Development Management Sub Committee

Wednesday 3 June 2020

Application for Planning Permission 19/02560/FUL at 500 Gorgie Road, Edinburgh, EH11 3YJ. Proposed development of former car park site to erect 35 flats with associated parking, access and services (as amended).

Item number

Report number

Wards

B09 - Fountainbridge/Craiglockhart

Summary

The principle of residential development in this location is acceptable. The proposal is appropriate in design and in keeping with the character of the surrounding area. The proposal will provide good amenity to future occupiers and will have no adverse impact on neighbouring amenity. The proposal is in accordance will LDP Policies Des 1, Des 4, Des 5 and Hou 1 and broadly complies with the council's non-statutory guidance.

Links

Policies and guidance for this application

LDPP, LHOU01, LHOU03, LHOU04, LDES01, LDES05, LTRA02, LTRA03, LEN09, LEN16, LEN21, LHOU02, LEN22, NSG, NSGD02,

Report

Application for Planning Permission 19/02560/FUL at 500 Gorgie Road, Edinburgh, EH11 3YJ. Proposed development of former car park site to erect 35 flats with associated parking, access and services (as amended).

Recommendations

1.1 It is recommended that this application be Granted.

Background

2.1 Site description

The site extends to approximately 0.15ha and comprises a former car park on the north side of Gorgie Road. The car park served Chesser House located to the east of the site. This was a former office block which has been recently converted into residential flats.

An office block known as Riverside House sits immediately north of the site. To the west, an existing restaurant bounds the site, with the Water of Leith passing the north west of the site.

The surrounding area is a mix of commercial and residential uses, with Saughton Park located to the far north.

2.2 Site History

09 Aug 2018 Granted permission for a Change of Use from existing office building (Class 4) to flatted residential development (Sui Generis) with ground floor commercial uses (Class 1, 2 and 11) (planning reference 17/00422/FUL).

26 Feb 2020 Granted material variation to application ref: 17/00422/FUL to reduce commercial floor space and create 2 additional flats (plot no. 164 and 165) (planning reference 19/01297/FUL).

Main report

3.1 Description Of The Proposal

The application seeks permission to erect a residential block of flats, with a car park and cycle parking facility to the rear of the block on the existing hardstanding. The proposal includes the removal of the existing substation.

A total of 35 flats are proposed, comprising of the following:-

10 x 1 bed flats 22 x 2 bed flats 3 x 3 bed flats

The proposed building be three storeys high on the western boundary, rising up to four with a fifth storey set back. The building will be finished in brown brick and the fifth storey articulated in a dark grey zinc clad.

Amenity space is proposed in the form of shared green space to the rear of the building, private gardens for ground floor flats and roof decking/terrace on the fourth floor for upper floor flats.

Revised plans were submitted to remove a roof terrace from the third floor level, lower the level of car parking provision, alter the cycle storage arrangements, and to revise the mix of units to comply with affordable housing requirements.

Supporting Documents

The applicant has submitted the following supporting documents which are available to view on the Planning Portal:

- Supporting Statement;
- Affordable Housing Statement;
- Flood Risk Assessment; and
- Drainage Strategy.

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.

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, the Committee needs to consider whether:

- a) the proposed development is acceptable in principle in this location;
- b) the scale, design and materials are acceptable;
- c) the proposal will provide satisfactory amenity for future residents;
- d) the proposal will adversely affect neighbouring amenity;
- e) the proposal will have an adverse effect on air quality;
- f) flooding and surface water management has been addressed;
- g) the proposal will result in road safety issues;
- h) the necessary infrastructure to support the development is secured;
- i) affordable housing provision is secured;
- j) the proposal will have any archaeological implications and
- k) issues raised in public comments are have been addressed.

a) Principle

The site is identified as Urban Area in the Adopted Edinburgh Local Development Plan (LDP), adjacent to an Area of Importance for Flood management and a Local Nature Conservation Site (Water of Leith).

The site is no longer utilised as a carpark. Parking provision for the residential units at Chesser House was provided elsewhere on site, and this area was not included within the red line boundary for the redevelopment of the Chesser site. The loss of the car park to provide residential units is acceptable in principle in this location subject to compatibility with the other policies in the local development plan.

The site is surrounded with a mix of commercial and residential uses and is well connected by existing public transport links, with tram, bus and rail links all within the locality. The site is within cycling distance of the city centre and therefore is an appropriate and sustainable location for housing.

LDP Policy Hou 1 'Housing Development' d) prioritises the delivery of housing on sites identified in the LDP, but also on other suitable sites in the urban area in recognition that windfall sites can contribute to land supply. To comply with Hou 1 d) proposals on sites suitable for housing should give consideration to how they might deliver housing as part of any proposals. This policy is intended to apply to all suitable sites in the urban area, including the application site which is vacant and unconstrained for development.

