

Inverleith Society Comments on the City of Edinburgh Council Review of the Inverleith Conservation Area Character Appraisal

The review represents a significant opportunity to improve the environment and amenity of Inverleith with benefits to the residents of the locality and to the City as whole.

At earlier stages of the review, the Society made clear and constructive suggestions for improving this guidance document which we believe would provide a better focus and a more effective and equitable application of conservation policy in Inverleith.

We are therefore very disappointed that the latest draft fails to grasp these opportunities.

Summary of our views

The original purpose of conservation area designation was supposed to be to protect and enhance the character, amenity and built environment of areas with special and significant historic or architectural qualities. Why has policy in Edinburgh lost this focus?

The current conservation area designation for Inverleith covers an unduly wide and diverse mixture of areas, and a very wide variety of building types and styles. In consequence descriptions in the character appraisal drift into broad generalisations which offer little clarity about the specific aims and objectives which conservation policy or development management should seek to achieve within the area. The perverse result is that the document is weak and ineffective in protecting the very qualities which make the area special and different and which the designation is supposed to protect.

We urge the Council to undertake a fundamental reconsideration of the approach they have so far taken in this review to

- **address the boundary anomalies which we have identified** (these are itemised below)
- **provide clear and robust statements on the conservation priorities for the most significant elements of the built environment in the area** so that owners, applicants and decision makers have a common understanding of the considerations which will apply to development applications (see below)

Re-drawing the boundary of the designated area

The current designated area includes substantial clusters of properties where conservation area polices are irrelevant and are in practice never applied in development management decisions. We need to recognise that the conservation area designation imposes additional burdens and costs on owners (and on the planning authority) and that in these areas there is no commensurate public benefit. This seems an indefensible waste of public and private resources.

While we welcome the willingness to consider re-drawing the boundary of the Conservation Area to exclude the properties on the North side of Ferry Road (which are in Forth ward) some of the other boundary changes we have proposed also need to be addressed.

Owners of properties within a Conservation Area are required to apply for planning permission for a variety of minor works which would in other circumstances be treated as permitted development. For example, owners have to pay significant application fees as well as paying for any professional input involved in preparing a planning application before they can modify fences, gate or walls, modify window glazing, make roof alterations eg to insert skylights, install solar panels or satellite dishes.

There is no justification for imposing these additional fiscal and regulatory burdens on properties in the first three areas below - the Council has never rejected any application in these areas on the grounds that the development would detract from the character of the Conservation Area. The inclusion of these areas has contributed to the general lack of focus in the document and in the descriptions of the key characteristics of the built environment.

- Werberside (the western half of the development to the North of Fettes College) has no visual, community or functional connections with the rest of the area and is accessed from Telford Road well to the West.
- The interwar and post-war developments to the East of Inverleith Row (Warriston Gardens/Warriston Drive etc; Eildon Terrace) have a completely different architectural character from the core areas of the Conservation Area and have little visual or physical interaction with the core area. The buildings make no special contribution to the qualities of the area.
- Ettrickdale/Liddesdale Place (between Glenogle Road and the Water of Leith) was not included in the Stockbridge Colonies Conservation Area with which it is at least contiguous and formally compatible but has nothing whatsoever in common with the Inverleith Conservation Area. Why does it need to be in a Conservation Area at all?

Bridge Place has also not been included in the Stockbridge Colonies CA (although it is contemporaneous and contiguous with the Colonies development). The Stockbridge Colonies buildings were formerly included in the Inverleith Conservation Area but now comprise a separate Conservation Area. The continued inclusion of Bridge Place in the

Inverleith Conservation Area (with which it (now) has nothing in common) is clearly anomalous.

Warriston Cemetery and Crematorium - although the cemetery is intrinsically very significant in its own right, it has little in common with the main part of the Conservation Area and shares few physical, design or visual connections with it. The area is protected by a variety of other designations under historic buildings and natural heritage legislation so inclusion within the CA does not seem to achieve anything extra.

On the other hand, given that the open space character of the area and its open aspect views are such important features of the area, consideration ought to be given to the inclusion of both the Broughton High School and Police HQ sites to the South of Carrington Road within the Conservation Area. Development on these sites would have a significant impact on the character of the South East quadrant of the conservation area.

Improving the effectiveness of the guidance

There is ample evidence from planning decisions in Inverleith that the failure to adopt clear objectives linked to positive policies for protecting and enhancing the qualities of the Conservation Area gives excessive scope for the planning authority to vary their interpretation and approach from one case to the next. The absence of any clear statements about the relative significance of different conservation priorities for the area has the effect of seriously undermining the effectiveness of the document - the inevitable result of which has been to diminish the attention given to retaining those qualities which give the area its special and distinctive sense of place – exactly the opposite of what conservation area designation was intended to achieve.

The present draft, like its predecessor, reads more like an academic essay than a document providing direction and guidance on the management of the heritage assets of the area. The Council's application of conservation area policy in Inverleith and therefore the framing of the character appraisal document need much sharper focus. Conservation objectives and priorities should be clearly stated and the guidance should be explicit in relation to the categories of development or alteration which development control would encourage (or discourage) in order to achieve those objectives.

For example, we would wish to see a clear statement that the Council will take every opportunity offered by development management - whether in setting broader planning policy, in relation to individual development control decisions or in highways management - to promote positive conservation actions in Inverleith. This should be about more than limiting the potential for damage by unsympathetic development and alteration projects.

Some properties within Important terraces like Howard Place, Comely Bank and Warriston Crescent have suffered from non-conforming alterations (to windows, doors, roofs) as well as to boundary walls and railings. This can have a disproportionately negative impact on the townscape value of the whole terrace as a built environment feature.

Likewise, the townscape value and architectural integrity of the row of villas on the West side of Inverleith Row, particularly those between the Botanic Garden East Gate and Inverleith Place, has been severely diminished by numerous inappropriate alterations and additions carried out in the second half of the last century - generally these seem to have been poorly considered and are often poorly constructed. Many of the boundary walls and railings on the street front have been removed or replaced and front gardens have been turned into car parking spaces generally – sometimes this has been done in a considered way, more often not.

Whenever the opportunity presents itself, the planning authority should make use of the development control process to ensure that important features of such properties are restored.

The general experience of walking along the streets of the area (including the views to building frontages from the footway) is very important both for residents and visitors. Significant traffic volumes on some streets – most obviously on Inverleith Row where the problem is further compounded by excessively narrow footways and excessive street clutter – has a serious negative impact on the pedestrian experience. The Council's actions on highways and traffic management should support the improvement objectives of the conservation area and it should be explicit in the character appraisal document that positive actions on this front should be a priority in Inverleith.

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