

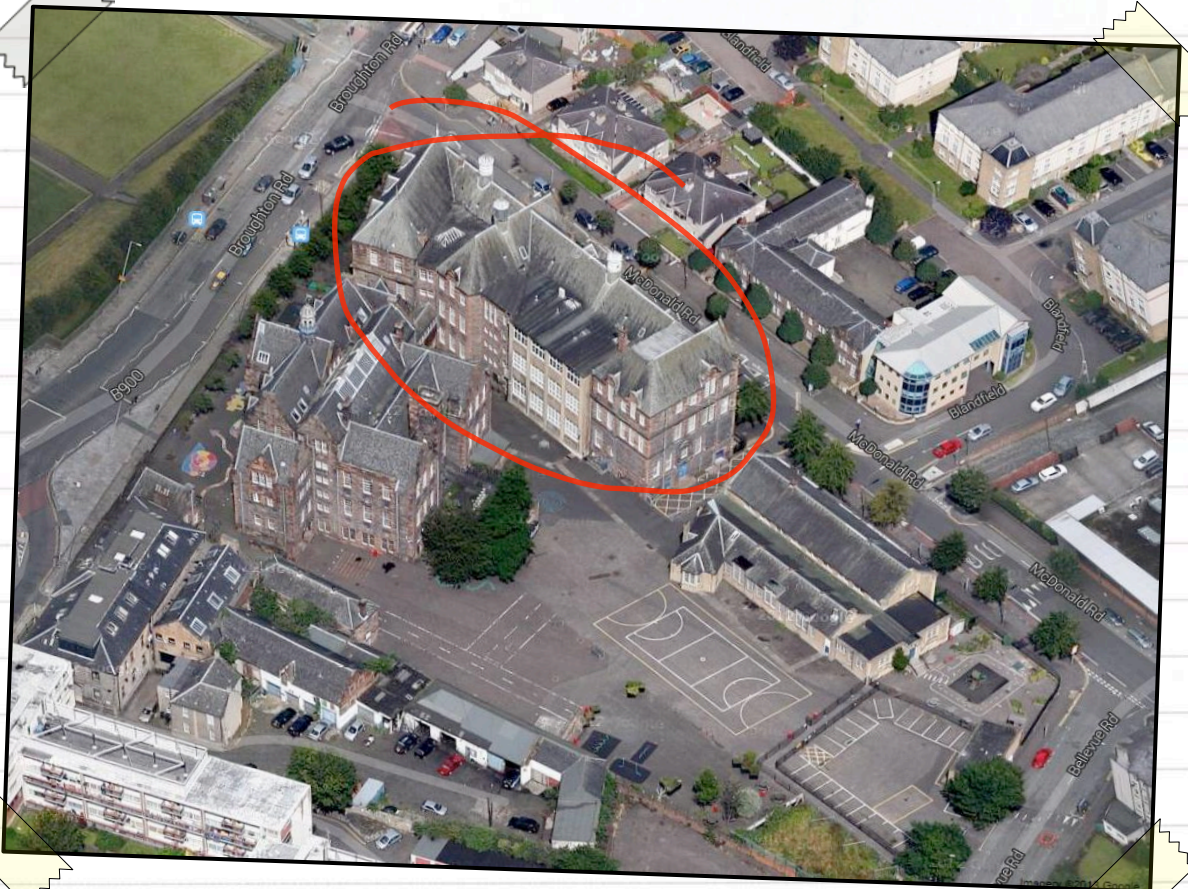
To all councillors who sit on the Development Management Sub Committee:

## WHY THE PLANNING APPLICATION FOR 154 MCDONALD ROAD SHOULD BE REFUSED...

Because:

- \* IT DOES NOT COMPLY WITH CURRENT DEVELOPMENT POLICY
- \* THE CORRECT PROCEDURE HAS NOT BEEN FOLLOWED

You will shortly be asked to consider the planning application 13/02458/FUL: "Alterations to and change of use from offices to form residential accommodation: 154 McDonald Road Edinburgh EH7 4NN". The planning application is to convert a former school building on the corner of McDonald Road and Broughton Road into 73 bed-sit apartments.



