

Grange/Prestonfield Community Council

Chief Planning Officer, PLACE,
City of Edinburgh Council,
Waverley Court, 4 East Market Street.
Edinburgh EH8 8BG

For the attention of Lynne McMenemy, Case Officer

12th July 2021

Re: Planning Application 21/03066/FUL at 34 Blackford Avenue EH9 2PP
Demolish existing and erect new dwelling

Dear Lynne McMenemy,

This Submission is in response to the Request for Consultation dated 28th June 2021 on application 21/03066/FUL, which in turn followed 20/04517/FUL for a scheme of similar purpose refused on 26th February 2021, to which this community council (GPCC), The Grange Association and local residents objected. The site has on it a single storey house, mainly a 19thC simple utilitarian building of “railway style” probably erected for business to do with the former Blackfordhill railway station. This building has later additions and alterations.

To the north on the west side of Blackford Avenue are later Victorian villas bordering and within the Grange Conservation Area. Immediately to the south are the Avenue Store, the cat clinic and the LDP Protected Blackfordhill station site on the South Suburban Rail Line. On the east side of Blackford Avenue opposite the cat clinic is the local Post Office. This is a well-patronised convenience retail small hub serving the local community, adjacent to bus stops.

The Report of Handling on 20/04517/FUL states:- “Though the building is not listed or of any significant historic or architectural interest, it contributes to a sense of place in this location and provides a feature of local interest”. GPCC is not in a position to assess whether this building could be adapted to meet current building and other environmental standards and offer a satisfactory level of amenity for future occupants. Therefore we have to accept that this application, like its predecessor, has to be considered as submitted, on the basis that the existing dwelling is to be demolished and replaced on the site with a new one.

Fitting a house onto the site: It is the view of GPCC, however, that a new house on this site should not be where the existing one is located, too close to the public highway, but positioned to comply with relevant housing development standards and related to the established pattern of the adjacent villas to the north. The existing building dates from when its surroundings were much less urban, located at a fork where the road led to the railway station for reasons unconnected with housing and before modern planning legislation. Demolishing it would remove the sense of place and heritage it now has, but a new dwelling in its place cannot replicate that.

A new dwelling set further back on the site would be less dominant and discordant than the current proposal which is higher than the existing dwelling, albeit slightly lower than the refused scheme. This could create an opportunity to establish a safer wider public footway, reflecting the building line and spatial structure to the north and forming a more sympathetic transition to the retail premises to the south. We point out that the Edinburgh Design Guidance indicates a minimum pavement width of 3m and a further 3m of “defensible space” to the principal elevation of a house, whereas this scheme perpetuates the narrow pavement at just 1.6m.

Moreover, the northern section of the building line, including three full-height windows, is proposed to align with the front garden boundary wall of 32 Blackford Avenue to the north, such that the front elevation of the house would be just 2.9m from the kerb line of this busy street and well forward of the Avenue Store's frontage.

The future: Looking ahead the present buildings forming the retail premises will come to the end of their useful life, especially as it becomes more challenging to meet environmental and building standards. This local retail centre could then be subject to redevelopment proposals, maybe shaped by a Place Brief to ensure it has a future, and possibly incorporating the LDP protected rail halt. We suggest that a new house at 34 Blackford Avenue should be sited to facilitate that process.

Car Parking space and vehicle access: The application site lies within the B1 Priority Parking Area. When this controlled parking scheme was being introduced in 2012, there was great concern about the potential detrimental effects on these valued local convenience stores near the site, one of which being the local Post Office, serving an area beyond walking distance for older people and people with limited mobility. The parking scheme was amended to permit short term parking for up to 30 minutes in a bay on the west side of Blackford Avenue, with no charge. This parking bay, in place since 2012 immediately north of the bus stop, is well used, helping to keep these local businesses viable.

The proposed vehicle access for the application site would sever the parking bay into two less flexible sections and would reduce available parking significantly. This bay is also used by delivery vehicles for the shops and the reduction in available parking could restrict deliveries.

We note that only one property on this west side of Blackford Avenue has off-street parking, and that is an historic anomaly that does not have the benefit of planning permission. Other applications for off-street parking have all been refused and the substantial villas adjacent to the application site at 32 Blackford Avenue and 1 Mortonhall Road have no off-street parking.

We do not agree that there is any unique requirement for the application site to have vehicle access from Blackford Avenue. The provision of one off-road parking space in this application is the same as the refused application and that Report of Handling states that one parking space will be provided in accordance with LDP Policy Tra2 and the standards set out in the Edinburgh Design Guidance. However, we suggest that this does not have to be provided where circumstances dictate otherwise as set out above. This is a busy road, as is pointed in the same Report of Handling under Environmental Protection. We suggest that this proposed car parking space and vehicle access could be a hazard to other road users, including buses and cyclists, and could compromise pedestrian safety in conflict with LDP Policy Tra4d. Therefore GPCC objects to the proposed car parking space and vehicle access.

Conclusion: For the reasons set out above GPCC objects to application 21/03066/FUL and has already submitted an objection to it in response to the public consultation. This submission in similar terms to that objection is in further support of that objection.

Yours truly,

Tony Harris
Planning Spokesperson GPCC