The proposal provides an opportunity to provide new housing in a sustainable location., in compliance with LDP Policy Hou 1.

b) Design, Scale, Layout and Materials

LDP Policy Des 1 supports new development where the design reflects the positive characteristics of the area. LDP Des 4 requires new development proposals to have similar characteristics to the surrounding urban grain, paying close attention to scale, height and positioning of buildings, materials and detailing.

The Edinburgh Design Guidance (EDG) sets out key aims for new development to have a positive impact to the immediate surroundings, through its height and form; scale and proportions; positioning of the buildings and site materials and detailing.

The surrounding area is of mixed character which varies in style and material palette. There are examples of stone built tenements, cast stone, brick and render buildings in the locality. The surrounding residential development is predominantly four storeys, with the recently converted Chesser House sitting at nine storeys. Riverside House which is located immediately north of the site reaches a height of seven storeys. The commercial property that bounds the west of the site is two storeys in height.

The proposed building will be four storeys with a recessed fifth storey. However, the building has been designed to drop to three storeys on the western boundary to integrate with the lower two storey commercial units adjacent. As such, the proposal respects its surrounds and will not exceed the established building heights in the locality.

The form and layout is appropriate in the context of the urban site, respecting the established street pattern and contributing to the urban form by creating a strong frontage along Gorgie Road. The approach to massing and use of materials to articulate the storeys is successful in reducing the overall massing of the building.

LDP Policy Hou 4 'Housing Density' seeks an appropriate density of development having regard to its characteristics and those of the surrounding area, and LDP Policy Hou 2 'Housing Mix' promotes a mix of house types where practical. The new development occupies the majority of the site with an area of external open space and minimal area of car parking to the rear. This is in keeping with the special character of the surrounding area which encompasses flatted buildings and tenements as the predominant from of residential accommodation. The site is located in the urban area and close to the city centre where there are higher densities and good public transport. The proposal includes a suitable mixture of one, two- and three-bedroom apartments.

The design is a high-density development that remains in keeping with the surrounding urban pattern, massing and building height, in compliance with policies Des 1, Des 4, Hou 4 and Hou 2 and Section 2 of the Edinburgh Design Guidance (Designing places: buildings).

The proposed site layout provides green amenity space and footpaths to the rear of the building. Recessed ground floor access will create canopies over the front entrances, along with private gardens to the front with low hedge boundary treatments. As a result, the proposal will create a positive boundary and active street frontage along Gorgie Road, developing a site that currently has a poor relationship with the street.

In terms of materials, the proposal provides for a contemporary design using a brown brick facade contrasted by a dark grey zinc cladding on the upper fifth level to articulate the set back from the building line. The design incorporates large vertical emphasis

windows to maximise light. Overall, the proposed material palette is appropriate for residential development and is in keeping with the appearance and character of the surrounding area.

Overall. the proposed design, scale, layout and materials are acceptable within the context of the site and its locality and comply with LDP Policies Des 1, Des 4 and Hou 4.

c) Creation of a Satisfactory Living Environment

Policy Des 5 states that development will be permitted where the amenity of neighbouring development is not adversely affected, and future occupiers have acceptable levels of amenity.

The proposal complies with minimum room size standards in the Edinburgh Design Guidance.

Environmental Protection has raised concern with regards to the adjacent commercial property which bounds the site to the west. This restaurant has a flue and concern was raised with regards to the potential impact upon the proposed roof terrace at third floor level. As such, the proposal was amended to remove this roof terrace in the interests of future residents' amenity.

Environmental Protection also raised concern with regards to potential noise disturbance associated with the traffic on Gorgie Road. This is a busy arterial route where a number of uses including residential co-exist. It is unrealistic to expect residential dwellings in this location to experience the same level of residential amenity as in a residential suburb. There are many residential properties within the vicinity that are affected by traffic noise and disturbance similar to the application property. Noise from outside the property cannot be controlled by planning and would therefore not be a justifiable reason to refuse planning permission.

LDP Policy Hou 3 ' Private Green Space in Housing Development' seeks to ensure adequate provision of green space will be provided to meet the needs of future residents. In flatted developments where communal provision will be necessary this is based on a standard of 10 square metres per flat (excluding units that are provided private gardens), a minimum 20% should be useable greenspace.

The proposal provides amenity space in the form of green space to the rear of the building, private gardens to the front and rear at ground level, and roof terraces on the upper floor. The proposal marginally fails the requirements in terms of on-site open space provision. However, the site is well served by publicly accessible open space with Saughton Park located to the north, accessed by Fords Road Bridge. The footbridge also provides access to the parkland on the west bank of Water of Leith and the core path system. The infringement of the policy is therefore acceptable in this instance as adequate provision of greenspace is accessible between onsite and off-site.

The proposed open space will be fully landscaped to allow for useable outside space.

In terms of waste collection, a bin store will be situated at ground floor level capable of providing sufficient waste and recycling facilities for prospective residents which meet the Council's requirements for the storage and collection of waste from the site. The proposal does not raise any issues in respect of waste collection in compliance with LDP Policy Des 5.