The Broughton Primary School Parent Council believes that 154 McDonald Road is a valuable community asset that should be retained as an educational and community resource rather than pass into the hands of private property developers. The only way this loss can be prevented is if you reject the current planning application that is before you.

McDonald Road is a Council owned property. The Council has a financial interest in the Developer securing this planning application.

## POLICY PROBLEMS...?

There are a few significant aspects of the proposed development of McDonald Road that do not comply with the Edinburgh Local Development Plan March 2013 and the Edinburgh Design Guidance May 2013...

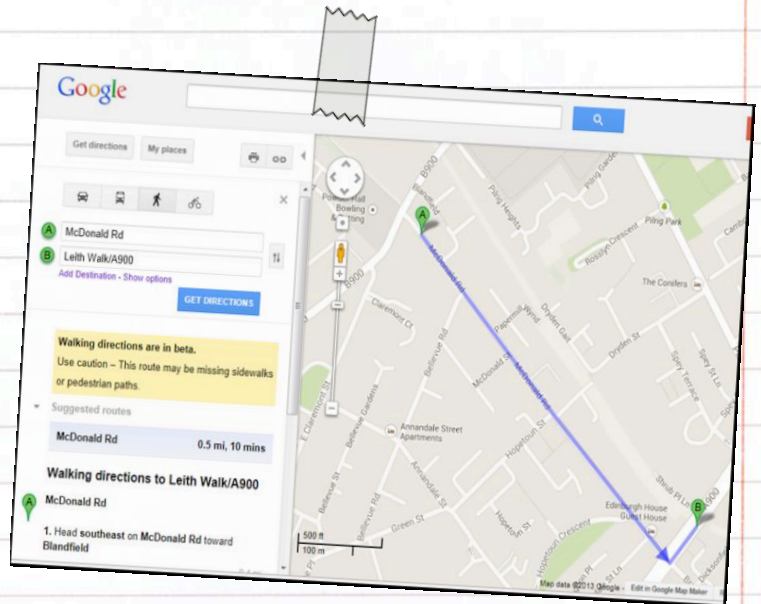


### HOU 4 - Housing Density

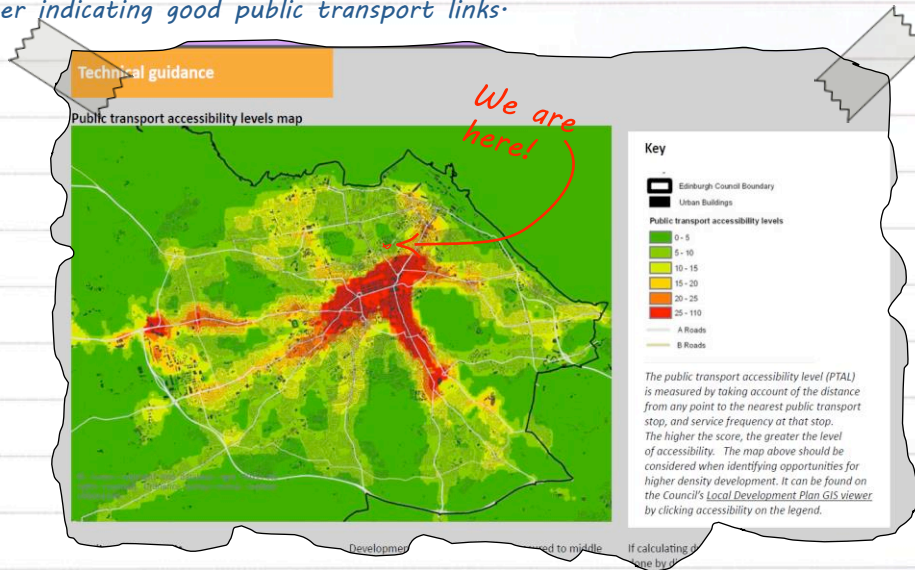
At 73 bed-sit apartments, the development of McDonald Road constitutes very high density housing. The policy allows this to be mitigated if the development has good access to public transport,

BUT...

