

Solutions 30.
FAO: Callum McKenna
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38 Queen Street
Glasgow
G1 3DX

British Telecommunications Plc.
BT Headquarters
81 Newgate Street
London
EC1A 7AJ

Decision date: 29 June 2022

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

The removal of 2 No. phone kiosks and the installation of 1 No. BT Street Hub unit.
At Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street Edinburgh

Application No: 22/02528/FUL

DECISION NOTICE

With reference to your application for Planning Permission registered on 11 May 2022, 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 does not comply with LDP policy Des 1 Design - Quality and Context as it is likely to have a high impact in visual terms to the detriment of the area.
2. The proposal does not comply with LDP policy Des 5 Development Design - Amenity as it is likely to adversely impact on the amenity of neighbouring properties.
3. The proposal is contrary to the Local Development Plan Policy Env 6 in respect of Conservation Areas - Development, as it would have a detrimental impact on the character and appearance of the conservation area.

4. The proposals are contrary to the non-statutory guidelines on Adverts and Sponsorship as - digital adverts are not supported on street furniture other than on bus shelters in appropriate locations.

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

Drawings 01-03, 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 will have a detrimental impact on the amenity of the location. The proposal is not acceptable with regards to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, LDP policies Env 6, Des 1 & Des 5, the Council's Guidance on Advertisements, Sponsorship and City Dressing, the Edinburgh Design Guidance, the Guidance on Listed Buildings and Conservation Areas and the Street Design Guidance.

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

Should you have a specific enquiry regarding this decision please contact Adam Cairns directly at adam.cairns@edinburgh.gov.uk.



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 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.

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
Proposed Telecoms Apparatus 16 Metres West Of , 117 Dundas
Street, Edinburgh**

**Proposal: The removal of 2 No. phone kiosks and the installation of 1
No. BT Street Hub unit.**

**Item – Local Delegated Decision
Application Number – 22/02528/FUL
Ward – B05 - Inverleith**

Recommendation

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

Summary

The proposal will have a detrimental impact on the amenity of the location. The proposal is not acceptable with regards to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, LDP policies Env 6, Des 1 & Des 5, the Council's Guidance on Advertisements, Sponsorship and City Dressing, the Edinburgh Design Guidance, the Guidance on Listed Buildings and Conservation Areas and the Street Design Guidance.

SECTION A – Application Background

Site Description

The application site is located on a paved area along Dundas Street. The area is mixed commercial and residential in nature with ground floor retail premises and residential dwellings located above.

Description Of The Proposal

The application is for the erection of a double-sided digital advertising display unit with rotating content . The advert will be housed within a BT "InLink" unit.

The intensity of the illumination of digital signs will not exceed 600 candelas per square metre between dusk and dawn the signs will not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements). The minimum display time for each advertisement will be 10

seconds. The InLink unit comprises a 2.9m high by 1.23m wide by 0.35m deep structure with an integral telecommunications interface on the side elevation. The main casing is in cast grey-coloured powder-coated aluminium with black coloured sections around and above the interface and digital display areas.

The key features of the telecommunications interface are as follows:

- free ultrafast Wi-Fi;
- touchscreen tablets to access council services, BT's phone book, maps and directions;
- an accessible design, including hearing induction loops, braille embossed and TalkBack functionality;
- integrated lighting and "privacy wings";
- 100% renewable energy powered.

Supporting Information

The following documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Design and Access Statement; and
- Street Hub Product Statement; and
- Noise Management Plan; and
- ICNIRP;
- Antisocial Behaviour Management Plan;
- Iip Professional Lighting Guide 2015; and
- Noise Management Plan.

Relevant Site History

22/02527/ADV
Proposed Telecoms Apparatus 16 Metres West Of 117
Dundas Street
New Town
Edinburgh

2 no. LED digital displays.

Other Relevant Site History

Consultation Engagement

Publicity and Public Engagement

Date of Neighbour Notification: 29 June 2022

Date of Advertisement: 3 June 2022

Date of Site Notice: 3 June 2022

Number of Contributors: 3

Section B - Assessment

Determining Issues

Due to the proposed development falling within a conservation area, this report will first consider the proposals in terms of Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997:

- Is there a strong presumption against granting planning permission due to the development conflicting with the objective of preserving or enhancing the character or appearance of the conservation area?
- If the strong presumption against granting planning permission is engaged, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh it?

