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**Decision date: 5 April 2019**

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

Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.  
At 14 Belford Road Edinburgh EH4 3BL

**Application No:** 19/00550/FUL

**DECISION NOTICE**

With reference to your application for Planning Permission registered on 7 February 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 is contrary to the Local Development Plan Policy Tra 4 as it would not be convenient or ready accessible to all cycle users visiting the site.
2. The proposal is contrary to the Local Development Plan Policy Hou 7 as it would significantly impact upon existing levels of residential amenity.
3. The proposal is contrary to the Local Development Plan Policy Des 12 as the proposed store would be materially detrimental to neighbouring amenity.

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

Drawings 01;02;03, 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 does not accord with the adopted Edinburgh Local Development Plan policy Hou 7, Des 12 or Tra 4. There are no material considerations that would justify consent.

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 Robert McIntosh directly on 0131 529 3422.



**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 19/00550/FUL  
At 14 Belford Road, Edinburgh, EH4 3BL  
Change of use to hostel Use Class 7 (Hotels and Hostels).  
Create cycle store for existing office use. New opening in  
gable.**

<b>Item</b>	Local Delegated Decision
<b>Application number</b>	19/00550/FUL
<b>Wards</b>	B05 - Inverleith

## Summary

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The proposal does not accord with the adopted Edinburgh Local Development Plan policy Hou 7, Des 12 or Tra 4. There are no material considerations that would justify consent.

## Links

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<b><u><a href="#">Policies and guidance for this application</a></u></b>	LDPP, LHOU07, LEN06, LEMP10, LDES12, LTRA03, LTRA04, NSG, NSLBCA, CRPDEA, NSGD02,
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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 application site relates to No. 14 Belford Road, a ground floor and lower ground floor office with undercroft.

This application site is located within the Dean Conservation Area.

### 2.2 Site History

17/02488/CLP-Lower two existing window cills and open up a third window on the north-facing basement elevation facing the rear- Grant.

11/03645/FUL-Enlarge an existing rear window opening by lowering the cill.- Grant

## Main report

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### 3.1 Description Of The Proposal

The application is for planning permission for the change of use of the existing office building into a hostel (class 7). A new opening in the gable will also be formed. This opening will be utilised as either a bike store and/or a smoking shelter.

### 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 proposal is acceptable in principle;
- b) The proposal will result in the creation of a satisfactory residential environment and if the proposal impacts on neighbouring amenity;
- c) The proposal impacts on the character or appearance of the conservation area
- d) The proposal raises any issues in respect of parking and road safety, and;
- e) Any issues raised in representations have been addressed

#### **a) Principle of the Proposal**

Policy Emp10 of the adopted Edinburgh Local Development Plan (LDP) states that hotel development will be permitted:

(a) in the City Centre where developments may be required to form part of mixed use schemes, if necessary to maintain city centre diversity and vitality, especially retail vitality on important shopping frontages.

(b) within boundaries of Edinburgh Airport, the Royal Highland Centre and the Business Gateway

(c) In locations within the urban area with good public transport access to the city centre.

The application site is within general walking distance of the defined city centre and there are good public transport links available.

The proposal complies with LDP Policy Emp10.

#### **b) Creation of a satisfactory residential environment and impact upon neighbouring amenity**

The existing office building is relatively large and is based over a ground floor level which comprises of the entrance hall and a single meeting room and a lower ground floor level where the majority of the unit is located. The ground floor meeting room has one quite large window while the main office on the lower ground floor only has two relatively small high level windows in a single north-west facing elevation.

There are no policies contained within the adopted LDP that relate to the creation of a satisfactory residential environment within a hostel.

However section 2.10, Daylight, sunlight, privacy and outlook of the supplementary Edinburgh Design Guidance states, design the building form and windows of new development to ensure that the amenity of neighbouring developments are not adversely affected and that future occupiers have reasonable levels of amenity in

relation to daylight, sunlight, and privacy and immediate outlook. This applies to all new developments where these aspects of amenity are particularly valued.

The supporting statement supplied with the application makes reference to a maximum of 38 beds being formed within the office unit.

Whilst it is assumed that many hotel and hostel customers expect rooms to have basic features like a window and a view, it is acknowledged that this level of amenity is not always important. There are certain capsule hotels where a small sleeping "pod" is all that is offered. These pods have no windows or natural sunlight but are acceptable as people will only tend to use these small spaces when they are planning to sleep.

This type of proposal could be incorporated within the existing office space and while the levels of amenity that would be available would be limited, due to it only having three possible windows, it is also acknowledged that people utilising this type of "pod" hostel may just want a simple space to sleep and/or have a restricted budget.

LDP policy Hou7 states that developments including changes of use which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted.

Whilst the supporting statement submitted with the application mentions that the existing office is open 24 hours a day without restriction, it is likely that the majority of office work within this unit will still normally be carried out during normal working hours. The change of use of the site to a hostel would potentially give far more opportunity for noise disruption to nearby neighbours at less sociable hours. The change of use of the site to a hostel with potentially up to 38 beds would also mean that the unit would be far more intensely used than if it was converted into residential use.

LDP policy Des 12 states that planning permission will be granted for alterations and extensions to buildings which;

a) In their design and form, choice of materials and positioning are compatible with the character of the existing building

b) Will not result in an unreasonable loss of privacy or natural light to neighbouring properties

c) will not be detrimental to neighbourhood amenity and character

The design and materials proposed for the new shelter are appropriate and its construction will not result in any unreasonable loss of privacy or natural light to neighbouring properties.

However, the construction of the store does raise significant concerns. This store/opening would be constructed within close proximity of the windows belonging to residential properties and could lead to significant noise intrusion from groups of individuals at all hours. It is also acknowledged that it would be very difficult to enforce any conditions which could be placed with regards to restricting the use of the store.

Environmental Protection were consulted as part of the assessment of the application. They have stated that they have concerns about noise from the proposed development affecting the amenity of nearby noise-sensitive residents. As a result they requested that the applicant submit a noise impact assessment (NIA) so they could fully assess the application. The two month statutory expiry date for the planning application ends on 5 April, and currently no NIA has been submitted for assessment.

On the balance of probability the proposed change of use and associated shelter will have a materially detrimental impact on the living conditions of nearby residents. The proposed use therefore does not comply with LDP policy Hou7.

In addition the formation of the smoking shelter or bike store could lead to significant nuisance for neighbouring properties. The proposed shelter therefore does not comply with LDP policy Des 12.

#### c) Impact on the character or appearance of the conservation area

Policy Env 6 Conservation Areas- states that development within a conservation area will be permitted which preserves or enhances the special character or appearance of the conservation area and is consistent with the relevant character appraisal.

The Dean Conservation Area Character Appraisal emphasises the limited range of building materials which produce a conformity which is one of the most important factors in the visual unity of the area.

Neighbouring properties have broadly similar openings with timber shutters similar to that proposed. Overall the proposal would preserve the special character and appearance of the conservation area and complies with policies Env 6 and the Dean Conservation Area Character Appraisal.

#### d) Parking and road safety

The application form mentions the formation of 12 parking spaces. However, as the red line boundary of the site does not cover any land out with the footprint of the existing building, this must be in relation to 12 possible bike parking areas formed within the proposed store.

This would be in compliance with LDP policy Tra 3.

LDP policy Tra 4 states that cycle parking should be designed in accordance with the standards set out in Council guidance. The Edinburgh Design Guidance establishes that short stay parking should be convenient and readily accessible, preferably with step free access and be located near to entrances.

The proposed bike store would be located down a multitude of steep steps. It would not be convenient or readily accessible to all cycle users visiting the site.

The Roads Authority were consulted as part of the assessment of the application. They have confirmed that they had no objections to the formation of the proposed shelter.



However they have stated that if shutters/doors were installed at the front of the proposed shelter the doors shutters should open inwards only.

They have, however, also asked that the application be continued as there appeared to be no information provided regarding the scale of the proposed development and therefore it was not possible to calculate tram contributions or parking provision.

The proposal does not comply with LDP policy Tra 4.

#### e) Representations

There were 26 letters of objection received.

Material objections-

The drawings submitted are incorrect

Lack of sufficient sunlight/daylight levels to proposed hostel

No green space, or social areas inside

Design not in keeping with area

Impact upon amenity level of local residents

Shortage of parking spaces, increased traffic

Trees at risk

Smoking shelter not appropriate

These points are addressed in section 3.3 a, b & C.

The baths at No. 5 Belford Road may not have been neighbour notified. -They have correctly been notified.

#### Non material Objections

-The applicant is not the sole owner of all the land

-Proposed stability of gable wall

-Impact upon existing pipes and cables

-No specific detail of what lies below No. 14

-Impact upon water supply and drainage

-Lack of detail about fire exits/ fire risks

These points are not material planning considerations.

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

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

#### **Reasons:-**

1. The proposal is contrary to the Local Development Plan Policy Tra 4 as it would not be convenient or ready accessible to all cycle users visiting the site.
2. The proposal is contrary to the Local Development Plan Policy Hou 7 as it would significantly impact upon existing levels of residential amenity.
3. The proposal is contrary to the Local Development Plan Policy Des 12 as the proposed store would be materially detrimental to neighbouring amenity.

## **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**

26 letters of objection were received. These will be addressed in section 3.3 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**

**Date registered** 7 February 2019

**Drawing numbers/Scheme** 01;02;03

Scheme 1

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

Contact: Robert McIntosh, Planning Officer  
E-mail:robert.mcintosh@edinburgh.gov.uk Tel:0131 529 3422

## **Links - Policies**

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### **Relevant Policies:**

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

LDP Policy Hou 7 (Inappropriate Uses in Residential Areas) establishes a presumption against development which would have an unacceptable effect on the living conditions of nearby residents.

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

LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

LDP Policy Des 12 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

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

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

## **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.

**The Dean Conservation Area Character Appraisal** emphasises the distinctive village character of the streetscape within Dean Village, the heritage of high quality buildings, the limited range of building materials, the predominance of residential uses, and the importance of the Water of Leith and its corridor.

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

# Appendix 1

## Consultations

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### Environmental Protection

I have reviewed the above application and we have some concerns about noise from the proposed development affecting the amenity of nearby noise-sensitive residents. Before we could consider the application fully we would need the applicant to provide a Noise Impact Assessment, demonstrating that any noisy activity (music / vocals, impact noise from the premises etc) would meet NR15 within the nearest noise-sensitive premises. Both airborne and impact noise should be considered and a worst-case scenario assumed. The NIA should also look at noise from the use of the entrance hallway, as that shares party walls with other premises. This type of premises will give rise to more movement in and out of the hall, at anti-social hours and possibly with wheeled suitcases etc, all giving rise to potentially transmissible noise.

### Roads Authority

This application should be continued  
There appears to be no information regarding the scale of existing and proposed development, i.e. number of rooms, beds and gross floor area. It is therefore not possible to calculate any tram contributions or parking provision.

END

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Conrad Hughes

Address: Flat K, 2A Dean Path, Edinburgh EH4 3BA

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:[Would be useful to have a definition of "neighbour" in your commenter type field: I live in the neighbourhood and regularly have cause to use the steps beside this building.]

- Dean Village's amenities are already overburdened, including never-ending overfull bins of all types. Adding 38 residents without additional community improvements will exacerbate this.

- Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues.

- Applicant states bike store would be used as a smoking shelter. The impact of this use on non-smoking cyclists is ignored. Ditto impact on the amenity of neighbouring residents above smoking area in terms of smell, noise and litter.

- Creation of a smoking shelter on a public footpath would result in anti-social behaviour and have a significant impact on the amenity and enjoyment of the residential properties situated above the proposed smoking shelter through the spread of noise and the smell of smoke.

- A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38 bed hostel.



- Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents.
- The application is contrary to LDP policy Des 5 Development Design - Amenity part A and C.
- The application is contrary to policy Hou 7 Inappropriate uses in a residential area.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Karen McKellar

Address: 37 Drumsheugh Gardens Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object to the proposal to turn the building into a hostel on the grounds of potential noise and disturbance, which would impact both local residents and guests at the Bonham Hotel.

In addition Dean Village is a conservation area, and as such should be preserved.

The applicant states that hostel use will not impact residents as the building is already used by workers and cleaners 24 hours a day. However clearly they are not living there, and the disturbance and noise from up to 38 residents would be significantly greater.

I therefore urge the planning authority to refuse planning permission. I note however that the applicant has also applied for permission to change the building to flats, or holiday lets, which we would have no objection to.

Thank you in advance for considering my objection.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Ms Inger Griffith

Address: 8 Hawthornbank Lane Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Cycle store poorly located and the use for smoking shelter will impact on smell, noise and litter. This will reduce our quality of life for neighbours and have a detrimental effect on this area of historic and beautiful surroundings

As for the use of this tenement as a hostel is a totally inappropriate plan.

The noise created by people occupying this hostel would be quite intolerable for residents and visitors alike and degrade this area which holds a world heritage sight within it and much natural beauty.

The quality of life for residents will be massively affected in a negative way.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Peter Blance

Address: 16/2 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

Re Change of Use to Hostel;

The Edinburgh Local Development Plan (para.234) states,

'Developments, including changes of use, which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted.' This policy aims

'to preclude the introduction or intensification of non-residential uses incompatible with predominantly residential areas'

The building comprising 12-16 Belford Road is residential flatted accommodation with the exception of the office at number 14 which runs under the whole block of flats. This is principally a residential building and a change of use at number 14 to accommodate a 38 bed hostel open at all hours of day and night would create noise, disturbance and infringement on the privacy of the residents of the building. It is an entirely inappropriate plan that will impact adversely on the Dean conservation area and in particular, the residents of this building. The design statement asserts that running and operating a 38 bed hostel would compare favourably with any disturbance currently caused to neighbours by cleaners entering the existing office. This is simply fanciful and fictitious. A hostel within this residential block will inevitably generate noise at unsociable hours from hostellers returning from the bars and pubs in the city centre. The application uses inappropriate comparisons with other hostels and hotels where the particular buildings referenced are utilised wholly for the purpose of accommodating guests. A hostel within a residential tenement is totally incompatible for the reasons of noise, disturbance, privacy and the inevitable impact on appearance through litter outside the building.