- ✗ Only the Lothian Buses number 36 bus serves Broughton Road - a limited service with a rather convoluted route to the City Centre.
- ✗ Only the Edinburgh Coach Lines number 13 bus serves McDonald Road - a more limited service than the Lothian number 36.
- ✗ Leith Walk, which is served by several bus routes, is a good 10 minute walk away crossing some busy road junctions.

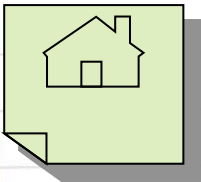


The Edinburgh Design Guidance includes a map of public transport accessibility. 154 McDonald Road appears to be in a 'green area' area of 5 to 10 on a scale that runs to 110 - a high number indicating good public transport links.



The developer has not provided any of the data and calculations required by Section 1.5 of the Edinburgh Design Guidance to justify the high density aspect of the development.

We believe that the statement made in the Developer's Planning Statement that the site is "highly accessible by public transport" is SIMPLY NOT TRUE!



## HOUS - Conversion to Housing

a) We believe that the conversion of McDonald Road into 73 bed-sit apartments does not provide a suitable residential environment.



The developer has not provided any specific information on the floor area of the individual apartments, but they have provided a scale plan of each floor from which the floor area can be calculated...

Number of apartments of less than 36 m <sup>2</sup> :	36
Number of apartments equal to 36 m <sup>2</sup> :	6
Number of apartments of greater than 36 m <sup>2</sup> :	31

minimum floor area of studio apartments stipulated by Edinburgh Council Design Guidance

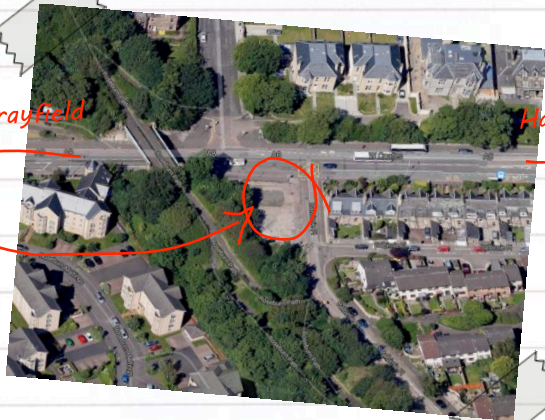
Looking at the scale plan provided by the developers it can be seen that the bed included in nearly all the apartments has a wall along one side making the double bed only accessible from the other side.

### Precedent

Planning permission was recently refused for a development on Kew Terrace in Roseburn - 13/00939/FUL. One of the reasons cited in the report was the adverse residential amenity - section 2.3 e - due to the floor space of some of the apartments being below the minimum required by the Design Guidance.

Murrayfield

Haymarket



There used to be a garage on the site



The development requires its own communal waste bins. Edinburgh Council Design Guidance stipulates a minimum of 14 waste bins of 1280 litres for a development of up to 48 homes. The McDonald proposals have three bins of 3200 litres each.

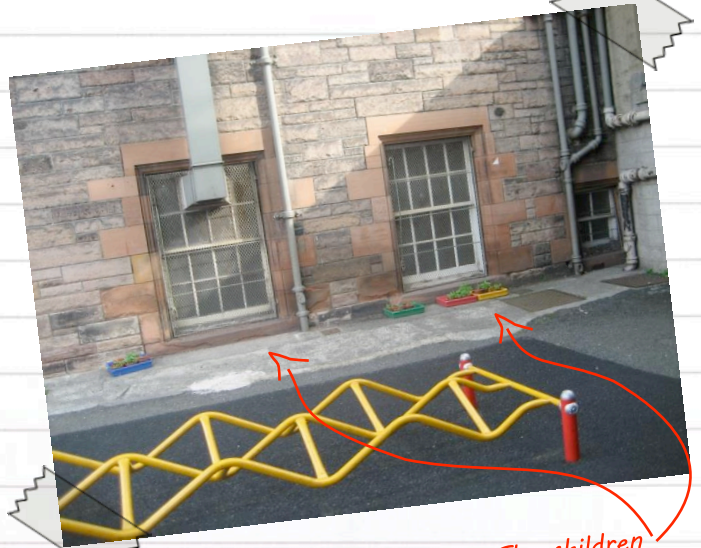
Also these bins appear to be located behind a cast iron fence and a tree with no obvious access for them to be emptied. Also there does not appear to be any provision for recycling bins.