This report will then consider the proposed development under Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Do the proposals comply with the development plan?

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

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

In the assessment of material considerations this report will consider:

- the Scottish Planning Policy presumption in favour of sustainable development, which is a significant material consideration due to the development plan being over 5 years old;
- equalities and human rights;
- public representations; and
- any other identified material considerations.

Assessment

To address these determining issues, it needs to be considered whether:

a) The proposals harm the character or appearance of the conservation area?

The following HES guidance is relevant in the determination of this application:

- Managing Change Conservation Areas

The New Town Conservation Area represents a planned urban concept of European significance with an overriding character of Georgian formality. Stone built terrace houses and tenements, built to the highest standards, overlook communal private gardens; to the rear are lanes with mews buildings, many of which are now in housing

use. The importance of the area lies in the formal plan layout of buildings, streets, mews and gardens and in the quality of the buildings themselves

The Council's Street Design Guidance reinforces the need to protect the special characteristics of streets such as along Dundas Street. It seeks a high standard of coordinated place management and street design interventions which will enhance the special character of these streets.

The double-sided digital advertising panel will be set perpendicular to the street within the InLink structure. Views both north and south will be interrupted by this panel, the bottom edge of which will sit approximately 0.6 metres above pavement level. The height of the proposed advert is 1.8 metres. Due to its alignment, height and illuminated digital nature, the advert will therefore have significantly greater impact than the existing static adverts on the existing phone boxes on both short and long distance views along Dundas Street.

The advertisements both individually and cumulatively within the commercial streets of the New Town will result in a material change in character, a key element of which is advertisements confined primarily to shopfronts with limited and subtle advertising on bus shelters and phone boxes at low level compared to the proposed digital advertisements which rise approximately 2.9 metres above pavement level.

The proposal will have a detrimental impact on the defining characteristics and appearance of this part of the New Town Conservation Area and is therefore contrary to the Council's guidance on Listed Buildings and Conservation Areas.

Conclusion in relation to the conservation area

In relation to the conservation area the proposals do not preserve the character and appearance of the conservation area. Therefore, the proposals are not acceptable in relation to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

b) The proposals comply with the development plan?

The development plan comprises the Strategic and Local Development Plans. The relevant Edinburgh Local Development Plan 2016 (LDP) policies to be considered are:

- LDP Environment policy Env 6
- LDP Design policies Des 1 and des 5
- LDP Transport policy Tra 9

The non-statutory 'Listed Buildings and Conservation Area' guidance is a material consideration that is relevant when considering policy Env 6.

Conservation Area

This has been assessed in section a) and does not comply with LDP Policy Env 6.

Principle

The Council's Guidance on Advertisements, Sponsorship and City Dressing states that advertisements are, by their nature, designed to create a high impact in visual terms, which may be inappropriate in sensitive environments. Careful control is therefore required to ensure that advertising is not detrimental to the amenity of these locations.

The Guidance states a presumption against freestanding digital advertising unless exceptional circumstances justify otherwise. The proposed digital advertisement would not be located within a special designated area.

The proposal seeks to install digital advertising as a principal element of a freestanding structure that also incorporates a telecommunications interface. No exceptional circumstances have been identified in this location and the applicant has not provided specific evidence that would justify the erection of the freestanding structure in this location. The advert is therefore unacceptable in principle in this location.

Amenity

The double-sided digital advertising panel will stand at 2.98m with a width of 1.23m. Due to its width, height and illuminated digital nature, the advert constitutes an unacceptable and unnecessary intrusion into the streetscape which would result in advertisement clutter to the detriment of amenity.

The proposal is considered to impact upon visual amenity, affecting immediate outlook, contrary to design policy Des 1 and Des 5.

Transport has raised no objection to the proposal. The proposal does comply with transport policy Tra 9 of the Edinburgh Local Development Plan.

Conclusion in relation to the Development Plan

The proposals do not comply with the relevant policies of the LDP.

c) There are any other material considerations which must be addressed?

