

Ms Anna Grant  
Planning and Strategy  
City of Edinburgh Council  
1 Cockburn Street  
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The  
Chessels  
Court  
Area  
Association

4 October 2006

### Deputation on CEC Caltongate Masterplan

Dear Ms Grant,

Many thanks for arranging the presentation last week on the new CEC Masterplan for the Caltongate development. I have now read through the documents and discussed them with other members of the Chessel's Court Area Association (CCAA). On behalf of the CCAA, I would like to provide a deputation on the CEC Caltongate Masterplan at tomorrow's planning committee meeting. Listed below are the comments we have on this new document. I would appreciate it if you could pass these comments on to members of the planning committee so they can consider these points before tomorrow's meeting.

Yours sincerely,

Jolin M. Warren  
Chairman

cc. Cllr Bill Cunningham

### Chessel's Court Area Association Deputation on the Caltongate Masterplan to the 5 October 2006 CEC Planning Committee Meeting

This deputation has two sections: one addressing the 'Caltongate Masterplan' document, and one addressing the 'Caltongate Masterplan Sustainability Statement' document.

#### Masterplan Document

- [1] The new Masterplan is much improved, both in its scope, presentation, and content. We'd like to thank the planning officers for their hard work.
- [2] There is huge public support to improve the cityscape and, in particular, to replace the bus depot with a development that fits well with the rest of the Canongate.
- [3] The street layout and building shapes in the new Masterplan is better and much more in keeping with the rest of the Canongate. In particular, the requirements for pedestrian

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permeability is very good.

- [4] The stronger consideration and integration of environmental and sustainability issues in the Masterplan is very welcome, even in light of a few concerns we still have as outlined below. The production of the Sustainability Statement is an excellent addition.
- [5] We welcome the requirement for a diversity of frontages and the use of different architects & styles for buildings.
- [6] We welcome the more specific and restrictive definition of the guide level for building heights.
- [7] We welcome the provision of steps linking Jeffrey Street to Cranston Street and East Market Street.
- [8] We think this is a good draft Masterplan, but would like the following areas addressed before it is adopted. We do not believe the community or the planning committee have had sufficient time to consider what is effectively a new document.
- [9] We have a great desire to see the 'Caltongate' area redeveloped with a high quality and useful mix of buildings and public spaces. Our major concern is that the whole development seems to rely on the demolition of the Canongate Ventures building. There is a significant chance (acknowledged by the planning officers) that the demolition of this building will not be allowed at the detailed planning stage. If this were to happen, we fear that development of the whole site would be shelved, which would be disastrous. The planning officers have assured us that the developers have a 'plan B' if Canongate Ventures can not be demolished. If this 'plan B' is viable, why has it not been presented to the community and the planning committee? We are gravely concerned that the development will stall because of the huge reliance on demolishing the Canongate Ventures building, and lack of willingness to consider alternatives that include the building in the development. It would be a travesty to have a hole in the ground for decades as happened with the Radisson SAS site years ago.
- [10] While there is some diversity of opinion amongst our members, the majority are very much opposed to the demolition of the Canongate Ventures building. From a heritage and sustainability standpoint it cannot be justified. A skilled and creative architect could surely incorporate the existing building and its idiosyncrasies into the 'Caltongate' plan to great effect and usefulness.
- [11] On page 39, the mandate to improve the area under the railway bridge should be stronger — it should state that improvements to the environment must be 'carried out' instead of 'considered'.
- [12] On page 39 and page 43, the provision of a new route to Regent Road is requested, with existing routes only being upgraded if this new route cannot be adequately funded. The Masterplan should be bolder — we need to ensure that existing routes are upgraded as well as having a new route provided.
- [13] The community facility (page 17, figure 14) would be better located on East Market Street. The CEC already owns common good land here and should use this to retain ownership of the community facility for the long-term benefit of the area's residents.
- [14] Although the section on 'Affordable Housing' on page 18 mentions that there should be provision of affordable housing on sites other than Calton Road, these sites are not identified on the map in Figure 14. To ensure that affordable housing is not confined to Calton Road, alternative locations should be shown throughout the document where appropriate.
- [15] The CEC should retain ownership of the affordable business units to ensure that they remain

affordable. This could be done by not selling the land already owned by the CEC and requiring a contribution for their development from the developer of the main area.