The Guidance recommends that the developer should engage with the Council Waste Services, but there no evidence presented that this has been done.

These are specifically not recommended by the Design Guidance!

b) We believe that the conversion of McDonald Road into 73 bed-sit apartments is not compatible with nearby uses, namely the school.

The developer indicates that the apartments will be suitable for first time graduate buyers and key workers. Quite often these vocations have working routines outside the normal working hours. It is therefore quite likely that residents will find themselves at home during schooling hours. The rear wall of McDonald Road is directly located within the playground of Broughton Primary School. Children at play can be incredibly noisy and we believe this intrusion into the private lives of future residents, particularly shift workers, will lead to inevitable conflict.



These are the windows of Unit 20. The children have even provided some window boxes!



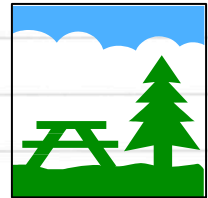
These are the windows of Unit 19. The man in the window has been Photoshopped into the picture for illustration purposes

There are some schools in Edinburgh that are overlooked by housing, but all the examples we have found residences are separated by a fence or wall.

Nothing comes close to the 73 dwellings in the playground being proposed for McDonald Road - this makes it wholly inappropriate residential for use.

c) We believe that the conversion of McDonald Road into 73 bed-sit apartments does not provide adequate open space or any car parking.

✗ The development provides a small fraction - about 25 m<sup>2</sup> - of the required open space for a development of this number of dwellings - 730 m<sup>2</sup>.



✗ And the open space that is being provided is very exposed to the busy McDonald and Broughton Roads.

The junction of McDonald Road with Broughton Road

✗ There is no parking being provided other than for two electric pool cars. Any future resident with a car would have to obtain a permit from the Council to park on the surrounding streets which are already very crowded and makes the crossing of roads for the school children even more dangerous.



d) We believe that the conversion of McDonald Road into 73 bed-sit apartments does not safeguard important and vulnerable uses.

In this context the important and vulnerable use is the education of the current and future generations of school children in North Edinburgh.

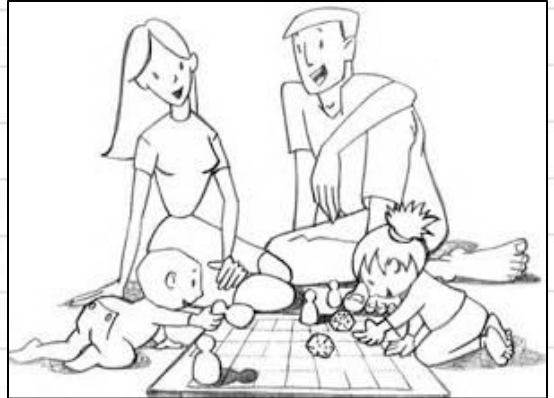
We believe the McDonald Road would be better used as an educational and community resource rather than being put over to high density bed-sit accommodation.





## HOU2 - Housing Mix

The Edinburgh Local Development Plan asks for a mix of housing to be provided to include housing suitable for families; old people; and people with special needs. The Edinburgh Council Design Guidance states that developments over 12 units should provide 20% of those units suitable for families with a floor area of greater than 91 m<sup>2</sup>.