## Re Create a Cycle Store/Smoking Shelter;

The application design statement states; 'A cycle store would therefore provide some outdoor space within the property boundary where smokers could sit.' This is proposed by creating an opening in the east cable of the building and such usage would be illegal.

The Smoking, Health and Social Care (Scotland) Act 2005 and The Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006 prohibits smoking in certain 'wholly or substantially enclosed' places.

The law applies to premises which the public or a section of the public has access and, premises which are being used wholly or mainly as a place of work.

A 'wholly or substantially enclosed' place is defined in the legislation. This design application to use the undercroft to the east side of the building as a smoking shelter would breach the legislation and is illegal. The duty to enforce this legislation rests with The City of Edinburgh Council.

The only access to the proposed cycle store would be via a set of very steep steps at the east side of the building and use of this location would breach the Edinburgh Design Guidance 2017. It is an inappropriate location that would inevitably lead to falls and personal injury as well as potential conflict of use with residents and pedestrians for whose use the steps are designed. Some impression of the narrowness, steepness and inappropriateness of the access can be gained from fig.6 of the Application Design Statement.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Kah Choong

Address: 2F2 16 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Councillor's Reference

Comment: Cycle stores is not in an ideal location, will have accessibility and safety issues to people using the steps. Creating a cycle stores will create a gathering area, which in turn will create anti-social behaviour, rubbish gathering area...etc.

The tenement building is a small quiet area, and we as neighbours would not want to many tourists and visitors to impact the serenity of the area.

# Comments for Planning Application 19/00550/FUL

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Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Org Janice Conner

Address: Link Group 2c New Mart Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Applicant states bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above smoking area in terms of smell, noise and litter.

- creation of a smoking shelter on a public footpath would result in anti-social behaviour and have a significant impact on the amenity and enjoyment of the residential properties situated above the proposed smoking shelter through the spread of noise and the smell of smoke.

- A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38 bed hostel.

- Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Julian Roberts

Address: 77 Ormonde Crescent Glasgow

## Comment Details

Commenter Type: Neighbour-Commercial

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Change of use from office to a 36-bed hostel (planning ref: 19/00550/FUL)

- Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues.
- Applicant states bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above smoking area in terms of smell, noise and litter.
- creation of a smoking shelter on a public footpath would result in anti-social behaviour and have a significant impact on the amenity and enjoyment of

the residential properties situated above the proposed smoking shelter through the spread of noise and the smell of smoke.

- A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38 bed hostel.
- Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents.
- The application is contrary to LDP policy Des 5 Development Design - Amenity part A and C.



- The application is contrary to policy Hou 7 Inappropriate uses in a residential area

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Miss Claire bell

Address: 15 Society Street, Nairn IV124PE

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Objection to Planning Application ref: 19/00550/FUL at No 14 Belford Road

As the owner of the property No 13 Belford Road (Flat 2F1) I would like to object to the planning applications submitted for developments at No14 Belford Road, which is located in the basement under the multi owned tenement.

It has come to my attention that 3No separate applications have been submitted for No 14 Belford Road by the same applicant, this one being for:

' Change of use from office to a 38-bed hostel (Use class 7), and Create Cycle store for existing office use.'

My OBJECTIONS to 19/00050/FUL :

1. I object to the ownership declaration made by the applicant, on the grounds that the applicant is NOT the SOLE OWNER OF ALL OF THE LAND IN THIS APPLICATION.

My solicitor has seen the title to No14 and has advised that it does not encompass the undercroft of No12. There is no access to this area from the No 14 Flat and the only access to the self - contained store under No 12 is from an access hatch within the No 12 property. (I will be having my solicitor send a legal letter to the applicant to this effect.)

2. I have had site to the deeds of all of the 6 flats in No13 which state that each flat has a common access to the solum on which our tenement sits.

3. The existing drawing describes the undercroft to No12 as being 'currently inaccessible from No14. The applicant therefore can have no knowledge of the current layout of this area.
4. The owner of No 12 has shown me that they have direct access to a self-contained store below a large area of her flat- this however is in the position indicated by the applicant for the proposed bike store / hostel.  
There is clearly no way that this development can proceed without the agreement of the owner of No 12, and as it would also affect the solum of the tenement above, it would also require the agreement of the owners of the 6 flats in No13 (including myself, which I certainly do not agree to.)
5. The application includes the proposal to create a cycle shelter on the steps from Belford Road to Hawthorn Rise for the existing office accommodation. However should it be successful, the property would no longer be an office accommodation; this seems contradictory!
6. Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues.
7. On turning the existing office into a 38 bed hostel, the applicant states that the bike store would be used as a smoking shelter. This would have a huge negative impact on the amenity of neighbouring residents above smoking area in terms of smell, noise, and litter. It is also a fire hazard to the properties above.
8. Creation of a smoking shelter on a public footpath would result in loitering on the steps, creating potential congestion and trip hazards for passing pedestrians.
9. Due to the significant adverse impacts on the amenity of the neighbouring residents and the risk to public safety on the steps, the application is contrary to LDP policy Des 5 Development Design - Amenity, parts A and C
10. Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents.
11. A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38 bed hostel.
12. Hostels do not have the same issues in relation to amenity as the existing office and the

applicant has not demonstrated how the amenity of neighbouring residents would be protected in terms of noise, overlooking, or loss of privacy.

13. A transient population will significantly diminish the sense of community The intensification of a transient population would diminish the sense of community, result in noisy, inconsiderate neighbours, and lead to issues outwith the control of planning restrictions.

14. The application is contrary to LDP policy Des 5 Development Design -

a. Amenity part A and C.

15. The application is contrary to policy Hou 7 Inappropriate uses in a residential area.

16. A 38 bed hostel would encourage loitering on Belford Road where ground floor flats are located. There is also an old person's residential home in very close vicinity which could be affected by additional noise.

17. The gardens and living spaces of 10 and 11 Belford Road would be in direct view from the windows located on the boundary, resulting in overlooking, loss of privacy, spread of noise and loss of amenity.

18. In order to create a 38 bed hostel the area under the proposal would be borrowing amenity from the surrounding gardens,( not just 10 and 11 Belford Road) to the detriment of neighbouring amenity and privacy.

19. A large proportion of the basement is without a source of natural light.

20. Increase in the amount of refuse, therefore additional bins required on the street with potential loss of parking.

21. The application does not include any proposed layouts, therefore the full impacts of the proposed development cannot be assessed in terms of the adverse effects on neighbouring properties.

22. As an owner of the gable wall where the proposed opening is suggested, I declare my right of common interest and note my concern on the stability of the building and above chimneys, should the opening be broken through for either the cycle shelter or as an entrance/ light source for the proposed hostel.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Lindsay Manson

Address: 93 Ravelston Dykes, Edinburgh Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: As the owners of both number 10 and 11 Belford Road, we object to the following planning applications for the reasons stated below.

Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not

considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues. The proposal therefore does not comply with LDP Policy Tra 3.

The applicant states the bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above the smoking area in terms of smell, noise and litter is contrary to Des 5 and Hou 7. The smoking shelter will be approximately 2-4 metres from an existing flat entrance and childrens bedroom and 1.5 metres from an existing kitchen window.

The smoking shelter would have a negative impact on the character of the surrounding area and is inappropriate in terms of the design and location. The proposal does not comply with Des 1.

The steps between Belford Road and Hawthorn Rise are a relatively well used link between the Dean Village and the West End. The creation of a smoking shelter on a public footpath would result in anti-social behaviour and have a significant impact on the amenity and enjoyment of the residential properties situated above the proposed smoking shelter through the spread of noise and the smell of smoke. The

steps are not well lit and a smoking shelter would most likely be abused by either hostel guests or members of public.

The applicant recognises issues of public urination and sleeping rough in association with the bike store. This is stated in the design statement. A smoking shelter will have the same issues and yet is not considered to be closed at night. There is a risk

to community security by creating the smoking shelter on the steps, it is therefore contrary to policy Des 5 Part C.

The existing property at no 12 Belford Road has an existing void space below their property, this area is approximately 1.5m deep, it is unclear from any of the submitted documents whether there is an actual void sub-basement below the no12 Belford Rd basement or whether it is solum and foundations to the existing tenement (ownership of this sub-basement is currently being legally reviewed). The proposed access and opening will not comply with the required clear opening height

of 2.1m without the permission of the owners consent at no12 Belford Road to carry out structural work in their basement.

A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare

the office cleaning procedure to a functioning 38 bed hostel.

Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents. Contrary to LDP Policy Hou7. The residents on

Belford Road, particularly the ground floor flats adjacent to the proposed hostel entrance area will be adversely affected through the spread of noise and loitering.

A 38-occupancy hostel will have adverse impacts on the neighbouring residents through the spread of noise to the upper flats on Belford Road and the ground floor flats on Belford Road.

The applicant states that sleeping in pods is 'premium'. A hostel with pods is likely to attract young people that are in Edinburgh to stay out late and party. There is therefore an intensification of a use contributing to a transient population that would diminish the sense of community in a residential area.

It is unclear what the applicant is applying for. The application requests a change of use to a hostel (class 7) but also applies for permission to create a bike store for the existing office.

The applicant has a certificate of lawfulness to create larger and in some cases new window openings on the north west elevation. The effect of the new and existing openings would have a significant adverse impact on the neighbouring residents of

10 and 11 Belford Road and 3 Hawthorn Rise as the windows are situated on the ground floor of the boundary between the tenement and the neighbouring garden.

These proposed windows are located 1.5 and 2m away from existing habitable rooms and an existing garden with a childrens play area.

An intensification of use for a hostel will result in a loss of privacy to these properties.

The application site/property is not well-suited to class 7 hostel, by the very nature of the

surrounding residential uses.

Multiple examples of surrounding hostel and hotel establishments are provided by the applicant in the design statement. These hostels do not have the same challenges as the proposal, due to the degree of separation and stand-alone nature of the examples. The proposal is situated on the ground and lower ground floor of a residential block and would not accord with the urban fabric or character of the street.

The applicant states that a detailed application is yet to be submitted. The issues highlighted by the applicant in the design statement would not be controlled through enforcement action if the application was granted.

Creating an opening the gable of the tenement flats would have a negative impact on the adjacent A Listed Building of Drumsheugh Baths.

Overall, the applicant has not considered the amenity or privacy of the neighbouring residents and the change of use and external alterations would not accord with LDP policies;

Des 5 Part (a) & (c)

Hou 7

Des 12 Part (b) & (c)

Tra 3

Env 3

Env 6

Des 1

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Miss Melissa Manson

Address: 11 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:- Planning application does not take in to consideration the privacy of shared garden at 10/11 Belford Road with the addition of new windows that will directly look on to private garden spaces. The existing windows described on the planning application are incorrect, with the lower level window (from rear elevation NW view - drawing A.011) currently not existing.

-The proposed bike store, in the middle of a steep, public stairway, is a significant health and safety risk. The mention of this being used as a smoking shelter concerns me as my bedroom window is within 2m of this area- the increased noise level, polluting fumes and risk of littering will directly affect me.

-The change of use to a 38 Pod hostel will diminish the sense of community in the area and is not appropriate for both the neighbouring tenement properties and properties at 10 and 11 Belford Road. There will certainly be an increase in noise and anti-social behaviour from this type of property that is often poorly controlled and managed.

-The applicant states that the existing office is open 24/hr, however working hours are generally 9am-5pm and the comparison between a busy Hostel is inappropriate. There will be a significant change in the pattern and hours of use. Hostels normally attract young, lively groups, often with late night, anti-social behavior that is not appropriate for a World Heritage Site and the Dean Village Conservation setting, especially when it is situated so closely to existing residences.

- The applicant has highlighted that there are already a number of Hostels in the area, however these are more ideally situated and self-contained, not in the basement of a residential block.

-It is unclear what the applicant is applying for, discussing both a cycle storage for existing commercial property but also a change of use to a Hostel.

- The applicant does not state how the amenity of neighbouring residents will be protected in terms



of noise, overlooking, or loss of privacy.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Roderick Mackay

Address: 3 Sunbury Place Edinburgh

## Comment Details

Commenter Type: Residents Association

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: 19/00550/FUL

Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

I refer to application 19/00550/FUL which appears to sit alongside applications 19/00555/FUL and 19/00031/FUL so it is unclear what the intentions are at this location.

My comments and objections are limited to this application and are as follows:-

1. The application appears to represent a 2 phase project namely create a cycle store for an existing office and once this is created not to use the cycle store in conjunction with the office but to utilise this new opening in the gable end for access to proposed new flat property (unit 2). The application therefore appears to suggest the creation of a new flat with no windows within a currently fully closed in space and relies on the concept of creating a new bicycle store (something that accords with council guidance) purely and simply to lend support to an alternative use.
2. The bicycle store proposal is not readily accessible from the street as the only access is via the public staircase between the building and Drumsheugh Baths.
3. There is likely to be a requirement to create additional/increase windows likely to affect the privacy of others and will also alter the external appearance of the highly visible unspoilt traditional gable end to the West of the block.
4. The committee should visit this complex site and consider the accuracy of the plans submitted and the probability of the proposal being delivered without significant alteration to the building beyond that which is proposed. In particular the arrangements for lighting and ventilating are not explained and will require modification to the building beyond that shown.
5. The use of this basement as 38 bed hostel style accommodation would result in loss of privacy

for existing residents and would typically create a situation where visitors would be arriving by taxi to an unfamiliar location at all hours of the day and night causing considerable noise and nuisance in an otherwise quite location.

6. Typically, this will result in outdoor smoking and nuisance

7. The development is also in close proximity to Lynedoch house which is a sheltered property.

Barry Mackay

Chairman

Dean Village Association

Scottish Registered Charity SC000404

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Dr David Perry

Address: 22 Damside Dean Village Edinburgh

## Comment Details

Commenter Type: Residents Association

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:1). Bicycle store not accessible from street, but from steps between Belford Road and Dean Village

2). . Creation of windows affects privacy of other residents, and destroys gable end.

3). Creation of a 38 bed hostel results in loss of privacy for existing residents and cause excessive noise and nuisance.

