

Development Management Sub Committee

Wednesday 24 June 2015

Application for Approval of Matters Specified in Conds 15/02054/AMC

At St James Centre, Edinburgh, EH1 3SS

Application for approval of matters specified in Condition 23
of Outline Planning Permission 08/03361/OUT for 'the precise
location and extent of individual uses'.

Item number	7.1(c)
Report number	
Wards	A11 - City Centre

Summary

The proposed uses are acceptable, being compliant with the uses established by the outline planning permission to which this application relates. Impacts on the conservation area, neighbouring amenity and in relation to equalities and rights are all acceptable.

There are no material considerations that outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LPC, CITD1, CITD2, CITD3, CITD5, CITD7, CITD10, CITE1, CITE3, CITE6, CITE7, CITE11, CITE12, CITE17, CITE18, CITH1, CITH2, CITH3, CITH4, CITH8, CITEM5, CITR1, CITR6, CITR12, CITT4, CITT5, CITT6, CITT7, CITT14, CITCA1, NSG, NSGD02, NSP,

Report

Application for Approval of Matters Specified in Conds 15/02054/AMC

At St James Centre, Edinburgh, EH1 3SS

Application for approval of matters specified in Condition 23 of Outline Planning Permission 08/03361/OUT for 'the precise location and extent of individual uses'.

Recommendations

1.1 It is recommended that this application be Approved subject to the details below.

Background

2.1 Site description

The site is to the north of the east end of Princes Street. It is 5.2 hectares and includes James Craig Walk, Elder Street, St James Place, Little King Street, Cathedral Street and much of both Leith Street and Multrees Walk.

Within the site, there is the St James Centre, the New St Andrew's House office, the King James Hotel and two multi storey car parks.

Two category 'B' listed buildings are within the site boundary. These are: James Craig Tenement (formerly 27-31 St James Square) (item no 30027, 27 January 1992); and, St Andrew's Hall which is part of the St Mary's (Roman Catholic) Cathedral listing (item no 27449, 19 December 1979).

Surrounding streets and spaces are characterised by both historic and modern buildings. There are a considerable number of listed buildings nearby. These include the following Category 'A' listed buildings: General Register House (Item no 27636, 14 December 1970); 23, 24, 25 and 26 St James Square (item no 29728, 14 December 1970); 30 - 34 (even numbers) Elder Street, including railings (item no 28731, 14 December 1970); 21 York Place, and 38 Elder Street, including railings and lamps (item no 29963, 14 September 1966); and, 27 York Place, 29-31 (odd nos) York Place, 33-37 (odd nos) York Place, 39- 43 (odd nos) York Place, 47-49 (odd nos) York Place, 51 York Place, 53-55 (odd nos) York Place, 57-61A (odd nos) York Place, 63-67 (odd nos) York Place and 69-73 (odd nos) York Place, all including railings (item nos, 29964, 29965, 29966, 29967, 29969, 29970, 29972, 29973 and 29974 respectively and all listed on 14 September 1966).

There are also the Category 'B' listed buildings nearby including the following: 45, 45A and 45B York Place, including railings (item no 29968, 14 September 1966); 5-11 (odd nos) Leith Street, 13 and 15 Leith Street, 27-35 (odd nos) Leith Street and 37-43 (odd nos) Leith Street and 8-12 Calton Road (item nos 29250, 29251, 29252 and 29253 respectively, all listed 19 December 1979).

Modern developments include the Multrees Walk shopping street and on Leith Street, offices and the Omni Centre.

Sandstone is the dominant external material, being used extensively on both the old and the new buildings. This provides visual cohesiveness. The Omni Centre is an exception, with its frontage being glass.

There is a mix of uses surrounding the site. There is the institutional use of General Register House. On James Craig Walk, there are flats and student housing. A related planning permission which is currently pending decision, permits the change of use from student housing to flats and shops. Along York Place, uses include residential and business. The tenements on Leith Street have shops and pubs at their ground levels with residential above. There are shops and hotels on Princes Street.

There are two birch trees at the Princes Street entrance of the existing centre. There are trees and vegetation outside New St Andrew's House next to James Craig Walk.

The application site is in the World Heritage Site.