- [16] Figure 17 on page 21 refers to 'building permeability', but it is not clear what this is. Would this involve 24-hour public access? It is important the the office block is not so monolithic that there are no public routes through the site.
- [17] Page 21 notes the requirement for public open space in the new housing developments. However, there should be a requirement that at least some of this is 'green space'. Public green space is very important to the amenity for residents and visitors alike, as can be seen by the grass square in Chessel's Court.
- [18] The height of the new CEC Headquarters should not be used as a basis for the heights of new buildings. For instance, the plant installation on the CEC building (a 'roofscape feature') is significantly taller than the old market building to the south, ruining the valley topography.
- [19] There should be no relaxation of height restrictions for 'landmark buildings' as suggested on page 24. This will lead to problems such as that described in the preceding point. The likely outcome of this relaxation would be an imposing hotel that ruins the nature of the valley.
- [20] We still feel certain heights are too high — in particular, the allowed heights for the new residential units are up to 10.4 metres taller than the residential flats that abut the east of the site. These new flats would dwarf the existing flats (which are not very old) and ruin the topography of the valley.
- [21] The section on 'unlisted buildings' on page 31 seems to imply that demolishing the buildings at 221-229 Canongate would be acceptable. This would remove a huge section of the existing Canongate and have detrimental effect on the area, both visually and in environmental terms.
- [22] There should be no provision for a new building to rise above Jeffrey Street (page 33). Because of the inappropriate height of the plant 'feature' on the new CEC Headquarters, the view from the curve Jeffrey Street is the only one that looks down the valley to the Firth. This is vital in connecting the Canongate with its wider setting and locating Edinburgh as a city on the ocean. A building rising above Jeffrey Street here would cut off this view and isolate the area from its wider geographical situation.
- [23] Provision for a 1st storey bridge over New Street (page 34) is not a good idea — the bridge would have to be significantly higher than depicted in Figure 45 (which shows the bridge located in between the ground level and the first floor of the buildings) and would therefore block one of the key views of the area (as defined on page 27, figure 28). A better plan would be for a covered pedestrian link at ground level. The single roof covering the link would have less visual impact than a 1st storey bridge. As there will be minimal (or no) motor traffic on this section of New Street, the roof can be quite low since passage of buses and lorries under the link need not be considered.
- [24] We still don't agree with the proposed demolition of 221-225 Canongate (or any subset of these buildings). It is not good environmental practice to needlessly demolish useful buildings which contain a significant amount of embodied energy. Importantly, they provide good housing and are a valuable part of the streetscape. The uninterrupted line of building fronts are a key quality of the Canongate.
- [25] On page 39, the mandate to improve the area under the railway bridge should be stronger — it should state that improvements to the environment must be 'carried out' instead of 'considered'.

- [26] On page 39 and page 43, the provision of a new route to Regent Road is requested, with existing routes only being upgraded if this new route cannot be adequately funded. The Masterplan should be bolder — we need to ensure that existing routes are upgraded as well as having a new route provided.

### Sustainability Statement

- [1] We would firstly like to congratulate the Council and the developers for developing this Sustainability Statement. The Statement rightly considers the many aspects of sustainability at all stages (procurement, development, operation).
- [2] There actual content and requirements in the Sustainability Statement are well thought out and will make a meaningful contribution to delivering sustainable development. We only have three suggested improvements (below).
- [3] We welcome the requirement for independent auditing to confirm that standards are being met (page 14) and the condition that sustainability appraisal reports must be submitted as part of the planning process (page 13). These requirements are necessary to ensure that the objectives are actually delivered.
- [4] Page 5 indicates that the 15 June planning committee required more reference to sustainability in the Masterplan. In fact, the resolution adopted stated that the final Masterplan should, "in addition to the recommendation at paragraph 3.125 of the Director's report, the achievement of carbon neutrality across the site in terms of procurement, construction and use." Carbon neutrality should therefore be specifically referenced in the Sustainability Statement so that it is a specific goal to work towards.
- [5] We suggest that another aim is for developers to consider the inclusion of appropriately designed wind turbines in residential and commercial buildings. Properly designed, these should have no worse visual impact than the chimneys of older buildings and would be a 'roofscape feature'. The ability for the development to generate some of its own electricity as well as heat would be extremely useful.
- [6] The Sustainability Statement should include a requirement to provide community recycling facilities (*i.e.* facilities for use by the wider residential area, not just the new flats). Whilst the Masterplan document mandates 'local recycling facilities' (Masterplan page 42), there is no provision for this in the Sustainability Statement.

