

Genlo Design.  
FAO: Grant McPherson  
31 Damhead, Old Pentland Road  
Lothianburn  
Edinburgh  
Scotland  
EH10 7EA

Perservere Ltd.  
C/O: Mr R Graham  
20 Gordon Street  
Leith  
EH6 8NA

**Decision date: 9 August 2019**

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS  
DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013**

Proposed development of 3no. one bed & 5 no. studio apartments on existing gap site.  
At 12 - 14 South Fort Street Edinburgh EH6 4DN

**Application No:** 19/02479/PPP

**DECISION NOTICE**

With reference to your application for Planning Permission in Principle registered on 5 June 2019, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

**Conditions:-**

**Reasons:-**

1. The proposal adversely affects the setting of nearby listed buildings and as such would be detrimental to the architectural character, appearance and historic interest of the building. It therefore does not comply with Policy Env 3.
2. The proposal does not preserve or enhance the special character and appearance of the Leith Conservation Area and so does not comply with Policy Env 6.
3. In respect of housing density the proposed density is considered excessive for the site area. The proposal therefore does not comply with Policy Hou 4.

4. Insufficient information has been submitted to assess the impact that the proposal will have on neighbours.

5. The proposal does not provide any green space within the site and is not within reasonable proximity to public green space. It therefore does not comply with Policy Hou 3.

Please see the guidance notes on our [decision page](#) for further information, including how to appeal or review your decision.

Drawings 01, 02, 03, 04, 05, 06, represent the determined scheme. Full details of the application can be found on the [Planning and Building Standards Online Services](#)

The reason why the Council made this decision is as follows:

The proposal adversely affects the setting of nearby listed buildings and as such would be detrimental to the architectural character, appearance and historic interest of the building. Additionally, the proposal does not preserve or enhance the special character and appearance of the Leith Conservation Area. In respect of housing density, the density is considered excessive for the site area and leads to a development which is crammed into the site. In respect of green space the proposal makes no provision on site and the site is not within reasonable distance of public green space. The proposal therefore does not comply with the relevant policy and guidance.

This determination does not carry with it any necessary consent or approval for the proposed development under other statutory enactments.

Should you have a specific enquiry regarding this decision please contact Alexander Calderwood directly on 0131 469 3824.

*D R Leech*

**Chief Planning Officer**

**PLACE**

**The City of Edinburgh Council**

## NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at [www.eplanning.scot](http://www.eplanning.scot) or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email [localreviewbody@edinburgh.gov.uk](mailto:localreviewbody@edinburgh.gov.uk).

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

# Report of Handling

## Application for Planning Permission in Principle 19/02479/PPP

At 12 - 14 South Fort Street, Edinburgh, EH6 4DN  
Proposed development of 3no. one bed & 5 no. studio  
apartments on existing gap site.

Item	Local Delegated Decision
Application number	19/02479/PPP
Wards	B12 - Leith Walk

### Summary

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The proposal adversely affects the setting of nearby listed buildings and as such would be detrimental to the architectural character, appearance and historic interest of the building. Additionally, the proposal does not preserve or enhance the special character and appearance of the Leith Conservation Area. In respect of housing density, the density is considered excessive for the site area and leads to a development which is crammed into the site. In respect of green space the proposal makes no provision on site and the site is not within reasonable distance of public green space. The proposal therefore does not comply with the relevant policy and guidance.

### Links

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<a href="#">Policies and guidance for this application</a>	LDPP, LHOU01, LHOU02, LHOU03, LHOU04, LDES01, LDES04, LDES05, LDES10, LEN03, LEN06, LEN08, LEN09, LTRA02, LTRA03, CRPLEI, NSG, NSLBCA,
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# Report of handling

## Recommendations

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**1.1** It is recommended that this application be Refused for the reasons below.

## Background

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### 2.1 Site description

The site is a small area of land (143sqm) attaching the blank gable end of a Georgian house and currently occupied by a builders yard/scaffolding store, including a small single storey shed over part of the site. The adjoining house was listed category B on 30.3.1994 ref.27421. There are further Georgian houses to both south and east, separated from the site by the adjoining roads. The tenement to the south contains a small public house at ground floor level.

Land to the immediate west (on Trafalgar Lane) serves as a common back green (screened behind a tall stone wall). Land opposite that area (south-west of the site) is screened by a tall brick wall and security fence over. This area is used to park coaches overnight. The surrounding area is otherwise residential.

This application site is located within the Leith Conservation Area.

### 2.2 Site History

18/10175/PPP - This application sought planning permission in principle for the construction of a studio apartment development on the site. It was refused on the 8th of February, 2019. It was refused on the grounds that the form and design were unacceptable in relation to the adjacent listed building, it lacked cycle parking and that it gave an unacceptable housing density.

## Main report

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### 3.1 Description Of The Proposal

This application seeks planning permission in principle for a new residential development comprising 3 one bed and 5 studio apartments. The proposed materials are as follows:

- Walls: Buff face brick to compliment existing/proposed sandstone

### 3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

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, it needs to be considered whether:

- a) the principle of housing is acceptable;
- b) the scale, form and design are appropriate within the context of the urban area;
- c) the proposals preserve the character of the adjacent listed building and preserve or enhance the character or appearance of the conservation area;
- d) impact on neighbouring amenity is acceptable;
- e) amenity of the created units is acceptable
- f) parking is considered; and
- g) public comments have been considered.

a) 'Policy Hou 1' states that priority will be given to the delivery of the housing land supply on other suitable sites in the urban area, provided proposals are compatible with other policies in the plan. On this basis the principle of housing development is unacceptable because there are a number of policies which the proposal does not comply with.

