure residents do not keep a car within the scheme **or its vicinity.**⁵

Rather than City Car Club taking up valuable spaces within the development, perhaps those spaces could be used for residents car parking, while the City Car Club uses spaces alongside the Links at the east end of Claremont Park , where other local residents might also benefit.

Cycle Parking

As well as spaces for cycle and motor bike parking, we recommend that the latest in secure bike storage and motor bike parking should be integrated into the development, given the high rate of bicycle and motor bike theft.

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Education provision

Planning requirements highlight the need for applicants to address the impact of new development on the school estate (Policy Com 2 School Provision). However, this application and supporting documentation so far shows no evidence of this. The developers appear to take the position that this is entirely the Council's responsibility, while they will be paying for it through the Section 75 Developers Contribution. (However there has been a suggestion that the developer is challenging the level of their contribution on the basis of development viability – is this true? These matters should be made public. An Education Impact Assessment should be produced by the Applicant. A development viability assessment should be made available from the District Assessor, if necessary.)

The Edinburgh Urban Design Panel report (Section 2: Connectivity and Movement) makes it clear that a study by the Council is needed to ascertain that the nearby school can accommodate an increase in numbers, or whether some children would have to go to other schools – which might affect the site design 'with respect to both movement and connectivity'. Has this been carried out? We would expect to have sight of this study.

⁵ Cf. model scheme at Slateford Green Housing

This is a matter of grave concern. The Primary schools in Leith are already under severe pressure of numbers. Just 'squeezing in' more children is not an acceptable option. There needs to be clear evidence that there is currently capacity - or a commitment to invest in building capacity - so that increased numbers would not impact negatively on the high quality education currently on offer from St. Mary's and other local schools.

It is far from clear that this can be done.

The nearest school to the proposed new development, St. Mary's, is so full that it is currently building urgently needed new classrooms – but they have no new additional Assembly Hall / PE / gym hall /dining room space that is needed, alongside classrooms, to meet the curricular and social needs of the expanded roll of children. They have lost playground space to the additional classrooms. And even if they had the money, they have no room to build any more extensions, in future.

The next nearest school, Leith Primary, has also seen its roll increase significantly. 10 years ago it had 190 children in 10 classes and now it has 430 children in 15 classes. Since 2015 they have NO access to Assembly/Gym / free space (until 2018) due to the Duncan Place demolition. The school as a whole has no disability access and cannot accept pupils with mobility problems. Their Victorian building is in disrepair and urgently requires further massive investment. They have an attic floor that is currently unusable, but which has the potential to be brought back into use.

Hermitage Park School currently has a Waiting List for entry to the school Nursery and to P1 (although there are spaces in older classes, due to larger class size limits).

As all these bulging Primary classes move on to Secondary education, pressure may become evident at Leith Academy.

We think that the pressure on education provision in our area is a serious situation that requires vision and advance planning – not just the developer throwing money at it, and the Council shuffling together some last minute 'fixes' to the already overburdened local schools.

We would like to see roll projections that include the new 635 homes to be built here, and for these to be made transparent and public.

Could the new development be required to contain public space for a new Nursery School, for example?

Or an outdoor classroom? A Community Hall / gym that would allow for PE instruction in line with Scottish Government guidelines (both of these to be used buy others, outside school hours)?

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Open Space

Policy ENV 10 , Policy HOU 10, Policy ENV 20, Policy Des 5

We welcome the provision of open and green space, as proposed, for this development, for communal use. The 'pocket park' should be good place to facilitate interaction between existing park users and residents of the new development, so that the new development is not a 'segregated' scheme. Therefore open access is encouraged.

However, there are real security issues also to be taken into account here. Nearby streets, the Links themselves, the Links Bowling green area and the Crops in Pots sites are plagued by misuse, and by detritus, by street drinkers, drug users and the street sex trade. Police Scotland will need to advise and monitor development to minimise possible abuse of the new green space area. Good lighting will be very important.

There are also the eternal litter and 'dog poo' issues (– will this park be dog friendly or dog free?) Suitable public waste disposal points must be provided within the pocket park area, and throughout the public realm, so that users do not rely merely on household waste disposal, or on the existing (poor) waste bins on Leith Links.

Sense of Place and Placemaking

We welcome that fact that the developers are apparently committed to retaining the Golf Memorial and may also consider other tangible links to the history of the site e.g. a 'Dig For Victory' memorial of some kind.

Whyte and Mackay, who owned the original bottling plant and axed 220 local jobs in 2003 might be prevailed upon to fund a 'Heritage' interpretation board or somesuch.

There has also been mention of 'public art'. This might be nice, but ideally as part of a community-led exercise.

How can a 'community' be formed in this place? Merely building houses does not create a community. Placemaking⁶ efforts need to be made to ensure that the new development involves both existing (nearby) and new residents in designing and using the new spaces in ways that meet peoples needs and that, ideally, can inspire them. It might be simple things like curved benches in pairs, that facilitate face to face conversations. It might be outdoor exercise equipment. It might be a communal barbecue pit. etc.