## **Deputation to CEC Planning Committee (5.10.06) Regarding revised Caltongate Masterplan from Canongate Community Forum**

The Canongate Community Forum is grateful for the chance to again address the Planning Committee regarding the revised masterplan but this is mixed with disappointment at the lack of opportunity for members of the public and other organisations to comment on this important document.

The timescale for considering the revised plan before this Committee meeting is completely unsuitable and only serves to fuel public concern that the planning process is undemocratic and exclusive.

It is crucial that the committee enable the same standards of feedback and continued dialogue through consultation of the revised masterplan as that undertaken in Grassmarket and Fountainbridge. This would help demonstrate that the masterplan is not merely a tool to secure a land deal being negotiated between Mountgrange and Edinburgh City Council but a serious attempt to provide a framework to guide future planning proposals for the area.

The proposed revisions do little to address concerns raised regarding the sustainability of this masterplan and certainly do not achieve carbon neutrality across the site as was recommended by the Committee in June. The embodied energy contained in the buildings threatened with demolition should also be considered and attention should be focused on how to improve energy efficiency within them rather than how to replace them.

The revised masterplan is still focused around the provision of a 5\* hotel with a Royal Mile address, views across the Waverley Valley and Conference facilities. This in turn appears to be dependant on the demolition of 18 homes and 2 Listed Buildings. No further consideration has been given to possible alternative layouts to accommodate the mix of uses and retain existing sound buildings

If the masterplan is to replace the existing development framework for the area in order to be more responsive to current and future needs it must take account of emerging local and national policies. It should therefore take account of recent CEC commissioned studies on small business property needs, the Edinburgh skyline report, as well as considering up to date information and research on the need for affordable housing and how it can best be delivered.

Despite there being an urgent need to secure additional housing land supply across the city and to find mechanisms to ensure affordable and family housing is available within the city centre, no consideration has been given to varying the balance of uses proposed originally by Mountgrange.

The masterplan still identifies a significant area of the site for large floorplate office development the type of which can be seen lying vacant around the immediate area - e.g. Waverleygate and new office developments on Holyrood Road.

Edinburgh is the most pressured and least affordable urban housing market in Scotland and there is a real opportunity for the masterplan to demonstrate how mixed tenure housing development which is well integrated with a variety of business, retail and community uses can regenerate a sensitive historic site such as the Canongate.

It appears there has been little change to the original masterplan produced by Mountgrange other than the exclusion of vehicular traffic from the public square and a commitment to including a ground source heating and cooling system. Whilst both these changes are welcomed serious consideration must be given to the need to protect the historic character of the Old Town as this is Edinburgh's unique selling point.

At a time when other cities both here and abroad are trying to recreate city centres where people can live, work and play, many look to Edinburgh as a good example of a city which still has a resident population in the city centre. We still have schools and community facilities serving the city centre residents which provide opportunities to develop a wide range of formal and informal networks which in turn enable innovative projects and enterprises to flourish.

It is vital that in the bid to become the top business tourist destination we do not create the sterile 'clone town' environment which can be seen in any other city in the UK but celebrate and reinforce the unique character of this City

To approve the revised plan as it stands fails to take the opportunity for Edinburgh City Council to provide an exemplar of Urban Design based on best practice both in community engagement and sustainable development.

