

# New Town & Broughton Community Council

From : Richard Price – NTBCC Planning Convenor

9<sup>th</sup> February 2015

David Givan,  
Planning & Building Standards,  
City of Edinburgh Council,  
Waverley Court,  
Edinburgh EH8 8BG

Dear Mr. Givan,

**Reference Application No. 14/05263/AMC**

**Approval of matters specified in condition 23 (i), (iii), (vii), (ix), (x), (xi), (xvi) and (xvii) of Planning Permission 08/03361/OUT relating to number of residential/commercial/business units, design of external features and materials, pedestrian and cycle access arrangements, treatment to adopted roads or footways, car parking venting, servicing, surface water and drainage, and hard and soft landscaping details St James Centre Edinburgh EH1 3S**

Representation on behalf of the New Town & Broughton Community Council.

NTBCC attended the public consultation event on 27<sup>th</sup> October for the Edinburgh St James master plan at the Glasshouse in Greenside Row. We have also had the opportunity to meet with the developer's team and discuss various aspects of the proposals in more detail.

NTBCC has studied this application in detail and were invited to the Cockburn Association Case Studies panel which provided further insight. We are generally supportive of the redevelopment of this site which will see the removal of an uninspiring 1970's structure which, whilst seen as being somewhat functional from a community standpoint, does not provide any architectural statement, is unsympathetic to its surroundings and does not contribute to the Edinburgh landscape in any shape or form.

The introduction of a crescent gallery design linking Multrees Walk to Waterloo Place is welcome as is the new emphasis given to the approach from Little King Street, although we believe that this could be further improved as discussed later. We are also encouraged by the expressed desire to potentially develop improved connectivity from Register Place.

More specifically, NTBCC have the following comments :

- 1) NTBCC are supportive of stated aspirations to improve and develop Leith Street into a more vibrant space although we are aware that there are several design constraints which could prevent this being wholly successful. The proposed design improvement of narrowing Leith Street by reinstating something resembling its original building line and removing the pedestrian barriers and traffic island down the centre of the street are also welcomed. We do not take exception to the removal of the pedestrian bridge to/from the Greenside car park which should encourage (or more correctly relocate) more pedestrians to street level thereby contributing in part to an increased vitality at street level, although we believe that further steps could be taken to further improve in this regard.

However, NTBCC have some concerns over the volume of vehicular traffic predicted to either access or egress the new development from Leith Street. This is due to the high number of parking spaces (~1750 – 1800 planned vs. 600 currently) planned for the new development (although we realise that this has been already consented under 08/03361/OUT ), coupled with the predicted proportion of traffic that will exit (~65%) and access the St James development (~35%) from Leith Street. It is also unclear as to traffic management to the development for vehicles entering Leith Street from Leith Walk and whether access to the St James development is permitted. This increased traffic in Leith Street seems contrary to the desire to improve the Leith Street streetscape and amenity for pedestrians. There is also a concern, perhaps outwith this application, on the impact of these increased traffic volumes on the traffic flows around Picardy Place. We would encourage the developer, in conjunction with City of Edinburgh Council to further model these impacts and ensure that they are available in the public domain for consideration by key stakeholders. We believe that there should be some form of restriction on the volume of traffic permitted to access/exit the development from Leith Street.

However, we would also support from a pragmatic standpoint, the through route for service deliveries from Queen Street/York Place through the St James development and exiting on Leith Street. The practicalities of attempting to route these exclusively via Elder Street for both access and egress would impose an undue constraint. We would however, expect the exit onto Leith Street to be a “left turn only”. This clearly would necessitate an exit from the parking facilities from Leith Street to permit this.

- 2) Proposed Leith Street improvements : we welcome as stated previously the desire to create an active frontage on Leith Street. This street, although an important north/south traffic connection from Edinburgh city centre and the New Town to the south side, it should have significance in its own right.

We understand that, as the subject of a separate application, there will be additional store access/ accesses from Leith Street to the current John Lewis store which will in part encourage shoppers to traverse at least the lower stretches of Leith Street.

However, it is disappointing that in a major redevelopment project that more is not being done to address the lack of active frontages facing onto neighbouring streets. Although there are additional small retail units fronting Leith Street, we believe that more could be done to re-instate more retail units on Leith Street.

The existing arrangement at Leith Street is completely ‘dead’ and exacerbated by the gaping vehicular entrances for trucks and cars which broadly remain unchanged in the new proposals. There is potential blight to existing businesses and improvements needs to be made to create increased footfall on the street, and act as another connector to the Omni cinema complex and shops. By creating more active uses, pedestrian activity would increase – consistent with the objective of increasing the street vitality.

- 3) NTBCC’s final concern concerning traffic management is the proposal, as we understand it, for vehicular access/egress for the residential units (~175), to be through exclusive use of Little King Street from Leith Street.

We support the public realm improvements planned for Little King Street and believe that once the plan for relocation of the York Place tram stop to Picardy Place is completed, this route will become a major access point for pedestrian flows to the new development. This key pedestrian link is being strengthened by shop frontage improvements, as we understand it, on the current John Lewis store as well as various food and drink developments nearby, including St Andrews House. It therefore seems to NTBCC that allowing routine vehicular traffic through this route solely for the perceived convenience of the residents and perhaps as an added selling point for the residential units is inconsistent with primary use of this street.