- ✗ There is not a single unit of the 73 proposed for McDonald Road that is suitable for a family



The Edinburgh Design Guidance strongly encourages access statements for planning applications. No such statement has been submitted by the developer for McDonald Road.



## HOU6 - Affordable Housing

It is the stated "ambition" of the developer that the proposed conversion of McDonald Road into 73 bed-sit apartments will all be priced to the public at below the current Council affordability threshold. There is:

- ✗ No commitment to sell at or below the Council affordability threshold of £126k.
- ✗ No commitment to limit the future on-sale value.
- ✗ No commitment to sell exclusively to a housing association or co-operative.
- ✗ The Developer's web-site states that the McDonald Road development is aimed to "maximise yield of a city apartment". This implies that McDonald Road will be specifically marketed at buy-to-let investors.



The proposed development has a shared laundry, shared heating, shared telecoms, and a concierge.

- ✗ There is no mention of how the cost of these shared services will be controlled.

The service charges will be an on going cost in addition to the purchase cost. There is a very real prospect that residents will face large service charges in the future.

Without an absolute commitment from the developer we view the 100% affordable housing claim with GREAT SCEPTICISM.



## DES6 - Sustainable Buildings

The proposed development for 154 McDonald Road into 73 bed-sit apartments includes several innovations to reduce the carbon footprint of the building:

BUT...

- ✗ The developer has made some fairly sweeping assumptions that the future residents will walk to work or get the bus.
- ✗ The developer has mistakenly labelled energy efficiency measures as sustainable.
- ✗ The developer has not provided any evidence of any actual carbon calculation having been performed.
- ✗ There is no evidence of any recycling bins being provided.
- ✗ There is no evidence in the proposals for the harvesting and re-use of rain water.
- ✗ The development requires the removal of a tree!



## HOU 3 - Green Space

This policy requires the provision of 10 m<sup>2</sup> of communal green space per flat.

BUT...

- ✗ Only about 25 m<sup>2</sup> of communal green space is being provided - 3.5% of that required by the policy;
- ✗ The proposed communal outdoor area is very exposed to both the busy McDonald Road and Broughton Road;
- ✗ There is no mention of secure access to the private garden;
- ✗ The green space will only receive direct sunlight during the early morning and late evenings.

How feasible would it be to enjoy some quiet time to do a bit of reading or have a barbecue in this area?

**NO  
PARKING**

## TR2 - Private Car Parking

The proposed development for McDonald Road does not have any private parking associated with it apart from 2 bays for electric cars or City Car Club cars.

- ✗ We think it is reasonable to assume that the majority of future residents will own a car and require on-street parking in the surrounding streets.
- ✗ We consider the provision of 2 electric cars / car club spaces as insufficient to encourage any future resident to forgo owning their own car.

The surrounding streets are already very crowded with vehicles which add to the risk posed to school children crossing the road to get to the neighbouring school.



Bellevue Road

The McDonald Road building is not well served by public transport: Only ECL number 13 bus serves McDonald Road; only the Lothian Buses number 36 bus serves Broughton Road; and Leith Walk, which is served by several bus routes, is a good 10 minute walk away across some busy road junctions.



## PROCEDURE PROBLEMS?

Edinburgh Council has a Planning Concordat in place. The current version is limited to major developments and was passed by the Planning Committee on 08 August this year. The previous version was dated June 2010 and is not as limited.

The planning application for 154 McDonald Road was made on 28 June 2013 which pre-dates the current concordat.

We believe that the planning application should have been managed under the concordat prevailing at the time it was made.

Here it is!

Looking at the second article...

The conversion of a former school building that sits within the same site as a currently functioning school has an obvious "wider community interest" in the form of the school children, their parents and carers, and the staff of the school.

X To date there has been no consultation or engagement from the Council regarding the sale and development of 154 McDonald Road.

Indeed proactive efforts by the Broughton Primary School Parent Council to obtain details from the Council both on the future of McDonald Road and the two vacant plots on Bellevue Road that also adjoin the School playground have been stonewalled.

