

## **Leith Central Community Council, Leith Links Community Council and Greener Leith**

Joint Response to:  
Outline Planning Application 0/04/232/OUT for Edinburgh Harbour

### **1 The name 'Edinburgh Harbour'**

There is very strong local resistance towards the current name of the development as it is perceived to ignore the distinction between Leith and Edinburgh as well as the long historical connections that Leith has to its maritime past. It was felt that this re-branding would sweep away identity, alienate locals, and do little to foster any future sense of place. Forth Ports claim to share local residents desire to 'put Leith on the map.' It is difficult to see how this will be achieved without a name which includes the word 'Leith.'

### **2 Misleading use of the word 'Village'.**

If the Planning and Design Statement sets out the design principals and the designed concept of the proposal (quoting from Planning Advice notice no 68), We consider the word 'village' misleading in the context of a densely populated area with high rise buildings, plazas and business quarters and we would ask for it to be removed from the proposal. According to the Oxford English Dictionary a village is a small group of dwellings in a rural area, usually ranking in size between a hamlet and a town. A village has a church, but no market.

### **3 Misleading Images used in the Planning and Design Statement**

Almost all the images in the document, which are meant to be an illustration of what the development will look like in time, are of places with much milder climates than that of Leith Docks. They portray a summer holiday atmosphere with people sitting out on terraces. There appears to be no traffic other than the odd tram or bicycle. We would like a more realistic portrayal of the development, in particular where it concerns the consequences of our Northern European climate and the projected traffic flows along key thoroughfares.

### **4 Marina and Active Use of Water**

We note that the illustrated marina for small boats in the proposal is 'an aspiration' based on whether Forth Ports can secure sufficient funding to modify the current lock that spans the mouth of the docks.

Whilst we wholly support active uses of the water, and would strongly support the necessary modifications to the new lock to facilitate this, we feel it is misleading to suggest that this development proposal will bring active uses to the waterfront itself when it will not.

## **5 A Zero Carbon Development?**

Forth Ports have been tasked through the Leith Docks Master planning process to ensure that their development is as close to carbon neutral as possible. It is our understanding that without implementing some form of district heating/cooling system the energy efficiency (and thus the carbon footprint) of the development as a whole will be much poorer.

Although there are sites earmarked for a CHP (Combined Heat and Power) plant in the plans, we understand that this will not be built prior to the rest of the buildings. If individual buildings are built without a means of connecting them to a pre-planned district heating/cooling system then we are concerned that there will be no economic case to build a local CHP plant when the rest of the development is completed. As a consequence the carbon savings that are associated with this means of providing heat, power and cooling services will be lost.

We urge the planning department to work with Forth Ports to ensure that a district heating and cooling system can be implemented and that if the CHP plant must be built last, then the buildings that are built prior to it are at least designed so that they can easily be integrated into district heating system.

Whilst we appreciate that there may be some regulatory barriers to establishing a district heating system, these are not insurmountable. We note UK examples such as Woking, where local district heating systems have been successfully implemented, and would wish to see Forth Ports engage constructively with the Edinburgh Energy Co-op to explore models that could deliver a sustainable, community owned, green energy system incorporated into the new development.

## **6 Active Travel**

Whilst we've seen plans that highlight cycle and pedestrian paths, there is still some ambiguity over the standards that these will be built to. We support the Cockburn Associations call for dedicated cycle links on key routes throughout the development. In particular, we would wish to see a clear plan for integrating the Edinburgh Harbour pedestrian routes with the Waterfront Promenade, and the other key long distance paths that link with the development. This development will form the 'gateway' between the existing path network and the later 'urban villages'. It is important that the existing network is extended and integrated into the wider re-development of the docks, and does not get 'lost' at the harbour.

It is likely that the Tram terminus outside Ocean terminal will be a significant transport interchange. It is vital that cycle routes to this terminus are of a very high quality, clearly signposted and that secure, attractive bike storage is provided close to the tram stop. As the docks are developed, it is likely that an increasing number of residents will choose to cycle or walk to this area, in order to go to work, meet others, go shopping or catch the tram onwards to other parts of the city. This will only happen if clear and visible priority is given to cycling, walking and public transport facilities in this area. As a minimum we would like to see dedicated "Copenhagen style" bike lanes, not advisory cycle lanes, on the main arterial routes through the development.

The diagrams we have seen of the 'Tram Plaza' do not show how through traffic will be managed, or how multiple transport modes will be integrated. We urge the planning committee to ensure that the council, TIE and Forth Ports put a great deal of thought into getting this area right for pedestrians, right as a green travel interchange, and right as an attractive 'destination'.

In conjunction with action to prioritise green travel modes, we propose that the parking charges are introduced throughout the development, as soon as the tram is operational. We believe that this will help to mitigate community concerns over congestion, air pollution and noise. We query the need for additional parking at Ocean Terminal.

The current proposals allow parking for about 25 cars for each allotted bicycle space. Integrated bicycle storage as part of every residential and commercial development would be preferred. We consider this at least as important as those close to bus and tram terminals as this will put in place the basic essential facilities for residents to choose active travel modes.