We therefore urge the Committee

1. Agree to further consideration of alternative layouts and increased commitment to providing an increased level and a greater mix of affordable housing integrated across the whole site.
2. Agree to make a commitment to retain and increase affordable business and workshop space within the site and secure it for future generations through public ownership.
3. To make a commitment to protect structurally sound usable buildings in line with National and Local Planning Policy and guidelines.
4. To facilitate a workshop /feedback session on the revised masterplan which is accessible to members of the public to demonstrate the Council's commitment to 'Listening to communities' as defined in Edinburgh's Community Plan

# **DEPUTATION TO PLANNING COMMITTEE FROM OLD TOWN COMMUNITY COUNCIL**

**5<sup>th</sup> October 2006-10-06**

## **ITEM 5. CALTONGATE MASTERPLAN**

**The Old Town Community Council are grateful for the opportunity to speak today and would like the Planning Committee to consider allowing an opportunity for further consultation BEFORE making a final decision on the masterplan.**

**I would like to draw the committee's attention to the National Standards for community engagement, produced by Communities Scotland and the Scottish Executive, which the Council and the Edinburgh Partnership are signed up to.**

**These standards include the need to ensure that the necessary information is shared between participants, that there is appropriate feedback and that methods used are fit for purpose.**

**It is claimed that there has been extensive community consultation however there has been no further consultation, stakeholders workshops, public meeting or exhibitions carried out since the Committee decision on the 15<sup>th</sup> June to take ownership of the masterplanning process and undertake substantial revisions to the masterplan.**

**Although a presentation was given to a limited number of representatives of some community organisations last week, the revised plans have only been in the public domain for 3 working days.**

**The members of the Community Council have been unable to arrange a meeting to discuss the revised masterplan within this very limited timescale and certainly cannot at this time provide a democratically agreed response, which reflects the views of the community they represent.**

**The regeneration of this area is to be welcomed, but this is an important strategic site within the heart of the Old Town. This plan would result in some significant changes to the Adopted policy framework and this can only aid the efficiency of the development process if it contains clear development guidance which has been agreed with the stakeholders.**

**If the committee are confident that the revised plan is a significant improvement on that previously considered and that the major issues of concern have been addressed why can't there be an opportunity for public consultation or feedback on the revisions now proposed.**

**We therefore urge the committee to agree to postpone making a decision until community organisations and other stakeholders and members of the public who have engaged in the community planning day have a reasonable period to submit comment on the finalised masterplan.**

## CALTONGATE MASTERPLAN

### Critique of Sustainability Appraisal

I have carefully studied the Sustainability Appraisal (SA) submitted with the Masterplan. The SA is structured in a way as to involve much repetition, so rather than go through it clause by clause I intend to pick out certain issues where I challenge the subjective judgements of the consultants. Necessarily the SA concerns itself with the developer's intentions due to the limited information in the Masterplan. However the SA tends towards unsubstantiated and optimistic statements about these intentions.

To set up the appraisal criteria the SA starts by reviewing international, UK, Scottish and local authority guidance defining and setting standards for sustainable development. It emphasises the Waverley Valley Redevelopment Strategy's aim to achieve "an exemplar of sustainable urban development". However, by confining their appraisal to the Masterplan as built, the consultants omit the first requirement for any sustainable development to use or convert existing buildings where possible. Whilst demolition of the bus garage is probably inevitable, no good reason is given for demolishing the other 5 buildings in use, two of which are listed.

#### Employment

The repetition in the SA leads to confusion about the number of jobs to be "created" by the development. Section 3.4 claims 2451 – 3093, Section 4.3 gives a "potential" of 2500 permanent jobs, Section 5.1 claims 2613 – 3348. These widely varying figures would be amusing were it not that job creation has been put forward as a major justification for the development.

As the figures in 3.4 and 5.1 do not differentiate between permanent and short term construction jobs the figures are meaningless for any economic appraisal of the Masterplan. If the potential 2500 permanent jobs are realistic, one can query how many will be new to Edinburgh and how many displaced from other, presumably less attractive, offices? Building more office space does little to "create" jobs. It is places like the Canongate Venture (scheduled for demolition in the Masterplan) that provide cheap space for starter businesses that actually have the potential to create jobs.

The jobs available in the retail and hotel developments are like to be low pay and short term or part-time. I am sceptical whether the replacement accommodation for "artisans" displaced by the demolitions will be effective. Experience shows that the costs of new build premises are usually too high for such users.

#### Planning

In Section 3.1 (assessed as Best Practice) it states that there was a detailed contextual analysis of the history of the site which has influenced the urban form and returned it to its Old Town context which had been disrupted by industrial development. This argument is difficult to accept when the Masterplan shows a 4 storey monolithic office block taking up half the bus garage area, effectively reproducing the unbroken

wall of building down the west side of New St. which has blighted the area since the bus garage was first built.