The proposal will result in the creation of a satisfactory residential environment and complies with LDP Policies Hou 3 and Des 5.

d) Impact upon Neighbouring Amenity

LDP Policy Des 5' Design- Amenity' supports proposals that have no adverse impact on neighbouring developments.

In this instance, the proposed windows on the rear and front elevations comply with Edinburgh Design Guidance in relation to required distance to neighbouring windows and therefore raise no privacy issues. The windows on the side elevations raise no privacy concerns.

The proposal will also not result in a loss of daylight into residential windows, nor result in harmful overshadowing upon neighbouring residential properties that is to the detriment of neighbouring amenity.

A letter of representation has raised concerns with regards to the impact of the proposed development upon daylight and privacy to the office building to the north, Riverside House. Edinburgh Design Guidance does not protect the amenity of commercial buildings.

Overall, the proposal is compliant with LDP Policy Des 5 and the Edinburgh Design Guidance and will not be to the detriment of neighbouring residential amenity.

e) Air Quality

LDP Policy Env 22 aims to ensure that no development will result in significant adverse effects for health, environment or air quality and appropriate mitigation measures can be provided to minimise the adverse impacts. Reducing the need to travel and promoting the use of sustainable modes of transport are key principles identified in the local development plan.

The site does not fall within a designated Air Quality management Area. The proposal will have no adverse impact upon any neighbouring AQMA.

The development will generate minimal vehicular movements and has been designed to mitigate operation impacts through the provision of cycling spaces and limited car parking which is good practice.

Scottish Environmental Protection Agency (SEPA) were consulted on the application and raise no objection with regards to air quality.

f) Flood Risk and Surface Water Management

Policy Env 21 states that planning permission will not be granted for development that would increase a flood risk or be at a risk of flooding itself, impeded the flow of flood water or be prejudice to existing or planned flood defence systems.

SEPA is a statutory consultee and in this instance has objected to the proposal on the grounds that the site is encroaches within the SEPA Flood Map and therefore be at medium to high risk of flooding from the Water of Leith and due to the lack of information submitted in relation to its potential increase the number of persons at risk during a flood event. SEPA requested a Flood Risk Assessment to be submitted demonstrating that no built development or land raising will take place within the functional floodplain, and that a safe, flood free access/egress can be provided.

There is a Flood Protection Scheme along the Water of Leith which affords a level of protection to existing property and infrastructure located behind it. This area falls within Phase 3 of this scheme. In August 2017, SEPA published a Planning Information Note 4 which sets out the position it now takes for development behind a FPS. In summary, where a planning application will result in land use change to a highly vulnerable use such as residential, SEPA requires to development to be protected to a 1:200 year standard including an appropriate allowance for climate change.

SEPA has a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce flood risk and promote sustainable flood risk management. It states that the cornerstone of sustainable flood risk management is the avoidance of flood risk. It is SEPAs view that vulnerable uses such as residential development should be directed to alternative locations rather than incorporating mitigation measures.

However, SEPA recognises that in determining applications, planning authorities have to consider a range of material considerations as well as flood risk. There may be circumstances where applications are granted planning permission despite an objection from SEPA.

The applicant has submitted a Flood Risk Assessment and amended proposals to address the concerns raised in the SEPA consultation response. SEPA were reconsulted on this further information but have not responded.

Notwithstanding SEPA's objection to the principle of residential development, this proposal has been designed to mitigate the potential flood risk and accords with LDP Policy Env 21. The Council's Flood Prevention Team is satisfied that the mitigation proposed is acceptable.

As SEPA has objected to the application, if the Council is minded to grant planning permission, it must refer the application to Scottish Ministers prior to the determination of the application.

g) Road and Pedestrian Safety

The applicant submitted a Transport Statement which was assessed by the Roads Authority.

The car park served Chesser House located to the east of the site. This was a former office block which has been recently converted into residential flats. Parking provision for the residential units at Chesser House was provided elsewhere on site, and this area was not included within the red line boundary for the redevelopment of the Chesser site.

LDP Policy Tra 2 'Private Car Parking' requires proposed car parking levels to not exceed the maximum levels stipulated in Council's guidance. Developers are encouraged to pursue lower levels of parking.

Car parking is to be provided to the rear of the building. The proposal provides for 8 car parking spaces, 1 of which is accessible parking and two electric charging spaces. This car parking provision is below the maximum level of 35 spaces and is therefore in compliance with Policy Tra 2- Private Car Parking. The proposed level of car parking is justified by the sites accessibility to public transport including bus and rail services and easy access to surrounding services and amenities.

LDP Policy Tra 3 'Private Cycle Parking' and LDP Policy Tra 4 ' Design of Off Street Car Parking and Cycle Parking' require proposed cycle and storage provision to comply with the standards set out in council guidance.