This application site is located within the New Town Conservation Area.

2.2 Site History

25 March 2009 - Conservation area consent was granted for redevelopment and refurbishment including demolition works and new buildings to provide mixed use development comprising retail (Class 1), leisure and culture (Class 10 and Class 11), hotel (Class 7), offices (Class 4), food and drink (Class 3), residential, and other related ancillary uses (including Financial, Professional and other Services - Class 2), car parking, servicing, access arrangements, provision of new public realm and refurbishment of existing department store, detailed approval of siting and maximum height of building blocks, points of vehicular access and egress and location of pedestrian routes at the St James Centre, Edinburgh (reference 08/03361/CON).

29 April 2009 - Outline planning permission was granted for the redevelopment and refurbishment including demolition works and new buildings to provide mixed use development comprising retail (Class 1), leisure and culture (Class 10 and Class 11), hotel (Class 7), offices (Class 4), food and drink (Class 3), residential, and other related ancillary uses (including Financial, Professional and other Services - Class 2), car parking, servicing, access arrangements, provision of new public realm and refurbishment of existing department store, detailed approval of siting and maximum height of building blocks, points of vehicular access and egress and location of pedestrian routes at the St James Centre, Edinburgh. This is the outline planning permission to which this application for approval of matters specified in condition relates (reference: 08/03361/OUT).

23 May 2014 - Application for approval of matters specified in condition 23 (ii) of Outline Planning Permission 08/03361/OUT submitted. This is pending consideration (reference: 14/02070/AMC).

19 December 2014 - Application submitted for approval of matters specified in condition 23 (i), (iii), (vii), (ix), (x), (xi), (xvi) and (xvii) of Outline 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. This is pending consideration (reference: 14/05263/AMC).

14 April 2015 - Application submitted for approval of matters specified in condition 23 (iv), (v), (vi), (viii), (xii), (xiii), (xiv) and (xv) of Outline Planning Permission 08/03361/OUT relating to cycle parking facilities, showers/lockers, signing of pedestrian/cycle routes, car parking bays, external lighting, hours of deliveries/collections, waste management + hours of operation. It is pending consideration (reference 15/01742/AMC).

21 April 2015 - Application submitted for approval of matters specified in Condition 23 of Outline Planning Permission 08/03361/OUT relating to design of the central hotel building (Block C) and associated landscaping and external lighting. This is pending consideration (reference: 15/01858/AMC).

10 April 2015 - Application submitted for alterations to department store including reconfiguration of existing entrance, creation of new entrance and provision of temporary plant at 69 St James Centre Edinburgh (as amended) (reference 15/01659/FUL). This application is for changes to the John Lewis Store to facilitate the development during its construction.

The St James CPO

9 October 2014 - The St James Quarter Edinburgh (Number Two) Compulsory Purchase Order 2014 was made. This site forms part of the Compulsory Purchase.

24 February 2015 - The St James Quarter Edinburgh (Number Two) Compulsory Purchase Order - Under consideration of the Scottish Government's Department of Planning and Environmental Appeals (DPEA reference CPO-EDB-005).

Other related applications within the site

15 December 2015 - Application submitted for listed building consent for internal and external alterations and ancillary works. 27,29,31 James Craig Walk Edinburgh EH1 3BA. Currently pending decision (reference 14/05148/LBC).

29 April 2015. Planning permission granted subject to legal agreement for change of use from student accommodation to Class 1 (Shops), Class 2 (Financial, professional & other services) and/or Class 4 (Business) uses and residential apartments, proposed alterations and ancillary works at 27, 29, 31 James Craig Walk Edinburgh. Currently pending decision (reference 14/05147/FUL).

27 April 2015. Listed building consent granted for internal and external alterations and erection of extension and ancillary works at 3 St James Place Edinburgh. The existing building is St Andrew's Hall and is used as the John Lewis Collection Point (reference 14/05144/LBC).

20 May 2015 -Planning permission granted for change of use to Class 3 (Food and Drink) and Class 4 (Business) uses, proposed alterations, erection of extension and ancillary works at 3 St James Place Edinburgh EH1 3JH (reference 14/05143/FUL).