The wind analysis was “desk based”. Anyone not desk based who walks around the area, especially along East market St, will know that the wind can funnel through the Waverley Valley with some strength. I cannot agree that the Masterplan will not be affected by this turbulence, indeed it may well exacerbate it. Surely some on site readings of wind forces was not beyond the developer’s budget? This is an important issue, as, in my (desk based) opinion the proposed new public square will be unpleasantly affected by wind turbulence.

The SA states that the “area is designated a Major Development Opportunity in the Local Plan. I believe the Local Plan designates the New St. bus garage only as a MDO, not the whole site covered by the Masterplan which has been extended south to the Canongate.

### Heritage

It is difficult to agree with the assessment of the Masterplan being “good practice” in respect of heritage issues. The SA does not query the demolitions of two listed buildings, and structurally sound lived-in tenements in Canongate, but instead emphasises the “mitigations”, such as the façade retention on the otherwise demolished old Sailors Ark building. Façade retention is not normally regarded as good practice, and only used as a last resort – in this case in an apparent attempt to appease heritage organisations. It is contentious to claim in the SA that facade retention “will maintain the character of the Royal Mile”. Character depends not just on a façade but a building’s function and history. Disguising the front of a hotel the retained façade will be meaningless.

It can hardly be regarded as “good practice” to insert the bulk of a 5 storey hotel into the Royal Mile.

### Transport

With a central location the Masterplan obviously scores well. However the claims for pedestrian priority through the “permeability” of the layout should be examined. The large office block which replaces much of the bus garage is not permeable to anyone but those who work there. It has a closed unbroken face to New St, and an almost similar one to the new housing to its east.

The much-vaunted “permeability” seems to pertain principally to the new opening to Canongate. If this is primarily a pedestrian/cycle route it could have passed through a number of existing pends opening off Canongate (as was successfully done in the truly permeable redevelopment of the Holyrood Brewery site on the south side of the Canongate).

A new connection to Calton Hill is also commended. This is a new staircase up to Regent Rd. replicating the two existing (admittedly grotty) stairs up. However the new stair emerges on to Regent Rd. about halfway towards Easter Rd. so is hardly convenient access to Calton Hill. For anyone older than 40 the ascent will be forbidding.

## Social and Community issues

I question the “good practice” awarded in this section. The consultation with the local community by the developer has been perfunctory – an exhibition in St. James shopping Centre is hardly convenient to residents of the Canongate. The community planning consultations have been carried out by the City of Edinburgh Council, not the developer. To date there has been no public feedback on these consultations, but the impression from those present was the rejection of many aspects of the Masterplan by the community. The statement in the SA that the development “was considered to have a beneficial effect” prompts the question by whom?

The SA refers to the benefits to the local community in the plan. My comments are:

- Supermarket – experience with the proposed supermarket in the Holyrood Brewery redevelopment shows that the viability of such shops is in doubt, especially if situated off a major route.
- Accommodation for artisans – new build premises often cost too much.
- Gym – presumably part of the hotel’s private health club and unlikely to be affordable by many locals.
- Crèche and community meeting room – questions of ownership and affordability arise again.

The SA emphasises improvements in safety in the area built into the plan. It is hard to see any improvement in the safety of New St. if the Masterplan goes ahead. Walled in by 4 storey office blocks on both side, and with views blocked at either end (by the existing rail bridge and the new pend carrying part of the hotel) it is likely to be more unpleasant and dangerous. And surely a development which aspires to be an exemplar of good urban design should be creating natural surveillance, not relying CCTV from the outset?

The SA states that affordable housing will be provided in Calton Rd. to meet the Council’s standards. Does the number of new houses take into account the number of affordable houses lost in Canongate or are those to be ignored?