In this instance, the proposal will provide 72 cycle parking spaces. The proposed level of cycle parking complies with the minimum standard set out in the current Parking Standards. The proposed cycle parking is split over three internal stores and one external store. The internal stores are all located on the ground floor and level access is provided from the rear core access points. The external store is located to the rear of the block adjacent to the car parking and is completely enclosed, weatherproof and secure, with direct level access provided. Two-tier racks are provided in the stores with a 2m aisle width to allow for manoeuvrability when accessing the racks. It is recognised that the access to the internal stores is not an ideal situation as they require 90 degree turns, however the 2m width of the lobby will provide some mitigation to this issue and with the constraints on this site the stores are considered acceptable. As such, the proposal complies with LDP Policy Tra 3 and LDP Policy Tra 4.

The Roads Authority was consulted on the proposal and having reviewed the transport and supporting statements, the Roads Authority is satisfied that the proposed transport infrastructure will be able to accommodate the impact of the proposed development subject to the conditions/informatives attached.

Overall, the development complies with LDP Policies Tra 2 and Tra 3.

h) Developer Contributions

This site falls within Sub-Area T-2 of the 'Tynecastle Education Contribution Zone'. A contribution of £27,175.00 is sought for additional educational infrastructure to support the projected increase in school rolls as a result of the development. A legal agreement will be required to secure these funds.

The proposals comply with Policy Del 1- Developer Contributions.

i) Affordable Housing

A total of eight units are proposed for Affordable Housing units, equating to 25% in accordance with LDP Policy Hou 6 'Affordable Housing'. A Section 75 legal agreement will be prepared and concluded to secure this provision.

The eight affordable homes will be tenure blind within a self-contained block at the south west corner of the development, with their own stairwell in accordance with the Council policy.

The mix of units will be as follows:-2 x one bed units; 5 x two bed units; and 1 x three bed unit.

The applicant originally indicated that the affordable housing would be 2x one bedroom apartments and 6x two bedroom apartments. However, the wider development included 3x three bedroom apartments (8.5% of all homes) and therefore the proposal was revised include a three bedroom affordable home, ensuring the affordable housing provision is representative of the wider development.

The proposals meet the required level of affordable housing contribution on site and are in compliance with LDP Policy Hou 6.

j) Archaeology

The city archaeologist was consulted on the proposal. There will be no archaeological implications as a result of the proposal.

k) Public Comments

Two representations were received from the public which raised the following material considerations:-

- density. This matter is addressed in Section 3.3b;
- proximity to the Water of Leith. This matter is addressed in Section 3.3f;
- impact upon daylight and overshadowing to neighbouring commercial property.
 This matter is addressed in Section 3.3d;
- lack of residential amenity. This matter is addressed in Section 3.3c;
- lack of parking. This matter is addressed in Section 3.3g;
- lack of assessible parking spaces. Plans were revised to include these in accordance with Edinburgh Design Guidance;

- size and mix of units; this matter is addressed in Section 3.3c and 3.3i.

Non-material considerations:-

Potential impact on future development of neighbouring commercial property.

Conclusion

The principle of residential development in this location is acceptable. The proposal is appropriate in design and in keeping with the character of the surrounding area. The proposal will provide good amenity to future occupiers and will have no adverse impact on neighbouring amenity. The proposal is in accordance will LDP Policies Des 1, Des 4, Des 5 and Hou 1 and broadly complies with the council's non-statutory guidance.

The application requires to be referred to the Scottish Ministers prior to determination due to the outstanding objection from SEPA.

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

3.4 Conditions/reasons/informatives

Conditions:-

- 1. Prior to commencement of work, a detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority. Thereafter sample panels of the materials are to be erected and maintained on site as agreed by the Council.
- 2. Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
 - ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

Reasons:-

- 1. In order to enable the Head of Planning to consider this/these matter/s in detail.
- 2. In order to enable the Head of Planning to consider this/these matter/s in detail.

Informatives

It should be noted that:

- 1. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
- No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
- 3. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
- 4. Environmental Protection Informatives

The proposed development site is located near to an air quality management area therefore the applicant will need to ensure that the development mitigates it impacts. The applicant will need to ensure that the development includes at least two 7Kw Electric Vehicle charging spaces that are fully operational prior to occupation.

5. Roads Authority Informatives

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

All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement.

All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved.

The applicant should consider revising the design of the existing access junctions. Street Design Guidance Fact Sheet G7 - Priority Junctions / Side Street Crossings is relevant.

6. Scottish Water Informatives

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

7. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation all of those matters identified in the proposed Heads of Terms.

These matters are:

A total of eight units are proposed for Affordable Housing units, equating to 25% in accordance with LDP Policy Hou 6 'Affordable Housing'. The units will be tenure blind for Mid Market Rent (MMR), with a breakdown of the following:

2 x one bed units; 5 x two bed units; and 1 x three bed unit.