4). Smoking area will attract extra nuisance and litter.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Elizabeth McLeod

Address: 6/16 Succoth Court Ravelston Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

Elizabeth McLeod (Owner No12 Belford Road)

6/16 Succoth Court

Edinburgh

EH12 6BY

Date: 25.02.2019

Dear Sirs

Object to Planning Application ref: 19/00550/FUL at No 14 Belford Road

As the owner of the property No 12 Belford Road I would like to object to the planning applications submitted for developments at No14 Belford Road, which is located in the basement under the multi owned tenement.

It has come to my attention that following 3 No separate applications have been submitted for No 14 Belford Road:

- Planning ref: 19/00550/FUL - Change of use from office to a 38-bed hostel (Use class 7), and Create Cycle store for existing office use.

- Planning ref: 19/00031/FUL - Create cycle store for ex office, change of use from office to domestic residential sui generis for 2 flats to hostel Use Class 7 (Hotels& Hostels) to self -catered holiday accommodation sui generis use for single-occupancy holiday letting.

- Planning ref: 19/00555/FUL - Change of use from office to self catering holiday apartment sui generis use for single occupancy holiday letting, and to create cycle store for existing office use.

My OBJECTIONS to 19/00050/FUL:

1. I object to the ownership declaration made by the applicant, on the grounds that the applicant is not the sole owner of all of the land in the application. My solicitor has seen the title to No14 and has advised that it does not encompass the undercroft of No12. There is no access to this area from the No 14 Flat and the only access to the self -contained store under No 12 is from an access hatch in my kitchen of my property No 12. (I will be having my solicitor send a legal letter to the applicant to this effect.)

2. I have seen sight of all of the deeds of all of the 6 flats in No13, which state that each flat owns the common property on which our tenement sits.

3. As the owner of No 12 I have direct access to a self- contained store height of 1.7m below my flat- this is in the location indicated by the applicant for the proposed bike store / hostel.

4. The existing drawing describes the undercroft to No12 as being currently inaccessible from No14. The applicant therefore can have no knowledge of the current layout of this area.

5. The application includes the proposal to create a cycle shelter on the steps from Belford Road to Hawthorn Rise for the existing office accommodation. However should it be successful, the property would no longer be an office accommodation; this seems contradictory!

6. Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues.

7. Applicant has proposed 12 new vehicle parking spaces, which would contradict his application, which includes a cycle store. There are not sufficient parking spaces as is. This could have a negative impact on Drumsheugh baths as they could potentially lose members if they were unable to park outside when using Drumsheugh Baths.

8. On turning the existing office into a 38-bed hostel, the applicant states that the bike store would be used as a smoking shelter. This would have a huge negative impact on the amenity of neighbouring residents above smoking area in terms of smell, noise, and litter. It is also a fire hazard to the properties above. My windows are directly above the proposed area.

9. Creation of a smoking shelter on a public footpath would result in loitering on the steps, creating potential congestion and trip hazards for passing pedestrians.

10. Due to the significant adverse impacts on the amenity of the neighbouring residents and the risk to public safety on the steps, the application is contrary to LDP policy Des 5 Development Design - Amenity, parts A and C

11. Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents.

12. A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38-bed hostel.

13. Hostels do not have the same issues in relation to amenity as the existing office and the applicant has not demonstrated how the amenity of neighbouring residents would be protected in terms of noise, overlooking, or loss of privacy.

14. A transient population will significantly diminish the sense of community The intensification of a transient population would diminish the sense of community, result in noisy, inconsiderate neighbours, and lead to issues outwith the control of planning restrictions.

15. The application is contrary to LDP policy Des 5 Development Design -

a. Amenity part A and C.

16. The application is contrary to policy Hou 7 Inappropriate uses in a residential area.

17. A 38-bed hostel would encourage loitering on Belford Road where ground floor flats are located. There is also an old person's residential home in very close vicinity, which could be affected by additional noise.

18. The gardens and living spaces of 10 and 11 Belford Road would be in direct view from the windows located on the boundary, resulting in overlooking, loss of privacy, spread of noise and

loss of amenity.

19. In order to create a 38-bed hostel the area under the proposal would be borrowing amenity from the surrounding gardens, (not just 10 and 11 Belford Road) to the detriment of neighbouring amenity and privacy.

20. A large proportion of the basement is without a source of natural light.

21. Increase in the amount of refuse, therefore additional bins required on the street with potential loss of parking. Contradicts application again as loss of parking spaces due to refuse bins, yet applicant asking for 12 new parking spaces.

22. The application does not include any proposed layouts; therefore the full impact of the proposed development cannot be assessed in terms of the adverse effects on neighbouring properties.

23. As an owner of the gable wall where the proposed opening is suggested, I declare my right of common ownership and note my concern on the stability of the building and above chimneys, should the opening be broken through for either the cycle shelter or as an entrance/ light source for the proposed hostel.

24. Belford Road is located in a Conservation area and any windows or openings in gable end are out of character with the "traditional tenement block" design. The Council's Character Appraisal identifies the key characteristics of the Dean Conservation Area. This application would contravene that.

Yours faithfully,  
Elizabeth McLeod  
Owner (No 12)



# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr philip Hunter

Address: 20 primrose bank road edinburgh

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: As a former owner of flat 1F1 in 13 Belford Road, I object to this application on the grounds that the applicant is not the sole owner of the cellar/undercroft he wishes to extend into and does not own the gable wall in which he proposes inserting a new entrance which is not in keeping. The development would have a detrimental impact on neighbours in terms of privacy, noise, disturbance and nuisance to a residential area, which would be detrimental to the sense of community in the Dean Conservation Area.

Specifically :

1. The applicant does not have sole ownership of the cellar/undercroft he wishes to extend into. Searches of title deeds for the tenement block back this up. The applicant describes the cellar as currently inaccessible and as such can have no knowledge of the internal layout. The application takes no account of the storage space under number 12 which conflicts with the proposed plans for the new entrance, cycle store and smoking area.
2. An entrance in the gable end is not in keeping with the area.
3. The applicant does not have authority to create an entrance or windows in the gable walls for a new entrance (door) or light source (windows) without agreement from other owners. It is a common wall for which all owners share ownership and responsibility. Because the applicant's property (number 14) has (according to deeds) only an entrance and stair in the tenement block shared with numbers 12 and 13, he has (certainly since 2010 to my knowledge and reportedly before then) accepted joint responsibility for common roof and guttering repairs in the block, has participated in decisions and has usually contributed his share of repair costs to the tenement block. The same principal should apply to ownership of - and responsibility for - the walls.
4. The drawings submitted are incorrect - some windows shown on the north side do not actually exist. The drawings also have a blue rectangle (lightwell?) in the pavement in front of number 12 which is not referred to in any text. If it's a proposed lightwell or skylight it would not be in keeping

with a conservation area.

5. The proposed cycle store is not located according to Edinburgh design guidance 2017 - "...readily accessible preferably with step free access...". It is not appropriate to locate a cycle store in the middle of a set of steps due to accessibility and safety issues.
6. The applicant states the cycle store will be used as a smoking shelter. This will impact the amenity of what is a residential area in terms of noise, smell and litter, potentially at all hours of the day and night. This would have adverse impact on nearby residents and on the Dean Village amenity for both residents and visitors.
7. The development of the cellar/undercroft would not be appropriate for residential, hostel or letting use due to lack of natural light. In addition, the creation of a hostel or holiday let would introduce unacceptable safety and fire risk for other residents in the block.
8. Hostel or holiday/Airbnb lets would add to footfall, noise and disturbance to the area at all times of the day and night and increased noise and traffic for support services for the property (cleaning, laundry, food) - not in the least comparable to the existing office workers and weekly cleaners as stated in the application.
9. The proposed windows to the north and west overlook primary living space in number 10 Belford Road and play areas on Hawthornbank Lane - the proposal borrows amenity from the surrounding gardens to the detriment of neighbouring amenity and privacy.
10. A hostel, holiday let or Airbnb type development would have a significant impact on the quality of life of residents in the tenement and surrounding area. A transient population would significantly diminish the sense of community and result in noisy, inconsiderate neighbours.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Ms Rosie Hunter

Address: 40 Lennox Row Edinburgh

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Reasons why the proposed development cannot go ahead

My main objection is that as the owner of flat 13/2 Belford Road, we have common ownership of walls as the deeds make reference to the gables and I quote, "a right in common with the proprietors of said tenement in and to the gables natural division walls roof chimney heads but not chimney cans". The owner of number 14 has contributed to at least one common roof bill to my knowledge so he must be aware of this fact. Therefore it is his responsibility to ask the other owners properties 12 and 13 before he proposes to create an entrance in a common wall and as an owner of 13/2, I would strongly object to an entrance being made in this common external wall. Not only would be out of keeping with a World Heritage site and a Conservation area, it could also cause structural damage to my property.

We also believe that we all have common ownership of the solum according to the deeds we have obtained. His plans, although worryingly vague, ignore the fact that number 12 own a cellar which would need to be used to create the space needed for a cycle store.

Apart from being very vague, the plans that have been submitted are actually incorrect as some of the windows shown on the North side do not actually exist on the planning application as they are not referred to in the text.

## Reasons why the proposed development should not go ahead

Creating a 38 bed hostel in this quiet, residential area would be a very bad idea. The many residents would be affected by the visitors' loitering on the steps creating noise and diminishing the sense of community.

Leading on from this, there would be a significant increase in footfall in the area.

The smoking in the proposed smoking area would smell and create noise, potentially into the early hours. The smoking would also create a significant fire hazard.

The parking space and litter facilities would not accommodate 38 extra people. There are not currently enough spaces for the residents as it is.

The proposed hostel would be have very poor natural light and would potentially not have the correct fire regulations.

The proposed windows overlook the main living space in number 10 Belford Road, infringing on their privacy.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Anna Webster

Address: 3, Hawthornbank Lane Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: As a notified neighbour, I wish to object to this application. This is for the following reasons:

- Despite this being an application for change of use to a hostel, there is no detail provided at all, and the drawings do not show any detail of access etc, but only the creation of a new entrance to a 'bike store'.
- This application is contrary to policy Hou 7 - Inappropriate uses in a residential area
- The hostels cited as examples by the applicant are completely different to this situation, being located in self-contained buildings with space around them, and not in a purely residential tenement situation.
- The applicant states that "Hostel use is not likely to impact on the amenity of local residents for a number of reasons:..." This is really not the case. The applicant uses the following justification, with our comments (shown in UPPER CASE).
- The existing office is open to co-workers 24hrs per day and at weekends without restriction. Cleaners have also cleaned the property on Sunday evenings for over a decade without there being any complaint. A hostel would not change the pattern of use. A 38-BED HOSTEL IS QUITE DIFFERENT TO A SMALL SHARED OFFICE USE, WITH CLEANERS ACCESSING ONCE A WEEK. IT IS INAPPROPRIATE TO COMPARE THE REQUIREMENTS OF A LARGE HOSTEL TO THOSE OF A SMALL SHARED OFFICE. PEOPLE ARRIVING AT, LEAVING, AND USING THE HOSTEL AT ALL HOURS WOULD HAVE A SEVERE EFFECT ON THE LOCAL RESIDENTIAL AMENITY, PARTICULARLY WITH WINDOWS OVERLOOKING NEIGHBOURING GARDENS AND RESIDENTIAL PROPERTIES (INCLUDING MINE).
- The ceiling of the property is double insulated with two layers of 'soundbloc' plasterboard beneath the original cement render ceiling, though this would have to be tested for acoustic separation and might need upgrading to meet building standards for the change of use. NOISE

WOULD TRAVEL THROUGH THE WINDOWS, NOT JUST THROUGH THE BUILDING. THERE WOULD ALSO BE EXTERNAL NOISE FROM PEOPLE USING THE 'SMOKING SHELTER' AND INEVITABLY SITTING/STANDING OUT ON THE HAWTHORNBANK STEPS.

- Hostels are inherently quiet at night as some residents go to sleep early and obligate fellow patrons to be mindful of the noise they generate. THIS REALLY IS NOT THE CASE! IN MY EXPERIENCE, HOSTELS ARE NEVER QUIET AT NIGHT. EVEN IF THEY ARE (BY SOME MIRACLE) QUIET INSIDE, THERE IS INEVITABLY NOISE OUTSIDE FROM PEOPLE ARRIVING/ LEAVING AND SMOKING/DRINKING OUTSIDE ETC. THIS NOISE, FROM 38 PEOPLE, WOULD DIRECTLY IMPACT ON THE AMENITY OF OUR PROPERTY AS WELL AS OTHER PROPERTIES (PARTICULARLY THOSE AT 10/11 BELFORD ROAD).

- As described above, a smoking shelter could be provided in the location of the proposed bicycle store, where it would not be adjacent to bedrooms facing the street or the entrances to the various tenements and flats. THESE STEPS ARE VERY IMPORTANT BOTH IN ACCESS TO OUR PROPERTY - WE USE THEM AT LEAST 10 TIMES A DAY - AND IN TERMS OF NOISE WITHIN OUR PROPERTY. WE CAN HEAR PEOPLE ON THE STEPS FROM WITHIN OUR PROPERTY, EVEN IF THEY ARE WALKING QUIETLY, AND THE CREATION OF A SMOKING SHELTER WOULD INEVITABLY LEAD PEOPLE TO LOITER ON THE STEPS AT ALL HOURS, PROBABLY DRINKING TOO, ESPECIALLY IN THE SUMMER MONTHS. THIS WOULD CREATE A SERIOUS NOISE NUISANCE FOR NEIGHBOURS. THE STEPS WOULD ALSO BECOME UNPLEASANT TO USE, PARTICULARLY FOR WOMEN AND CHILDREN AT NIGHT TIME, WITH PEOPLE HANGING AROUND THERE AT ALL HOURS. LITTERING IS ALSO A KEY CONSIDERATION.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Derrick McIntyre

Address: Mainsfield Morebattle Kelso

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am the landlord of 15 Belford Road and feel this would be unsuitable

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Peter Blance

Address: 1F1, 16 Belford Road, Edinburgh EH4 3BL

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Re Change of Use to Hostel;

The Edinburgh Local Development Plan (para.234) states,

'Developments, including changes of use, which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted.' This policy aims

'to preclude the introduction or intensification of non-residential uses incompatible with predominantly residential areas'

The building comprising 12-16 Belford Road is residential flatted accommodation with the exception of the office at number 14 which runs under the whole block of flats. This is principally a residential building and a change of use at number 14 to accommodate a 38 bed hostel open at all hours of day and night would create noise, disturbance and infringement on the privacy of the residents of the building. It is an entirely inappropriate plan that will impact adversely on the Dean conservation area and in particular, the residents of this building. The design statement asserts that running and operating a 38 bed hostel would compare favourably with any disturbance currently caused to neighbours by cleaners entering the existing office. This is simply fanciful and fictitious. A hostel within this residential block will inevitably generate noise at unsociable hours from hostellers returning from the bars and pubs in the city centre. The application uses inappropriate comparisons with other hostels and hotels where the particular buildings referenced are utilised wholly for the purpose of accommodating guests. A hostel within a residential tenement is totally incompatible for the reasons of noise, disturbance, privacy and the inevitable impact on appearance through litter outside the building.



