

Leith Central Community Council response to planning application

March 2021

21/00528/FUL - Change of use from Assembly and leisure (class 11) to Residential (class 9)

54 Rosslyn Crescent Edinburgh EH6 5AX

The proposal to turn the Bowling Green at 54 Rosslyn Crescent into a private house is **contrary to the National Planning Policy Guidance 18** and to **Edinburgh Local Development Plan design principles** which aim at encouraging sustainable developments that help build stronger communities and safeguard vulnerable places.

The proposal is **contrary to the Edinburgh Local Development Plan** aims which are about protecting and promoting existing open spaces, both public and privately owned, that contribute to the amenity of their surroundings and the city, provide or are capable of providing for the recreational needs of residents and visitors or are an integral part of the city's landscape and townscape character and its biodiversity.

Former bowling clubs in Edinburgh are significant open spaces in the city and should not be turned into individual private houses when viable social alternatives exist. Their assembly and leisure status can provide great opportunities for the community which, now possibly more than ever, needs outdoor social activities and interaction.

In line with the Council's objectives regarding open green spaces, former bowling clubs need coordinated protection. The Council should help identify opportunities with the community to set standards to enhance or transform them for the common good.

Due to the damaging impact on the community, a change of use from Assembly and Leisure (class 11) to Residential (class 9) should only be considered as a last resort when all alternatives have been exhausted. In the present case, the local Pilrig community, along with a community group, has expressed a strong interest in giving a new public life to the former bowling club.

Ultimately the proposed change of use at 54 Rosslyn Crescent means turning a historic accessible open space into a private house with its own private garden. This is unacceptable and would set a precedent for other bowling clubs.

Therefore, Leith Central Community Council **objects** to the application and, in accordance with the reasons listed below, the City of Edinburgh Council should refuse the application.

Reasons:

1. The application is contrary to NPPG 18

- The Pilrig Conservation Area is not subject to economic decline so a change of use from Assembly and leisure (class 11) to Residential (class 9) would not be justified. The Assembly and leisure class can help provide jobs and volunteering opportunities to the wider community.
- The proposed change of use would fail to preserve land use and patterns of social and economic activity which are key components in the character of the historic environment.
- The proposed change of use would fail to preserve the historic environment which comprises more than just the physical remains of the past.

- The proposal would fail to preserve the social and economic factors of the Pilrig Conservation Area which contributes significantly to the cultural heritage and help define the character of the historic environment.
- It has not been demonstrated that the former bowling club can no longer serve as an Assembly and leisure place.
- The proposal would be contrary to Conservation policies which should give a high priority to maintaining and enhancing the prosperity and vitality of historic areas.
- The proposed change of use is not based on the findings of a Townscape audit.

2. Edinburgh Local Development Plan

2. 1 Housing: The application is contrary to the Edinburgh Local Development Plan

Policy Hou 5 Conversion to Housing

- The proposal does not demonstrate that a satisfactory residential environment can be achieved in the existing clubhouse being directly overlooked by adjacent properties.
- The proposal does not demonstrate that the change of use is acceptable with regard to policies in the Edinburgh Local Development Plan that seek to safeguard and provide for important and vulnerable uses such as those found at 54 Rosslyn Crescent.
- The proposal would be detrimental to a mixed use environment.
- The proposal did not provide evidence of an active marketing of the site for Leisure uses. A local community group has expressed its interest in leasing the former bowling club but it has been ignored by the site owners.

2.2 Design principles: The application is contrary to the Edinburgh Local Development Plan

Policy Des 1 Design Quality and Context

- The proposal would not create or contribute towards a sense of place. It would close off an Assembly and Leisure place to the benefit of a single user.

2.3 The application is contrary to the Edinburgh Local Development Policy Des 5 Development Design – Amenity

- The proposal has not demonstrated that future occupiers would have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook.
- The applicant has not provided a daylight and sunlight analysis demonstrating that minimum light requirements would be achieved inside the proposed house.
- The proposed rooflights would mean that existing adjacent properties on Rosslyn Crescent would have direct views into the proposed building.
- The building and the site can only be accessed through a single door which sits within a wall which seemingly falls outwith the ownership of the land.
- The proposal has not demonstrated that refuse and recycling facilities, cycle storage, low and zero carbon technology have been sensitively integrated into the design.
- The proposal has not demonstrated how it would address the presence of the adjacent substation to protect the future inhabitants of any nuisance which may occur.