The applicant will be required to pay a contribution of £27,175 towards education infrastructure. The site falls within Sub-Area T-2 of the 'Tynecastle Education Contribution Zone'. Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.

The applicant is required to contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;

In support of the Council's LTS Cars1 policy, the applicant should consider contributing the sum of £12,500 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area.

The legal agreement should be concluded within 6 months of the date of this notice. If not concluded within that 6 month period, a report will be put to committee with a likely recommendation that the application be refused.

Financial impact

4.1 The financial impact has been assessed as follows:

The application is subject to a legal agreement for developer contributions.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

There have been two representations received in relation to the proposal.

Background reading/external references

- To view details of the application go to
- Planning and Building Standards online services
- Planning guidelines
- Conservation Area Character Appraisals
- Edinburgh Local Development Plan
- Scottish Planning Policy

Statutory Development

Plan Provision The Adopted Edinburgh Local Development Plan.

Date registered 17 June 2019

Drawing numbers/Scheme 01, 02, 03D, 04C, 05D, 06B, 07C, 08C, 09, 10, 11, 12,

13,

Scheme 2

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Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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

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

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

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

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

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

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

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

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

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

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Relevant Non-Statutory Guidelines

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

Application for Planning Permission 19/02560/FUL At 500 Gorgie Road, Edinburgh, EH11 3YJ Proposed development of former car park site to erect 35x flats with associated parking, access and services (as amended).

Consultations

Scottish Water comment

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Water

This proposed development will be fed from GLENCORSE Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water.

Foul

This proposed development will be serviced by EDINBURGH PFI Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water.

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted.

Greenfield sites will not be considered and a connection to the combined network will be refused.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps

10 or more domestic dwellings:

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

SEPA comment

Advice for the planning authority

We object to this planning application on the grounds of a lack of information relating to flood risk. We will review this objection if the issues detailed in Section 1 below are adequately addressed.

In the event that the planning authority proposes to grant planning permission contrary to this advice on flood risk, the Town and Country Planning (Notification of Applications) (Scotland) Direction 2009 provides criteria for the referral to the Scottish Ministers of such cases. You may therefore wish to consider if this proposal falls within the scope of this Direction.

Flood risk

The application is for a change of use from a car park to residential development adjacent to the Water of Leith. The site is encroaching within the SEPA Flood Map and may therefore be at medium to high risk of flooding from the Water of Leith. There is a Flood Protection Scheme along the Water of Leith which affords a level of protection to existing property and infrastructure located behind it. However, this area falls within Phase 3, which has no current time scale for construction.

1.1 The Water of Leith has a long and well documented history of flooding. We hold information on a flood level of 49.2mAOD, surveyed after the 2000 flood, between the site and the downstream Ford's Road bridge. Review of the Site Plan as Existing, site

levels across the site range between 49.79mAOD and 51.01mAOD, with the majority of the site being approximately 50.5mAOD.

- 1.2 We therefore object due to a lack of information as the proposed application is for a change of use from car park to residential properties, therefore, potentially increasing the number of persons at risk during a flood event. As outlined in our Flood risk and vulnerability guidance residential developments are classed as highly vulnerable. This proposed development may also reduce the ability of the functional flood plain to store and/or convey water which could increase flood risk elsewhere.
- 1.3 We will review this objection when a Flood Risk Assessment has been submitted which demonstrates that no built development or land-raising will take place within the functional floodplain. We also require that it be demonstrated that safe, flood free access/egress can be provided.
- 1.4 As part of a review undertaken by SEPA to better understand the Flood Protection Scheme standard of protection, a number of uncertainties regarding both the hydrology and hydraulic model were raised. We are aware that the Council has commissioned Arup Consultancy to review the hydrology and hydraulic model to clarify these uncertainties and an updated study may be available in due course.
- 2. Sustainable Urban Drainage System (SUDS)
- 2.1 We advise that developers should follow the approach set out in the CIRIA SUDS Manual (C753) and ensure the surface water management proposals are in compliance with The Controlled Activities Regulations General Binding Rules 10 and 11. Applicants should be using the Simple Index Approach (SIA) Tool to determine if the types of SUDS proposed are adequate. We therefore refer your authority to our standing advice on SUDS.
- 2.1 Construction phase SUDS should be used on site to help minimise the risk of pollution to the water environment. Further detail with regards construction phase SUDS is contained in Chapter 31 of SUDS Manual (C753).
- 2.2 Comments should be requested from Scottish Water where the SUDS proposals would be adopted by them and, the views of your authority's roads department and flood prevention unit should be sought on the SUDS strategy in terms of water quantity and flooding issues.

Detailed advice for the applicant

3. Flood risk

The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km2 using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland.

3.1 We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood

Risk Assessments. Please note that this document should be read in conjunction Policy 41 (Part 2).

- 3.2 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process.
- 3.3 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to the City of Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice in line with the phases of this legislation.