Create a Cycle Store/Smoking Shelter;

The Smoking, Health and Social Care (Scotland) Act 2005 and The Prohibition of Smoking in Certain Premises (Scotland) Regulations 2006 prohibits smoking in certain 'wholly or substantially enclosed' places.

The law applies to premises which the public or a section of the public has access.

A 'wholly or substantially enclosed' place is defined in the legislation. This design application to use the undercroft to the east side of the building as a cycle store and smoking shelter would breach the legislation and is illegal.

The duty to enforce this legislation rests with The City of Edinburgh Council.

The only access to the proposed cycle store would be via a set of very steep steps at the east side of the building and use of this location would breach the Edinburgh Design Guidance 2017. It is an inappropriate location that would inevitably lead to falls and personal injury as well as potential disturbance and conflict of use with residents and pedestrians for whose use the steps are designed. Some impression of the narrowness, steepness and inappropriateness of the access can be gained from fig.6 of the Application Design Statement.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Josh Thomson

Address: 16/4 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Objection:

We own and reside at 2F1 16 Belford Road and we strongly object to the proposal to change a basement office and co-sharing workspace at 14 Belford Road into a 38 bed hostel. We believe this would have a material detrimental effect on the living conditions of nearby residents.

Disruption in a Residential Area:

This section of Belford Road is a quiet, residential cul-de-sac. The tenement block 12-16 Belford Road currently has 15 1-2 bed apartments. Having a hostel would more than double the number of residents in this tenement block.

In addition, there would be access to the hostel at all hours by hostel dwellers as well as staff which would be disruptive because it would mean increased traffic accessing and turning around within Belford Road. For example - taxis dropping people off, lorries for services such as laundry pick up etc.

We note that there is no provision for a social/common area in the hostel which means that hostel residents are therefore more likely to sit outside the building on the steps and kerbs socialising, drinking, smoking particularly during the summer months and the festival in August. It is highly possible that the hostel dwellers would order takeaway food to be delivered. We believe the noise generated would constitute a material detrimental effect to us as residents.

The applicant notes the need for additional accommodation for tourists in Edinburgh. There is an existing hostel (Belford Hostel) which is a large standalone building on a busy road with social areas within and is therefore in a much more appropriate location. We do not believe it is

appropriate for a hostel to be built in the basement of a tenement block in a quiet residential area.

#### Inaccuracies within the Application:

Regarding the application itself, we find that there are errors and unsubstantiated claims:

- i. There is no plan attached to the application showing details of the proposed 38 bed hostel;
- ii. the application for a cycle store and smoking shelter for the existing office is on the same application for the change of use to a 38 bed hostel. This is confusing as the two seem mutually exclusive.
- iii. The claim that "Hostels are inherently quiet at night as some residents go to sleep early" is entirely unsubstantiated;
- iv. the application compares the disruption of an existing weekly visit by a cleaner on a Sunday evening to a 38 bed hostel. This is clearly not a fair comparison;
- v. the applicant argues that the existing users of the co-sharing office have "a high level of fitness and to date 100% of co-work licencees cycle to work."
  - a. Why is a smoking area required therefore? This seems wholly inappropriate;
  - b. We live at 16 Belford Road and we have seen, as shown in photograph included in the application, at most 2 cycles secured to the railings next to our building. It is unclear if the owners of these cycles are co-work licencees.
- vi. The application states "a smoking shelter could be provided in the location of the proposed bicycle store, where it would not be adjacent to bedrooms facing the street or the entrances to the various tenements and flats." This is inaccurate as the entrance to the smoking shelter would be below windows of 12 Belford Road and next to the front doors of 10/11 Belford Road. The plan also shows the doors to the smoking shelter staying open.

#### Facilities:

Given the increase of the number of people staying overnight in the building, there would clearly also need to be better facilities such as recycling and rubbish disposal. The application merely states that "existing waste facilities exist, for change of use, a further application would be required." The bins on Belford Road are already regularly full. Additional facilities would need to be provided and this would impact the residents of Belford Road due to the noise.

The application states that there is no need for new or altered water supply or drainage. It also states that there is no provision for sustainable drainage of surface water. We find it hard to believe that a hostel for 38 people wouldn't require a change in water supply or drainage (eg use of showers, toilets, washing facilities etc). This would impact us as other residents in 12-16 Belford Road.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Miss Harriet Nicol

Address: 16/7 Belford road Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Hostel use in a tenement is incompatible. The noise will spread and people frequently entering the building at insocial hours will have significant impact on the surrounding residents

The application is contrary to policy hou 7 inappropriate uses in residential area.

The application is contrary to LPD policy des 5 development design a, entity part B and C.

Creation of bike store to be used as a smoking shelter would result in anti-social behaviour, the smell of smoke and litter.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Dr Kenneth MacKenzie

Address: 12 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am the occupant of 12 Belford Road, a ground floor flat with an entrance on Belford road and windows overlooking the stairs down to Dean Village between number 12 and Drumsheugh Baths. I am a tenant of Mrs E McLeod and I have lived at this address for over 4 years.

The kitchen and bathroom of no. 12 overlook the stairs, with the bathroom window being the leftmost window at the lowest level of the main building on the drawings of the northeastern elevation (A.012, for example), and the kitchen windows the two windows to the right. All of these windows are directly above the level area on the staircase where it is proposed to create a new opening for the entrance to the proposed bicycle store.

I object to this proposal for a number of reasons.

1. One of the proposals in the application is that the new opening in the wall adjoining the staircase would provide a smoking area for occupants of the premises at number 14. My kitchen and bathroom windows are directly above this area; I often have these windows open (especially the bathroom window, to reduce condensation after showering), and I believe that cigarette smoke would be certain to enter my home if the area was used for smoking. There was formerly a waste bin at the top of the staircase, next to Drumsheugh baths, and this would often attract smokers. On calm days, the bathroom and hallway would stink of cigarette smoke for long periods if I had the

windows open. I have no doubt that this would be much worse if people were smoking directly under my windows. There are also issues of noise and disturbance.

2. Furthermore, encouraging people to congregate and smoke on a narrow stairway frequently used by pedestrians would be significantly detrimental to the amenity of the area.

3. My kitchen floor has a removable section allowing access to a void directly below the floorboards. This void is about 3.5m square, with a longer section extending along the full length of the north-west wall of the property, where it adjoins number 10 Belford Road. The void extends all the way to the north-eastern exterior wall of the property, overlooking the stairway to Dean Village. The void extends to a depth of 1.25m below the upper surface of the floorboards and has a concrete floor. The void contains electric cabling and pipes for gas, water, and waste. Mrs McLeod tells me that the deeds to the property indicate that the void belongs to no. 12, and the pipes and cables which it contains certainly supply services to no. 12. Careful measurement suggests that the upper surface of the concrete floor of the void is 1.73m (5'8") above the level area on stairs where a new opening in the wall is proposed. This means that it would be physically impossible to build cycle store and the new opening as illustrated in A.012 without intruding seriously into 12 Belford road. The application claims that there is an undercroft belonging to number 14, but if this is the case then it would be some way under the concrete floor described above, and would surely be too deep for any external access to be provided.

4. The application also proposes converting number 14 into a hostel. There is more detail in a separate proposal (19/00555/FUL), and I will comment more fully in my comments to that application. Briefly, I object strongly to this part of the proposal. This part of Belford Road is a quiet residential street, and a hostel would be completely inappropriate, with a severe impact on the amenity if neighbours, myself included. Presumably the plan to use the stairs to Dean Village as a smoking area also applies to this part of the plan, and I have already given detailed objections to this in 1 and 2 above. I suspect that the impact from multiple users of a hostel would be significantly magnified. My points about the feasibility of constructing a cycle store apply a fortiori to the creation of a hostel, where much more extensive building works would be required which would certainly intrude upon the structure of 12 Belford Road.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Dr Kenneth MacKenzie

Address: 12 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

I am the resident at number 12 Belford Road, a ground floor flat directly above the eastern part of 14 Belford Road. These comments are an addendum to my previous comments on this application. There have been multiple planning applications for 14 Belford Road, and I was under the impression that the proposal for change of use to a hostel was dealt with more fully in one of the other applications. However, I now see that this was incorrect, and this is the only application which refers to the hostel. I would therefore like to expand my comments on this part of the application.

The application proposes a change of use to a hostel, and a figure of up to 28 beds is mentioned. I believe that the rest of the block contains a total of 14 flats, so possibly about 30 residents in total. A hostel of the suggested size would thus contain about as many residents as the whole of the rest of the block, and it is very difficult to believe that this level of occupancy would cause no disturbance or other loss of amenity to the current (permanent) residents of the building. I am in a ground floor flat with windows looking directly onto the pavement, and would be particularly affected by people going in and out of the building. It is not unusual for me to be disturbed late at night by drunken tourists passing by,

especially during the summer: on several occasions I have had people banging on my windows in the early hours of the morning. The occupants of the hostel would presumably be young tourists, who can be particularly problematic in this respect. The idea of 28 people going in and out at all hours of the day cannot be said to be attractive.

I am also highly doubtful that it would be possible to create a hostel of the proposed size in the space available. In my earlier comments I described a void below the kitchen floor at 12 Belford Road which descends to quite a deep level, and it seems unlikely that it would be physically possible to extend the premises at number 14 under number 12 unless the extension was at a considerable depth below ground. There are presumably stringent building and safety regulations for a hostel of the type proposed, and I find it hard to imagine that it would be possible to provide adequate lighting, ventilation, access, and emergency exits given the space constraints. I don't believe that the owners of 14 Belford Road have any idea of the structure of the part of the building below 12 Belford Road, and their plans are simply not credible because of this.

In summary, I object in the strongest terms to the proposal for change of use of 14 Belford Road to a hostel, for both social and architectural reasons.



# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Miss Eilidh Robertson

Address: 1f1 13 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposal would have a drastic affect on my enjoyment of the property. A Hostel is completely unsuited to a tenement building. There is already a Hostel located on Belford Road which is in a standalone building. There is already a high footfall to this Hostel and the noise late at night already interferes with my enjoyment of the property. If there was a Hostel in the same building this would be a complete interference with the enjoyment and amenity of the properties within and neighbouring the tenement. The spread of noise and guests entering the property at unsociable hours would significantly impact on the amenity of the surrounding residents.

The applicant has stated that cleaners entering the existing office would have the same impact as 38 hostel guests. This is not an appropriate or accurate comparison. A Hostel does not carry with it the same issues as an office in respect of noise and disturbance to neighbours, due to day time working and leisure purpose associated with a Hostel.

A new entrance from the steps would cause increased noise in a quiet residential neighbourhood. It would not be appropriate to have a cycle store half way down a set of steps, this would lead to accessibility and safety issues. This would also be contrary to page 55 of the Edinburgh Design guidance 2017. Biking area being used as a smoking shelter would attract anti social behaviour and would impact on the amenity of my and my neighbours property. This would cause increased noise, smell and litter. We would be unable to open our windows without the risk of smoke coming through from the cycle store/smoking area as our flat is situated directly above this. This would have a significant impact on the enjoyment of our property. Not to mention this would not be environmentally friendly or healthy and would be to the detriment of the tourists who use the steps as a thoroughfare.

A formation of a new access from the steps would be completely impractical. The height of the cellar area is unlikely to be sufficient to allow for a residential dwelling to be formed or for a new access to be made from the steps. This could have the effect of undercutting, undermining and reducing the stability of the building. It is disputed that the applicant has legal title to the lower basement part of the property. The proprietors of the tenement have a right to the solum of the building and no permission has been requested.

A hostel is completely inappropriate in a quiet residential area.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Jamie Dawson

Address: 13/1 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposal would have a drastic affect on my enjoyment of the property. A Hostel is completely unsuited to a tenement building.

There is already a Hostel located on Belford Road which is in a standalone building. There is already a high footfall to this Hostel and the noise late at night already interferes with my enjoyment of the property. If there was a Hostel in the same building this would be a complete interference with the enjoyment and amenity of the properties within and neighbouring the tenement.

Guests would be entering the property at unsociable hours and the spread of noise would negatively impact on my enjoyment of the property. This would also affect the elderly residents in the assisted living flats across the road and neighbours with children.

The applicant has stated that cleaners entering the existing office would have the same impact as 38 hostel guests. This is not an appropriate or accurate comparison. A Hostel does not carry with it the same issues as an office in respect of noise and disturbance to neighbours, due to day time working and leisure purpose associated with a Hostel.

A new entrance from the steps would cause increased noise in a quiet residential neighbourhood. It would not be appropriate to have a cycle store half way down a set of steps, this would lead to accessibility and safety issues. As a cyclist this is a completely impractical solution and this would also be contrary to page 55 of the Edinburgh Design guidance 2017.

Biking area being used as a smoking shelter would attract anti social behaviour and would impact

on the amenity of my and my neighbours property. This would cause increased noise, smell and litter. I would be unable to open my windows without the risk of smoke coming through from the cycle store/smoking area as our flat is situated directly above this. This would have a significant impact on the enjoyment of our property. Not to mention this would not be environmentally friendly or healthy and would be to the detriment of the tourists who use the steps as a thoroughfare.

