

Development Management Sub Committee

Wednesday 31 July 2019

**Application for Planning Permission 18/10180/FUL
At Royal Blind School, 2B Craigmillar Park, Edinburgh
Refurbishment and conversion of existing listed school for
residential use (21 units). Refurbishment and extension of
existing gate lodge building. Demolition of non-listed
structures and formation of new residential dwellings (27
units),(as amended).**

Item number

Report number

Wards

B15 - Southside/Newington

Summary

Whilst the proposal broadly complies with the policies in the Edinburgh Local Development Plan, there are policy infringements in relation to the density of development, the design of the flat roofs on all new builds and sustainability requirements. On balance, the benefits of the proposals outweigh the relatively minor infringements. The proposal will enhance the character and setting of the listed building. It will not adversely undermine the character and appearance of the conservation area. All occupiers will have acceptable levels of living amenity and neighbouring amenity will not be adversely affected. Adequate car and cycle parking will be provided.

Links

[Policies and guidance for this application](#)

LDPP, LDEL01, LDES01, LDES03, LDES04, LDES05, LDES06, LEN02, LEN03, LEN04, LEN05, LEN06, LEN09, LEN12, LEN16, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU04, LHOU05, LHOU06, LTRA02, LTRA03, LTRA04, LRS06, NSG, NSGD02, OTH, CRPCMP, HEPS,

Report

Application for Planning Permission 18/10180/FUL At Royal Blind School, 2B Craigmillar Park, Edinburgh Refurbishment and conversion of existing listed school for residential use (21 units). Refurbishment and extension of existing gate lodge building. Demolition of non-listed structures and formation of new residential dwellings (27 units),(as amended).

Recommendations

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

Background

2.1 Site description

The application site is the former Royal Blind School that specialised in the care and education of visually impaired children. It also includes the former building of the Scottish Braille Printing Press. The site is accessed via a junction road on the west side of Craigmillar Park with a gate lodge at its entrance. The junction road runs parallel to an existing railway line to the north of the site and faces onto the rear gardens of properties on Mentone Gardens/Mentone Terrace. The main school building sits on the highest point of the site and fronts onto West Saville Road with trees screening the site. A pedestrian access to the west of the site leads onto Saville Terrace.

The main school building is of 19th century stone construction. It is three storeys in height with an attic level. The building has a number of later 20th century alterations, including two large additions on its north and west elevations. The existing uPVC windows on the building were in-situ prior to the building being listed.

There are areas of open space to the front and side of the school building. Existing areas of hard surfacing relate to the previous play areas and parking arrangements.

The surrounding area is principally a Victorian residential suburb with detached and semi-detached villas and terraces.

The main school building, gate lodge and boundary walls are category C listed (date of listing: 25/03/1997, reference LB44443). The listing description of the building acknowledges that the interior of the building has been significantly remodelled with very few features remaining as a result of the site's use as a residential school.

This application site is located within the Craigmillar Park Conservation Area.

2.2 Site History

06 December 2018 - Application for listed building consent submitted for the refurbishment and conversion of existing listed school for residential use. Refurbishment and extension of gate lodge building (application number 18/10258/LBC).

13 December 2018 - Application for conservation area consent submitted for the substantial demolition in a conservation area (application number 18/10355/CON).

Main report

3.1 Description Of The Proposal

The proposal is to convert the site to housing. It seeks to convert the main school into 21 flats (Block H). It is proposed to demolish a number of non-listed structures and to erect 27 townhouse units (block A-F) within the site. It is also proposed to refurbish and extend the existing gate lodge to form a residential unit. This will bring the total number of new units on the site to 49.

Block H apartments will have seven one bedroom units, 10 two bedroom units and four units with three bedrooms. The proposed townhouses will provide larger size accommodation with a mix of two, three, four and five bedrooms over three and four floors.

The townhouses will be contemporary in design with a flat roof. The rear elevations of the townhouses will include both a Juliet and a projecting glass balcony. The treatment finish will include sandstone to match the school building and light render with grey anthra-zinc cladding and grey uPVC windows.

External works to the main school building will involve the removal of all 20th century additions and the reinstatement of the north and west elevations of the building with stone to match. Slates on the roof are to be repaired and replaced where required. The existing uPVC windows on the building are to be replaced with new uPVC windows.

It is proposed to demolish the existing outbuilding to the listed gate lodge. Alterations to the existing gate lodge will include the repair and replacement of the existing roof slates and timber windows. It seeks to erect a 5.5 metres by 6 metres flat roof extension on the west elevation of the existing gate lodge. The extension will have a natural buff stone and zinc finish.

The repair and replacement of the existing uPVC windows, timber windows and roof slates are not 'development' as defined under Section 26 of the Town and Country Planning (Scotland) Act 1997 (as amended). Assessment of their merit is therefore not required.

Three category B and two category C trees within the site are to be removed (Myrobalam Plum, Alder, Eucalyptus and Western Red Cedar).

The site will be landscaped throughout to provide open space for Block H apartments. The townhouses will have private gardens to the rear.

The existing priority access junction will be retained to serve the development from Craigmillar Park.

A commuted sum is proposed to provide affordable housing off site.

A provision of 49 private car parking spaces will be provided within the site; 11 units will have a garage with a driveway; nine units will have a private driveway; nine units will have an external garage; and 19 surface car parking spaces and three motorcycle spaces will be provided to service Block H apartments, including eight spaces for disabled people and six electric charging spaces.

Cycle parking will include 130 spaces within the site; 100 double stacked racks to service Block H apartments without garages; 29 of the units will have their own private garages; and 1 provision for the lodge.

Bin store enclosures for Block F and H will be provided to the south west corner of the site, adjacent to the new garages.

Supporting Statement

The applicant has submitted the following information in support of the application:

- Design and Access Statement
- Daylighting Report
- Drainage and SUDS Strategy
- Transport Statement
- Tree Survey Report
- Roost Assessment
- Affordable Housing Statement
- Asbestos Survey
- Building Survey Report
- Condition Survey - Chimney
- Noise and Vibration Assessment
- Preservation Report

These documents are available to view via the Planning and Building Standards Online Services.

Scheme One

The original scheme was significantly revised with a full scale re-design of the site. The previous block of flats and mews style housing have been omitted and replaced with townhouses instead. The main school building will have no additions to its elevations and it will be reinstated with more open space. The proposed number of units has reduced from 51 to 49. Natural buff stone is proposed instead of brick.

3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states that in considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Do the proposals comply with the development plan?

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

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

3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) the principle of residential development is acceptable in this location;
- b) the proposal will have an appropriate density of development;
- c) the development design will preserve and enhance the character or appearance of the conservation area;
- d) the proposal will affect the setting and character of the listed buildings;
- e) the proposal will impact on neighbouring amenity;
- f) future occupiers of the new builds will have acceptable levels of living amenity;
- g) the proposal address issues of road safety;
- h) the proposal will impact on existing trees;
- i) any other material considerations; and
- j) any matters raised in representations have been addressed.

a) Principle

Policy Hou 1 of the Edinburgh Local Development Plan (LDP) allows new housing development on suitable sites within the urban area provided it is compatible with other policies.