2.4 The application is contrary to the Edinburgh Local Development Policy Des 6 Sustainable Buildings

- The proposal has not demonstrated that the current carbon dioxide emissions reduction target has been met, with at least half of this target met through the use of low and zero carbon generating technologies.

2.5 Environment: The application is contrary to the Edinburgh Local Development Plan Policy Env 6 Conservation Areas - Development

- The proposed change of use would fail to protect Edinburgh's heritage of club houses and small businesses for future generations.
- The proposal would not demonstrate that it has been informed by the Pilrig Conservation Area Character Appraisal and Council guidance on Conservation Areas.

2.6 The application is contrary to the Edinburgh Local Development Plan Policy Env 16

- The proposal has not demonstrated that a detailed ecological survey has been undertaken to determine whether bats or other protected species are present on site. Bats are protected by Habitats Regulations and any conversion could possibly endanger them. Planning permission will not be granted for a development that would have an adverse impact on species protected under European or UK law.
- The proposal has not demonstrated or detailed the biodiversity enhancements which should be a fundamental aspect of the design (Scottish Planning Policy para 194 – “seek benefits for biodiversity from new development where possible”).
- The proposal would be ignoring the current ecological character of the site (inc. bats habitats) in the absence of a wildlife survey.

2.7 The application is contrary to the Edinburgh Local Development Plan Policy Env 18 Open Space Protection

- The proposed private house is not for community purpose and the claimed benefits to the local community do not outweigh the loss of accessible open space.

2.8 Employment and Economic Development: The application is contrary to the Edinburgh Local Development Plan Policy Emp 9 Employment Sites and Premises

- The proposed change of use from Leisure (class 11) to Residential (class 9) would fail to help meet the needs of the community and small businesses. The justification for this criterion lies in the Edinburgh Small Business Study which identified that businesses with fewer than 10 employees, account for around 14% of the city's employees and that the current supply of suitable premises is insufficient to meet market demand.

3. Major concerns about the submitted information

The information submitted falls below standards set by HOPS (Heads of Planning Scotland) and by the Edinburgh Design Guidance 2017

- No site plan has been provided.
- No site section has been provided.
- The extents of hard and soft surfacing have not been identified.
- The floor plans omit to show adjacent properties and their windows directly overlooking the proposal.
- New boundary treatments (eg. “security fencing”) have not been detailed.
- The access to the site has not been clearly identified and cannot be assessed against the land ownership which seems to suggest that the site is landlocked.
- Details and specifications of the proposed new external finishes are not included.
- The floor plans and elevations have no scale bars and don't indicate the respective size of each document, which makes it impossible to assess the proposal in terms of sizes and areas.
- No existing or proposed levels are indicated on the drawings.
- There is no cross section submitted which would demonstrate how the proposal relates to existing site levels and neighbouring development.

- New chimneys, vents, etc. are not shown on the elevations or the proposed roof plan.
- The proposed roof plan does not highlight the proposed new rooflights.
- There is no existing roof plan which makes it extremely difficult to assess and compare what is proposed to what is existing.
- No details or specification of the proposed rooflights and roof finishes have been provided despite the fact that the clubhouse sits in the Pilrig Conservation Area.
- It is not clear if the change of use would apply to the clubhouse only or to the whole site.
- New windows and door openings are not clearly defined.
- Extents of demotions and downtakings are not clearly defined.
- The supporting statement consists of a series of points which are not supported by the submitted drawn information or other evidence.

The level of information provided is extremely concerning and makes Leith Central Community Council wonder how this application has been validated in the first place. Once again, this is an application in a conservation area.

For all the reasons listed above, Leith Central Community Council objects to the application and the City of Edinburgh Council should refuse the application due to non-compliance with the Development Plan.