The Wimpey City site is key to linking Ocean Terminal to the heritage area around Forth Ports and onwards to the Shore for pedestrians and cyclists. This area was sold on and does not form part of this application. However as the planning application for this site has lapsed, there is an opportunity for the City Council to work with Forth Ports to establish a design brief in respect of public routes and access prior to any new application being made.

## 7 Public Parks

According to pages 290-294 of the Environmental Statement both of the planned parks in the development are shown to be seriously affected by strong wind. This is caused by 'façade downwash' from the surrounding high buildings. The Environmental Statement also shows these parks to be in the shadow of the same buildings for a significant amount of time during the day. This microclimate will not conducive to the establishment of trees and shrubs and further mitigation such as canopies and screens will be essential for these areas to become suitable for their intended purpose.

According to the phasing plan the actual construction of these very small green spaces, (around 4.2m<sup>2</sup> per dwelling) will not take place for another 5-10 years after construction has started. Taking into account the detrimental effect of the microclimate it could be several decades before these spaces come into their own. We would like to see these parks made much larger and started much sooner, not least to increase the amount of water permeable surfaces to avoid the risk of flooding.

Forth Ports claim that the parks cannot be provided earlier in the building timeline, unless a public sector subsidy is provided. However, we assume that the developers would need to build and pay for these parks in any case. Given the lack of green space in the proposed development as a whole, we urge the planning committee to compel the developers to alter the phasing of the development such that public green spaces are built far sooner. This may even benefit the developers as it will undoubtedly make the residential units easier to sell.

## 8 Open Space Maintenance

As well as bringing forward the phasing of the green spaces there needs to be a robust maintenance plan, submitted prior to approval. The plan should show how long term maintenance will be funded and indicate who will ultimately be the owner and who will be responsible for its management. We have learned that conditions in respect of landscaping and maintenance are either not enforced or prove to be unenforceable. We do want see this situation repeated yet again in such an important application.

We would prefer it if all public open spaces were adopted at the outset by the City of Edinburgh Council. Open space that is not accessible to the public should remain under the common ownership of local residents with a more traditional factoring arrangement.

We note that Planning Advice Note 65 requires developers to demonstrate how they propose open spaces will be maintained over the long term. We urge the planning committee to ensure that common areas are not transferred to a third party land manager and that new residents are not bound into a contractual arrangement whereby they are obliged to pay a 'land management company' a fee for maintaining common areas through the title deeds, where the residents do not directly own the common land.

Arrangements of this type have proven problematic in new developments throughout Scotland, and we note the difficulty residents have had in tackling land management companies, such as Greenbelt Group, where they feel they are receiving a poor quality service.

## **9 Hard Landscaping**

We note that 'There is no attenuation of surface water at present or proposed for the development' (Buro Happold Page A13.123 of A13.23) and that the developers propose to let surface water run straight into the Forth without any filtration or other mitigation. The developers propose 33,000m<sup>2</sup> of hard landscaping. This large amount of hard landscaping increases the risk of flash flooding and poor local water quality, unless water permeable surfaces, "Sustainable Urban Drainage Systems," and surface water filtration systems are implemented.

There a picture of cobbles on page 16 in the Sustainability Strategy. What percentage of the hard landscaped surface is going to be covered in these cobbles? And will they be reclaimed or recycled from elsewhere in the docks? In order to create a distinctive sense of place careful thought will need to be given to the design of this hard landscaping. It should incorporate 'historical' features wherever possible as well as public art. Given the large amount of hard landscaped public space, we would like to see more design detail, and assurances that opportunities for conserving 'heritage features' are not lost in the development of the site.

There may also be opportunities to involve local residents in the design and selection of public art in the development. If, however, cobbles are not going to be used, their image should not be in this document.

## **10 Building Height**

We note that the proposals still include a number of tall buildings, up to 24 storeys in height. We continue to argue that good architecture doesn't need to be tall architecture and that buildings of this height will be detrimental to the surrounding area, and the views into and out of the World Heritage Site. Unlike others, we do not believe it is enough to focus on conserving a limited number of 'view corridors,' into and out of the city, as tall buildings have such a huge impact on the skyline and draw the eye from a great distance away. For those residents currently living nearby the development the prospects are grim: they will lose their view completely. We urge the planning committee to restrict the height of the proposed buildings to a level no taller than a maximum of 12 Storeys.

The "boutique" hotel adjacent to Forth Ports offices is perhaps a misnomer given its height. This is likely to dwarf existing heritage buildings. Likewise, the nine storey car park adjacent to the former bond warehouses. The onus should be on the developer at the detailed planning stage to demonstrate the architectural quality of their proposals and the merit of taller buildings rather than giving carte blanche at the outline stage.

## **11 Cultural Venue**

We query if the City Council will be a willing partner in the cultural centre when the City already is or is to invest in the Usher Hall, Kings Theatre etc and the Government are investing in the Chamber Street museum and the Portrait Gallery. Reference is made to the area's heritage but not the proposed Maritime Museum which has strong local support. This could have great appeal for both visitors and local families.