The site is an urban area as designated in the LDP and is located within an established residential neighbourhood. Therefore, the principle of residential development on this site is acceptable, subject to compliance with other policies in the LDP.

Policy Hou 5 of the LDP states that planning permission will be granted for the change of use of existing buildings in non-residential use to housing, provided that a satisfactory residential environment can be achieved; housing would be compatible with nearby uses; appropriate open space, amenity and car and cycle parking standards are met; and the change of use is acceptable having regards to other policies in the plan. The principle of the conversion of the listed building (Block H) is addressed in each turn below.

Residential Amenity

The proposed floorspace for the units within the school building will exceed the minimum floor space standards as contained in the Edinburgh Design Guidance and it will have an acceptable mix of accommodation. In addition, future occupiers of the Block H will have acceptable levels of living amenity in terms of privacy and daylight to living spaces.

Nearby uses

The site lies within a residential area and the proposed development of the site to housing is compatible with that use.

Open Space

Policy Hou 3 Private Green Space in Housing Development of the LDP requires a standard provision 10 sqm of greenspace per flat to be provided. In addition, a minimum of 20% of the total site area should be useable greenspace.

The proposed landscape areas around the Block H exceeds the requirements to provide 210 sqm of greenspace for the proposed 21 flats. The submitted Daylight and Sunlight Analysis demonstrates that more than 20% of the total site area will be useable greenspace with a capacity to receive sunlight due to its south facing orientation.

Car and Cycle parking

The provision of car and cycle parking are addressed in section (f) below.

In summary, future occupiers of Block H will have acceptable levels of living amenity as a result of converting the existing building to housing. The proposed number of units within Block H is acceptable. The proposal complies with Policy Hou 5 of LDP.

b) Density of Development

Policy Hou 4 Housing Density of the LDP states that the density of a development on a site will be dependent on its characteristics and those of the surrounding area; the need to create an attractive residential environment and to safeguard living conditions within the development; the accessibility of the site; and the need to encourage and support provision of local facilities necessary to high quality urban living.

The site is 1.41 hectares (including the gate lodge) and the provision of 49 units on the site will be developed at density of 34 dwellings per hectare. This will result in a higher density of development in contrast to the neighbouring detached and semi-detached Victorian villas and terraces. However, the figure does not reflect the properties that have been subdivided. Whilst the proposed development layout and size of the plots do not conform to the residential development pattern in the area, the proposal is for the redevelopment of a former school site with a listed building that features a number of incongruous additions. The proposed density of development will have no more of an impact in terms of what is currently there and this is a relevant material consideration which, on balance, outweighs the infringement relating to the characteristics of the wider area. Future occupiers will have acceptable levels of living conditions within the development. The site is accessible to public transport, local facilities and shops on Craigmillar Park and Mayfield Road.

The proposal is an acceptable minor infringement to policy Hou 4 of the LDP.

c) Development Design and Conservation Area

LPD Policy Des 1- Design Quality and Context of the LDP requires development proposals to create or contribute towards a sense of place. The design should be based on an overall design concept that draws upon the positive characteristics of the surrounding area. Permission will not be granted for proposals that are inappropriate in design or for proposals that would be damaging to the character or appearance of the area.

Policy Des 3 Development Design - Incorporating and Enhancing Existing and Potential Features of the LDP states that planning permission will be granted for development where it is demonstrated that existing characteristics and features worthy of retention on the site and in the surrounding area, have been identified, incorporated and enhanced through its design.

Policy Des 4 Development Design - Impact on Setting of the LDP also requires development proposals to have a positive impact on its surroundings, including the character of the wider townscape, having regards to its height and form; scale and proportions, including the spaces between the buildings, position of buildings and other features on the site; and the materials and detailing.

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

The site is located within the Craigmillar Conservation Area. The character appraisal states the following:

The Craigmillar Park Conservation Area is principally a Victorian residential suburb developed as part of Edinburgh's southward expansion in the late 19th and early 20th centuries.

There is a distinct pattern of detached, semi-detached and terraced Victorian houses oriented towards the street frontages, set within significant gardens. Consistency is provided by the very regular building lines, with all properties set back behind a front garden. The properties also have significant rear gardens. The mature gardens soften the stone buildings and create an open landscaped structure which characterises the Conservation Area.

Most of the buildings have changed little since they were constructed, solidly built of stone and slate, with many rich features characteristic of Victorian buildings, including low stone walls, making the buildings within gardens readily visible. The area is characterised by the consistent and unspoiled quality of the Victorian buildings and the important relationship of the buildings, trees, gardens and open spaces.

The character appraisal also identifies the main school building being a prominent building within the conservation area.

The existing later 20th century additions within the site are incongruous by virtue of their scale, form and design. They do not make a positive contribution to the character of the area. The removal of these additions to facilitate the proposed townhouses would result in conservation gains by allowing more open views to the site and this will enhance the setting of the school building.

An approximately 190 sqm of open space to the front of the school building will be lost to extend the existing road layout for Block F garages. The loss of open space is small in comparison to the overall scheme is acceptable and the proposed landscaping and layout will more than compensate for this loss.

The Edinburgh Design Guidance does not preclude the introduction of modern buildings within sensitive sites. The position and layout of the townhouses will occupy and rationalise the existing areas of development. It will provide a more coherent form and layout to allow clear movement within the site. The townhouses will be appropriately scaled and set back from traditional buildings and will not undermine the building lines of neighbouring properties on Saville Terrace and West Savile Road.

The use of sandstone on important front and gable elevations will allow the character and appearance of the conservation area to be respected. Although the proposed flat roofs are not characteristic of the area, and so contrary to policies Env 6 and Des 4, the proposal is a simple and modern interpretation of townhouses where the roof profile will provide clarity between the listed building and the new builds. The subservience of the townhouses and the variations in the site levels and treatment finish will help to subtly add visual interest to the site without dominating the area. The existing rear extension to the school is overbearing and is visible from Saville Terrace and Mentone Terrace. The proposal in comparison will have a reduced impact in terms of what is currently there and this is a relevant material consideration.

The original scheme was significantly revised to address previous design concerns and this has resulted in the omission of the 5 and 6 storey blocks of flats and the use of brick as a treatment finish. In the current scheme, the overall visual impact to the area has been considerably reduced. The proposed development layout and design has special regard to the setting of the listed building and the characteristics of the site. An exception to policy in respect of the flat roof design is therefore justified as the overall scheme will both preserve and enhance the character and appearance of the conservation area.

There are a number of existing steps within the site that will continue to present obstacles for wheelchair users and individuals with restricted mobility. However, the proposed layout will not inhibit users to move around the site and the building regulations will be applied to ensure compliance with statutory requirements.

The proposed development design broadly complies with policies Des 1, Des 3, Des 4 and Env 6 of the LDP.

d) Setting and Listed Buildings

The Historic Environment Policy for Scotland (HEPS) outlines how the Council should undertake the collective duty of care whenever a decision in the planning system will affect the historic environment. There are three key areas which define how the historic environment should be understood, recognised and managed to support participation and positive outcomes, including "Managing Change" under policies HEP2, HEP3 and HEP4.