The following material planning considerations have been identified:

SPP - Sustainable development

Scottish Planning Policy (SPP) is a significant material consideration due to the LDP being over 5 years old. Paragraph 28 of SPP gives a presumption in favour of development which contributes to sustainable development. Paragraph 29 outlines the thirteen principles which should guide the assessment of sustainable development.

The proposal does not comply with Paragraph 29 of SPP.

Emerging policy context

The Draft National Planning Framework 4 is being consulted on at present and has not been adopted. As such, little weight can be attached to it as a material consideration in the determination of this application.

While City Plan 2030 represents the settled will of the Council, it has not yet been submitted to Scottish Ministers for examination. As such, little weight can be attached to it as a material consideration in the determination of this application.

Equalities and human rights

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

Public representations

Four letters of representation have been received. The letters were all in objection to the scheme.

A summary of the representations is provided below:

material considerations

- Impact on character of conservation area; assessed in section a) conservation area.
- Impact on amenity; assessed in section b) amenity.
- Impact on pedestrian flow; assessed in section b) transport.

Conclusion in relation to identified material considerations

The material considerations identified have been addressed within the sections above.

Overall conclusion

The proposal will have a detrimental impact on the amenity of the location. The proposal is not acceptable with regards to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, LDP policies Env 6, Des 1 & Des 5, the Council's Guidance on Advertisements, Sponsorship and City Dressing, the Edinburgh Design Guidance, the Guidance on Listed Buildings and Conservation Areas and the Street Design Guidance.

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reasons

1. The proposal does not comply with LDP policy Des 1 Design - Quality and Context as it is likely to have a high impact in visual terms to the detriment of the area.
2. The proposal does not comply with LDP policy Des 5 Development Design - Amenity as it is likely to adversely impact on the amenity of neighbouring properties.

3. The proposal is contrary to the Local Development Plan Policy Env 6 in respect of Conservation Areas - Development, as it would have a detrimental impact on the character and appearance of the conservation area.

4. The proposals are contrary to the non-statutory guidelines on Adverts and Sponsorship as - digital adverts are not supported on street furniture other than on bus shelters in appropriate locations.

Background Reading/External References

To view details of the application go to the [Planning Portal](#)

Further Information - [Local Development Plan](#)

Date Registered: 11 May 2022

Drawing Numbers/Scheme

01-03

Scheme 1

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Adam Cairns, Planning Officer
E-mail: adam.cairns@edinburgh.gov.uk

Appendix 1

Consultations

The full consultation response can be viewed on the Planning & Building Standards Portal.



By email to:
planning.local1@edinburgh.gov.uk

City of Edinburgh Council
Planning and Strategy
4 Waverley Court
East Market Street
Edinburgh
EH8 8BG

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300058799
Your ref: 22/02528/FUL
07 June 2022

Dear City of Edinburgh Council

Town and Country Planning (Development Management Procedure) (Scotland)
Regulations 2013
Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street New Town
Edinburgh - The removal of 2 No. phone kiosks and the installation of 1 No. BT Street
Hub unit

Thank you for your consultation which we received on 27 May 2022. We have assessed it for our historic environment interests and consider that the proposals affect the following:

Ref	Name	Designation Type
GDL00367	THE NEW TOWN GARDENS	Garden and Designed Landscape

You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

We have considered the information received and do not have any comments to make on the proposals. Our decision not to provide comments should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further Information



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

This response applies to the application currently proposed. An amended scheme may require another consultation with us.

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org.

Yours faithfully

Historic Environment Scotland

Comments for Planning Application 22/02528/FUL

Application Summary

Application Number: 22/02528/FUL

Address: Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street Edinburgh

Proposal: The removal of 2 No. phone kiosks and the installation of 1 No. BT Street Hub unit.

Case Officer: Adam Cairns

Customer Details

Name: Mr Simon Holledge

Address: 9/1 Carlton Terrace Edinburgh

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the commercial use of public space by a private company. The street hubs are intentionally obtrusive for advertising purposes and clutter the pavement for wheel-chair users and other people with mobility issues. BT have not maintained their telephone kiosks and have left them to become dirty, dilapidated and covered with graffiti. The same thing will happen with the BT hubs. BT cannot be trusted to respect public space. Finally these hubs are particularly unsuited to Edinburgh's historic streets in and around the World Heritage Site.