A formation of a new access from the steps would be completely impractical. The height of the cellar area is unlikely to be sufficient to allow for a residential dwelling to be formed or for a new access to be made from the steps. This could have the effect of undercutting, undermining and reducing the stability of the building. It is disputed that the applicant has legal title to the lower basement part of the property.

# Comments for Planning Application 19/00550/FUL

## Application Summary

Application Number: 19/00550/FUL

Address: 14 Belford Road Edinburgh EH4 3BL

Proposal: Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable.

Case Officer: Robert McIntosh

## Customer Details

Name: Ms Jane Yellowlees

Address: 13 (3F2) 13 Belford Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Jane Yellowlees (Owner occupier)

13 (3F2) Belford Road

Edinburgh EH4 3BL

8 March 2019

Dear Sirs

Objection to Planning Application ref: 19/00550/FUL at No 14 Belford Road

As the owner of the property No 13 Belford Road (Flat 3F2) I would like to object to the planning applications submitted for developments at No. 14 Belford Road, which is located in the basement under the multi owned tenement.

It has come to my attention that following 3 No. separate applications have been submitted for No 14 Belford Road:

Planning Application Ref: 19/00550/FUL at No 14 Belford Road

Change of use (from office) To (38-bed) hostel Use class 7 (Hotels and Hostels). Create Cycle store for existing office use.

Planning Application Ref: 19/00555/FUL at No 14 Belford Road

Change of use (from office) to self-catered holiday apartments sui generis use for single occupancy holiday letting. Create cycle store for existing office use.

Planning Application Ref: 19/00031/FUL at No 14 Belford Road

Create cycle store for exist office. Change of use (from office) to domestic residential sui generis for 2 flats To hostel Use Class 7 (Hotels and Hostels) To self-catered holiday accommodation sui generis use for single-occupancy holiday letting.

This objection below refers to the following planning application:

Planning Application Ref: 19/00550/FUL at No 14 Belford Road

Change of use (from office) To (38-bed) hostel Use class 7 (Hotels and Hostels). Create Cycle store for existing office use.

### 1.0. Description of Proposal

The description of the proposal is confusing. It states the application is for a Change of use to hostel Use class 7 (Hotels and Hostels)." But it also states that it is an application to "Create cycle store for existing office use."

If the application for the change of use is successful then the store & shelter will not be for an office. What does the applicant really want or need planning for? Is the application for an office cycle store & smoking shelter for an office being used to gain more Hostel accommodation?

The applicant should be clear and open about what this application is actually for.

### 2.0. Land Ownership Certificate

I object to the ownership declaration made by the applicant. It is NOT correct. The applicant is NOT the sole owner of the land in the application. I have seen the deeds for all 6 flats in No. 13 Belford Road and the main door flat No. 12 Belford Road which state that each of those flats has a right of common ownership. The applicant has made a false statement and should withdraw their application.

### 3.0. Drawings:

3.1. The application does not include any drawings for the change of use to a Hostel. The Design Statement for the Hostel is vague and contradictory. Insufficient information has been provided. As a result, the full impact and extent of adverse effects on neighbouring properties and wider Dean Conservation Area cannot be fully assessed.

This is contrary to LDP Policy Env 6: Conservation Areas - Development, which requires that "Planning Applications should be in a sufficiently detailed form for the effect of the development proposed on the character and appearance of the area to be assessed."

3.2. Insufficient survey and investigation work has been carried out to prove that any development is possible in the area below Nos. 12 & 13 Belford Road.

The applicant's drawing of the existing plan describes the "undercroft" below Nos. 12. & 13 Belford Road as "currently inaccessible". The applicant can have no knowledge of the current layout of this area. There are no sections to prove that any of the levels work or where the existing solum level is. There are major structural walls supporting 4 levels of flats and the access stair the 6 flats in No. 13. There are no details of the internal load bearing walls shown on the plans. Details of the self-contained store, accessed by a hatch in No. 12 Belford Road, are missing. The existing store is in the area proposed for the bike store & smoking shelter / Holiday Let accommodation. The existing store would obstruct any development in that area.

3.3. Basement Plan - Ref: The Lower Ground Floor Plan Drg No. A.011.

The Plan the applicant has submitted is incorrect. The layout is not accurate - See comments to item 3.2. above. The area of the "New cycle storage" is described as the "UNDERCROFT TO 14 BELFORD ROAD". This is incorrect and misleading as the area is actually below Nos. 12 to 13 Belford Road and under common ownership by those properties. Also, with the exception of the self-contained store accessed by a hatch in No. 12 Belford Road the area is currently underbuilding and not an "undercroft".

3.4. East Elevation - Ref: East Elevation Drg No. A.012 & the Application for Change of Use to Hostel

The tenement at Nos. 12 to 16 Belford Road is 150 years old. It has never had any windows, entrances, openings or grilles in the east or west gables at the basement level or at ground floor level in the west gable. Access to the properties in the tenement has only ever been from the front or the rear of the building. The main windows are all located at the front and rear facades above basement level. Those in the gables are small, limited to one per level and centred on the façade well above eye level. There are two extra small windows in the east gable to No. 12 Belford Road, but they appear to be unfortunate, later interventions.

The historic steps from Belford Road to Hawthorn Rise provide a key pedestrian link from the City above to Dean Village and the River of Leith Walkway below. 150 years old they form a significant part of the historic fabric of the Dean Conservation Area. They are well used and loved by both locals and visitors alike. Any new development at the top of steps would be intrusive and detrimental to the use of those steps. It would borrow amenity, from the steps, but would destroy their character. Anyone who uses the steps is likely to suffer obstruction, nuisance and noise. It would result in loss of amenity for neighbours, local residents and visitors. It would have a huge impact on the amenity and enjoyment of the historic steps. It would also have a huge impact on the amenity and enjoyment of the wider Dean Conservation Area.

The new large entrance / deep, open recess proposed at basement level in the east gable is out of

character (Ref. Drg No. A.012). The building lies in the Dean Conservation area and Edinburgh's World Heritage Site. It is one of a few remaining historic tenements on the south side of the river and is unique on Belford Road. Alterations to the gables at basement level would affect the amenity and character of the historic tenement block. It would also have a huge impact on the amenity and enjoyment of the wider Dean Conservation Area.

### 3.5. West Gable - No drawing has been provided for the Application for Change of Use

The change of use proposed by No. 14 Belford Road is likely to rely on the addition of windows not only the north but also the west boundary façade. If so, the proposed development would borrow amenity and light from the children's play area on the west boundary. The windows would be at garden level and would look straight into the children's play area. This would result in loss of amenity and privacy to the play area. The windows would also look down into the neighbouring properties on Hawthornbank Lane. This would result in loss of amenity and privacy to those properties. Also, spread of noise to the play area and neighbouring properties.

The tenement at Nos. 12 to 16 Belford Road is 150 years old. It has never had any windows, entrances, openings or grilles in the east or west gables at the basement level. There have also never been any openings at ground floor level in the west gable. Access to the properties in the tenement has only ever been from the front or the rear of the building. The main windows are all located at the front and rear facades above basement level. Those in the gables are small, limited to only one per level and centred on the façade well above eye level. The lowest of the three on the west gable is at first floor level. It is well above eye level when viewed from the Belford Road. It is also well above the children's play area at basement level next to the west boundary façade.

Any windows added at basement level would be very visible from the Belford Road. This would result in loss of amenity to local residents and visitors. The three central windows at high level on the west façade are an important design feature. As there is no windows at ground floor level any new windows added at basement level would look odd and disconnected. Alterations to the gables at basement level would affect the amenity and character of the historic tenement block. It would also have a huge impact on the amenity of the wider Dean Conservation Area.

### 3.6. North facade - No drawings have been provided for the Application for Change of Use

The change of use proposed by No. 14 Belford Road is likely to rely on the alterations and addition of windows on the north boundary façade. If so, the proposed development would borrow amenity and light from the garden of No 10 & 11 Belford Road to the north. Once altered and added the windows would look straight into garden and windows of No 10 & 11 Belford Road. This would result in loss amenity, and privacy to the garden and property of No 10 & 11 Belford Road. Also, spread of noise to the garden and neighbouring properties.

### 4.0. Access & Parking:

The applicant has applied for 12 new parking spaces. This is excessive. The request is not



practical given the current parking arrangements on Belford Road. There is also a lack of detail to substantiate this request.

If the 12 new parking spaces are for the office, the request would appear to contradict the applicant's argument for a new bike store.

There is currently a shortage of parking in the street. Permit holders already use visitors' parking as there are insufficient resident parking bays. At certain times of the day parking for the Drumsheugh Baths (next to No 12 Belford Road) results in the loss of all available spaces. Parking for the Edinburgh's Society of Musicians at 3 Belford Road, which hosts concerts, already adds further pressure on the available parking.

The extra traffic and parking associated with a 38-bed Hostel would have significant impact on the amenity and enjoyment of the neighbours. It will result in a loss of parking for the local residents. It will also result in an increase of traffic and traffic noise, which is likely to be at unsociable hours. The intensification of a transient population would diminish the sense of community and lead to issues out-with the control of planning restrictions.

#### 5.0. Water Supply & Drainage

The applicant states there will no alterations or connections required to existing services. Can this be true? Unlike Nos. 12 & 13 Belford Road any development in the undercroft below Nos. 12 & 13 Belford Road is below street level. There is currently no habitable accommodation in the undercroft area. The applicant has not done enough to prove there would not be significant disruption.

#### 6.0. Trees

The applicant states there are no trees in adjacent properties in his application. This is not correct. There are trees very close to the north boundary façade and west boundary gable of No. 14 Belford Road. The trees fall within the Dean Conservation Area. There is no detail of what works would be required for the 38-bed hostel. Any alterations to the boundary facades to form new or enlarge existing windows would need access through those gardens. The trees would be at risk during the works.

#### 7.0. Waste Storage and Collection

There would be an increase in refuse, which would result in more communal bins on the street and/or more kerb side collections. The existing communal bins (adjacent to No. 16 Belford Road) often overflow. Any increase in communal bins is likely to result in further loss of resident parking. There would also be an increase in smell and litter. This would result in loss amenity to Belford Road and the neighbouring properties; in particular Nos. 12 to 16 Belford Road.

## 8.0. Cycle Store & Smoking Area

8.1 It is unclear whether the application is for an office Cycle Store & Smoking Shelter or for a 38-bed Hostel with Smoking Shelter. This section deals with my objection to the Cycle Store & Smoking Shelter. But the comments are also relevant to the Smoking Shelter for Hostel.

As part of my objection to the Cycle Store & Smoking Shelter please refer to items listed below:

- item 1.0 Confused application
- Item 2.0 Land Ownership declaration is incorrect
- item 3.2 Insufficient information to prove viability / impact on neighbouring properties
- item 3.3 Errors and misleading information on drawings
- item 3.4 to 3.6 Intrusive intervention in historic fabric & a Conservation Area
- item 3.4 to 3.6 Borrowed amenity / Loss of amenity
- Item 5.0 Disruption due to alteration of existing services
- item 7.0 Increased refuse and loss of parking

8.2. Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle store in the middle of a set of narrow, steep, public steps due to accessibility and safety issues.

8.3. The historic steps from Belford Road to Hawthorn Rise provide a primary pedestrian access from the City above to Dean Village and the River of Leith Walkway below. 150 years old they form a key part of the historic fabric of the Dean Conservation Area. They are well used and loved by both locals and visitors alike. The steps are narrow, uneven and steep at the top. The landings are also uneven and not level. It is difficult for two people to pass safely, let alone somebody carrying a bike. The cycle store & smoking shelter would be in regular use. This would create potential congestion, obstruction and trip hazards for passing pedestrians.

8.4. The applicant claims the design of the entrance to the cycle store & smoking shelter would be like those to No. 10 & 11 Belford Road. But they are completely different in scale and style. Unlike the tenement at No. 12 & 16 Belford Road, the property at No. 10 & 11 Belford Road fronts onto the steps and has domestic scale entrance doors with shutters. The cycle store & smoking shelter would have large double doors not shutters. When open during, the doors would expose a large, deep recesses full of bikes and smokers.

8.5. The applicant states the cycle store would also be a smoking shelter. The windows to the neighbouring properties are right above the store and shelter. The effect of the noise and smoke rising from below would be horrible. The cycle store & smoking shelter is a fire hazard to the properties above. The cycle store & smoking shelter would have a huge negative impact on the

amenity and enjoyment of the neighbouring residents.

8.6. The cycle store & smoking shelter is remote from the main office. It is likely to be abused and attract anti-social behaviour both during the day and at unsociable hours. The cycle store & smoking shelter would have a huge negative impact on the amenity and enjoyment of the neighbouring residents.

8.7. The creation of a smoking shelter on a public footpath would result in loitering on those steps. This would create potential congestion and trip hazards for passing pedestrians. The stair is at its narrowest and steepest at this point. There would also be smell, noise and litter. This would have a huge negative impact on the amenity and enjoyment of neighbours, local residents and visitors.

8.8. Due to the significant adverse impacts on the amenity of the neighbouring residents and the risk to public safety on the steps, the application is contrary to LDP Policy Des 5: Development Design - Amenity

8.9. The application is contrary to LDP policy Hou 7: Inappropriate uses in a residential area.

8.10. Scottish law prohibits smoking within office buildings. The applicant states the new bike store and smoking shelter is for office use. The boundary of the building stops at the door. Despite a large doorway, the proposed shelter is still an enclosed space within a building and is used as a store. It is not an outdoor space as the applicant claims. It's use for smoking would be illegal. The applicant should withdraw the application.

9.0 Change of use to (38-bed) Hostel Use class 7 (Hotels and Hostels).

9.1 It is unclear whether the application is for an office Cycle Store & Smoking Shelter or a 38-bed Hostel with Smoking Shelter. This section deals with my objection to the Change of Use from Office to Hostel.