Policy Env 3 Listed Buildings - Setting states that development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the architectural character, appearance or historic interest of the building, or to its setting.

Policy Env 4 Listed buildings - Alterations and Extensions states that proposals to alter or to extend listed buildings will be permitted where those alterations are justified; would not result unnecessary damage to historic structures or diminution of its interests; and where any additions would be in keeping with other parts of the building.

The redevelopment of the site will greatly improve the character and setting of the listed building. The removal of the later 20th century incongruous additions will reinstate the architectural composition of the school building on all sides. The proposed townhouses will be subservient in scale and will be appropriately scaled back from the main school block. Although the design of the flat roofs are not characteristic of the surrounding area, the proposal is a simple and modern interpretation of townhouses with a limited palette of materials that will not adversely overwhelm or harm the setting of the listed building. Differences in the site levels will help to subtly accentuate the differences in the design of the townhouses which, in turn will add interesting features to the site.

A number of comments received were aimed at the repeated use of uPVC windows on the main school building. The windows were replaced prior to the building being listed and have remained in-situ for more than four years. There are no powers to enforce their replacement with timber framed windows. Whilst uPVC windows are not characteristic of traditional conservation areas, there is nothing to prevent the existing uPVC windows from being retained in-situ. The replacement of the existing uPVC windows like for like are not 'development' as defined under Section 26 of the Town and Country Planning (Scotland) Act 1997 (as amended).

The interior of the school has been significantly remodelled in connection to its previous use as a residential school. The proposed alterations to convert the building into flats will not diminish the special interest of the listed building.

A portion of the west wall of the existing gate lodge will be removed to facilitate the proposed extension. However, its loss will be compensated by allowing the beneficial use of the gate lodge as a dwellinghouse. Whilst flat roof additions are generally not characteristic of traditional buildings, the extension will be subservient in scale and the use of high quality materials will provide an appropriate contrast and degree of physical separation between the existing and new addition. The extension will not adversely undermine the character of the gate lodge and it will not impact on the nearby listed church and war memorial.

The proposal complies with policies Env 3 and Env 4 of the LDP.

e) Neighbouring Amenity

Policy Des 5 Development Design - Amenity requires development proposals to demonstrate that neighbouring amenity will not be adversely affected as a result of a development and will have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook.

The submitted Design and Access Statement demonstrates the reduced scale of the development and its visibility from properties on Mentone Terrace/Gardens to the north of the site.

Existing privacy levels on the western section of the site are already compromised due the location of windows on the three storey extension to the side of the school. The rear elevations of Block E and F will have a garden depth of 7.3 metres. The distance of these townhouses from neighbouring gardens will not result in further adverse overlooking.

The development would be set far back enough from properties to the north of the site and would not adversely undermine sunlight to these properties.

The proposed Juliet and projecting balconies will not result in unacceptable noise levels within a residential area.

The layout, distance and height of the proposed development will not have an adverse impact on neighbouring amenity in terms of loss of privacy, loss of daylight to windows or result in overshadowing to private gardens.

The proposal complies with policy Des 5 of the LDP.

f) Future Occupiers of New Build - Amenity

Policy Des 5 Development Design - Amenity requires development proposals to demonstrate that future occupiers of a development will have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook.

Floorspace

The proposed townhouses (Block A-F) exceed the minimum floor space standards as contained in the Edinburgh Design Guidance and it will provide an acceptable housing mix in compliance with policy Hou 2 (Housing Mix).

Daylight

The no sky line, the vertical sky component and average daylight factor were used to calculate daylight to the proposed living spaces which are living rooms and bedrooms. The results can be found in Appendix D of the submitted Daylight and Sunlight Analysis report. It should be noted that daylight to kitchens are not protected living spaces and daylight to these room are discounted for the purpose of this assessment. Due to the proximity to the existing school, Blocks C, D, E and F broadly fail the vertical sky component but comply with the average daylight factor for all of the living rooms within the townhouse blocks and this is acceptable.

Open Space

The rear gardens for the proposed townhouses vary in their size where the majority exceed 30 sqm with the exception of Blocks C and D which have very little garden space, ranging between 14 to 19 sqm. However, the open space provision around the school building would offset for the small size of these gardens and this is acceptable.

Sunlight

The submitted Daylight and Sunlight Analysis demonstrates that for the majority of the spring equinox (21 March), more than 50% of the total garden area will be sunlit and this is acceptable.

Privacy

The Edinburgh Design Guidance advises that the pattern of development in an area will help to define appropriate distances between buildings and consequential privacy distances. This means that there may be higher expectations for separation in suburban areas than in historic areas.

The development pattern in the area is defined by a high degree of physical separation. The redevelopment of the site by modern standards will have a shorter privacy distance between buildings, ranging between 9 metres to 20.6 metres. The rear of Blocks E and F will have a garden depth of 7.3 metres. It would be unrealistic to expect modern developments to closely match the generous size of nearby development plots as the proposal is for the redevelopment of a former school that currently has a number of large buildings on the site. The previous scheme was significantly revised to address privacy concerns and this has resulted in the omission of the high blocks of flats and its replacement with townhouses instead. The revised scheme is an improvement where future occupiers by modern standards will have reasonable levels of privacy. This is a relevant material consideration which, on balance, outweighs the defined development pattern of the area and its consequential privacy distances.

Noise

The site lies within a residential area. The proximity of the development to the existing railway line to the north of the site will not have an unacceptable impact in terms of noise.

In summary, future occupiers of the townhouses will have acceptable levels of amenity and the proposal broadly complies with Policy Des 5 and Hou 3 of the LDP.

g) Road Safety

Policies Tra 2- Tra 4 of the LDP sets out the requirement for private car and cycle parking. The car and cycle parking standards are contained in the Edinburgh Design Guidance.

The proposed car parking complies with the maximum standards and future occupiers of all of the units will have one car parking space.

Cycle parking is acceptable and complies with the standards.

A financial contribution towards the provision of two car club vehicles in the area was requested by Transport. As the development includes a generous parking provision and accords with guidance, there is no requirement for City Car Club provision.

The existing priority access junction will serve the development from Craigmillar Park and transport has not raised concerns in terms of road safety.

The proposal complies with policies Tra 2- Tra 4 of the LDP.

h) Trees

Policy Env 12 Trees of the LDP states that development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Preservation Order or on any other tree or woodland worthy of retention unless necessary for good arboricultural reasons. Where such permission is granted, replacement planting of appropriate species and numbers will be required to offset the loss to amenity.

The proposed removal of the five trees within the site is acceptable as they are not integral to the landscape character or to the heritage of the conservation area in terms of their size, form and species. The loss of these trees will be more than compensated by the proposed landscape scheme.

The proposal complies with policy Env 12 of the LDP.

i) Material Considerations

Impact on school infrastructure

Policy Del 1 Developer Contributions and Infrastructure Delivery in the LDP states that where necessary and relevant to mitigate any negative additional impact on infrastructure, proposals will be required to make a contribution towards education.