There is an urgent need to good quality children's play equipment (as Leith Links facilities have not been upgraded for many years). The developer should be encouraged to provide play equipment in the green space areas shown on the plans.

We would like to see the developers set aside funds to consult on this and to support residents-led ideas and initiatives.

Landscaping

The developers intend to use a landscaping company. We suggest that this company be made aware of the idea of community-led placemaking, so that they have a sensitive approach rather than just imposing some 'formula' to create a bland and impersonal 'background wallpaper' sort of park/ space.

Allotments

⁶ http://www.pps.org/reference/what_is_placemaking/

We welcome the rerouting of access paths, the retention of the wall, and, overall, the collaboration with allotment holders to maximise benefit for all around the allotments.

Trees

There are some mature trees and fruit trees within the site. We would like to see as many as possible of these retained. We would like to seek assurances that for every one that is chopped down, at least one new tree - preferably more - will be planted nearby.

As part of placemaking (see above), planting of apple and pear trees, raspberry canes etc. might be considered, for communal enjoyment.

Need for Community Facilities

Policy HOU 10 , Policy RET2

Having originally planned quite a mixture of housing and commercial/business units, the developers are now proposing only two ground floor units for retail / commercial use. They seem to be pessimistic about the chances of letting these profitably but apparently intend to leave these in the hands of a letting agent and to let market forces determine their ultimate use.

We think this is not good enough, and we would like to see these premises 'ring-fenced' for services that will benefit the local community. Could the NHS be contacted by the developer for a new doctor surgery which would be desperately needed considering the possibility of 2000 new residents in the area.

HealthCare Facilities

Healthcare, specifically GP services, are urgently needed in this local community, with its rapidly expanding population, as other local doctors have closed their patient lists due to lack of capacity. Lack of premises is not the only barrier to provision of GP services; difficulty recruiting GPs is another major issue. We suggest that there is scope here for thinking 'outside the box' – for the developer to proactively procure a tenant from the Health sector by offering inducements such as housing in the development on attractive terms to younger doctors with GP qualifications, in exchange for a commitment to work in the area

Shop

Such a large housing development will also definitely need a convenience store as otherwise the nearest shop would be the tiny corner shop on Links Place or the Shell garage shop at Seafield (necessitates crossing busy trunk road). (There was to be a COOP on Queen Charlotte Street (planning permission granted 2014) but there is as yet no sign of that shop coming into being.) If a shop is not provided within easy walking distance, people will simply jump into their cars and drive along to Tesco!

Community Space

Apart from the Duncan Place Resource Centre (currently out of commission), the Leith Links area has no public space for community events. People need to have somewhere that they can get together and a focus for social activities. Rather than having a boarded up vacant

commercial unit, a Community Room would be very welcome, available for – say – playgroup sessions, meetings, coffee mornings, information leaflets and notice board etc.

Creative Industries

An attendee at a Leith Links Community Council meeting pointed out that a majority of the capital's 'creatives' live and work in Leith, and that there is currently a shortage of suitable premises, preventing expansion of this industry locally. We suggest that the developers proactively contact this group of professionals to see if there might be possibilities there for uptake of the units.

Leith Conservation Area

The site borders the Leith Conservation area although does not fall within it. We would like to be reassured that the developers and the Council together respect the Conservation Area in terms of street furniture, lighting, signage, etc. so that there is a transition that harmonises with both styles, rather than a sharp contrast between the 'old' and the 'new' areas.

We will be anxious to check details of the planning application, as these emerge, to monitor the developers' commitment to traditional materials (eg. setts or paving rather than tarmac).

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Further Points

Policy Des 6

Flooding Risk

We were concerned to learn that the site is susceptible to flooding and that the design of the public realm in the proposed development may have to change in the light of this. We note that self-certification and an updated Flood Risk Assessment have been carried out and that SEPA are unconcerned. However, full details of any measures needed to mitigate flooding and changes to the design of the public realm should be fully explored and published before planning permission is granted.

Building Heights

Residents of Links Gardens in particular have expressed concern about the flats in Phase 1 still being higher (even after amendments) than the existing Victorian and Georgian buildings. We note however that they are far enough away not to 'overlook' existing residents, and that they are north of existing buildings so should not block light unduly. Reducing the height of the buildings at Phase 1 block B within the Leith Conservation area would retain the view of the row of Georgian housing at Leith Gardens from the Links.

Waste Disposal and Recycling

The developers so not have much to say about this except that they will conform to Council standards and that shared / communal rubbish and recycling collection points will be

appropriately camouflaged to keep the development attractive. We would like to hear more about this as details develop for each phase of the development. Unattractive and inefficient rubbish disposal and recycling facilities are endemic across Edinburgh. A new development is a good chance to come up with better designed facilities. Leith is committed to fighting litter!