Comments for Planning Application 22/02528/FUL

Application Summary

Application Number: 22/02528/FUL

Address: Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street Edinburgh

Proposal: The removal of 2 No. phone kiosks and the installation of 1 No. BT Street Hub unit.

Case Officer: Adam Cairns

Customer Details

Name: Miss Anggi Wulan

Address: 226 Leith Walk Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It's not really good if we change the existing stuff with commercial stuff. It's a conservation area we need to keep clear and good with sightseeing

Comments for Planning Application 22/02528/FUL

Application Summary

Application Number: 22/02528/FUL

Address: Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street Edinburgh

Proposal: The removal of 2 No. phone kiosks and the installation of 1 No. BT Street Hub unit.

Case Officer: Adam Cairns

Customer Details

Name: Ms Linda Rosborough

Address: 37 Northumberland St Edinburgh

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the inappropriate installation of an advertisement bollard in a Conservation Area and adjacent to the World Heritage Site. What is worse is that it will be illuminated damaging the character of the area. This will be a significant visual intrusion, totally inappropriate for its setting. It is significant that in contrast to the high design standards in the past for street telecommunications facilities, this would bring a totally inappropriate trashy commercialism to the New Town.



The Community Council represents the views of local residents to Edinburgh City Council

From : Richard Price: NTBCC Planning Convener

2 Bellevue Terrace
Edinburgh
EH7 4DU

24th June 2022

Mr. Adam Cairns,
The City of Edinburgh Council,
Waverley Court,
East Market Street,
Edinburgh, EH8 8BG

Submitted by email to adam.cairns@edinburgh.gov.uk

Dear Mr. Cairns,

22/02528/FUL The removal of 2 No. phone kiosks and the installation of 1 No. BT Street Hub unit. Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street Edinburgh

This proposal within the New Town & Broughton Community Council's (NTBCC) area forms part of a wider pan-Edinburgh series of applications for the installation of BT 'Street Hubs' which are essentially double-sided digital advertising display units with static but frequently rotating content - the majority of which aim to replace redundant BT phone kiosks. Some of these applications have already been determined but the majority, including this proposal for Dundas Street, are live applications, open for comments from the general public.

We note that the proposed location is on the periphery but just outwith the (Old and) New Town World Heritage site but the site does sit within the New Town Conservation area.

Generally, the New Town & Broughton Community Council would support removal of redundant i.e. infrequently used BT phone kiosks. These kiosks have often been subject to either vandalism to some degree, locations for anti-social behaviour or more typically targeted as suitable locations for graffiti or fly-posting. However, whilst this application proposes removal of a currently under-utilised and graffiti'd (1 off) kiosk on Dundas Street, it also proposes replacing the redundant kiosk with a BT 'Street Hub'.

1. Assessment of Benefits for 'Street Hubs'

We note the possible benefits as stated in the background document lodged ('Outlining the Full Range of Benefits that Street Hubs Provide') and whilst these may be relevant to a few local residents or more likely visitors to the area, these do not appear to have been a material consideration in previous, broadly similar, applications that have already been determined.

We are also aware that this current tranche of applications across Edinburgh are part of a wider pan-UK activity by the applicant. Whilst we understand and acknowledge that experience elsewhere is not a material planning consideration, it is worth noting the responses by various local authorities across the UK differs; with some embracing this move to modern technology but others who have not been enticed by the perceived benefits - even when the applications (similar to this one) propose the removal of unsightly BT phone booths.

The key features of the telecommunications interface as stated in the application include :

- free ultrafast Wi-Fi;
- touchscreen tablets to access council services, BT's phone book, maps and directions;
- an accessible design, incl. hearing induction loops, braille embossed and TalkBack functionality;
- integrated lighting and "privacy wings";
- 100% renewable energy powered.

Having considered the proposed benefits as listed above and the document referenced previously; although there may be elements that could be beneficial to local residents, based on anecdotal evidence for other UK cities, we remain unconvinced there are sufficient real benefits to support this proposal versus the significant disbenefits outlined below.

