

David Givan
Chief Planner
Edinburgh City Council

Sent by email: david.givan@edinburgh.co.uk

26th August 2021

Dear Mr Givan,

New Town World Heritage Site and Communal Bin Hubs

We are writing to seek your views on the planning implications of Edinburgh City Council's recent decision to install Communal Bin Hubs in the New Town's most sensitive streets. As you may be aware, this decision was reached without any prior input from those having historic environment expertise and without any prior consultation with affected residents.

The Communal Bin Hubs will consist of up to 7 large bins, of different shapes and sizes, corralled by a fixed structure. According to the published criteria, there are to be hubs within 50 metres of every household and people will not be required to cross roads. This will result in very large numbers of permanent new structures in the most significant streets of Edinburgh's New Town Conservation Area, and of the World Heritage Site. The streets in question currently have weekly household collections from gull-proof bags and box recycling. This waste management solution was carefully established in conjunction with Historic Scotland and Edinburgh World Heritage to fit with the iconic historic character of the area.

Our view is that this plan has been ill-thought-out, takes no account of the historic character of the affected streets, and that the efficient, appropriate existing arrangements should continue. New Town and Broughton Community Council, amongst others, has made representations to the Council to that effect. The decision is all the more extraordinary considering the recent very careful work of the Council to install new high quality street lamps, very carefully sourced to be appropriate for the character of the New Town.

We understand that the Council intends to proceed by Traffic Regulation Orders. These are a highly unsuitable basis for a decision with such significant heritage implications, due to the limited criteria and opportunity for statutory consultation on the impact of the new structures. The Council's position appears to be that the proposals do not require planning permission as they amount to permitted development. This seems highly unlikely, as it is not at all reasonable to consider Communal Bin Hubs as street furniture and there appears to be no specific exemption for waste disposal facilities of the scale proposed. Moreover, the cumulative impact of the Bin Hubs dispersed throughout the streets will have significant adverse impact on the character of New Town Conservation Area and the setting of its many listed buildings, which surely constitutes development.

As a Community Council we enjoy frequent engagement with your officers on planning applications and are pleased to play our part in decision-making affecting our community. This is a very marked contrast to the situation we find ourselves in with these proposals. We would be grateful for your assurances that the planning service will fully engage with these plans; that there is proper consideration of the proposed development under planning

legislation and that we are fully consulted. This includes ensuring that we can fully engage in any EIA screening of the proposals.

It would seem absolutely extraordinary for a decision of a change of this impact and scale to be outwith the system for proper consideration of development. We would, therefore, also be grateful for your general comments on the responsibilities of the planning service in relation to the Council's plans to develop Communal Bin Hubs in New Town Conservation Area.

We are copying this letter to the Interim Chief Planner of the Scottish Government, given her overall responsibility for the operation of the planning system.

Yours sincerely,

Tannis Dodd

Secretary, Stockbridge and Inverleith Community Council

Copy to:

Interim Chief Planner of the Scottish Government

Planning and Architecture Division

Directorate for Local Government and Communities

chief.planner@gov.scot