'Policy Hou 2' states that the Council will seek the provision of a mix of housing types and sizes where practical, to meet a range of housing needs, including those of families, older people and people with special needs, and having regards to the character of the surrounding area and its accessibility. The surrounding area is characterised by residential development which varies in size and the number of bedrooms provided. This application proposes 3, 1 bedroom apartments and 5 studio apartments and so contributes to the provision of a mix of house types and sizes in the area.

'Policy Hou 4' states that the Council will seek an appropriate density of development on each site having regard to its characteristics and those of the surrounding area and to the need to create an attractive residential environment and safeguard living conditions within the development. In the instance of this application, whilst the visual density as seen from South Fort Street is broadly "correct", the attempt to have two flats per floor on this restricted site creates a density that is not characteristic of the surrounding area, crams too many units on the site and will not create a satisfactory residential environment.

b) 'Policy Des 1' states that planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a sense of place and would not be damaging to the character or appearance of the area around it.

'Policy Des 4' states that planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider area townscape and landscape, and impact on existing views.

In terms of this application the proposal seeks to introduce a flat roofed block of studio/1 bedroom apartments which will be finished in buff face brick. Neither the flat roof element of the proposal or the proposed finish bears an acceptable relation to the adjacent buildings which have pitched roofs and traditional finishes. Apart from the colouring of the proposed brick the design bears no relation to other development in the immediate and wider area and as a result detracts from its character and appearance. Therefore the proposal does not comply with Policy Des 1 and Policy Des 4.

c) 'Policy Env 3' states that development which affects the setting of a listed building will be permitted only if not detrimental to the architectural, character, appearance or historic interest of the building, or to its setting. In the instance of this application, the form and design of the proposed apartment block bear no relation to the adjacent listed building at 8-10 South Fort Street (reference LB27421) and also the other listed buildings in the surrounding area. The proposal is of a modular profile which does not respect or relate to the architectural features or historic interest of these listed buildings. As a result of this the proposal does have a detrimental impact on the architectural, character, appearance and historic interest of the setting of these buildings and so does not comply with Policy Env 3.

'Policy Env 6' states that development within a conservation area will be permitted if it preserves or enhances the special character or appearance of the conservation area and is consistent with the relevant conservation area character appraisal. As previously discussed the proposal fails to suitably integrate with the adjacent listed building which it will be attached to. The northern end of South Fort Street is characterised by a number of traditional tenement and terraced buildings. The Leith Conservation Area Character Appraisal states that the Madeira area in which the site is located retains a largely Georgian domestic character, with stone buildings and slate roofs predominating. It can therefore be concluded that the proposal is not respectful of its immediate surroundings and that of the wider conservation area. The proposal does not comply with Policy Env 6.

d) 'Policy Des 5' states that planning permission will be granted for development where it is demonstrated that the amenity of neighbouring developments is not adversely affected and that future occupiers have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook.

From the information provided it is not possible to determine the extent to which the proposal would have implications for daylight, sunlight, privacy and immediate outlook. As this is an application for Planning Permission in Principle this may be considered as one of the reserved matters. The applicant would need to provide plans of neighbouring development in relation to the proposed building and identify the positioning of neighbouring windows. A sunlight and daylight test would also be required. This could be addressed within any future application for detailed full planning permission.



e) The Edinburgh Design Guidance states that one bedroom apartments should have a minimum internal floor area of 52 sqm and that studio apartments should have a minimum internal floor area of 36 sqm. In the instance of this application the proposed 3, 1 bedroom apartments are 52 sqm and the 5 studios range between 39 and 50 sqm. The proposal therefore complies with guidance in this respect.

Policy Hou 3 states that planning permission will be granted for development which makes adequate provision for green space to meet the needs of future residents and that for flatted development a minimum of 10 square metres per flat should be provided. The Edinburgh Design Guidance also states that all homes should be within 400 metres of good quality greenspace of at least 500 square metres. In the case of this application the nearest is Victoria Park which is 410 metres to the west. The proposal does not make provision for green space on site and also is not an acceptable distance away from public green space. Additionally, the flats will solely overlook the frontages of neighbouring residences and not overlook any form of natural environment. The proposal therefore does not comply with Policy Hou 3.

f) Policy Tra 2 considers car parking. On-site parking is not included and not possible. However current policy objectives seek to minimise car generation and a car-free development in this location is acceptable, given its close proximity to Ferry road, which is a major public transport corridor.

Policy Tra 3 considers cycle parking. Cycle parking is identified in the submitted plans. As this is an application for Planning Permission in Principle the suitability of the level of provision may be considered as one of the reserved matters. This could be addressed within any future application for detailed full planning permission.

g)The following material planning considerations were raised and were addressed in previous discussion:

- The proposal would lead to the overdevelopment of the site.
- Implications for parking.
- Scale of proposal will put a strain on local services.
- Scale of proposal will block views of areas including the gardens to the rear. Proposal is contrary to the character of the Leith Conservation Area.
- Proposal will have adverse implications for the adjacent listed building and the setting of the listed buildings in the surrounding area.
- Proposal would have adverse implications for the amenity of neighbouring residents.

The following issues are not material planning considerations:

- Implications for the foundation of No.10 South Fort Street.
- Relationship with owner of the site.

It is recommended that this application be Refused for the reasons below.

### **3.4 Conditions/reasons/informatives**

#### **Reasons:-**

1. The proposal adversely affects the setting of nearby listed buildings and as such would be detrimental to the architectural character, appearance and historic interest of the building. It therefore does not comply with Policy Env 3.
2. The proposal does not preserve or enhance the special character and appearance of the Leith Conservation Area and so does not comply with Policy Env 6.
3. In respect of housing density the proposed density is considered excessive for the site area. The proposal therefore does not comply with Policy Hou 4.
4. Insufficient information has been submitted to assess the impact that the proposal will have on neighbours.
5. The proposal does not provide any green space within the site and is not within reasonable proximity to public green space. It therefore does not comply with Policy Hou 3.