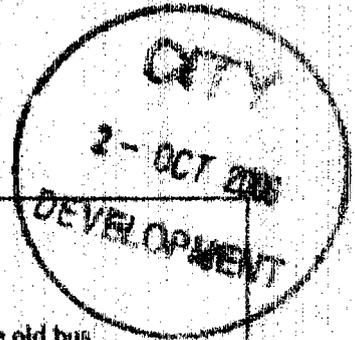
## Regeneration

In Section 4 the SA claims that “the Masterplan will provide a framework for the regeneration of the Waverley Valley and the Canongate”. This arrogant statement betrays the developer’s lack of understanding of the recent history of the area. Over the last 20 years the Calton Rd. area has become a success story of incremental post-industrial urban renewal. This was spearheaded by small-scale local private sector housing conversions and new build, and has changed the area enough to attract national volume builders. Blight has only persisted due to the derelict bus garage. Larger scale renewal has taken place on the Holyrood Brewery site to the south of Canongate, but this exemplary scheme only intervened in Canongate where there were existing gap sites. The completion of the Scottish Parliament will bring more activity and people into the lower part of Canongate and trigger more incremental upgrading and renewal.

A proper analysis of the site context and history might have led the developer to focus his attentions on the regeneration of the bus garage site which clearly needs large scale action. The effect of this regeneration on the adjacent areas could then be monitored, and eventually (if necessary at all) a more sensitive and less draconian revitalisation of the Canongate could be undertaken

Jim Johnson  
Dip.Arch..ARIAS

# Draft Caltongate Masterplan Comments



Dear Sir or Madam,

I am generally in favour of plans to develop the area around the old bus station in New Street. However there are certain aspects of the plan which are alarming.

One aspect of the plan is for an office building in Jeffrey Street. Indications are that this may be as high as seven stories. This building will jut into the Waverley valley and dominate this part of Edinburgh. It will transform an area which is sunny and full of open and interesting views into one of shadows and closed spaces. It will particularly degrade the views as you walk east along Jeffrey Street. This is one of the most historic and busiest tourist areas in Edinburgh. It is being destroyed by the developers desire to squeeze the absolute maximum office space out of this small area. The new Council office buildings, where the architects have shown some restraint regarding the preservation of the Waverley valley, will also be overshadowed.

One other aspect which will be detrimental to the area is to have a two storey building on Jeffrey Street to the west of the above office building. This will completely obliterate the view of Calton Hill as you look along Jeffrey Street from the High Street. This is an outstanding view at present and one that attracts many tourists into Jeffrey Street. The idea of a viewing terrace will not mitigate this as no one will be drawn into Jeffrey Street in the first place. This destruction of first class views will ruin the qualities that make the old town attractive to tourists and bring them to the hotels that are being proposed. As you know a petition was handed in to the council a few years ago with thousands of signatures to preserve the view in question. Why is this being ignored now?

The plan to demolish the old school which is a listed building, demonstrates that the character and fabric of the Old Town is being sacrificed to help with the developer's profit margin. I think that the new Scottish parliament demonstrates that old buildings can not only be integrated into new developments, but that they can enhance the new buildings. Queensberry House was preserved and now adds considerably to the overall scheme.

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Age: Under 16  16-29  30-44  45-59  60-74  75+

*Any personal details will be for Council use only and for the purposes of this consultation exercise.*

Please leave any completed comment sheets in the box provided or send to Anna Grant, Planning and Strategy, 1 Cockburn Street, Edinburgh, EH1 1ZJ

----- Original Message -----

From: "Marie Hamilton" >

To: <anna.grant@edinburgh.gov.uk>

Sent: Wednesday, October 04, 2006 4:04 PM

Subject: Caltongate revised plan

I wish to register my objection to the very short time you are allowing for public consultation on the revised plan.

Marie Hamilton, Canongate resident

**PROPOSED AMENDMENTS TO SECTION 7.0, 1<sup>st</sup>  
PARAGRAPH OF THE REVISED CALTONGATE  
MASTERPLAN dated 5 October 2006**

(The additions and amendments to the text are shown in italics)

“Figure 60 outlines the traffic circulation through the site. East Market Street, part of New Street, the Canongate and *West Calton Road* remain as primary vehicular routes. The main vehicular access to the *residential car parking of the development* is from Calton Road. *In accordance with the Waverley Valley Redevelopment Strategy, approved by the CEC, heavy vehicle servicing access to the development will be from Leith Street via West Calton Road and methods will be introduced for discouraging heavy and service traffic from using the eastern part of Calton Road.*”

The Committee is requested to approve this amendment.