The site falls within Sub-Area BJ-2 of the 'Boroughmuir James Gillespie's Education Contribution Zone' as defined in the Supplementary Guidance: Developer Contributions and Infrastructure Delivery (August 2018). The Council has assessed the impact of the proposed development on the identified education infrastructure actions and current delivery programme. The education infrastructure actions that are identified are appropriate to mitigate the cumulative impact of development that would be anticipated if the application is minded to be approved. The development is therefore required to make a contribution of £ 293,594 towards the delivery of these actions based on the established 'per house' and 'per flat' rates for the appropriate part of the Zone. This will be secured via a legal agreement.

Provisions for affordable housing are met

Policy Hou 6 in the LDP states the residential developments, including conversions, consisting of 12 or more units should include provision for affordable housing amounting to 25% of the total number of units proposed.

A cost plan was submitted and verified by an independent assessor. Options for onsite delivery have been explored and discounted. The high build costs at rate of £307,000 per unit renders the site unviable for a Registered Social Landlord (RSL). The high build costs are due to the presence of the listed building on the site and the conservation requirements to provide sandstone and slate. RSLs typically secure properties from developers at approximately £130,000 per unit and whilst commuted sums could have been used to support on site delivery, the cost difference is too great to present value for money for a RSL. A commuted sum payment in lieu of onsite affordable housing is therefore required in this case.

A commuted sum figure was independently assessed by the District Valuer and is valued at £66,000 per unit. This gives a total commuted sum of £792,000. This will be secured via a legal agreement.

The proposal complies with policy Hou 6 of the LDP.

Impacts on archaeology

Policy Env 9 Development of Sites of Archaeological Significance seeks to protect and enhance archaeological remains.

The proposal will have low archaeological impacts as the school has undergone several phases of development. A condition requiring the implementation of a programme of archaeological works is required.

Flooding issues

Policy Env 21 Flood Protection seeks to ensure development does not result in increased flood risk or be at risk of flooding by demonstrating sustainable drainage measures.

Policy RS 6 Water and Drainage states that planning permission will not be granted where there is an inadequate water supply or sewerage available to meet the demands of the development and necessary improvements cannot be provided.

A Surface Water Management Plan was submitted. Flood Planning has raised concerns that the proposed redevelopment of the site will not achieve a surface flow rate akin to greenfield sites. However, Scottish Water is satisfied that the demands of the proposed development can be accommodated within their network. The site has a number of constraints to its layout, including the listed building, the location of the existing trees and the layout of the existing road. In these circumstances, it would be difficult to achieve greenfield levels when the proposal is for the redevelopment of a former school site. In addition, it would be unreasonable to request further amendments to the development layout as Scheme Two has involved substantial changes to address the number of objections to the original scheme. The existing constraints of the site would still be a prevalent issue and this is a material consideration which, on balance, outweighs the sustainability concerns of the site's surface flow rate. The proposed development layout will not increase flood risk or be at risk of flooding itself.

The proposal broadly complies with Policy Env 21 and RS 6 of the LDP.

Impacts on potential bat roosts

The submitted Bat Activity Survey Report identifies no bat roosts. The proposal complies with Policy Env 16 of the LDP.

Contaminated land issues have been addressed

A standard condition requiring a site survey, followed by any necessary works is required.

Air quality issues have been addressed

Policy Env 22 Pollution and Air, Water and Soil Quality seeks to minimise the potential source and effects of pollution.

The proposed development will have less impact in terms of car movements on peak hours than the previous use of the site. Both total AM and PM peak hour traffic will be reduced but minor increases will occur in AM departures and PM arrivals. The development will not adversely affect local air quality. The applicant has demonstrated a commitment to provide electric vehicle charging points which will also reduce emissions.

Waste

The provision of kerbside collection for waste will be provided for Block A-E and for the existing gate lodge. Communal collection in the form of enclosed bin stores will be provided for Block F and H. Waste Planning has indicated that refuse collection can be accommodated on the site.

Sustainability

Policy Des 6 Sustainable Buildings of the LDP seeks to promote the ways that new developments can reduce its impact on the environment.

With regards to meeting reductions in carbon dioxide emissions, the building regulation will be applied to ensure compliance with statutory requirements.

The proposals do not comply with policy Des 6 as uPVC is not a sustainable material. However, the proposal is to replace the existing uPVC on the school building and this is not development as defined under Section 26 of the Town and Country Planning (Scotland) Act 1997 (as amended). The proposal is to redevelop a former school site with a listed building where the benefits derived from adapting the school building and the wider site to housing site outweighs this minor infringement.

Network Rail

Drawing No. 53 show the proposed erection of a 1.8 metres high vertical slats Scottish larch timber fence to the rear of Block A and B that will provide back lane access adjacent to the railway boundary. While there is an existing high stone boundary wall adjacent to the railway line to the north of the site, the height of this boundary is not clear. Therefore, a condition is required to ensure that a suitable trespass proof fence, measuring 1.8 metre in height is provided. This is to address Network Rail's concerns.

Drawing No. 48- 53 provides details of the hard and soft landscaping works. The proposed planting of Acer Campestre trees (Maple) to the rear of Block A townhouses will be positioned approximately 3 metres from the adjacent boundary to the existing railway line to the north of the site. The new trees will have a predicted height between 300-350cm. The proposed landscaping is therefore acceptable.

j) Matters raised in representations addressed

Material - Objection

- Amended scheme not be in-keeping with the character or appearance of the conservation area and it will harm the setting of the listed building - Addressed in Section 3.3 (c) and (d).

- uPVC windows on the listed building are not appropriate and are not environmentally friendly - Addressed in Section 3.3 (d) and (i).
- Inappropriate use of flat roofs - Addressed in Section 3.3 (c).
- Existing access junction from Craigmillar Park will affect the convenience and safety of road users - Addressed in Section 3.3 (g).

Material - Support

- Revised scheme is an improvement.
- Support principle of housing on the site.
- Supportive of the refurbishment plans to the listed school building.

Representations - General comments

- General management of existing trees - any future works to a tree would require a separate application for Tree Works.

Grange and Prestonfield Community Council - Support

- Welcomes the change of use of the site to housing and the conversion of the school building to flats with the exception of uPVC windows.
- The revised layout works better and emphasises the character of the main listed school.
- Accepts that extending the existing gate lodge is necessary to achieve a more satisfactory dwelling; requests that the design of the flat roof be reviewed - Addressed in Section 3.3 (d).
- Requests more supporting information on the durability of the materials for the proposed flat roof - Addressed in Section 3.3 (c).
- Notes that Block C does not score well in the Daylight and Sunlight Analysis - Addressed in Section 3.3 (f).
- Accepts the submitted Transport Statement and requests that a signal controlled pedestrian crossing at the priority junction be considered - Addressed in Section 3.3 (hg).
- Submitted detailed costplan and construction costs schedule should be made available for comments. **Objects** to no provision for onsite affordable housing - Addressed in Section 3.3 (i).