The proposed 'Street Hub' kiosks have a height of almost 3 metres whereas the kiosk that it is replacing (possibly a ST6 : 'Street Talk 6') is around 2.5 metres in height. This seems a significant and unnecessary increase in height which we do not believe is compensated for or justified by the reduction in depth or footprint versus the existing phone kiosk, nor by any reduction in the total number of kiosks.

What is clear is that the proposed replacement 'Street Hub' is a large and dominant structure - the overall size of the kiosk structure as a whole is scaled up to accommodate two large and prominent advertising screens. The physical design of the unit is led by the requirement for these screens to be as prominent as possible to passing pedestrians, cyclists and drivers. The scale of the unit is far in excess of what would be "reasonably required for the purposes of the electronic communications apparatus". If the screens were omitted, the communications apparatus would fit inside a considerably smaller unit. While Street Hub kiosks are designed to replace traditional phone boxes, they are not designed to accommodate any person using the kiosk inside the unit. Therefore

there is no reasonable requirement to approach, let alone exceed, the scale of the phone box that provides an enclosure for the caller as well as the apparatus.

The advertising screen is such a dominant feature of the kiosk that they make up the greater part of the physical character of the proposal. Whilst the screens may be intrinsic to the proposal as a whole, they are incidental to the communications equipment in that it would be entirely practical to have the communications equipment either without them or perhaps as a much less dominant feature of the proposed application - which NTBCC would be more inclined to support.

We would also note that there have been many applications over the past few years for (static) adverts on new bus shelters that have been granted and which appear to be in accordance with current planning policies and regulations that acknowledge that the maintenance of bus shelters is desirable & needs to be supported to some degree by advertising revenue. However, we note that the Council's current non-statutory 'Guidance on Advertisements, Sponsorship and City Dressing' makes a specific distinction between digital adverts on bus shelters (in appropriate locations) versus digital advertisements on other street furniture – the latter of which are not supported by current non-statutory guidance.

2. Impact on the New Town Conservation Area & Compliance with the Development Plan

Although the proposed Street Hub is proposed to be adjacent to the new 'New Town Quarter' development, which in itself may diminish to a degree the attributes of the Conservation area, it will also be sited on one of the main gateways into the World Heritage site – hence the advertisement panels proposed (both individually and cumulatively) within Dundas Street will result in a material change in character in the New Town Conservation area as well as the WHS gateway. Current Council policy states, in relation to on street advertisements, that they should be confined primarily to shopfronts with limited and subtle advertising on bus shelters and phone boxes at low level.

However, as previously discussed, the proposed digital advertisements would rise almost 3 metres above pavement level. As such, the proposal will have a detrimental impact on the defining characteristics and appearance of this part of the conservation area and is therefore contrary to the Council's 'Guidance on Listed Buildings and Conservation Areas'.

In relation to the current Local Development Plan and the Council's Guidance on Advertisements, Sponsorship and City Dressing – this states that advertisements are, by their nature, designed to create a high impact in visual terms, which may be inappropriate in sensitive environments. Hence careful control is therefore required to ensure that advertising is not detrimental to the amenity of these locations. We therefore take the view that this advertising is unacceptable in principle in this location. Furthermore, the application does not comply with the 2016 LDP Policies Des 1 and Env 6. As indicated previously, we are also of the view that due to its width, height and illuminated digital nature, the advert constitutes an unacceptable and unnecessary intrusion into the streetscape which



would result in advertisement clutter to the detriment of amenity and that the proposal would have a negative impact upon visual amenity, affecting immediate outlook, contrary to the 2016 LDP policies Des 1 and Des 5.

However, given the proposed location and the relatively wide pavements there, we accept that an adequate area of footpath could be retained.

In summary, given that the proposal is contrary to a number of LDP policies and associated non-statutory guidance, we would wish to register our objection to this application as presented.

Although the deadline for submitting comments has now passed, we would also urge the Planning officer to refuse the associated 22/02527/ADV application ('2 No LED Digital Displays' : Proposed Telecoms Apparatus 16 Metres West Of 117 Dundas Street New Town Edinburgh).

We trust that these comments are helpful in the determination of this application.

Yours,

Richard Price
NTBCC Planning Committee
On behalf of the New Town & Broughton Community Council