Regulatory advice for the applicant

- 4. Regulatory requirements
- 4.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 4.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 4.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:
- o is more than 4 hectares.
- o is in excess of 5km. or
- o includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25 degrees

See SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

4.4 Below these thresholds you will need to comply with CAR General Binding Rule 10 which requires, amongst other things, that all reasonable steps must be taken to

ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.

4.5 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office.

Waster Services comment

Compliance with Waste Strategy (Domestic Waste Only)

The provision of a full recycling service is mandatory in Scotland, so developers must make provision for the full range of bins (either individual containers for each property, or communal bins for multiple properties). These must be stored off street at all times, except on the day of collection (in the case of individual bins). Refuse facilities must be integral, so that each bin store will hold a complete set of recycling and residual waste facilities.

The waste collection teams will require safe and efficient access to these from the earliest occupation, and therefore cognisance must be taken of my comments below in relation to operational viability. Should these drawings substantially change, please let me know.

For high density properties such as these flats, we recommend communal waste containers for landfill waste, mixed recycling for paper and packaging, glass, and food. The number of bins required is calculated on the number of properties within the development. However, it should be noted that due to changes within the service over the next three years, the bin requirements will change, and you should review these with us prior to starting work.

The bins required under the current service would be $2 \times 1280l$ non-recyclable waste, $2 \times 1280l$ mixed recycling, $1 \times 360l$ glass and $1 \times 360l$ food for each bin store. We require 2 mixed recycling bins in each bin store to allow for future changes to this service. We would need to see drawings that demonstrate that the bin stores are of a suitable size to accommodate these bins.

It is important to consider the British standards BS5906:2005, which states that an occupier should not be required to carry waste a distance of more than 30m from their door.

Developers can either source their own bins in line with our requirements, or can arrange for us to do so and recharge the cost - this will probably be most convenient for them, but they must provide at least 12 weeks' notice.

Waste Management Responsibilities

The Waste and Cleansing Services will be responsible for managing the waste from households and any Council premises only. I am assuming this would include this development.

Regarding any commercial aspect, it would be the responsibility of any third party commercial organisations using the site to source their own trade waste uplifts. Architects should however note the requirement for trade waste producers to comply with legislation, in particular the Waste (Scotland) Regulations which require the segregation of defined waste types to allow their recycling. This means there would need to be storage space off street for segregated waste streams arising from commercial activities. This would have to be separate from the residential bin storage area.

Any appointed waste collection contractors, appointed to manage commercial waste, could be expected to have similar requirements to the Council in terms of their need to be able to safely access waste for collection.

Operational Viability

Developers need to ensure that services are accessible so that our collection crews can provide the service in a safe and efficient manner, taking account of turning circles, length and width of vehicles, distance bins must be pulled, surfaces, slopes and so on.

Obviously sufficient capacity must also be provided to allow successful collection of each segregated waste stream. Initial information on the requirements for waste services is available in the Architect and Developers Instructions, which can be provided for reference.

I would recommend further contact with me to ensure adequate provision of segregated household waste bins include all of the above and suitable access for the refuse collectors is arranged.

Archaeology comment

The site occurs on the southern bank of the Water of Leith, opposite and close to the historic estate of Saughton Hall. The Victorian Saughton Leather works formed the sites northern and eastern boundaries into the 20th century. Although the site occurs within an area of archaeological potential, it is considered that the development of Chesser House would have had a significant impact on this site. This combined with its location out with the leather works and distance from Saughtonhall has resulted in the conclusion that there are no known archaeological implications in relation to this scheme.

Communities and Families comment

The Council has assessed the impact of the growth set out in the LDP through an Education Appraisal (August 2018), taking account of school roll projections. To do this, an assumption has been made as to the amount of new housing development which will come forward ('housing output'). This takes account of new housing sites allocated in the LDP and other land within the urban area.

In areas where additional infrastructure will be required to accommodate the cumulative number of additional pupils, education infrastructure 'actions' have been identified. The infrastructure requirements and estimated delivery dates are set out in the Council's Action Programme (January 2019).

Residential development is required to contribute towards the cost of delivering these education infrastructure actions to ensure that the cumulative impact of development can be mitigated. In order that the total delivery cost is shared proportionally and fairly between developments, Education Contribution Zones have been identified and 'per house' and 'per flat' contribution rates established. These are set out in the finalised Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery' (August 2018).

Assessment and Contribution Requirements

Assessment based on: 25 Flats (10 one-bedroom flats excluded)

This site falls within Sub-Area T-2 of the 'Tynecastle Education Contribution Zone'.

Using the pupil generation rates set out in the Supplementary Guidance, the development is expected to generate at least one additional primary school pupil but not at least one additional secondary school pupil.

The Council has assessed the impact of the proposed development on the identified primary school education infrastructure actions and current delivery programme. The primary school education infrastructure actions that are identified are appropriate to mitigate the cumulative impact of development that would be anticipated if this proposal progressed.