Comments relating to the original scheme

- Despite the level of objections to the original scheme, there was broad support for housing on the site.

Material - Objection

- Impact on setting and character of the listed building - Addressed in Section 3.3 (d).
- Design and layout of the new builds - Addressed in Section 3.3 (c).
- Impact on the character and appearance of the conservation area - Addressed in Section 3.3 (c).

- Demolition of existing outbuilding and inappropriate extension to the existing gate lodge - Addressed in Section 3.3 (d).
- Extension to the existing gate lodge will impact on the listed church and war memorial - Addressed in Section 3.3 (d).
- Impact on neighbouring amenity - Addressed in Section 3.3 (e).
- No onsite affordable housing - Addressed in Section 3.3 (i).
- Loss of open space - Addressed in Section 3.3 (c).
- Traffic levels and parking associated with 52 units - Addressed in Section 3.3 (j).
- Future occupier's amenity - Addressed in Section 3.3 (f).
- Proposals are of no benefit to the wider neighbourhood in terms of shortage of public green space - Addressed in Section 3.3 (c).
- Loss of trees - Addressed in Section 3.3 (h).
- Location of cycle parking impractical with no cycle parking for visitors - Addressed in Section 3.3 (g).
- Conflicts with Scottish Government's priority for low carbon usage - Addressed in Section 3.3 (e).
- Existing pedestrian crossing near to the site entrance will need to be improved - Addressed in Section 3.3 (g).

Non-Material - Objection

- Not aware of pre-application consultation events taken place - There are no statutory requirement to carry out pre-application consultation for a local scale development.
- Construction noise - This is not a matter for the planning authority.
- Value paid for own properties - Planning does not control fluctuations within the property market.
- Noise pollution impacting on older buildings - The proposal is to redevelop the site for housing within a residential area. This does not preclude assessment of the proposal.

Material - Support

- Development of appropriate scale and massing and the selection of high quality of materials will enhance the neighbourhood and will fit in with the conservation area.
- Demolition of inappropriate additions will enhance the area.
- Refurbishing the main school building will provide good quality housing.
- Landscape scheme will allow the development to fit in with the area.

Non-Material - Support

- Cala has engaged with communities and has involved entering a legal agreement to reflect the community's concern - This is a civil matter that carries no bearing in the assessment of the proposal.
- Former school has been vacant for considerable time, resulting anti-social behaviour and spate of burglaries - Not a planning matter.
- Requesting conditions to restrict construction hours - Not a planning matter.

- Requesting condition to restrict parking permits on adjacent streets being granted for future residents - Planning has no remit over the allocation of parking permits.

Conclusion

Whilst the proposal broadly complies with the policies in the Edinburgh Local Development Plan, there are policy infringements in relation to the density of development, the design of the flat roofs on all new builds and sustainability requirements. On balance, the benefits of the proposals outweigh the relatively minor infringements. The proposal will enhance the character and setting of the listed building. It will not adversely undermine the character and appearance of the conservation area. All occupiers will have acceptable levels of living amenity and neighbouring amenity will not be adversely affected. Adequate car and cycle parking will be provided. It is recommended that the application be granted.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. No demolition or development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic Building recording, excavation, analysis & reporting) in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Planning Authority.
2. Prior to the commencement of construction works on site:
 - (a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, 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 remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.

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 to the satisfaction of the Head of Planning.
3. Notwithstanding the approved drawings, sample/s of the proposed materials for the new townhouses shall be submitted to and approved in writing by the Planning Authority before commencing work on the site.

4. Notwithstanding the approved drawings, details of a 1.8 metres high trespass proof fence on the northern boundary of the site shall be submitted to and approved in writing by the Planning Authority before commencing works on the site. Details of the approved fence shall be implemented prior to the first occupation of the development.
5. The approved landscaping scheme (Drawing 48 and 49) shall be fully implemented within six months of the completion of the development.

Reasons:-

1. In order to safeguard the interests of archaeological heritage.
2. In order to ensure that the site is suitable for the proposed use.
3. In order to enable the planning authority to consider this/these matter/s in detail.
4. In the interests of public safety and the protection of Network Rail infrastructure.
5. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.

Informatives

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement has been concluded to make a financial contribution to Children and Families to alleviate accommodation pressures in the local catchment area.

The contribution shall be £293,594 index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.

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.

2. Permission should not be issued until the applicant has entered into a suitable legal agreement to ensure that affordable housing is provided in accordance with Council policy.

The contribution shall be £792,000 indexed linked from the date of the decision by the Development Management Sub-Committee.

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.

3. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

4. 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.
5. 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.

6. **Network Rail**

Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.

- Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a "possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.

The developer must contact our Asset Protection Engineers regarding the above matters, contact details below:

Network Rail Asset Protection Engineer
151 St. Vincent Street, GLASGOW, G2 5NW
Tel: 0141 555 4352
E-mail: AssetProtectionScotland@networkrail.co.uk

7. The applicant will be required to:
 - a. Contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;
 - b. Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary;
 - c. Contribute the sum of £2,000 to promote a suitable order to introduce a 20pmh speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council. The applicant should be advised that the successful progression of this Order is subject to statutory consultation and advertisement and cannot be guaranteed;

8. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details.
9. A Quality Audit, as set out in Designing Streets, to be submitted prior to the grant of Road Construction Consent.
10. 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), 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) and timetables for local public transport.
11. The applicant should note that new road names may be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity.
12. The applicant should be advised that as the development is located in the extended Controlled Parking Zone, they will be eligible for one residential parking permit per property in accordance with the Transport and Environment Committee decision of 4 June 2013. See http://www.edinburgh.gov.uk/download/meetings/id/39382/item_7_7 (Category D - New Build and Category E - Sub divided or converted)
13. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property.
14. 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.

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:

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

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

The original scheme was first advertised on 25 January 2019 and the proposal attracted 46 representations; 36 objected and 10 supported the proposal.

The second scheme was re-advertised on 3 May 2019 and the proposal attracted 9 representations; 2 were objections; 5 supported the proposal and 2 were general comments.

The representations received are addressed in the assessment section in the report.

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 site is an urban area as designated in the Edinburgh Local Development Plan and the Craigmillar Conservation Area.

Date registered

15 January 2019

Drawing numbers/Scheme

01-12, 13A-14A, 21-26, 27A-32A, 33-37, 38A-43A, 44-59.,

Scheme 2

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Laura Marshall, Planning Officer

E-mail:laura.marshall@edinburgh.gov.uk Tel:

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

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 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

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

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Env 2 (Listed Buildings - Demolition) identifies the circumstances in which the demolition of listed buildings will be permitted.

LDP Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

LDP Policy Env 4 (Listed Buildings - Alterations and Extensions) identifies the circumstances in which alterations and extensions to listed buildings will be permitted.

LDP Policy Env 5 (Conservation Areas - Demolition of Buildings) sets out criteria for assessing proposals involving the demolition of buildings within a conservation area.

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

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 12 (Trees) sets out tree protection requirements for new development.

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

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

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 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 Hou 5 (Conversion to Housing) sets out the criteria for change of use of existing buildings to housing.