As part of my objection to the change of use to a Hostel please refer to items listed below:

- item 1.0 Confused application
- Item 2.0 Land Ownership declaration is incorrect
- item 3.1 Insufficient information to assess full impact
- item 3.2 Insufficient information to prove viability / full impact
- item 3.3 Errors and misleading information on drawings
- item 3.4 to 3.6 Intrusive interventions in historic fabric & Conservation Area
- item 3.4 to 3.6 Borrowed amenity / Loss of amenity & privacy
- item 4.0 Excessive request for parking
- Item 5.0 Disruption due to alteration of existing services
- Item 6.0 Trees at risk in a Conservation Area

- item 7.0 Increased refuse and loss of parking

9.2. The application does not include any drawings for the change of use to a Hostel. The Design Statement for the Hostel is vague and contradictory. Insufficient information has been provided. As a result, the full impact and extent of adverse effects on neighbouring properties and Conservation Area cannot be fully assessed.

This is contrary to LDP Policy Env 6: Conservation Areas - Development, which requires that "Planning Applications should be in a sufficiently detailed form for the effect of the development proposed on the character and appearance of the area to be assessed."

9.3. Hostel use in a tenement is incompatible due to the spread of noise and large number of people entering the building often at unsociable hours. A transient population will significantly diminish the sense of community and result in noisy, inconsiderate neighbours. This very likely to have a significant impact on the amenity surrounding residents. In particular, those in the flats above the Hostel; Nos. 12 to 13 Belford Road and 15 to 16 Belford Road.

9.4. Hostel use does not have the same issues in relation to amenity as the existing office. The applicant states that one or two cleaners entering the existing office would have the same impact as 38 hostel guests. It is not accurate or reasonable to compare weekly office cleaning to a fully functioning 38-bed Hostel.

9.5. Hostel use would encourage loitering on Belford Road where ground floor flats and the main doors to Nos. 13 and No. 16 access stairs are located. There are residents' parking spaces immediately in front of the entrance to No. 14 Belford Road with only a narrow pavement between. The intensification of a transient population would diminish the sense of community and lead to issues out-with the control of planning restrictions. This would have a huge impact on the amenity of the surrounding residents.

9.6. The applicant states that the office cycle store & smoking shelter would continue to be used as a smoking shelter for the Hostel. This would result in loitering on the steps, creating potential congestion and trip hazards for passing pedestrians. The stair is at its narrowest and steepest at this point. There would also be smell, noise and litter. This would have a huge negative impact on the amenity and enjoyment of neighbours, local residents and visitors. For further comments on the impact of a smoking shelter on the amenity of the neighbouring properties, the historic steps and the wider Conservation Area see Item 8.0 above.

9.7. There is an old person's residential home in very close vicinity which could be affected by the additional noise.

9.8. Due to the significant adverse impacts on the amenity of the neighbouring residents and the risk to public safety on the steps, the application is contrary to LDP policy Des 5 Development

Design - Amenity and LDP Policy Des 12: Alterations and Extensions.

9.9. The application is contrary to LDP Policy Hou 7: Inappropriate uses in a residential area.

9.10. In order to create a 38-bed hostel the area under the proposal would be borrowing amenity from the surrounding gardens to the detriment of neighbouring amenity and privacy.

9.11. A large proportion of the basement is without a source of natural light. The change of use proposed is likely to rely on the addition and enlargement of windows in the north boundary façade and the addition of windows in the west boundary façade. This would result in issues of overlooking, loss of privacy, spread of noise and loss of amenity to neighbouring properties and gardens. For further comments see items 3.4 to 3.6 above.

9.12. The tenement at Nos. 12 to 16 Belford Road is a quiet, secluded residential block with a small, discrete office in part of the basement. The flats are extremely small. Generally, no more than one or two occupants per flat. I have lived here for a number of years. There is never any trouble with noise or privacy. A 38-bed Hostel would completely change the character of a unique historic tenement on Belford Road. The loss of amenity is likely to be so great that it would force residents to move.

9.13. There are already a number of hostels and hotels in the immediate area including Belford Hostel and Britania Hotel at the west end of Belford Road.

Yours faithfully,

Jane Yellowlees

Owner Occupier 13(3F2) Belford Road

West End Community Council  
% Ashfield, 61 Melville Street  
Edinburgh EH3 7HL

07.03.2019  
The Director of Planning  
City of Edinburgh Council  
Waverley Court, 4 East Market Street  
Edinburgh EH8 8BG

Dear Sir

**14 Belford Road Ref: Planning Application 19/00550/FUL**

In support of local residents, the West End Community Council objects in part to these proposals.

**Objections:**

**Change of Use to hostel (Use Class 7)**

1. There is a lack of detail as to what alterations would be made for visitor accommodation and reception.
2. No mention is made of on-site concierge provision.
3. Servicing and waste storage have not been addressed.
4. Coach access for drop-off could be problematic in this location with the closure at the Dean Bridge/Queensferry Road end of Belford Road.
5. This property is part of an otherwise wholly residential tenement. To use a possible two flats as a hostel with transient visitor occupation would be an opportunity lost to reinstate for residential use. The Community Council is keen to ensure that a living city centre is retained where possible and appropriate.
6. Neighbour amenity:  
Noise pollution: There are concerns about the possible effect on neighbouring households from the number and times of movements of individual hostellers. Servicing vehicles and coaches would also add to noise disturbance.
7. Neighbour Notification may be incomplete. The Board of the adjacent Drumsheugh Baths has apparently not been notified.

Ref: ELDP Policies Des 5; Des 12; Hou 7

**No objection:**

**Cycle Storage and Smoking area**

1. Dean Conservation Area and World Heritage Site  
The WECC agrees that there is a need for cycle storage and considers the proposals to meet the character requirements in terms of materials and location.
2. As regards the Smoking Area, we note that there have been problems with hotels and public houses in the West End over several years. We assume that the distance from adjacent residential windows and gardens complies with recently enacted requirements.

Ref: ELDP Policies: Des 12; Env 4

We trust that the above points will be considered to be material.

Yours faithfully  
Isabel Thom  
Planning Convenor, West End Community Council

NEIKES / 0 / REPLET .

Robert McIntosh

PLACE

Waverley Court  
4 East Market Street  
Edinburgh  
EH8 8BG

Planning &

25 FEB 2020

Building Standards

Mr Ross Manson  
10 Belford Road  
Edinburgh  
EH4 3BL

T: 07813943660  
E: rtmanson@gmail.com

Reference: 19/00550/FUL

Date: 22/02/2019

Dear Mr McIntosh,

**19/00550/FUL | Change of use to hostel Use Class 7 (Hotels and Hostels). Create cycle store for existing office use. New opening in gable. | 14 Belford Road Edinburgh EH4 3BL**

I object to the following planning applications for the reasons stated below.

Poorly located and inaccessible cycle store. Page 55 of the Edinburgh Design Guidance 2017 states that cycle "parking should be convenient and readily accessible, preferably with step-free access and located close to entrances." It is not considered appropriate to locate the cycle parking in the middle of a set of steps due to accessibility or safety issues. The proposal therefore does not comply with Tra 3.

The applicant states bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above the smoking area in terms of smell, noise and litter is contrary to Des 5 and Hou 7. The smoking shelter would have a negative impact on the character of the surrounding area and is inappropriate in terms of the design and location. The proposal does not comply with Des 1.

The steps between Belford Road and Hawthorn Rise are a relatively well used link between the Dean Village and the West End. The creation of a smoking shelter on a public footpath would result in anti-social behaviour and have a significant impact on the amenity and enjoyment of the residential properties situated above the proposed smoking shelter through the spread of noise and the smell of smoke. The steps are not well lit and a smoking shelter would most likely be abused by either hostel guests or members of public.

The applicant recognises issues of public urination and sleeping rough in association with the bike store. This is stated in the design statement. A smoking shelter will have the same issues and yet is not considered to be closed at night. There is a risk

to community security by creating the smoking shelter on the steps, it is therefore contrary to policy Des 5 Part C.

A hostel does not carry with it the same issues as an office in terms of noise. The applicant states that the cleaners entering the existing office would have the same impact as 38 hostel guests. It is not considered appropriate or accurate to compare the office cleaning procedure to a functioning 38 bed hostel.

Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is very likely to have a significant impact on the amenity surrounding residents. Contrary to LDP Policy Hou7. The residents on Belford Road, particularly the ground floor flats adjacent to the proposed hostel entrance area will be adversely affected through the spread of noise and loitering.

A 38-occupancy hostel will have adverse impacts on the neighbouring residents through the spread of noise to the upper flats on Belford Road and the ground floor flats on Belford Road.

The applicant states that sleeping in pods is 'premium'. A hostel with pods is likely to attract young people that are in Edinburgh to stay out late and party. There is therefore an intensification of a use contributing to a transient population that would diminish the sense of community in a residential area.

It is unclear what the applicant is applying for. The application requests a change of use to a hostel (class 7) but also applies for permission to create a bike store for the existing office.

The applicant has a certificate of lawfulness to create larger and in some cases new window openings on the north west elevation. The effect of the new and existing openings would have a significant adverse impact on the neighbouring residents of 10 and 11 Belford Road and 3 Hawthorn Rise as the windows are situated on the ground floor of the boundary between the tenement and the neighbouring garden. An intensification of use for a hostel will result in a loss of privacy to these properties.

The application site/property is not well-suited to class 7 hostel, by the very nature of the surrounding residential uses.

Multiple examples of surrounding hostel and hotel establishments are provided by the applicant in the design statement. These hostels do not have the same challenges as the proposal, due to the degree of separation and stand-alone nature of the examples. The proposal is situated on the ground and lower ground floor of a residential block and would not accord with the urban fabric or character of the street.



The applicant states that a detailed application is yet to be submitted. The issues highlighted by the applicant in the design statement would not be controlled through enforcement action if the application was granted.

Creating an opening the gable of the tenement flats would have a negative impact on the adjacent A Listed Building.

Overall, the applicant has not considered the amenity or privacy of the neighbouring residents and the change of use and external alterations would not accord with LDP policies;

**Des 5 Part (a) & (c)**

**Hou 7**

**Des 12 Part (b) & (c)**

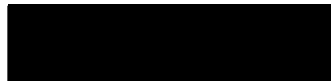
**Tra 3**

**Env 3**

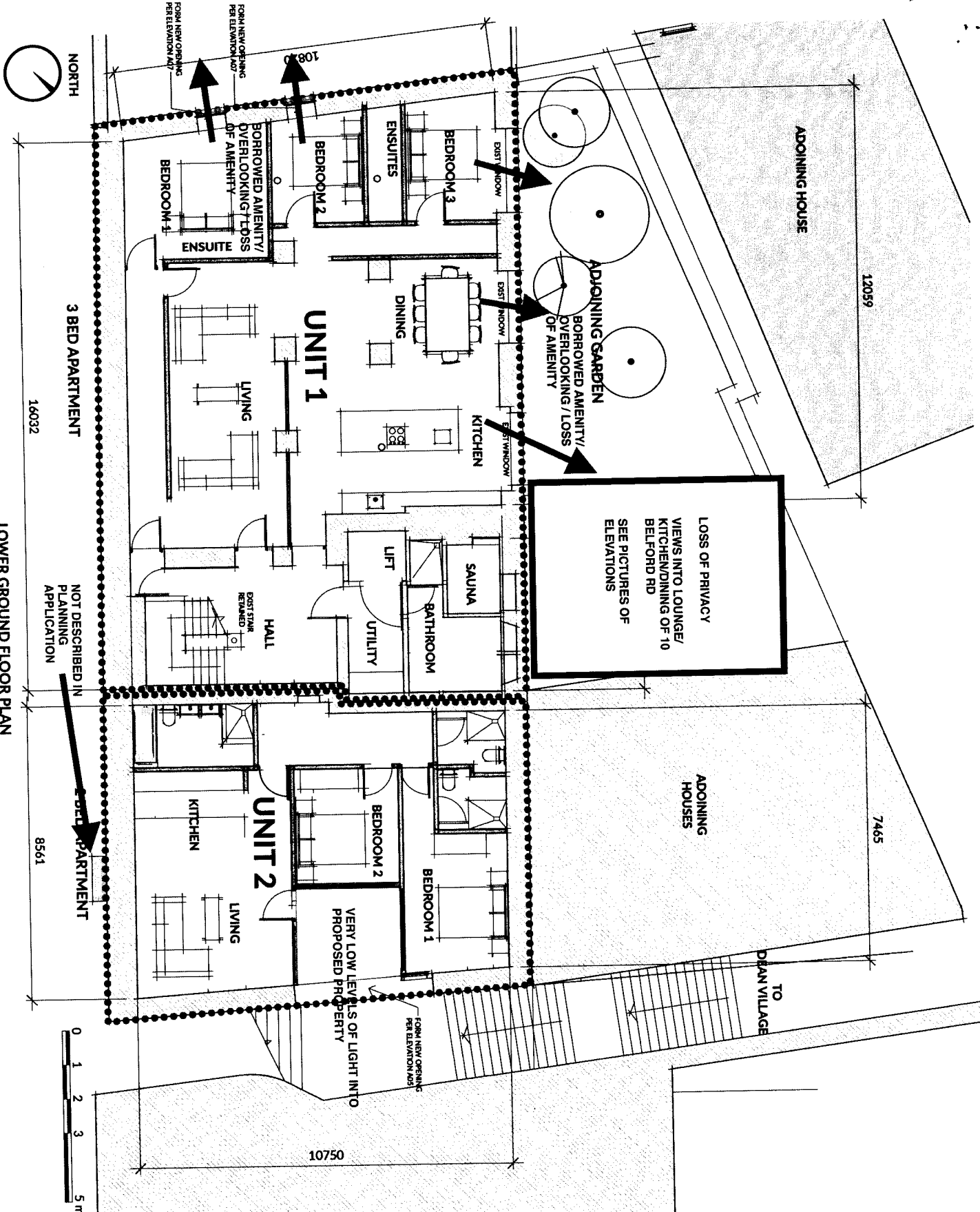
**Env 6**

**Des 1**

Yours sincerely,

A solid black rectangular box used to redact the signature of Ross Manson.