## **Risk, Policy, compliance and governance impact**

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

## **Equalities impact**

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### **5.1 The equalities impact has been assessed as follows:**

The application has been assessed and has no impact in terms of equalities or human rights.

## **Consultation and engagement**

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### **6.1 Pre-Application Process**

Pre-application discussions took place on this application.

### **6.2 Publicity summary of representations and Community Council comments**

3 letters of representation have been received from 3 members of the public; this is summarised and addressed in the Assessment Section of this Report.

## **Background reading / external references**

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- To view details of the application go to
- [Planning and Building Standards online services](#)

## **Statutory Development**

### **Plan Provision**

Located within the urban area as defined by the Edinburgh Local Development Plan 2016.

### **Date registered**

5 June 2019

### **Drawing numbers/Scheme**

01, 02, 03, 04, 05, 06

Scheme 1

David R. Leslie  
Chief Planning Officer  
PLACE  
The City of Edinburgh Council

Contact: Alexander Calderwood, Planning Officer  
E-mail:alexander.calderwood@edinburgh.gov.uk Tel:0131 469 3824

## **Links - Policies**

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### **Relevant Policies:**

#### **Relevant policies of the Local Development Plan.**

LDP Policy Hou 1 (Housing Development) sets criteria for assessing the principle of housing proposals.

LDP Policy Hou 2 (Housing Mix) requires provision of a mix of house types and sizes in new housing developments to meet a range of housing needs.

LDP Policy Hou 3 (Private Green Space in Housing Development) sets out the requirements for the provision of private green space in housing development.

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

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

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Des 10 (Waterside Development) sets criteria for assessing development on sites on the coastal edge or adjoining a watercourse, including the Union Canal.

LDP 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.

LDP Policy Env 6 (Conservation Areas - Development) sets out criteria for assessing development in a conservation area.

LDP Policy Env 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological remains of national importance.

LDP Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

LDP Policy Tra 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

**The Leith Conservation Area Character Appraisal** emphasises the area's unique and complex architectural character, the concentration of buildings of significant historic and architectural quality, the unifying effect of traditional materials, the multiplicity of land use activities, and the importance of the Water of Leith and Leith Links for their natural heritage, open space and recreational value

### **Relevant Non-Statutory Guidelines**

**Non-statutory guidelines** 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

# Appendix 1

## Consultations

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- Environmental Protection

"Date: 12th July 2019

TOWN AND COUNTRY PLANNING SCOTLAND ACT 1997  
PROPOSED DEVELOPMENT OF 3 No. 1 BEDROOM AND 5 No. STUDIO  
APARTMENTS | 12-14 SOUTH FORT STREET, EDINBURGH, EH6 4DN  
(19/02479/PPP)

I refer to the above application and would offer no objections in relation to this proposal but would recommend that the following condition is attached to the consent if granted:

Prior to the commencement of construction works on site:

- (a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
- (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority
- (c) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

The development will comprise 3 one bedroom and 5 studio apartments on four storeys; basement to second floor.

The proposed development site is currently used as a builders yard and has a single storey building in the north eastern part of the site.

There are flatted residential properties to the north and east on South Fort Street, a public house to the south on Trafalgar Place with flatted residential properties above and adjacent to it and a yard used for the parking of coaches to the south west.

The proposed development site has been used as a builders yard for a number of years and therefore the developer should demonstrate that the land is or can be made suitable for housing."

- Archaeologist

"12-14 South Fort Street

Further to consultation request, I would like to make the following comments and recommendations concerning this planning application for proposed development of 3x one-bedroom and 5 studio apartments on existing gap site.

The site is situated on the edge of historic medieval port and town of Leith and significantly overlying the site associated with the 16th century siege fortifications of known as Mount Falcon. The contemporary Petworth Map of the 1559/60 Siege of Leith depicts a large series of fortifications known as Mount Falcon which fixed the NE line of the English/Protestant forces besieging the government held port of Leith. Nineteenth and 20th century map evidence indicates that most of the site has remained free from significant development either as farm land or latterly garden grounds.

Based on the historical and archaeological evidence the site has been identified as occurring within an area of potential archaeological significance. Accordingly, this application must be considered under terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and CEC's Edinburgh Local Development Plan (2016) Policies ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

In terms of buried archaeology, map evidence indicates that most of the site has remained free from significant development either as farm land or latterly garden grounds. As such it is likely that important evidence (ditches, siege works and/or artefacts) for the 16th century nationally significant military actions in Leith may survive across the site. It is considered therefore, that this proposal would be regarded as having a potential moderate impact as ground-breaking works associated with construction of the new development are likely to disturb significant remains.

Accordingly, it is essential that phased programme of archaeological work is undertaken prior to development and submission of detailed FUL/AMC applications. This will see a phased archaeological programme of works, the initial phase being an archaeological evaluation of the site. The results of the evaluation will allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and /or excavation, recording and analysis of any surviving archaeological remains both externally and internally.

It is recommended that the above programmes of archaeological work are secured by the following condition;

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building recording, analysis & reporting, publication in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

The work would be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and

resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant."

- Transportation -

"No objections to the application subject to the following being included as conditions or informatives as appropriate:

1. Cycle parking to be a reserved matter. The Council's parking standards set out the level of cycle parking required for development in this area. The applicant should note that cycle parking is required to be in a safe and undercover location which is convenient, accessible and easy to use;

2. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport."

END



# Comments for Planning Application 19/02479/PPP

## Application Summary

Application Number: 19/02479/PPP

Address: 12 - 14 South Fort Street Edinburgh EH6 4DN

Proposal: Proposed development of 3no. one bed & 5 no. studio apartments on existing gap site.