LDP Policy Hou 6 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

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

LDP Policy RS 6 (Water and Drainage) sets a presumption against development where the water supply and sewerage is inadequate.

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.

Other Relevant policy guidance

The Craigmillar Park Conservation Area Character Appraisal emphasises the predominance of high quality stone-built Victorian architecture of limited height which provides homogeneity through building lines, heights, massing and the use of traditional materials, and the predominant residential use.

The Historic Environment Policy for Scotland 2019 outlines Government policy on how we should care for the historic environment when taking planning decisions.

Appendix 1

**Application for Planning Permission 18/10180/FUL
At Royal Blind School, 2B Craigmillar Park, Edinburgh
Refurbishment and conversion of existing listed school for
residential use (21 units). Refurbishment and extension of
existing gate lodge building. Demolition of non-listed
structures and formation of new residential dwellings (27
units),(as amended).**

Consultations

Scheme 1

Archaeology

The Royal Blind School first established in the late 18th century, moved to this site in 1835. The current c-listed main school building and gate-lodge are recorded as being constructed latter, in 1874, by a design by Charles Leadbetter. The school has evolved through to the present day with major extensions occurring in the in 1930's and 1960s'.

The Listed Royal Blind School is regarded as being of archaeological and historic significance. This application must be considered therefore under terms the Historic Environment Scotland's Policy Statement (HESPS) & Archaeology Strategy, Scottish Planning Policy (SPP), PAN 02/2011 and Edinburgh Local Development Plan (2016) Policies ENV3, ENV4, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Firstly, it is welcomed that this scheme seeks to retain and restore the main Victorian School building and 19th century listed gate-lodge. The proposals will require extensive demolition of 20th century out buildings and extensions as well as internal alterations. It is considered however that such works will not have a significant adverse impact. Nevertheless, it is recommended that a historic building survey (phased & annotated plans and elevations, photographic and written survey and analysis) is undertaken of all school buildings prior to and during demolition/development. This is to provide a permeant archaeological of the school at the end of its history at this location and to development, with the results combined with those arising from the recommended archaeological field work.

As stated the school has undergone several phases of development, of interest being the development of the school in the 19th and early 20th centuries. Although latter construction and redevelopment has almost certainly had a significant impact upon survival evidence of earlier buildings may survive under more modern ones. Accordingly, it has been concluded that this scheme has a potentially significant but low archaeological impact in terms of disturbing insitu remains. It is recommended therefore that a programme of archaeological work (excavation) is undertaken prior to/ during development in order to fully excavated, recorded, analysed and publish any significant remains that may be disturbed.

It is recommended that the following condition is attached if consent is granted to ensure that this programme of archaeological works is undertaken.

'No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic Building recording, excavation, analysis & reporting) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

The work would be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant. Please contact me if you require any further information.

Network Rail Scotland

Whilst Network Rail has no issues with the principle of the proposed development, we would have to object to the proposal unless the following conditions were attached to the planning permission, if the Council is minded to grant the application:

1. The applicant must provide a suitable trespass proof fence of at least 1.8 metres in height adjacent to Network Rail's boundary and provision for the fence's future maintenance and renewal should be made. Details of the proposed fencing shall be submitted to the Planning Authority for approval before development is commenced and the development shall be carried out only in full accordance with such approved details.

Reasons: In the interests of public safety and the protection of Network Rail infrastructure.

2. No development shall take place on site until such time as a scheme of landscaping has been submitted to and approved in writing by the Planning Authority. The scheme shall include hard and soft landscaping works, boundary treatment(s), details of trees and other features which are to be retained, and a programme for the implementation/phasing of the landscaping in relation to the construction of the development. Where trees/shrubs are to be planted adjacent to the railway boundary these should be positioned at a minimum distance from the boundary which is greater than their predicted mature height. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. Network Rail can provide details of planting recommendations for adjacent developments. All landscaping, including planting, seeding and hard landscaping shall be carried out only in full accordance with such approved details.

Reason: To control the impact of leaf fall on the operational railway.

Network Rail would also recommend that the following matters are taken into account and are included as advisory notes, if granting the application:

Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.

- Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a "possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.*

The developer must contact our Asset Protection Engineers regarding the above matters, contact details below:

*Network Rail Asset Protection Engineer
151 St. Vincent Street, GLASGOW, G2 5NW
Tel: 0141 555 4352
E-mail: AssetProtectionScotland@networkrail.co.uk*

Grange and Prestonfield Community Council

1. *Summary of Proposal: On this site, in the Craigmillar Park Conservation Area, it is proposed to provide 52 dwellings, 21 apartments by conversion of the C Listed original School Building, 30 in new build on the site and 1 by adapting and extending the C Listed Gate Lodge.*

2. *Support in Principle: GPCC supports the change of use to housing and welcomes the conversion of the original School Building to apartments. Although the original Listed Gate Lodge is to be substantially extended, we agree this is necessary to create an up to date and viable dwelling. We note that all other buildings and later additions on the site are to be removed. We support this as many are of indifferent quality and unsympathetic to the character of the original buildings. GPCC welcomes the prospect of this historic brownfield site coming to life again and the improved security for nearby residents resulting from this now vacant site being re-occupied.*

3. *GPCC Comments in General: The following comments are referenced to the 89 documents in the application and should be read with GPCC comments on the accompanying applications 18/10355/CON & 18/10258/LBC. We are ready to engage with Cala to see how our concerns could be mitigated. Some could perhaps have been avoided and time saved if there had been earlier engagement with all local residents affected by this scheme rather than just contiguous neighbours involved with the removal of limiting legal burdens on the site.*

GPCC considers that the title "Community Consultation" and the text on page 40 of the Design and Access Statement need further explanation. There was an exhibition by Cala on 7th June 2018 of proposals already largely finalised. Prior to that we understand there had been the negotiations with contiguous neighbours referred to above. At no time prior to June 2018 had there been any consultation with others affected by the scheme such as those living on the north side of the site. Page 58 of the same document states, "A set of height parameters were agreed with the immediate neighbours.....", a term which is not explained. Those neighbours on the north side of the site were never consulted and only learned about the adverse impact on them at the exhibition in June 2018. Since then only minor changes have been made, such as that to the Block A roof profile, which although welcome still maintains the same proposed roof height.

On 10 December 2018 GPCC held a public meeting in Craigmillar Park Church Hall when Cala representatives presented their proposals. In the following Q&A session there was support for the scheme in principle, but new build blocks A & B on the north side of the site were the main concern. We were told at the meeting the planning applications had already been submitted.