Ross Manson  
10 Belford Road  
Edinburgh  
EH4 3BL



**PROJECT**  
Development at  
14 Belford Road  
Edinburgh

**DRAWING**  
Lower Gnd Floor  
Plan Proposed  
scale 1:100@A3

**A.03**

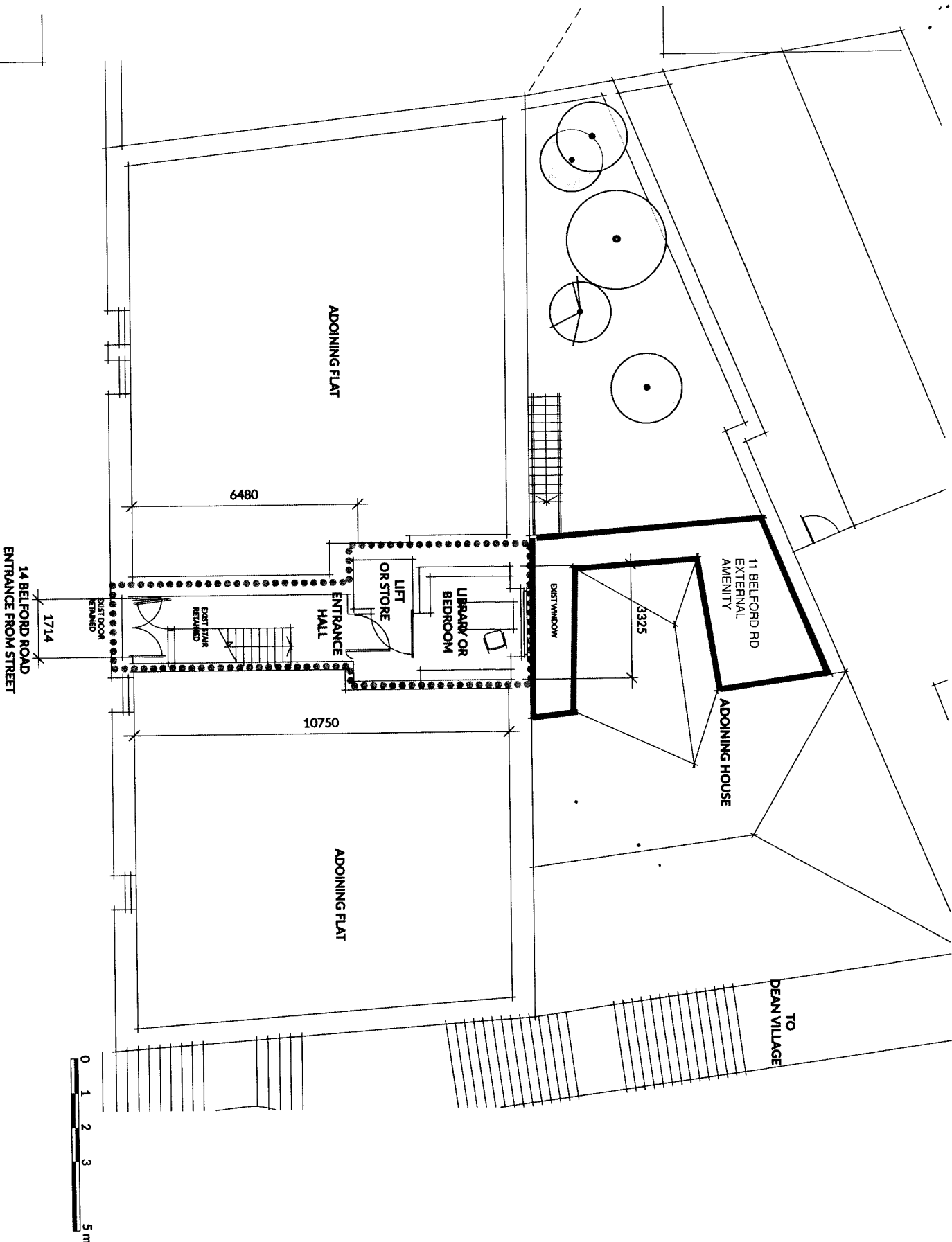


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January 4, 2019

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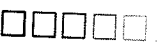


PROJECT  
Development at  
14 Belford Road  
Edinburgh

DRAWING  
Upper Gnd Floor  
Proposed  
scale 1:100@A3

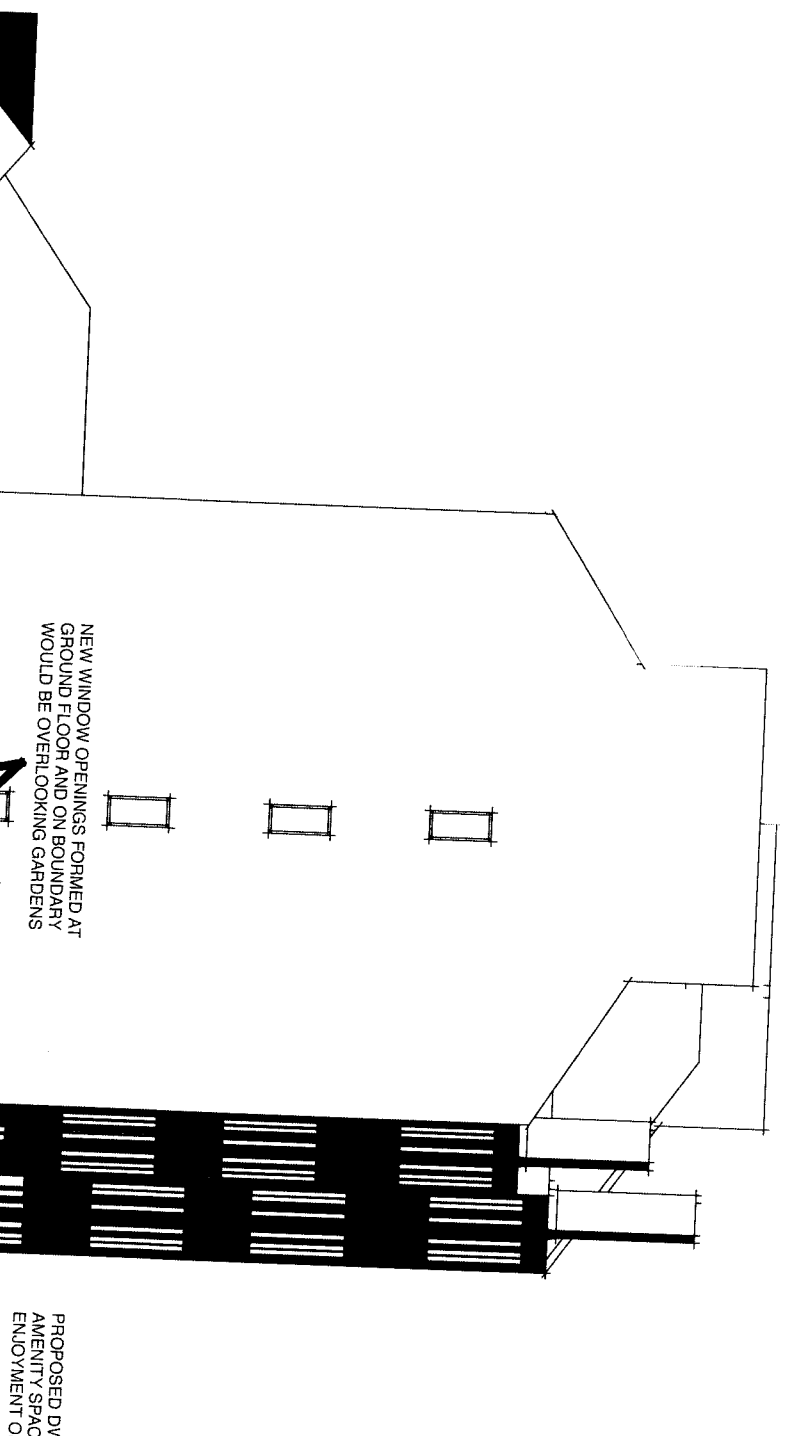
A.04

**ANDELL  
ARCHITECTS**



Andell Architects Interior Designers  
14 Belford Road  
Edinburgh  
EH4 3BL  
[www.andell.org.uk](http://www.andell.org.uk)

CLIENT  
Andell Studios  
issue  
December 16, 2018  
REVISIONS



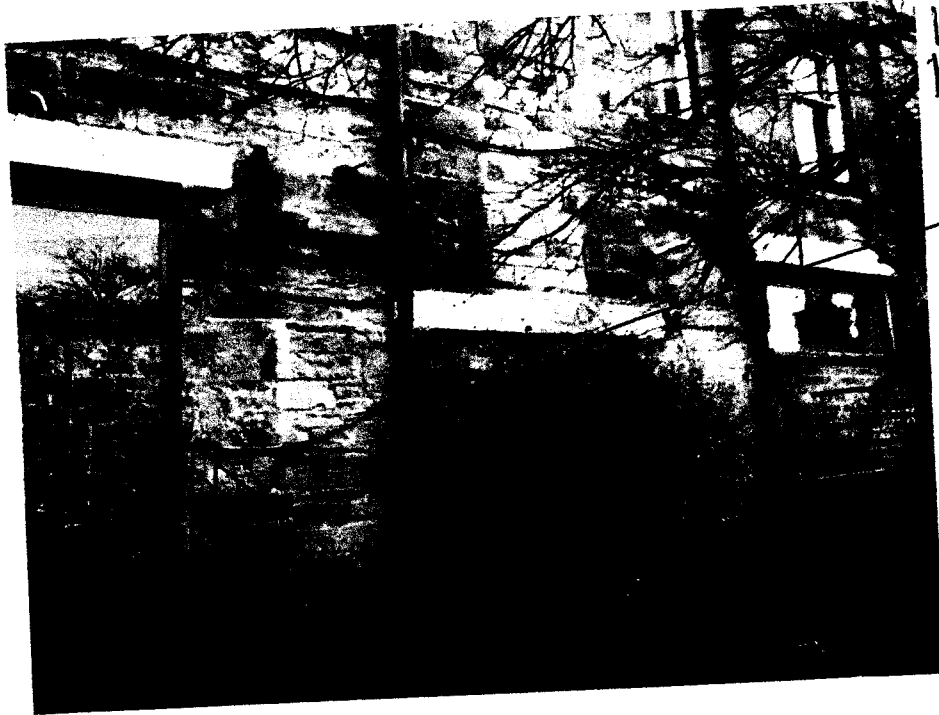
PROPOSED DWELLINGS RELY HEAVILY ON NEIGHBOURING  
AMENITY SPACES TO THE DETRIMENT OF THE PRIVACY AND  
ENJOYMENT OF GARDENS

**PROJECT**  
Development at  
14 Belford Road  
Edinburgh

**DRAWING**  
South West  
Elevation  
scale 1:100@A3

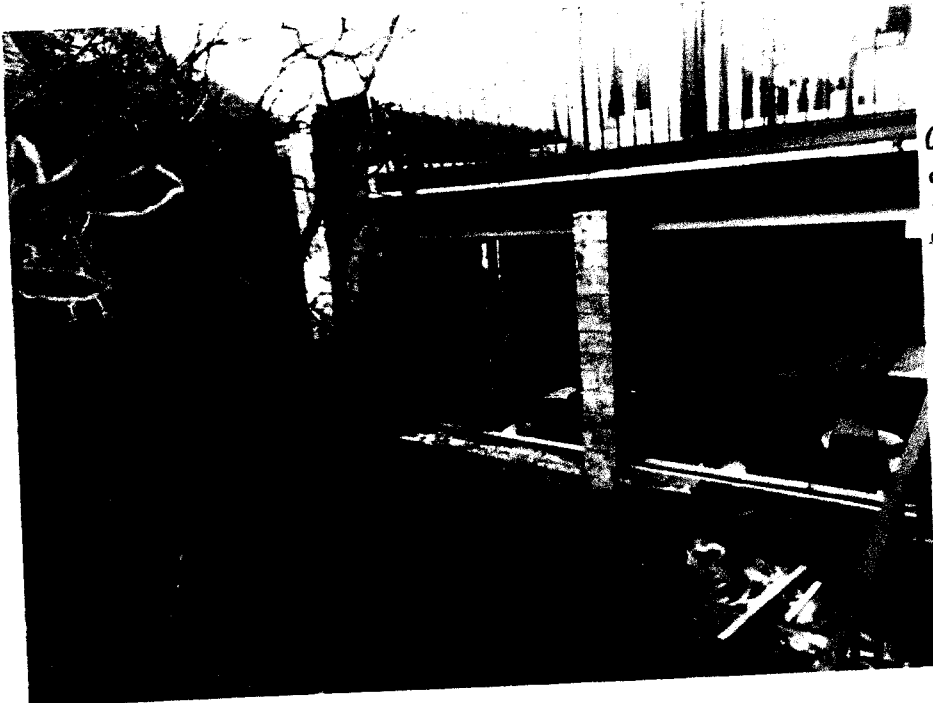
0 1 2 3 5m

**A.07**



existing  
view of No 14 rear  
basement elevation.

no opening



view to No 10 and  
11 Belford Road  
deck and living  
space from No 14  
window.

no windows



view from No 10  
Bedford Rd Irvine  
room to rear  
garden and no  
14 windows.

Robert McIntosh

PLACE

Warwick Court  
4 East Market Street  
Edinburgh  
EH8 8BG

Murthos L. Mannan  
93 Ravelston Dykes  
Edinburgh EH2 6EY  
tel no 07970 400354

Planning &amp;

25 FEB 2020

Building Standards

Reference 19/00550/FUL  
Date: 24 February 2019

19/00550/FUL: Change of use to hostel class 7 (Hotels and Hostels). Create cycle storage for existing office use. New opening in gable. 14 Belford Road, Edinburgh EH4 3BL

We object to the following Planning Applications for the reasons stated below.

It is noted that the Applicant has a poorly located and inaccessible bike store, ED Guidance 2017 notes that parking should be readily accessible, preferably with "step free access". The proposal does not comply with RA3.

The Applicant states that the bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above the smoking area in terms of noise, smell and litter would be apparent, it is contrary to Dec 5 and 7.

The shelter is located approximately 1.5 metres from an existing kitchen window and 2-4 metres from an existing flat entrance and children's bedroom.