Case Officer: Alexander Calderwood

## Customer Details

Name: Mr Andrew Dodds

Address: 10/3 South Fort Street Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:\* Proposed plan breaks listed building line

\* No basement currently exists, could undermine the foundation to #10 South Fort Street

\* Would require structural stabilizing work to #10 South Fort Street

\* Overdevelopment of site / no amenities

\* Very limited public parking will be exacerbated

\* Proposed plan suggests building over a window on ground floor elevation in #10 South Fort Street on adjacent wall

\* Owner of proposed land has history of improper maintenance and causing damage to #10 South Fort Street

# Comments for Planning Application 19/02479/PPP

## Application Summary

Application Number: 19/02479/PPP

Address: 12 - 14 South Fort Street Edinburgh EH6 4DN

Proposal: Proposed development of 3no. one bed & 5 no. studio apartments on existing gap site.

Case Officer: Alexander Calderwood

## Customer Details

Name: Mr Robert Ainsworth

Address: 9-8 South Fort Street Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Mr. Calderwood,

I write to object to the development at 12 South Fort Street reference 19/02479/PPP.

The building is disproportionately dense in its provision of housing. The height of the building is above the levels of the surrounding properties and contains a greater number of stories. This is despite its small footprint and will result in a disproportionate strain on the local services. The property was recently refused planning on this basis, and the revised application presents no reduction.

The height and appearance of the building will block views of areas including the gardens to the rear and does not comply with the local development plan in relation to the Leith conservation area.

The site has never been used for residential purposes, previously forming a garden and garage for the adjacent property at number 10. I believe a change of use is required to convert from the current unclassified commercial use as a building materials storage yard.

The existing one storey building is attached directly onto an existing listed building, within its curtilage.

Edinburgh City Council Listed Buildings Guidance, under guidance "New development in the grounds of listed buildings" states "Buildings and structures erected before 1 July 1948 within the curtilage of a listed building are treated as part of the listing building, even if they are not included within the description. Listed building consent will, therefore, be required for works which affect

their character. Planning permission may also be required."

The property is within the curtilage of the listed building: Numbers 10 and 12 shown as one property on 1893 ordinance survey sheet I.16.21 <https://maps.nls.uk/view/74415603>. The existing one-storey building dates to before 1945: The building at number 12 is present on 1945 ordinance survey sheet 36/2676 S.W. <https://maps.nls.uk/view/102734561>

The property is thus in need of listed building consent.

Additionally, the appearance, height and density of the building would also have a detrimental impact upon the 6No. listed buildings within a 30m radius of the building. The proposed structure would have a detrimental impact upon the current views of the listed terraces and their garden setting to the rear. Views of gable would be lost entirely.

There exists no provision for parking for the proposed building. This is contrary to Table 1A of Edinburgh City Council Parking Standards and I can find no reason this building should be exempt. A total of 5.33 spaces are required to the parking standards.

There is no excess on-street parking at this location as demonstrated by recent issues with council minibuses providing transport for disabled people being unable to navigate down Trafalgar Lane and by the applicant's parking of commercial vehicles in the road of South Fort Street during use of the site. Previous applications at this site have included car parking.

There is insufficient space available in the cycle area to Table 1B of Edinburgh City Council Parking Standards. A total of 12 spaces are required to the parking standards. The location of the cycle area is not situated close enough to the building entrance. Additionally, there is insufficient space around the cycle area to retract and stow bicycles, due to the limited width of the footpath. The inclusion of the cycle area on top of the ground floor of the building will result in a step, which is contrary to Appendix 2 of Edinburgh City Council Parking Standards.

I do not believe the ramp to the entrance can be DDA compliant, in the limited space available.

There is no provision of bin chutes to the property - despite a storage basement. There is no excess provision of communal waste storage/disposal on the street, and the most recent nearby development needed to include a private bin store.

It should be noted that the applicant's company is incorrectly noted on the application. The company is Persevere Property Group, a private company owned by the current occupier to the site - who is a building contractor. The application erroneously lists the company as Persevere Ltd, which is a wholly owned division of the Port of Leith Housing Association.

It should also be noted that the description of the proposed building works is incorrect. The

description states 5No. studios and 3No. 1-bed flats. Whereas, the submitted drawings show 4No. studios and 4No. 1-bed flats.

4No. studio and 4No. 1-bed flats in such a small footprint is simply unrealistic and detrimental to the area.

Yours Sincerely,  
Robert Ainsworth  
Flat 8, 9 South Fort Street

# Comments for Planning Application 19/02479/PPP

## Application Summary

Application Number: 19/02479/PPP

Address: 12 - 14 South Fort Street Edinburgh EH6 4DN

Proposal: Proposed development of 3no. one bed & 5 no. studio apartments on existing gap site.

Case Officer: Alexander Calderwood

## Customer Details

Name: Mrs Lynn Arundel

Address: 101/3 Ferry Road Leith Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It states that this is the first application, this is NOT the first application, the last application was rejected.

The height of this building would impact on the light coming into my back garden and this is reduced enough at the moment by the trees in the next door neighbours back garden.

There is not enough on street parking for the householders already living in the area so the amount of houses being built would certainly cause mayhem if every household has at least 1 car. the building itself doesn't even look very nice and I worry that these rooms would be let for either students or Airbnb.

Therefore I object to this application.

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Tel: 0131 529 3550 Fax: 0131 529 6206 Email: [planning.systems@edinburgh.gov.uk](mailto:planning.systems@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100144409-003

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Genlo Design		
Ref. Number:	18002	You must enter a Building Name or Number, or both: *	
First Name: *	G	Building Name:	
Last Name: *	McPherson	Building Number:	31
Telephone Number: *		Address 1 (Street): *	Damhead
Extension Number:		Address 2:	Lothianburn
Mobile Number:		Town/City: *	Edinburgh
Fax Number:		Country: *	Scotland
		Postcode: *	EH10 7EA
Email Address: *	g		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text" value="Mr"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text"/>
First Name: *	<input type="text" value="G"/>	Building Number:	<input type="text" value="20"/>
Last Name: *	<input type="text" value="Graham"/>	Address 1 (Street): *	<input type="text" value="Gordon Street"/>
Company/Organisation	<input type="text" value="Perservere Ltd"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="Edinburgh"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="Scotland"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="EH6 8NA"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="REDACTED"/>		

## Site Address Details

Planning Authority:	<input type="text" value="City of Edinburgh Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="12-14 SOUTH FORT STREET"/>
Address 2:	<input type="text"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="EDINBURGH"/>
Post Code:	<input type="text" value="EH6 4DN"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="676336"/>	Easting	<input type="text" value="326241"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Proposed development of 3no. one bed & 5 no. studio apartments on existing gap site.