Main report

3.1 Description Of The Proposal

Approval is sought for matters specified in Condition 23 of the outline planning permission reference 08/03361/OUT for the redevelopment of the St James Centre.

The outline planning permission established parameters for the development including its footprint, form, height and maximum floor areas for individual uses. This AMC application seeks approval for the precise location and extent of individual uses.

A car park is proposed over the lowest three floors of the development. Much of this will be underground. These levels are known as B1, B2 and B3.

Above this there is three levels of shops with some on food and drink premises on the lowermost level of these three. This is known as Level 01. Also on that same level is ancillary use. At Level 03, which is at grade with St James Square, there is hotel uses.

At Level 04 there are more shops and proportion of food and drink space.

At Level 05, in the two northernmost blocks, there is residential use. This extends upwards, over four floors in total to Level 08. Also on Level 05 is class seven (hotel and hostel use) as well as a cinema and food and drink use. The cinema extends upwards over four floors in total. It is located to the south west of the existing John Lewis shop. The class seven use extends up to Level 08 with a further three floors at a central part of the site up to and including Level 11.

3.2 Determining Issues

Do the proposals harm the character or appearance of the conservation area? If they do, there is a strong presumption against granting of permission.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) the proposed details are acceptable and comply with the planning permission in principle;

- b) the proposal preserves and enhances the character or appearance of the conservation area;
- c) the proposals will have an adverse impact on the amenity of neighbours;
- d) the proposal has any equalities or human rights impacts.
- e) material representations or Community Council comments raise issues to be addressed.

a) Compliance with the Planning Permission in Principle

The proposed location and extent of the individual uses is consistent with both the outline planning permission - 08/03361/OUT and the primary application for approval of matters specified in condition - 14/05263/AMC. This is known as the primary AMC. The primary AMC application shows how these uses are set out and exact arrangement and considers the impact of the proposed uses in detail. That assessment concludes that the uses are acceptable.

The principle is therefore acceptable.

b) Character and Appearance of the Conservation Area

The impact of the detailed proposals on the character and appearance of the conservation area is fully addressed in the primary AMC application - 14/05263/AMC. This concludes that the proposals will enhance the character and appearance of the conservation area. The impact of the proposal on the conservation area is therefore acceptable.

c) Neighbouring Amenity

A full assessment of the impact of uses on neighbouring amenity is detailed in the primary application for approval of reserved matters (14/05263/AMC). This concludes that any impact on neighbouring amenity is acceptable. The impact of the proposal is therefore acceptable in relation to amenity.

d) Equalities and Human Rights

In relation to equalities, the development will improve accessibility for disabled people. Entrances into the centre will be provided at grade throughout the development. There will be lifts, escalators and stairs to provide access internally. All people will be able to use the development and the environment created around it. This means there are no adverse impacts on equalities in relation to age, gender identity, marriage/civil partnership, pregnancy/maternity, race or religion/belief.

In relation to human rights, the development will promote health by being accessible to pedestrians and cyclists. There will be significant job opportunities which will help reduce poverty within the city. Physical security will be promoted through creating a development that provides passive supervision to the spaces and streets around it.

There are no adverse impacts in relation to legal security, education and learning, standard of living, productive and valued activities, individual, family and social life, identity, expression and respect, and participation, influence and voice.

e) Public Comments

No representations have been received, however, comments from the New Town and Broughton Community Council have been received. They are generally supportive of the proposals and issues they raise are fully addressed in the primary AMC application 14/05263/AMC.

The application 14/02070/AMC received nine letters of objection. As this is for uses and is very similar to this application it is relevant to assess the representations upon it.

These were as follows.

Material representations

Site description

- clarity of site boundary with St James Square - addressed in application drawing 14.

Historic Context

- effect on Edinburgh World Heritage Site, especially skyline - addressed in section 3.3d) of the primary AMC application 14/05263/AMC.

Amenity

- effect on air quality - addressed in section 3.3 h) of the primary AMC application 14/05263/AMC.
- services - addressed in section 3.3 h) of the primary AMC application 14/05263/AMC.
- waste - addressed in section 3.3 h) of the primary AMC application 14/05263/AMC.