We have consistently queried the need for a cultural centre as laid down in the LDDF when there is a 1500 seat theatre lying unused nearby. The Leith Theatre Trust have a number of partners who see year round potential uses for the theatre. It's location would provide the iconic "gateway" suggested in the Design Statement and bring old and new Leith together.

## **12 Housing and Business Mix**

The proposal to turn Ocean Terminal (OT) "inside out" and make the surrounding area more vibrant is welcome. Likewise the Scottish Government's agreement to open up the area around Victoria Quay, to allow development on Victoria dock will help connect the area between OT and Malmaison which is currently quite sterile for pedestrians and cyclists. Developing the heritage potential area around Forth Port's existing offices is also welcome. However, we are aware of other "boutique hotel" developments along Leith Walk that could result in a future over provision.

We have concerns about the drift of employment opportunities to the West and South of the City so the establishment of the business sector opposite OT is welcome. The "Plaza" and other "trendy" imported terms is out of place in Leith and does not reflect the "deeply considered and sensitive," approach that the applicant has made.

Note comment that the North Edinburgh Local Plan, revised in 2004 is now "out of date." In our view it follows that by the same token the Leith Dock Development Framework (LDDF) is also "out of date" and the housing mix as stated in LDDF, particularly following the credit crunch should now be reviewed.

Concern that the applicant's design team have been informed by waterfront developments across the world that have been developed at the height of the property boom. Should a more pragmatic be taken given the present economic climate? Are the "loft-house" apartments referred to more a reflection of Forth Ports Design Team's personal aspirations rather than the real needs of Leith and Edinburgh?

“Branding” is stated as key. We recall that OT was initially conceived as a high fashion destination. It was to be a location for the retailers that have in fact established themselves on George Street with restaurants such as Conran’s Zinc Bar. However, OT has turned out to be a popular family destination in spite of the initial “mis-branding”. Should Forth Ports not review their “Branding” and consider a stronger family focus for the entire Waterfront development?

We note the proposed housing mix: 1870units (1074- 1 bed, 652 - 2bed, 144-3bed) including 72 work/life units.

It is stated that the target market for Edinburgh Harbour are “young urbanites” and “downsizers”. We query if there is such a market both in the near and long term. The average age of first time buyers is 34. Young “urbanites” are likely to rent or share rented flats with friends. They are likely to remain in the established HMO areas.

Nevertheless, if the majority of flats are bought as buy to let with occupants that are on short term assured tenancies this will create a transient population. At their presentation Wimpey City (an adjacent development site) clearly indicated that it was this young professional market that they were targeting and it is perhaps not surprising that they have let their planning application lapse.

This lifestyle of the “young urbanite” population will not be attractive for downsizers whose own children have fled the nest and who now are looking for a safe, secure and quiet environment. The reputation of the Waterfront developments for hen and stag parties, high maintenance costs, problems with factors, insecure underground parking, burglaries and antisocial tenants needs to be scotched if it is to attract mature buyers. "Secure by Design" principles should be incorporated into all developments.

Whilst we think many people in their late 50s and 60s may well seek established developments – preferring not to live next to potential building sites for the remainder of their lives - we are concerned that the housing mix will not be appropriate to meet the profile of demand for social housing. We are aware of a need for more sheltered, amenity and supported hostel accommodation as well as family housing. The proposed preponderance of one bedroom flats will not meet this. Were the local Housing Associations consulted?

Does the reference to an "emphasis on smaller units" also mean smaller floor areas? The average new home floor area in the UK is currently the lowest in Europe with new homes smaller than those built in this country 50 years ago!

The growth of buy to let has encouraged this trend with landlords assuming their tenants will make do with more cramped conditions. However, although these "starter" homes may be an attractive option given the current housing market they are unlikely to be attractive for owners and tenants in the longer term and will not contribute towards achieving a sustainable and established community of residents. Given the high density of the development we call for a more generous provision with minimum space standards set and agreed for each house type with the City Council.

From our support of Out of the Blue we are aware that there are many craftsmen and artists in Leith and that there is a strong demand for studio and workshop space. The 72 proposed work/live units may underestimate the potential demand and this should be tested, perhaps by commencing these in the first phase. The Council have proposed similar developments for the Bonnington/Steads Place re-development but we consider that the proposed Waterfront location is a more appropriate location and would help achieve the vibrant atmosphere that is being sought.

### **13 Conclusion**

This project, hugely important to all of Edinburgh, will take several decades to complete. Although it may undergo certain changes over time, it is very important that from the outset the highest possible standards are used for all aspects in the building of these new neighbourhoods. A holistic approach will be necessary in terms of sustainability, environmental standards, quality of design and construction. Sufficient high quality recreational green space and a genuine commitment to active travel, energy efficiency and a land use mix suitable for all members of the community must be part of it right from the beginning.

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More information on the organisations supporting this statement can be found at:

Greener Leith:

[www.greenerleith.org](http://www.greenerleith.org)

Leith Central Community Council:

[www.leithcentralcc.co.uk/](http://www.leithcentralcc.co.uk/)

Leith Links Community Council:

<http://leithlinksc.org.uk/>