Looking at the third article...

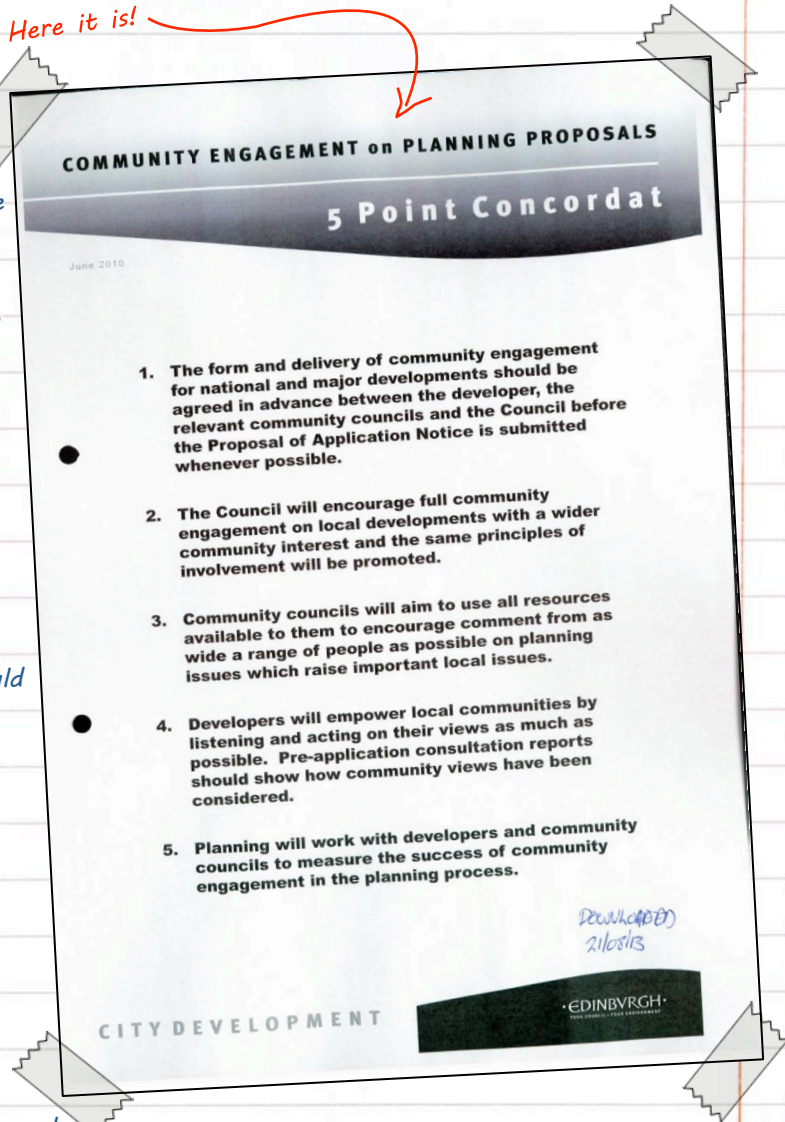
Again the raising of "important local issues" is undeniable.

X To date there has been no engagement from the local community councils.

Failure of the Council to follow the second article probably kept the community councils as much in the dark as the Parent Council!

And finally the fourth article...

Although the planning statement for the application states "numerous parties were consulted" in fact there were only 5 meetings, 4 of which were with the Council. The fifth meeting was with four members of the Broughton Primary School Parent Council and was arranged at short notice only after the whole issue had surfaced via other sources.



*We really hope you have enjoyed reading our presentation.*

*We have every confidence that you will put the best interests of the current and future children of North-Central Edinburgh above short-term financial gain when you consider the application for 154 McDonald Road.*

*Thank you*

*The Broughton Primary School Parent Council*



*“ensuring every child in Edinburgh has the best start in life”*

*The very first commitment of the Edinburgh Council Labour and SNP group Coalition Agreement 10 May 2012*