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Procedural issues

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)



Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

Contextual elevation drawing LRB1 Supplementary Site/Location Plan LRB2 Supporting Planning Review Statement

## Application Details

Please provide details of the application and decision.

What is the application reference number? \*

19/02479

What date was the application submitted to the planning authority? \*

05/06/2019

What date was the decision issued by the planning authority? \*

09/08/2019

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## **Declare – Notice of Review**

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr G McPherson

Declaration Date: 08/11/2019

### **Proposal Details**

Proposal Name	100144409
Proposal Description	Proposed development of studio apartments on existing gap site.
Address	12-14 SOUTH FORT STREET, EDINBURGH, EH6
Local Authority	City of Edinburgh Council
Application Online Reference	100144409-003

### **Application Status**

Form	complete
Main Details	complete
Checklist	complete
Declaration	complete
Supporting Documentation	complete
Email Notification	complete

### **Attachment Details**

Notice of Review	System	A4
18002 Review Statement	Attached	A4
18002 Appendix 1	Attached	A1
Appendix 2 Site Location Plan	Attached	A1
Appendix 3 Email to LAPO	Attached	A4
Notice_of_Review-2.pdf	Attached	A0
Application_Summary.pdf	Attached	A0
Notice of Review-003.xml	Attached	A0

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# Review Statement

**12-14 South Fort Street, Edinburgh**

## OVERVIEW

We are seeking review of the decision of the Edinburgh Council Planning Authority to refuse planning application 19/02479/PPP on the following grounds:

- We believe that the planning application, which was significantly informed by consultation with the Senior Planning Officer prior to submission, will improve the quality of the existing site at 12-14 South Fort Street, without adverse impact on the character of the local area and the neighbouring historical residential property.
- We do not believe that the assessment carried out by the planning officer reflects the proposal or surrounding area.
- The handling report contains both inaccuracies and contradictory statements to earlier planning decisions and decision made recently in the local area.
- Procedurally, we are dissatisfied with the lack of opportunity given by the planning officer to discuss the proposals before the application was determined.

Further information is provided below in order to provide context to our appeal.

## LOCATION AND SITE

Planning application 19/02479/PPP relates to an existing gap site at 12-14 South Fort Street, Edinburgh. The site is 143sqm and located on the corner of South Fort Street and Trafalgar Lane.

The site is located in Leith Conservation Area. The area is comprised of mixed use, predominantly residential and industrial, sites. The increase in recent residential developments near the site has created a new residential character in place of the former industrial character. Residential use in the area comprises of a mixture of historical Georgian buildings and modern development.

The site comprises a brownfield gap site, currently used as an industrial service and scaffold yard. The site, in its current use, offers little in visual enhancement of the area nor does it significantly contribute to the special character of Leith Conservation Area or contribute to the architectural character or appearance of the neighbouring property.

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The site features a single storey office building, integrated within the site wall and the gable wall of number 10 South Fort Street.

Number 10 South Fort Street is a Grade B listed residence. The building has an exposed, rendered, gable on the southern boundary of the site, this form of gable end treatment is not as originally intended, and suggests that an adjoining building of a similar height has been demolished in the past. To its immediate north, there is a four storey residential building, which features a mansard roof and forms the corner plot between South Fort St and Ferry Road.

The site is located in close proximity to recognised amenity and open space, including Keddie Park and the Water of Leith, which holds open space status.

## **BACKGROUND**

Planning application 18/10175/PPP was refused on 8th February 2019 on the grounds of the form and design to the rear of the development being unacceptable in its juxtaposition to the neighbouring listed building, the lack of cycle parking and unacceptable density.

Prior to submission of 19/02479/PPP, consultation and discussion was undertaken with the Senior Planning Officer to address the previous grounds for refusal. As a result of this, design changes were made to the satisfaction of the Senior Planning Officer including increasing floor plan size, increased window provision and altered roof design. The basement flats were removed to provide supplementary storage and cycle parking was integrated at street level in compliance with Local Authority requirements. Discussion with the Senior Planning Officer regarding density reflected and recognised the importance of visual density over statistical density. The updated floor plans and design reflect acceptable visual density and enhanced living space.

On this basis planning application 19/02479/PPP was submitted in good faith that the pertinent issues raised in the determination of the earlier application had been fully addressed to the satisfaction of the Planning Authority.

## **DESIGN PROPOSAL**

The proposal seeks to create eight modern living apartments within the constraints of an existing brownfield site in Leith Conservation Area.

The proposal includes two elements, the first reflects the character of the adjacent listed building, featuring sympathetic materials and detailing to form a transitional entrance bay, which hosts the communal space and provides a connection between the existing building to the North and the proposed four storey element to the South. This new four storey element accommodates the

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majority of the proposed habitable floorspace, successfully decoupled from the historic fabric of number 8-10 South Fort Street. This approach addresses issues identified within the previous application, whilst creating an improved living environment courtesy of improved floor space.

The proposed four storey element creates a 'bookend' to the southern end of the established block, replicating in principle the existing four storey element to the north of number 8. This 'bookend' effect reinforces the strong links between number 8-10 and number 5-7 on the opposite side of the street. Indeed in the 1990's permission was granted along similar principles when a 4 storey element was introduced to 'bookend' number 7 South Fort Street. This is relevant as numbers 8-10 South Fort Street are considered as a fragment of the wider original scheme which included the buildings opposite<sup>1</sup>.