4. *Affordable Housing Obligation: This is addressed in a separate Policy Statement by Justin Lamb Associates (JLA). LDP Policy Hou6 requires that 13 homes out of the 52 proposed for this site are of approved affordable housing tenures. This Policy states: "For proposals of 20 or more dwellings, the provision should normally be on site." LDP paragraph 232 states: "A key aim is that affordable housing should be integrated with market housing on the same site etc " Further on in the same paragraph "Provision on an alternative site may be acceptable.....if there are exceptional circumstances." JLA for Cala propose a commuted sum in lieu of onsite provision, citing affordable housing policy tests. GPCC considers that JLA has not shown why there are such exceptional circumstances as to justify the setting aside of a key aim in the LDP. GPCC objects to what is proposed and asks for the affordable housing to be on site.*

5. *Transport Statement Parts 1 and 2: This is a separate study by SWECO and we agree with much of its content. We agree with the removal of existing car parking on the access road off Craigmillar Park and that this should be the only road access to the site. We support the retention of the other pedestrian accesses to encourage walking through the site. CEC car parking standards now stipulate no minimum provision and It is not at all clear why the maximum of 1 car space per dwelling, 52 in all, is justified, with bus stops just outside the site entrance on Craigmillar Park and nearby on Mayfield Road. We ask that the number of parking spaces be reconsidered.*

The study concludes that daily vehicle trips to and from the site when fully redeveloped may be no more than when it was in use as the school and Braille Press. However, the study ignores any traffic problems in the main road at this access, adjacent to the busy northbound bus stop, the church needing disabled access and the signal controlled pedestrian crossing. At peak times traffic on this busy primary route to and from the city can be backed up past this access. We urge that consideration be given to modifying and slightly relocating the signal controlled pedestrian crossing to incorporate a phase for the access road. This would greatly aid pedestrian safety.

6. *Car Parking: The Design and Access Statement Part 11 and the Site/Roof Plan 13 show car parking with 52 spaces in all being provided. (See 5 above for comment). A significant proportion of these are to be in buildings and this is welcome. We think that the 9 surface parking spaces in the SE corner of the site near the bend in East Savile Road, when in use for their intended purpose, could be detrimental to the setting of the Listed school building, contrary to LDP Policy Env3. We ask that these 9 parking spaces in this location be reconsidered.*

7. *Listed Gate Lodge: We have no objection to the downtakings shown for the Listed Gate Lodge or to the proposed substantial extension as we understand the need to change this building to offer better amenities for future residents. We are concerned about the proposed south elevation. In front of this is the attractive garden and lawn of Craigmillar Park Church with its buildings on two sides and War Memorial. We think the unsympathetic uPVC clerestory windows and flat roof of the proposed Lodge extension protruding above the boundary wall may jar with these existing features when seen from the main road and we ask that their treatment be reconsidered, to respect better the character of the Conservation Area (LDP Policy Env6).*

8. *Listed School Building - Glazing: The Listed School Building (Block H) currently has uPVC glazing. Drawings 39-41 state that these are to be replaced but gives no further detail. Drawing 61 shows that the replacement glazing is uPVC. We object to this as we think it will detract from the character of the refurbished building and not respect or enhance the Conservation Area. The Royal Blind School should not have installed uPVC glazing years ago and there is a stark contrast between the front elevation of the school building and the dwellings on the south side of West Savile Road with traditional sash and case. The opportunity should now be taken to further enhance and restore the character of this Listed Building and the Conservation Area by replacing the uPVC glazing with materials more in keeping.*

9. *New Build Materials:*

a) *Glazing: UPVC is proposed throughout the new build housing on the site for windows and doors. We think this would detract from the setting of the Listed School Building and the character of the Conservation Area and we object to it.*

b) *Cladding: The cladding of significant areas of the new build is stated to be Dark Grey Cladding (TBC). We think people living close to this site should be told what they might have to look at for a long time and its durability. We think all external materials should be detailed now as part of this application. This is a significant site in a Conservation Area.*

c) *Brick and Stone: Except where unspecified dark cladding and uPVC are to be used, external walls are generally to be of buff brick, with some intervening panels of buff stone. Buff stone is to be used for the Gate Lodge extension and adjacent to West Savile Road dwellings. We welcome this, but we think there may be other areas of new build in brick which would clash with natural stone dwellings surrounding the site. Whilst not opposing the use of appropriate brick, we ask that the relation between brick and stone be reconsidered having regard to the visual impact of brick new build on the stone dwellings and tenements nearby.*

10. *New Build Block A: This is the brick clad block of 6 Townhouses, each with 5 bedrooms, on the site of the existing swimming pool in the NW corner of the site, directly opposite the tenement dwellings on the south side of Mentone Terrace. All 4 storeys of the Townhouses will be visible from the north side and 3 on the south due to the slope of the site. The proposed new building is to extend further to the east than the swimming pool and will be much higher. Its southern frontage will follow the building line of the north side of Savile Terrace to the west. Although Block A will be slightly further away from the Mentone Terrace dwellings than the present swimming pool, we estimate its roof would be nearly 7m higher than the present pool roof, that is 1.5m higher than ridge line of the roof of the houses on the north side of Savile Terrace. Block A as proposed will appear dominant and massive, reducing some precious winter sunlight into many of the dwellings on the south side of Mentone Terrace and adversely impacting on the amenity of the people living there. We object to the height of Block A.*

11. *New Build Block B: This is the brick clad block of 7 Apartments to the east of Block A, also opposite the Mentone Terrace dwellings, to be sited on a landscaped area of the site where there are no existing buildings. All 5 storeys will be seen from Mentone Terrace and 4 storeys on the other 3 sides of this flat-roofed building containing 4 two bedroom apartments and 3 with three bedrooms. The view from all around it will be of a stark 4-5 storey building about 17m high overpowering its setting. Like its neighbour Block A, it may reduce direct winter sunlight into the Mentone Terrace dwellings opposite, adversely impacting on the amenity of residents. We think it would also have an adverse general effect on the character of the Conservation Area. We object to Block B and ask for development on this part of the site to be reconsidered.*

12. *New Build Block G: This is to be of 6 floors on the site of the school hall immediately to the north of the Listed School Building of about the same footprint and height as existing. The north side of the new building will be slightly nearer the Mentone Terrace dwellings than the existing and will have protruding balconies. It is to have a flat roof matching the ridge line of the existing hipped roof. For these reasons we think that the new building will appear much more dominant and overpowering than the existing. We object to the roof profile of Block G and ask that this be reconsidered, requiring the proposed top floor accommodation to be reconfigured.*

13. *The Combined Impact of Blocks A,B & G: For the reasons set out above we think that the combined effect of these new build blocks would be discordant when seen against the rest of the new build and the converted school building. The proposals for other parts of the site create a sense of place whereas Blocks A, B and G appear massive, overpowering and discordant, not respecting the character of the stone tenements nearby or the Conservation Area. The amenity of residents of Mentone Terrace in particular would be adversely affected. The Design and Access Statement itself we suggest finds it hard to justify the height of Block B, on page 51 referring to it as "a prominent marker". We do not think local people should have to put up with architectural jargon or a "prominent marker".*

Scheme 2

Grange and Prestonfield Community Council

This is a response on behalf of Grange/Prestonfield Community Council (GPCC) to your request for consultation of 1st May 2019. It is similar in content to comments on this amended application being sent in this week. On this site, in the Craigmillar Park Conservation Area, CALA propose to provide 49 dwellings, 21 apartments by conversion of the C Listed original School Building, 27 in new build on the site and 1 by adapting and extending the C Listed Gate Lodge. GPCC supports the change of use to housing and welcomes the conversion of the original School Building to apartments. Although the original Listed Gate Lodge is to be substantially extended, we agree this is necessary to create an up to date and viable dwelling. We note that all other buildings and later additions on the site are to be removed, except for the boiler chimney. We support this, as many are of indifferent quality and unsympathetic to the character of the original buildings. GPCC welcomes the prospect of this historic brownfield site coming to life again and the improved security for nearby residents resulting from this now vacant site being re-occupied.