Traffic

- cycle lane provision - addressed in section 3.3 i) of the primary AMC application 14/05263/AMC.
- movement and road safety - addressed in section 3.3 i) of the primary AMC application 14/05263/AMC.
- vehicle and cycle access and parking - addressed in section 3.3 i) of the primary AMC application 14/05263/AMC.
- compliance with Local Transport Strategy - addressed in section 3.3 i) of the primary AMC application 14/05263/AMC.
- Transport Impact Assessment - addressed in section 3.3 i) of the primary AMC application 14/05263/AMC.

Flooding

- flooding and drainage - addressed in section 3.3 h) of the primary AMC application 14/05263/AMC.

Equalities

- access and parking for infirm and disabled - addressed in section 3.3 c) above.

Other

- owner and neighbour notification - all neighbour notification and publicity was carried out in accordance with the relevant regulations.
- privatisation of public space - addressed in section 3.3 a), b) c) and i).
- submitted proposals materially differ from those consulted on - addressed in section 3.3 e) of the primary AMC application 14/05263/AMC.

Non material representations

- construction may destabilise neighbouring buildings - addressed by other legislation.
- lack of detail in planning permission 08/03361/OUT - 08/03361/OUT relates to outline proposals only. Details are considered in later applications for matters conditioned. 14/02070/AMC is one of these.

Conclusion

In conclusion, the proposals accord with the principle established under the Outline Planning Permission. There will be no significant impact on neighbouring residential amenity and will have a positive impact on equalities and human rights. There are no material considerations which outweigh this conclusion.

It is recommended that this application be Approved subject to the details below.

3.4 Conditions/reasons/informatives

Conditions:-

NONE

Financial impact

4.1 The financial impact has been assessed as follows:

The application site is subject of the St James Quarter Edinburgh (Number Two) Compulsory Purchase Order. The financial implications have been reported to the appropriate Council Committees separately.

There are no other financial implications to the Council resulting from this application.

Risk, Policy, compliance and governance impact

5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

Equalities impact

6.1 The equalities impact has been assessed as follows:

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application meets the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

This application was advertised on 8 May 2015. No representations were received. Comments, generally in support of the proposals, were received from the New Town and Broughton Community Council.

The application reference 14/02070/AMC - a duplicate application - was advertised on 30 May 2014. Ten representations were received, of which nine objected to the proposal.

Material Representations

- application content and notification;
- vehicle and cycle access and parking;
- Transport Impact Assessment;
- air quality;
- flooding and drainage; and
- Edinburgh World Heritage Site.

Non-Material Representations

- effect of construction works; and
- lack of detail in outline consent 08/03361/OUT.

There was no response from the New Town and Broughton Community Council for 14/02070/AMC.

A full assessment of the representations can be found in the assessment section of the main report.

Background reading/external references

- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Edinburgh City Local Plan and Rural West Edinburgh Local Plan](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

The application site is identified in the Edinburgh City Local Plan as being within the Central Area. The site forms part of an identified Central Area Development Proposal (CA 1- St James Quarter). The site is also included in the St James Quarter Development Brief.

Date registered 29 April 2015

Drawing numbers/Scheme 01 - 16,

David R. Leslie

Acting Head of Planning and Building Standards

Contact: Emma Wilson, Senior Planning Officer

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Links - Policies

Relevant Policies:**Relevant policies of the Edinburgh City Local Plan.**

Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effective development of adjacent land or the wider area.

Policy Des 3 (Development Design) sets criteria for assessing development design.

Policy Des 5 (External Spaces) sets criteria for assessing landscape design and external space elements of development.

Policy Des 7 (New Pedestrian Routes in the City Centre) relates to the creation of new pedestrian routes in the City Centre.

Policy Des 10 (Tall Buildings) sets out criteria for assessing proposals for tall buildings.

Policy Env 1 (World Heritage Site) protects the quality of the World Heritage Site and its settings.

Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

Policy Env 6 (Conservation Areas Development) sets out criteria for assessing development in conservation areas.

Policy Env 7 (Historic Gardens & Designed Landscapes) establishes a presumption against development that would be detrimental to Historic Gardens and Designed Landscapes.

Policy Env 11 (Landscape Quality) establishes a presumption against development which would adversely affect important landscapes and landscape features.