The four storey element offers both form and function. Whilst a departure from the pitched roofs of surrounding buildings, this form proves necessary and desirable due to the skewed nature of the southern boundary, where a gable or pitched roof becomes problematic and unsightly. The flat roof provides a simplified appearance and affords greater economy in respect of habitable accommodation.

Featuring an optimised footprint based on established build lines, the proposed apartments exceed all minimum guidelines as prescribed within the Planning Authority's guidance. This will provide desirable residential accommodation in a mix of studio and one bedroom apartments, further extending the mix of current residential opportunities in the wider area.

The new design has removed the need for basement level habitation, which has provided supplementary lockable storage area(s) for residents and cycle parking provision has been integrated at street level.

## **GROUNDS FOR APPEAL**

We are seeking an appeal on the following grounds:

- We do not believe that the assessment carried out by the planning officer accurately reflects the proposal or surrounding area.
- The handling report did not accurately calculate the distance from the proposed development to the nearest amenities and open space. This factual inaccuracy was used to justify refusal under policy HOU3.
- The handling report contradicts key decision making points from a previous planning application for the site (18/10175/PPP) relating to ENV3 and ENV6.

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<sup>1</sup> Historic Environment Scotland - LB27421 - Listed Building Description for 8-10 South Fort Street (Statement of Special Interest)

- 
- The handling report fails to reflect recent planning decisions in the local area and the Planning Authority's preference for prioritising visual density.
  - We believe that the application was refused on unreasonable grounds, requiring a higher level of detail than would be required for a planning permission in principle application.
  - Despite efforts to engage with the planning officer regarding any material considerations, the planning officer failed to respond. As such we were not afforded the opportunity to provide further information or address any relevant matters before determination.

## **JUSTIFICATION FOR PLANNING PERMISSION IN PRINCIPLE**

The key determining factor for planning application 19/02479/PPP is whether the residential use of the site can be justified in principle. We believe that residential use can be justified because of the following:

**The application complies with Policy Hou3.** It was accepted in the determination of planning application 18/10175/PPP that the proposed residential use of this site was acceptable in principle. That determination identified that the proposed site lies within an urban area, that surrounding uses were generally residential in nature, and that proximity of the development to amenity was well within guidelines.

In contradiction, the handling report for 19/02479/PPP states inaccurately that the site "is not within reasonable proximity to public green space" and therefore is grounds to state that residential use is unacceptable.

The handling report sites Victoria Park as the nearest greenspace to the development. This is factually inaccurate. The site enjoys close proximity to Keddie Park, located just 50m from the site, and the Water of Leith Walkway represents designated Open Space and accessible amenity for residents.

The handling report also states that residences will not overlook a natural environment. It is our belief that this is an unreasonable demand and represents an inadequate assessment of the local area by the planning officer. Like the existing residential properties on South Fort Street, the outlook from the development would be the surrounding built and urban environment. There is no existing soft landscaping or trees on the site, and no loss of landscaping results from these proposals.

We believe that the application complies with Policy Hou3.

**The visual density of development is acceptable and the statistical density is more favourable than recent residential development in the area.** In the handling report for 19/02479/PPP it was

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deemed that the density of the development was inappropriate. This fails to reflect the consultation with the Senior Planning Officer which resulted in significant design change.

The updated design proposes apartments which exceed all minimum guidelines as prescribed within the Planning Authority's guidance. This guidance is intended to provide improved residential environments, therefore compliance with this guidance will result in the creation of a satisfactory residential environment.

Further, the reasoning contradicts recent delegated planning decisions in the local area, where developments with a significantly greater density than that being proposed were approved and deemed satisfactory in terms of residential environment<sup>2</sup>.

The matter of density was considered during consultation with the Senior Planning Officer, with the design proposals modified to reflect advice. Further, we discussed visual density, which has been deemed satisfactory and acceptable in the determination of 19/02479/PPP, with respect to local decision making<sup>3</sup>. It can be demonstrated from recent planning decisions, visual density is considered to outweigh density in statistical terms.

We believe that in the context of this site, which is modest in size, the density of the proposed development is acceptable.

**The proposed development is appropriate to the conservation area (complies with ENV6) and is acceptable in terms of the setting of the adjacent building (complies with ENV3).** The proposal is for a modest residential development within the Leith Conservation Area. The area comprises a mixture of industrial and residential property and is predominantly residential in character. Residential use in the area comprises a mixture of historical Georgian buildings and modern development, as exemplified by the properties located on the opposite side of South Fort Street.

The site, in its current use, offers little in visual enhancement of the area nor does it significantly contribute to the special character of Leith Conservation Area or contribute to the architectural character or appearance of the neighbouring property.

The design proposals have sought to sympathetically integrate this proposed development into the existing mix of modern and Georgian buildings on South Fort Street.

In consultation with the Senior Planning Officer, the design proposals have been modified to reflect the local area and to provide visual continuity to the street, preserving and framing the character of the neighbouring property.

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<sup>2</sup> 18/04685/FUL

<sup>3</sup> 18/04685/FUL, 13/02548/FUL



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The proposal includes two elements, the first reflects the character of the adjacent listed building, featuring sympathetic materials and detailing to form a transitional entrance bay, which hosts the communal space and provides a connection between the existing building to the North and the proposed four storey element to the South. This new four storey element accommodates the majority of the proposed habitable floorspace, successfully decoupled from the historic fabric of number 8-10 South Fort Street. This approach aims to address issues identified within the previous application, whilst creating an improved living environment courtesy of improved floor space.