The proposed development is therefore required to make a contribution towards the delivery of these actions based on the established 'per house' and 'per flat' primary school contribution rates rates for the appropriate part of the Zone.

If the appropriate infrastructure contribution is provided by the developer, as set out below, Communities and Families does not object to the application.

Total infrastructure contribution required: £27,175

Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.

Roads Authority Issues

The application should be continued.

Reasons:

1. The current proposals are considered contrary to LDP Policy Tra 2, 3 & 4 for the following reasons:

- a. Minimum requirements for Cycle, Accessible and electric vehicle parking as per the 2017 Parking Standards have not been met (see note I for further info)
- b. The current layout of the cycle stores is not considered acceptable due to the requirement for a right angled turn for entry/exit. Full details of proposed cycle stores are required, including dimensioned layouts and details of proposed cycle parking, the applicant should note that parking provision for non-standard bikes is also required. Draft Street Design Guidance Fact Sheet C7 cycle parking is relevant;
- 2. The applicant should considered revising the design of the existing access junctions. Street Design Guidance Fact Sheet G7 Priority Junctions / Side Street Crossings is relevant;

Note:

- I. The application has been assessed under the 2017 parking standards. These permit the following:
- a. A maximum of 35 car parking spaces, (1 space per unit), 10 spaces are proposed;
- b. A minimum of 72 cycle parking spaces, (2 spaces per 2/3 room unit and 3 spaces per 3+ room unit. Assessment is based on habitable rooms), 60 spaces are proposed;
- c. A minimum of 8% of the car parking should be designated as accessible, meaning a requirement for 1 accessible parking space, 0 are proposed;
- d. A minimum for 1 of every 6 car parking spaces being equipped for electric vehicle (EV) charging, meaning a requirement for 2 EV spaces;
- e. A minimum of 1 Motorcycle parking Space (1 per 25 units), 0 MC parking is proposed;
- II. The level of car parking is justified by the sites accessibility to public transport including bus, tram and rail services and easy access to surrounding services and amenities;
- III. The applicant is required to contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;
- IV. In support of the Council's LTS Cars1 policy, the applicant should consider contributing the sum of £12,500 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;
- V. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
- VI. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking

places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;

VII. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future.

Roads Authority Issues updated comment

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

- 1. The applicant is required to contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;
- 2. In support of the Council's LTS Cars1 policy, the applicant should consider contributing the sum of £12,500 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;
- 3. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
- 4. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;
- 5. The applicant should consider revising the design of the existing access junctions. Street Design Guidance Fact Sheet G7 Priority Junctions / Side Street Crossings is relevant;

Note:

- I. The application has been assessed under the 2017 parking standards. These permit the following:
- a. A maximum of 35 car parking spaces, (1 space per unit), 8 spaces are proposed;
- b. A minimum of 72 cycle parking spaces, (2 spaces per 2/3 room unit and 3 spaces per 3+ room unit. Assessment is based on habitable rooms), 72 spaces are proposed;
- c. A minimum of 8% of the car parking should be designated as accessible, meaning a requirement for 1 accessible parking space, 1 space is proposed;
- d. A minimum for 1 of every 6 car parking spaces being equipped for electric vehicle (EV) charging, meaning a requirement for 2 EV spaces, 2 spaces are proposed;

- e. A minimum of 1 Motorcycle parking Space (1 per 25 units), 0 MC parking is proposed;
- II. The proposed level of car parking is justified by the sites accessibility to public transport including bus, tram and rail services and easy access to surrounding services and amenities. This level of car parking complies with the current parking standards and based on the justification provided is considered acceptable;
- III. The proposed level of cycle parking complies with the minimum standard set out in the current Parking Standards. The proposed cycle parking is split over three internal stores and one external store. The internal stores are all located on the ground floor and level access is provided from the rear core access points. The external store is located to the rear of the block adjacent to the car parking and is completely enclosed, weatherproof and secure, with direct level access provided. Two-tier racks are provided in all the stores with a 2m aisle width to allow for manoeuvrability when accessing the racks. It is recognised that the access to the internal stores is not an ideal situation as they require 90 degree turns, however the 2m width of the lobby will provide some mitigation to this issue and with the constraints on this site the stores are considered acceptable;

Flood Prevention comment

The (agent) responses satisfy CEC Flood Prevention's comments. This application can proceed to determination, with no further comments from our department.

Environmental Protection comment

The applicant proposes developing 35 residential flats in what is currently a car parking area for Chesser House a former office which is currently being converted into residential use. Environmental Protection have raised many concerns with this proposed development, including noise, odours, local air quality and contaminated land impacts. The development site is located on the busy Gorgie Road therefore the applicant will need to assess the impacts this will have on the proposed development. A noise impact assessment will then need to detail the specific mitigation measures required with supporting drawings showing where acoustic glazing will be required.

To the north of the development is an existing office with substation, this will need to be assessed to ensure there is no plant noise that could impact the proposed development.