Robert McIntosh

PLACE

Warwick Court  
4 East Market Street  
Edinburgh  
EH8 8BG

Murthos L. Mannan  
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It is noted that the Applicant has a poorly located and inaccessible bike store, ED Guidance 2017 notes that parking should be readily accessible, preferably with "step free access". The proposal does not comply with RA3.

The Applicant states that the bike store would be used as a smoking shelter. Impact on the amenity of neighbouring residents above the smoking area in terms of noise, smell and litter would be apparent, it is contrary to Dec 5 and 7.

The shelter is located approximately 1.5 metres from an existing kitchen window and 2-4 metres from an existing flat entrance and children's bedroom.



The smoking shelter would have a negative impact on the surrounding area, being located in a World Heritage site and Dean Village Village Conservation Area as well as being located adjacent to the Grade I listed Drumsheugh Baths.

The existing Hawthorne Rise steps are a well used historical route between the Dean Village and the West End. The creation of a smoking shelter on a narrow public footpath will result in anti-social behaviour and will have a significant impact on the amenity and enjoyment of residential properties surrounding the shelter.

The Applicant recognises issues of public urination and sleeping rough in association with the bike store, this is noted in the Design Statement. A smoking shelter will have the same issues, there is a risk to community security and is therefore contrary to policy D5 Part C.

In relation to the Applicant applying for a Hostel Use we note the following. The Applicant states that a cleaner entering a building normally once a day would have the same impact as people entering a 38 bed hotel, there is no comparison and it is considered inappropriate to try and compare the two functions. Hostel use in a tenement is incompatible as the spread of noise and people entering the building at unsociable hours is likely to have a significant impact on the amenity for surrounding residents. This is contrary to LDP Policy HOU7

The Applicant states that sleeping in pods is 'premium'. A hostel with pods is likely to attract young people that are in Edinburgh to stay out late and party. There is therefore an intensification of a ~~use~~ use contributing to a transient population that would diminish the sense of community in a residential area.

There is confusion as to what the Applicant is applying for, there is a request for a Change of Use to a hostel but reference to permission for a bike store for the existing office.

The Applicant has a certificate of lawfulness to create larger and in some cases new window openings in the north west elevation. The effect of the new and existing openings would have a significant adverse impact on the neighbouring residents of 10 and 11 Belford Road and 3 Hawthorn Rise as the windows are situated on the ground floor of the boundary between the tenement and the garden. An intensification of use for hostel use will result in a loss of privacy to these properties.

Most hostels in Edinburgh are located in a stand alone position not located in the basement of a tenement, in a predominant residential areas. We note that a Detailed Application is yet to be submitted, the issues highlighted by the Applicant in the Design Statement would not be controlled by enforcement action if the Application was Granted.

In conclusion the Applicant has not considered the amenity and privacy of the neighboring residents and the change of use and external alterations would not accord with LDP Policies

Des 5 Part(a) and (c)

Hou 7

Des 12 Part(b) and (c)

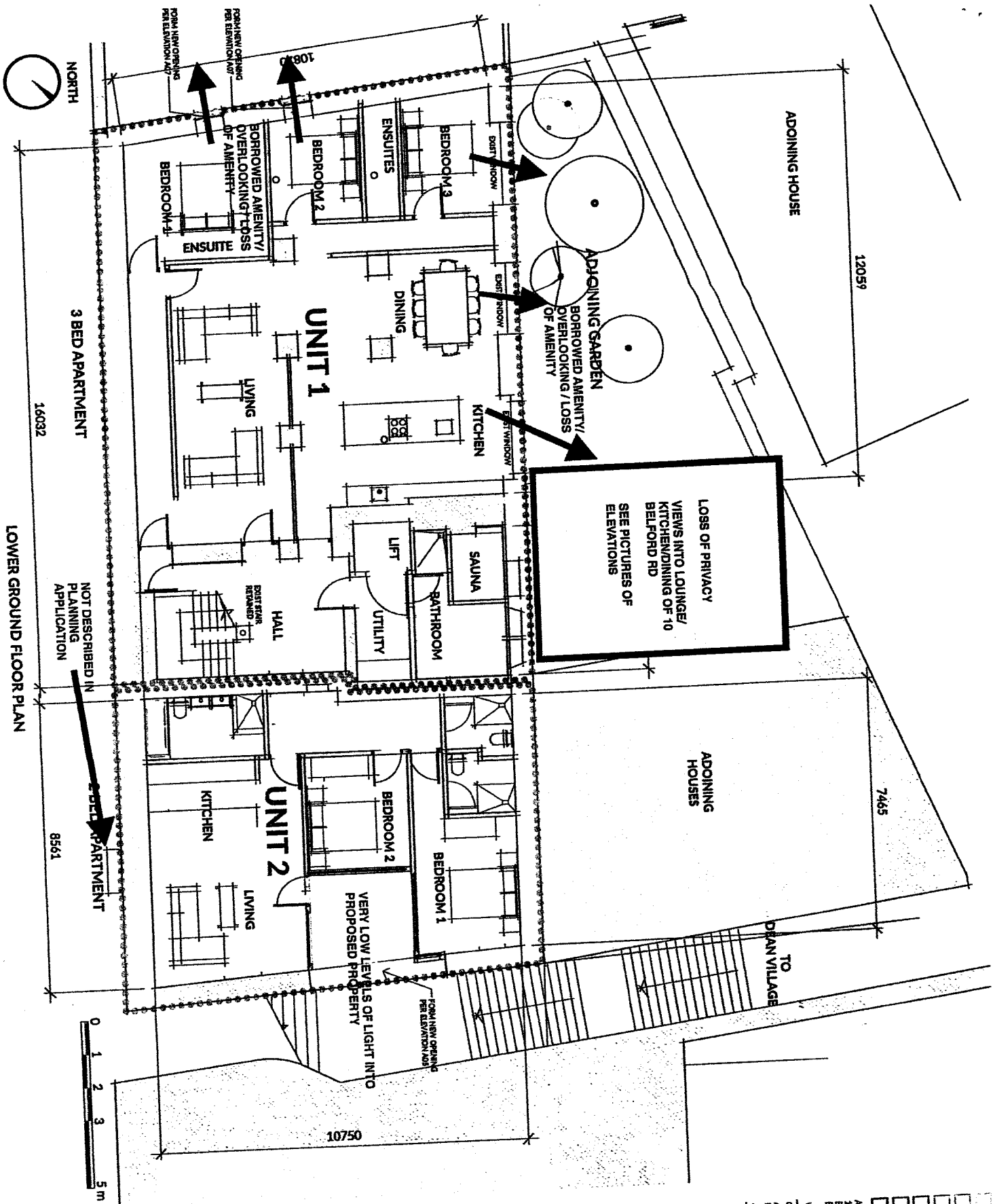
Tra 3

Env 3

Env 6

Des 1.

Yours sincerely, (owner 10/11 Belford Road)  

**PROJECT**  
Development at  
14 Belford Road  
Edinburgh

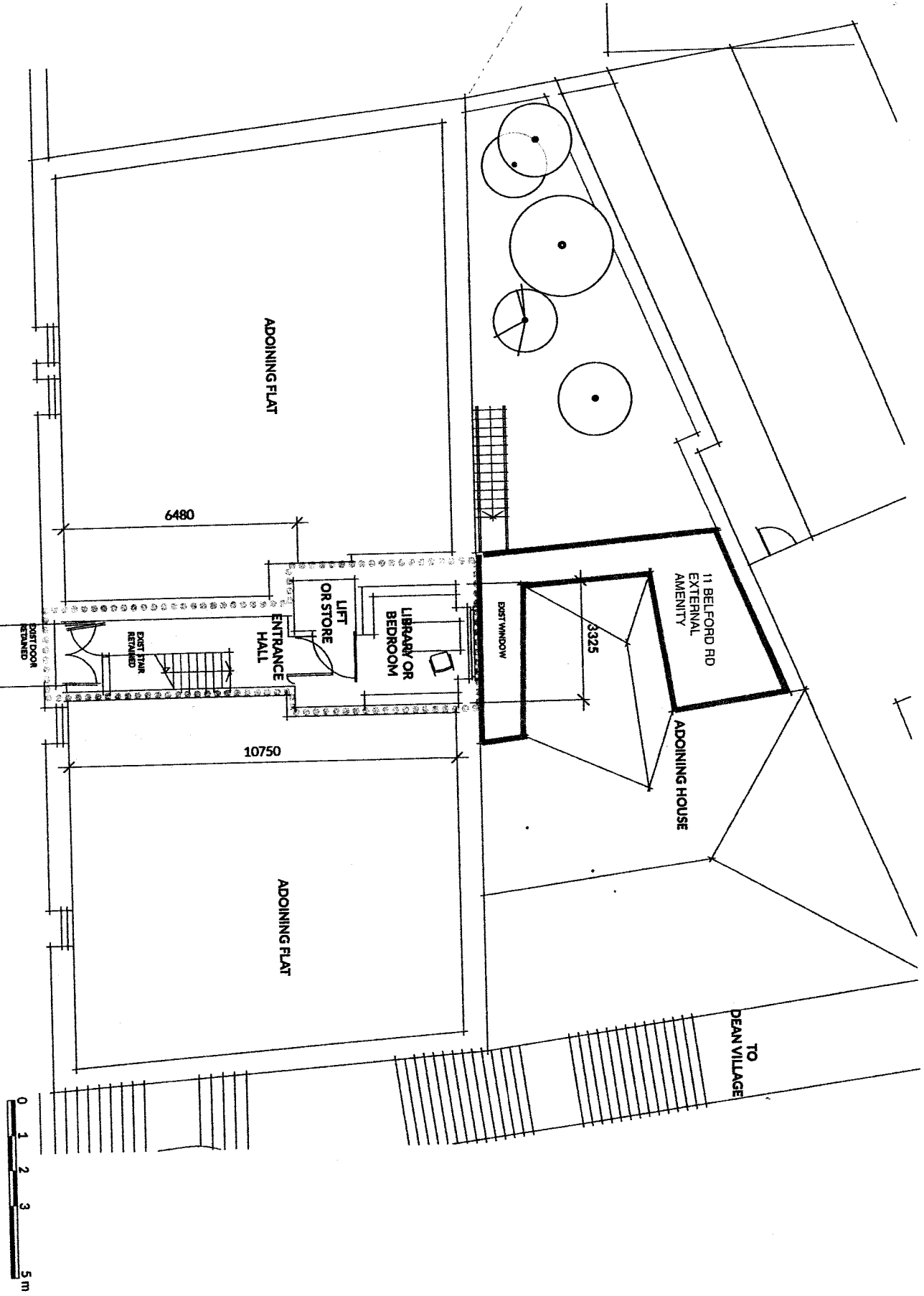
**DRAWING**  
Lower Gnd Floor  
Plan Proposed  
Scale 1:100@A3

**A.03**

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Edinburgh  
EH4 3BL

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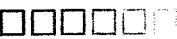
CLIENT  
Andell Studios  
Issue  
January 4, 2019  
REVISIONS



**PROJECT**  
Development at  
14 Belford Road  
Edinburgh

**DRAWING**  
Upper Gnd Floor  
Proposed  
scale 1:100@A3

**A.04**



Andell Architects Interior Designers  
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December 16, 2018

REVISIONS

PROPOSED DWELLINGS RELY HEAVILY ON NEIGHBOURING  
AMENITY SPACES TO THE DETRIMENT OF THE PRIVACY AND  
ENJOYMENT OF GARDENS

LOSS OF AMENITY  
BORROWED AMENITY  
LOSS OF PRIVACY

NEW WINDOW OPENINGS FORMED AT  
GROUND FLOOR AND ON BOUNDARY  
WOULD BE OVERLOOKING GARDENS

FOR NEW OPENING IN GABLE  
NEW THREE BAY AND ONE  
WINDOWS TO MATCH EXISTING

GARDEN AREA

0 1 2 3 5m

DRAWING  
South West  
Elevation  
scale 1:100@A3

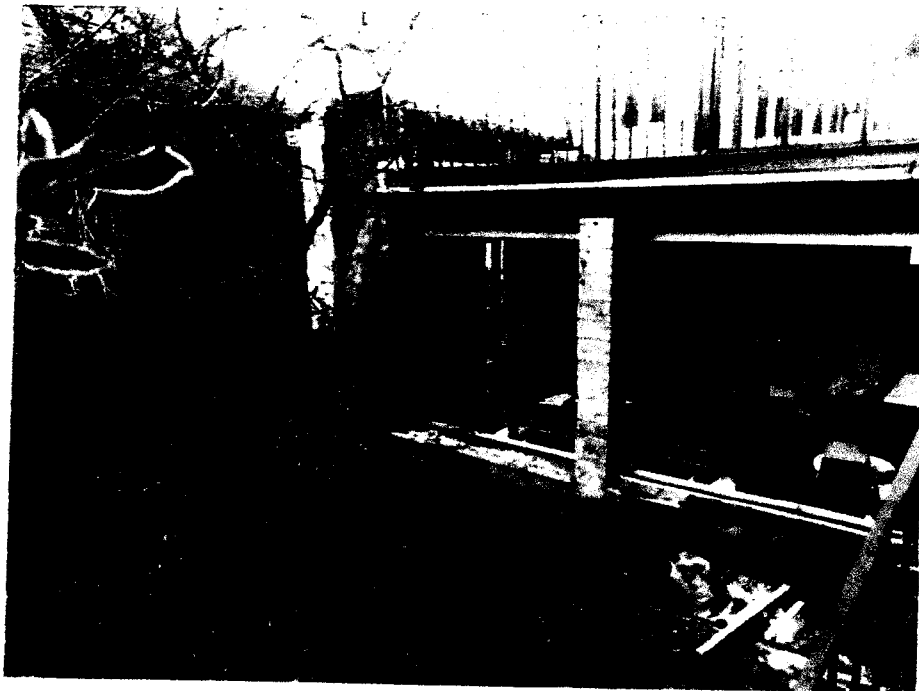
PROJECT  
Development at  
14 Bedford Road  
Edinburgh

A.07



existing  
view of No 14 rear  
basement elevation

no opening



view to No 10 and  
11 Belford Road  
deck and living  
space from No 14  
window

no windows



view from No 10  
Bedford Rd Irving  
room to rear  
garden and no.  
14 windows.