The proposed four storey element creates a 'bookend' to the southern end of the block, replicating in principle the existing four storey element to the north of number 8. This bookend effect reinforces the strong links between number 8-10 and number 5-7 on the opposite side of the street. Indeed in the 1990's permission was granted along similar principles when a 4 storey element was introduced to bookend number 7. This is relevant as number 8-10 are considered as a fragment of the wider original scheme which included the buildings opposite.

We believe that, not only is residential use on this site completely appropriate to the conservation area in which it is located, the proposed design offers an opportunity to further enhance the visual characteristics of South Fort Street whilst sympathetically framing and enhancing the important Georgian property located next door.

**The Proposal will not have an adverse impact on neighbours.** The handling report makes little comment on the justification for refusing 19/02479/PPP on these grounds, stating that insufficient information has been provided regarding impact on neighbours.

We believe this is an unreasonable statement as the application is for planning permission in principle. Full details and evidence regarding impact on neighbours would be sought at the detailed planning permission stage. Further, despite our efforts to engage with the planning officer<sup>4</sup> regarding any material considerations expressed by neighbours, the planning officer failed to respond. As such we were not afforded the opportunity to provide further information or address any relevant matters.

We believe that the proposed development will not cause adverse impact on neighbours. We can confirm that all Visual Sky Component figures are in excess of the minimum standards required by the authority, to ensure the existing neighbouring properties will maintain access to sufficient daylight provision. Every effort has been made to maintain the privacy of surrounding neighbours, all properties are intended for long term residential use and there is no consent being sought for short term or holiday let.

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<sup>4</sup> Email to LAPO - Appendix 3

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Further, we believe that the proposed development will provide significant improvement to the status quo - improving visual outlook for neighbours, removing an active service and scaffold storage yard and removing the potential for 'bad neighbour' development of an industrial nature on this site.

## **CONCLUSION**

We believe that the proposed development provides a high quality residential development, sympathetic to the local area which it occupies. The development will improve visuals, remove existing 'bad neighbour use' replacing with long term residential property which will not only provide a desirable place to live, but also improve the current mix of housing size and types in the local area. The design, as informed by the planning authority, sympathetically compliments the neighbouring Grade B listed property, whilst also providing an opportunity to improve the 'quality' of the property by eliminating the exposure of the existing gable elevation.

As shown in the justification above, this proposed development complies with policies Hou3, ENV3 and ENV6, provides sufficient visual density and detail to achieve permission in principle for residential use on the site at 12-14 South Fort Street.

We ask the Local Review Body to uphold our appeal, grant planning permission in principle and allow this application to proceed to the detailed planning permission stage.

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**APPENDIX 1:** LRB1 - Contextual elevation of proposed development

**APPENDIX 2:** LRB2 - Annotated Site Plan

**APPENDIX 3:** Email to LAPO 29/07/2019

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# APPENDIX 3

Email to LAPO: 29/07/2019 - No response or communication received by return

Grant McPherson

Mon 29/07/2019 13:35

To: alexander.calderwood@edinbu...

Cc: Stephen.dickson@edinburgh.g...

This message was sent with high importance.



Evernote

Good afternoon Alexander,

Hope this finds you well. Just following up from my voicemail message on the 18/07/2019.

We are aware that a small number of objections have been received in respect of our latest proposal for 12-14 South Fort Street, Edinburgh.

At this time it is unclear whether any material considerations have been raised however, we would be happy to engage & 'where necessary' amend our proposals in order to address any such concerns.

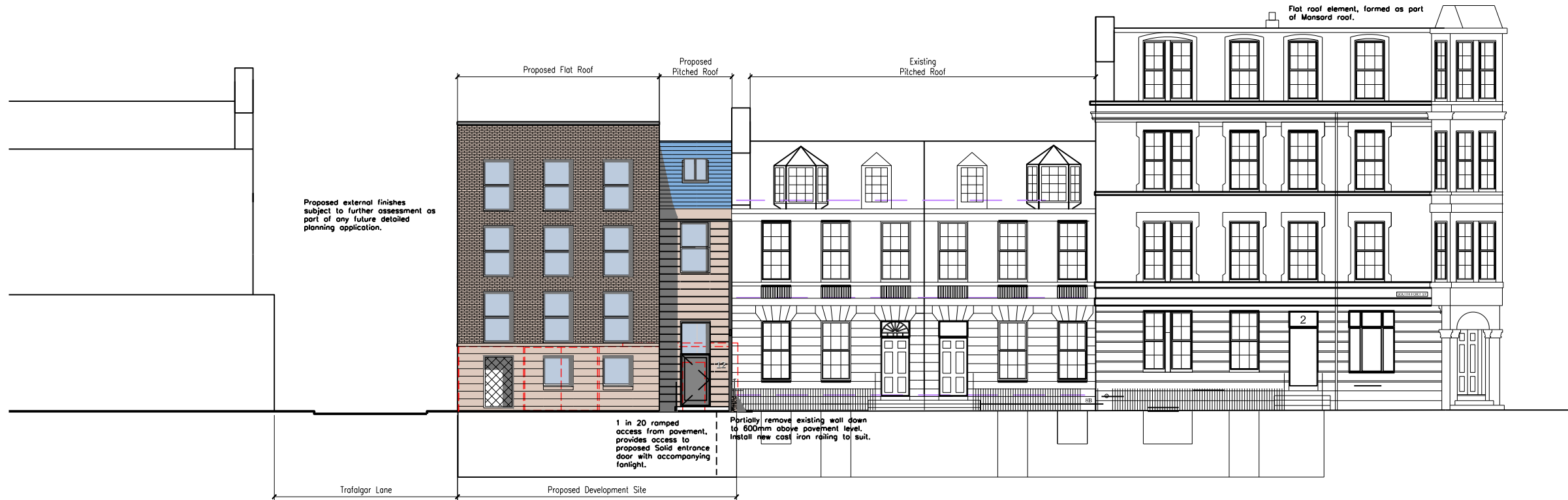
Following on from our previous application, we conducted a series of meetings & discussions with the Authority in respect of the site. This latest proposal was greatly influenced by these discussions and attempts to address the predominantly LDP issues cited previously as grounds for refusal.