Policy Env 12 (Trees) sets out tree protection requirements for new development.

Policy Env 17 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Policy Env 18 (Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Policy Hou 1 (Housing Development) supports housing on appropriate sites in the urban area, and on specific sites identified in the Plan.

Policy Hou 2 (Housing Mix) requires the provision of a mix of house types and sizes in new housing developments.

Policy Hou 3 (Private Open Space) sets out the requirements for the provision of private open space in housing development.

Policy Hou 4 (Density) sets out the factors to be taken into account in assessing density levels in new development.

Policy Hou 8 (Inappropriate Uses in Residential Areas) establishes a presumption against development which would have an unacceptable effect on the living conditions of nearby residents.

Policy Emp 5 (Hotel Development) sets criteria for assessing sites for hotel development.

Policy Ret 1 (City Centre Retail Core) sets criteria for assessing retail development in or on the edge of the City Centre Retail Core.

Policy Ret 6 (Entertainment and Leisure Developments – Preferred Locations) identifies the Central Area, Leith & Granton Waterfronts and town centres as the preferred locations for entertainment and leisure developments.

Policy Ret 12 (Food and Drink Establishments) sets criteria for assessing the change of use to a food & drink establishment.

Policy Tra 4 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in supplementary planning guidance, and sets criteria for assessing lower provision.

Policy Tra 5 (Private Cycle Parking) requires cycle parking provision in accordance with levels set out in supplementary guidance.

Policy Tra 6 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Policy Tra 7 (Tram) prevents development which would prejudice tram safeguards or identified tram routes.

Policy Tra 14 (City Centre Public Parking) outlines the circumstances in which car parks in the Central Area will be supported.

Policy Ca 1 (Central Area) sets criteria for assessing development in the Central Area.

Relevant Non-Statutory Guidelines

Non-Statutory guidelines Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings and landscape, in Edinburgh.

Non-statutory guidelines on 'PARKING STANDARDS' set the requirements for parking provision in developments.

Appendix 1

Application for Approval of Matters Specified in Conds 15/02054/AMC

At St James Centre, Edinburgh, EH1 3SS

Application for approval of matters specified in Condition 23 of Outline Planning Permission 08/03361/OUT for 'the precise location and extent of individual uses'.

Consultations

Transport - response dated 12/06/15

I have no objections to the application.

TRAMS - Important Note:

The proposed site is on or adjacent to the Edinburgh Tram which is now operational. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:

- o Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;
- o Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
- o Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
- o Any excavation within 3m of any pole supporting overhead lines;
- o Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use;
- o The Council has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line. See our full guidance on how to get permission to work near a tram way <http://edinburghtrams.com/community/working-around-trams>.

SEPA - response dated 06/05/2015

Thank you for consulting SEPA on the above applications in relation to the discharge of condition 23 of extant outline planning permission 08/03361/OUT.

After considering the above 3 AMC applications, it would appear that the issues raised are outwith of SEPA's remit. Therefore we have no comment to make on any of the above applications.

As we are keen to be as helpful as possible in the processing of the relevant AMC applications for this proposal, please consult us on any future AMC applications if there are any specific issues that you require SEPA's input on i.e. surface water drainage.

I trust the above is acceptable, however please do not hesitate to give me a call if you have any queries.

Scottish Natural Heritage (SNH) - response dated 25/05/2015.

With regards the two above recent consultations for St James Centre, we do not intend to offer comments to these applications.

New Town + Broughton Community Council (NTBCC) - response dated 31/05/2015

Reference Application No. 15/02054/AMC Application for approval of matters specified in Condition 23 of Outline Planning Permission 08/03361/OUT for 'the precise location and extent of individual uses'. St James Centre Edinburgh EH1 3SS

Representation on behalf of the New Town & Broughton Community Council. Having considered the above application, we would make the following comments :

1) Although NTBCC did not make a representation on the previous AMC relating to "the precise location and extent of individual uses" (14/02070/AMC), for which we understand that this AVC application supercedes, we did make comment on 14/05263/AMC more generally. We would therefore want to restate NTBCC's position regarding Condition 23 (ii).