To the west of the proposed development there is a row of local business, 536 Gorgie Road is a cause of concern as it has consent for a use that will introduce plant that will likely impact this proposed development.

The applicant has not submitted a supporting noise impact assessment therefore it is not possible to establish the level of impact these noise source will have on the proposed development. Environmental Protection cannot support the application until a noise impact assessment is submitted.

536 Gorgie Road has consent to introduce plant that will extract cooking odours the applicant will need to investigate this and ensure that the proposed development does

not introduce residential use above the termination point of the extract within 30m of the extract point. A tenant has occupied this food business and it; s appears to be a spicy fried chicken outlet. The type of operator is not controlled by planning condition but the production of fried spicy chicken can have a more serious impact on amenity when compared with other type of food outlets.

The proposed development site is located near to an air quality management area therefore the applicant will need to ensure that the development mitigates it impacts. The applicant will need to ensure that the development includes at least two 7Kw Electric Vehicle charging spaces that are fully operational prior to occupation. The applicant would need to submit a drawing showing the exact location of the charging points. Environmental Protection recommend that all spaces in the car park have charging facilities installed.

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable)

Therefore, Environmental Protection recommends that this planning application is refused due to the likely poor level of amenity afforded to future tenants.

Affordable Housing comment

1. Introduction

I refer to the consultation request from the Planning Department about this planning application.

Housing Management and Development are the statutory consultee for Affordable Housing. Housing provision is assessed to ensure it meets the requirements of the city¿s Affordable Housing Policy (AHP).

- * Policy Hou 6 Affordable Housing in the Edinburgh Local Development Plan states that planning permission for residential development, including conversions, consisting of 12 or more units should include provision for affordable housing.
- * 25% of the total number of units proposed should be affordable housing.
- * The Council has published Affordable Housing Guidance which sets out the requirements of the AHP, and the guidance can be downloaded here:

https://www.edinburgh.gov.uk/affordable-homes/affordable-housing-policy/1

2. Affordable Housing Provision

This application is for a development consisting of up to 35 homes and as such the AHP will apply.

There will be an AHP requirement for a minimum of 25% (8.75) homes of approved affordable tenures. In accordance with affordable housing policy, the developer has rounded down the number of homes on site to 8.

The Council aims to secure 70% of new onsite affordable housing for social rent. The applicant has set out that they are in discussion with LAR Housing Trust, an established affordable housing provider, who are their preferred provider. It should be noted that LAR are not a registered social landlord and therefore could not provide social rent. There is a need for all affordable tenures and, given the relatively small number of affordable homes, we believe mid market rent would be acceptable in this instance.

The eight affordable homes are a self-contained block at the south west corner of the development, with their own stair core. This is welcomed as it allows the affordable housing provider to effectively manage and maintain these affordable homes. The applicant originally indicated that the affordable housing would be 2x one bedroom apartments and 6x two bedroom apartments. However, as the wider development included 3x three bedroom apartments (8.5% of all homes) we asked the applicant to revise the scheme to include a three bedroom affordable home and they have accepted this. We welcome the inclusion of the three bedroom affordable home, which means that the affordable housing is representative of the wider development.

The affordable homes are required to be tenure blind and fully compliant with latest building regulations. The design of affordable housing should be informed by guidance such as Housing for Varying Needs and the relevant Housing Association Design Guides and we require that applicants work with the Council and the affordable housing provider to achieve this. The homes are situated within close proximity of regular public transport links and next to local amenities. An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, should be provided.

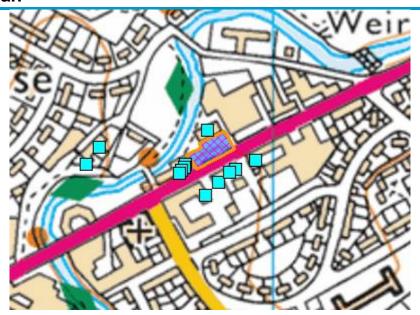
3. Summary

The applicant has made a commitment to provide 25% on site affordable housing and this will be secured by a Section 75 Legal Agreement. This approach which will assist in the delivery of a mixed sustainable community.

- * The applicant has submitted an ¿Affordable Housing Statement¿, setting out their approach.
- * The tenure type, mix and location of the affordable homes must be agreed by the Council
- * The applicant has entered into dialogue with the Council and LAR Housing Trust to deliver the affordable housing on site as mid market rent, which is acceptable.
- * The affordable housing includes a variety of house types and sizes and, at the request of this department, includes a three bedroom affordable home. The affordable housing is therefore representative of the provision of homes across the wider site.
- * In the interests of delivering mixed, sustainable communities, the affordable housing policy units are expected to be identical in appearance to the market housing units.
- * The affordable homes should be designed and built to the affordable housing providers design standards and requirements.
- * The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.

We would be happy to assist with any queries on the affordable housing requirement for this application.

Location Plan



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