Should you wish to discuss any of the above and/or any associated matter, please do not hesitate to contact me.

Kind Regards

Grant McPherson

Technical Design Consultant



East Elevation  
Scale 1:100 @ A1

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Please note that ALL works are to be undertaken within Clients own feu.

Drawn by: GMC

Description:  
Proposed East Elevation  
# 2 - 12 South Fort Street

Project Ref: 18/002

Project Name:  
Proposed Apartment  
Development.

Issue:

24/2019  
10/

Client:

Mr R. Graham,  
12-14 South Fort Street  
Leith, Edinburgh.



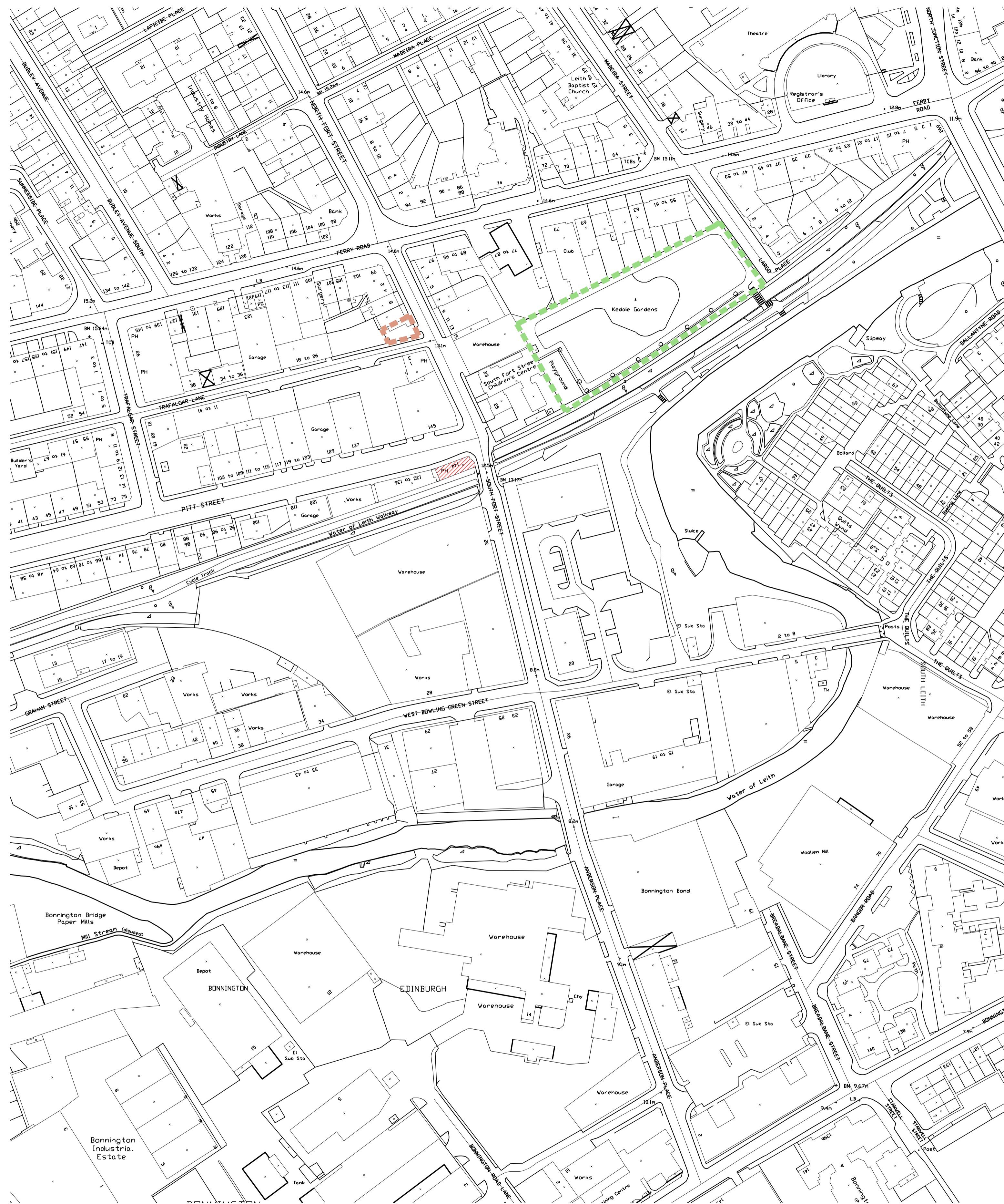
GENLO  
DESIGN

( gen-loo lo-see )

Latin term meaning 'the genius of the place', referring to the prevailing duty or spirit. Every place has its own unique qualities, not only in terms of its physical makeup, but of its history and culture. It is the responsibility of the designer to understand these unique qualities, to enhance them rather than to destroy them.

LRB1

Rev -



Location Plan  
Scale 1:1250 © A1



Existing Site Plan  
Scale 1:100 © A1

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Please note that ALL works are to be undertaken within Clients own feu.

(Open-Access)

**GENLO**  
DESIGN



Client:  
**Mr R. Graham,  
12-14 South Fort Street  
Leith, Edinburgh.**

Issue:  
**24/2018  
09**

Project Ref: 18/002  
Project Name:  
**Proposed Apartment  
Development.**

Drawn by: GMC  
Description:  
Site & Location Plan(s)

**LRB2**

Rev 1

Leith has received the status of the 'place' reflecting to the surrounding area. Every place has its own unique qualities, not only in terms of the physical makeup, but of how it is perceived, so it ought to be the responsibility of the designer to create unique qualities, to enhance them rather than to destroy them.