2) Overall- - the Quantum of Development of this AMC application does not differ greatly vs. the previous AMC application (14/02070/AMC) with a marginal decrease in the overall area requesting consent (178,700 m² vs. 181,500 m²) - with both applications being significantly lower than the original outline Planning permission which was granted under 08/03361/OUT.

3) We understand that the previous application (14/02070/AMC), which is still pending consideration, will be withdrawn.

4) We had previously made representation on 14/05263/AMC as follows:

"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. "

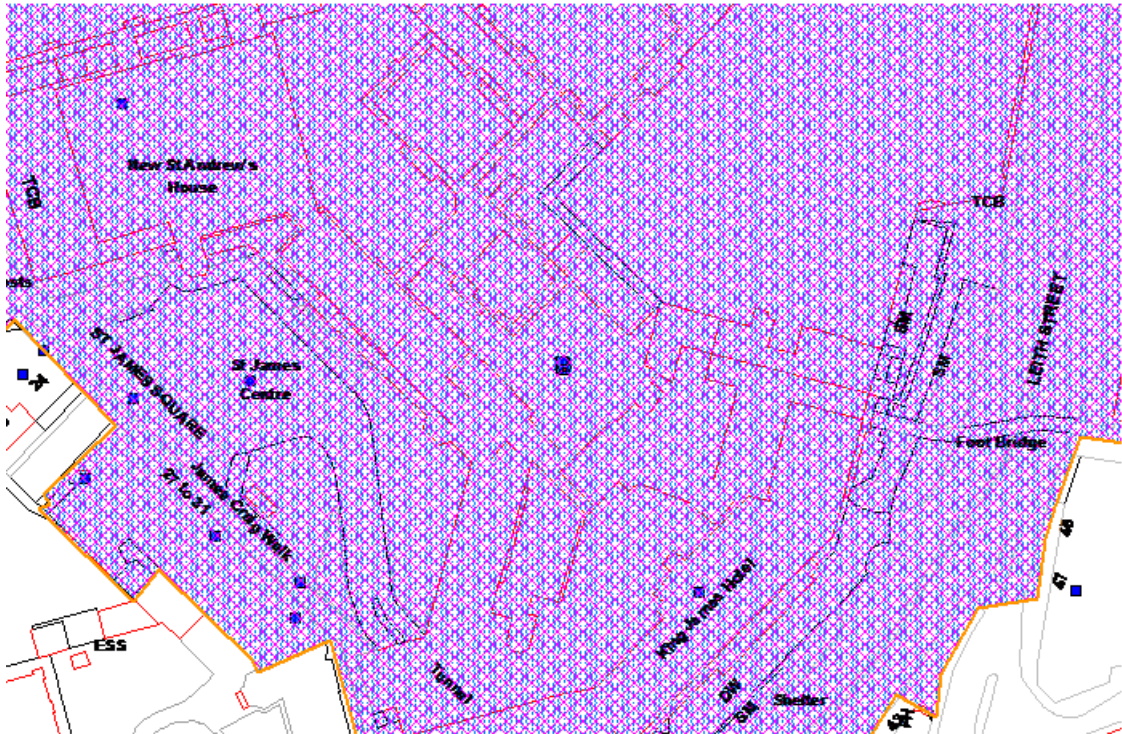
Furthermore, although the Class 1 usage under the current application is lower than the Outline planning permission (54,800 m² vs. 65,000 m²), it has increased marginally from 14/02070/AMC - we had stated previously that " regarding proposed Class uses, a large amount of retail use is proposed against 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".

We would take this opportunity to reiterate NTBCC's general concerns of the ability of the developer to place the large volume of additional retail space on the market and would suggest that some further consideration of "future proofing" may be beneficial.

5) Broadly, we support the marginal reduction in car parking in the latest AMC application vs. the previous AMC application. 58,000 m² of car parking represents a significant increase vs. the current provision and whilst not being against car parking on the city centre in principle, we do have concerns over the ability of the current infrastructure (routed exclusively through Queens Street) to support the increase - therefore a reduction, however marginal, is to be supported.

We are overall very supportive of this development proceeding to the current timeline and the comments outlined above will hopefully be seen as constructive to enable this development to be a major improvement vs. the current site.

Location Plan



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