We understand that this proposal is consistent with current thinking regarding “shared” spaces but give such an important pedestrian route which should become busier in the future, that this route should be fully pedestrianised.

- 4) Regarding the number of residential / commercial / business units under Condition 23 (i), we were disappointed to note no Class 2 or Class 4 units are now included. The quantum would appear to have changed from that put forward last year in application 14/02070/AMC. NTBCC notes that office uses have been dropped entirely from the scheme yet this would seem to be a convenient and accessible location and other nearby developments have indicated a strong demand for premium office space in the city centre. Offices especially those falling under Class 2 use could be seen as beneficial to this development as the principal users would be members of the public. This would contribute more significantly to the expected vibrancy of the area through increased footfall and more importantly, would also be more consistent with City of Edinburgh Council’s planning policies for the city centre which seek to create a diverse, thriving welcoming and successful place. We understood from initial consultations at the outline stage that offices were significant in terms of the economic justification for the redevelopment, not least in terms of permanent job creation.
- 5) Secondly, regarding proposed Class uses, a large amount of retail use is proposed against the backdrop of declining High Streets generally and the concern over the impact of this development on the current premium shopping areas e.g. George Street. NTBCC would therefore encourage the developers to consider future adaptability, as highlighted by the Cockburn Association in their representation. It would seem beneficial to both the City of Edinburgh and the key commercial stakeholders that, during the design stage, “different permutations of users have been considered and that, on the valid planning grounds of sustainability the new quarter is future-proof.” “The issue is not about whether the present consultants have assessed the market correctly in what they propose to build now, but how the building as built can cope with the situation if they have not, or if circumstances change. We also note that a significant increase in retail floor space is proposed. Whilst this could boost Edinburgh’s retail offering in line with City of Edinburgh’s vision ; if demand continues to decline as witnessed elsewhere across the UK, it could displace shopping from existing locations due to a competitive “race to the bottom” and cause decline elsewhere, particularly if the mall owner offers incentives. Therefore some degree of future-proofing in the design at this stage would seem both necessary and appropriate if demand does not materialise to allow full occupancy of all four floors of retail. One possible future-proofing option would be a contingency plan to allow perhaps the top level (where footfall may be challenged) to be converted to offices, for example. NTBCC therefore support the Cockburn Association’s position regarding “a strategy in the quantum of development that sees an element of office use retained in the mix of uses until it has been trialled that no demand ..... exists”.
- 6) NTBCC are supportive of maximising future connections between the new St James Square and West Register Square. Although this was included in NTBCC’s representation on the 27 – 31 James Craig Walk (14/05147/FUL), we reiterate our strong desire for these associated developments to be planned holistically. We believe that ensuring maximum connectivity and permeability is vital to ensure this. We would strongly suggest that CEC Planning Department urge the interested parties to liaise appropriately to ensure that this is achieved.
- 7) NTBCC note that this is a significant development and the planned timeline coincides, wholly or in part, with several other large developments within the city centre. In addition, there are incomplete plans regarding the Picardy Place junction improvements, the extension of the tram towards either the foot of Leith Walk or further to Granton and finally, the current Leith Walk public realm improvements. Whilst the developer has outlined initial considerations to manage the significant disruption that this development may cause, NTBCC has concerns that the local infrastructure will be severely compromised by the sheer tonnage of materials that need to be removed from the development site, and to a lesser extent, the volume of materials that would need to be transported from Leith Docks for the construction. From initial discussions with the development team, they indicate that until the contracts for demolition and construction are

placed, it may be premature to develop these plans further. NTBCC would urge City of Edinburgh Planning department to ensure that this impact to the local community is minimised and also more generally on Edinburgh residents through appropriate conditions to ensure detailed review of the demolition and construction plans are required prior to granting full consent. This would include any lessons learned from the extended tramworks disruption that was inflicted on Edinburgh residents.

- 8) We share the concern raised by the Cockburn Association concerning the phased construction of this project and the concern that the commercial viability may be impacted through cost overruns in the initial phases or a change in the economic cycle, especially as the benefits of the development mostly accrue at completion. We would encourage an outline approach for phasing to be developed to address the risks to both to the city of Edinburgh and its residents.
- 9) Regarding Condition 23, item (iii), covering “The design of all external features and glazing specifications (including acoustic capabilities), all external materials and finishes, including their colour”; whilst we would defer to higher architectural bodies on the choice of limestone vs. sandstone for the specified primary facades, we do have concerns over the use of concrete panels for the secondary facades which includes the majority if not all of the higher elevations. There are numerous examples in Edinburgh and in other cities of pre-fabricated concrete panels clad in an appropriate natural stone being used – we would therefore question the proposal for the use of concrete panels for these facades.

We hope that you find our comments useful in considering the details of this application.

Yours faithfully

Richard Price on behalf of NTBCC Planning Committee