So far GPCC has held two public meetings when CALA presented their proposals, on 10th December 2018 and 4th April 2019 and Notes have been produced of both meetings. At the 4th April meeting, revised proposals had a much better reception from those attending, than the original scheme announced on 10th December. The following comments in headed paragraphs are referenced to the 91 documents in the amended scheme and replace comments made on the original proposals.

Affordable Housing Obligation: This is addressed in a separate Policy Statement by Justin Lamb Associates (JLA) amended in May 2019. LDP Policy Hou6 requires that 12+ homes out of the 49 proposed for this site are of approved affordable housing tenures. This Policy states: "For proposals of 20 or more dwellings, the provision should normally be on site." LDP paragraph 232 states: "A key aim is that affordable housing should be integrated with market housing on the same site etc " Further on in the same paragraph "Provision on an alternative site may be acceptable.....if there are exceptional circumstances." JLA for CALA propose a commuted sum in lieu of onsite provision, citing affordable housing policy tests, with supporting financial statements. JLA also state in Part 2 that " the applicant has submitted a detailed costplan and construction costs schedule on a confidential and Open Book basis to the Council's Corporate Property Department, to provide evidence etc". We think any such information, denied to the rest of us, should not be taken into account in the assessment of this application.

Overall GPCC considers that JLA has not shown why there are such exceptional circumstances as to justify the setting aside of a key aim in the LDP. JLA seems to consider that cost alone justifies this approach and GPCC disputes this. Even accepting this argument, we suggest this might apply only to the conversion part of the development, with the new build affordable housing obligation being met on site. GPCC therefore objects to what is proposed.

Transport Statement Parts 1 & 2: This is a separate study by SWECO, amended in April 2019, and we agree with much of its content. We agree with the removal of existing car parking on the access road off Craigmillar Park and that this should be the only road access to the site. We support the retention of this as a pedestrian access and the gated pedestrian access onto Savile Terrace to encourage walking and cycling through the site. We note that overall there will be 130 cycle parking spaces provided.

CEC car parking standards stipulate no minimum provision, only a maximum, which at 49 vehicle parking spaces is what is proposed. Changes from the original proposals are welcome in making the car parking spaces less obtrusive. We make no comments on the revised car parking provision, except to point out that there are good bus services close by, with bus stops just outside the site entrance on Craigmillar Park and nearby on Mayfield Road. We acknowledge there is a balance to be struck between meeting the aims of CEC car parking policies and the risk of added pressure on street parking in the RPP Zone B6 in adjacent streets.

The SWECO study concludes that daily vehicle trips to and from the site when fully redeveloped may be no more than when it was in use as the school and Braille Press. However, there can be traffic problems on Craigmillar Park at this access, adjacent to the busy northbound bus stop, the church needing disabled access and the signal controlled pedestrian crossing. At peak times traffic on this busy primary route to and from the city can be backed up past this access. The study refers to the site access off Craigmillar Park as being a "priority access junction", but it is not clear what this priority is. There is a case for looking at this junction in relation to the adjacent signal controlled pedestrian crossing to see if there could be some integration of function to assist traffic in and out of the site and to aid pedestrian safety. We ask that this be considered in the assessment of this application.

Listed Gate Lodge: We have no objection to the downtakings shown for the Listed Gate Lodge or to the proposed substantial extension as we understand the need to change this building to offer better amenities for future residents. We welcome the changes made in the revised proposals so that they have less visual impact on the enclosed garden and lawn of Craigmillar Park Church and the War Memorial. We have some concern however that the detailing of the flat roof of the proposed extension to the Lodge introduces a jarring note at the site entrance and request that this be reviewed.

Conversion of Listed School Building: We support what is proposed for this building, with the exception of the glazing. The Royal Blind School installed uPVC glazing years ago, which in our view it should not have done, and it is now proposed to replace this on a like for like basis. We have to accept that CALA can do this, but we think it will detract from the character of the refurbished building and not respect or enhance the Conservation Area. There is an unfortunate contrast between the front elevation of the school building and the dwellings on the south side of West Savile Road with traditional sash and case. We hope that the proposed glazing can be reconsidered for the principal elevations, so that the existing glazing can be replaced with materials more in keeping.

The New Build Dwellings:

a) Glazing: UPVC is proposed throughout the new build housing on the site for windows and doors. Whilst we think this would detract from the setting of the Listed School Building and the character of the Conservation Area, we accept that it would be difficult to maintain an objection, when these materials have to be accepted for the Listed school building.

b) Cladding: The cladding is to be mainly of light wet dash render, dark grey brick to lower ground floor levels and natural buff stone, as well as the uPVC materials referred to above. Buff stone is to be used for the Gate Lodge extension. We have no further comments on the cladding proposed for the amended scheme.

c) Roofs: Flat roofs are now proposed for the new build in the amended scheme, except for the Garage Block fronting onto West Savile Road. This change has enabled roof heights to be lowered, which makes the new build more subservient to the original Listed School Building, emphasising its character. Whilst this approach may not be acceptable to all, in this context it enhances the coherence of the development, whereas sloping roofs would be of varying pitch or height due to the differing widths of the residential blocks. The durability of the flat roof materials compared with more traditional roofs ought, we suggest, to be further explored in additional supporting documentation.

d) General Arrangement: We think that the amended scheme layout works much better than the original and emphasises the character of the original school building, with the reduction in roof heights generally.

The landscaping scheme keeps to a minimum loss of existing trees and we support it. We support splitting Block A into 3 elements containing 6 Townhouses and welcome the reduction in roof height so as to have less adverse impact on winter sun into the Mentone Terrace dwellings. Taking into account the aluminium coping which raises stated roof heights slightly, the overall height of Block A is to be similar to the ridge height of the adjacent 7 Savile Terrace. Part 05 of the Revised Design and Access Statement shows visualisations from Savile Terrace and Mentone Terrace Gardens. The latter indicates that although there would still be some small loss of direct winter sunlight into habitable rooms of Mentone Terrace, this may be an acceptable compromise.

The amended Block B is to be of 5 Townhouses with a flat roof height very slightly lower than Block A. The same Part 05 referred to above also gives visualisations of this revised Block, which we think is now acceptable. Visualisations are also presented of Blocks C-F, on which we have no further comments, except to note that Block C appears not to score well in the Daylight and Sunlight Analyses. We trust therefore that in assessing this application, there will be a very vigorous examination of compliance with these standards for both the buildings to be on the site and those existing gardens and dwellings affected by this development.

Summary: GPCC supports much of this amended application, but some concerns still remain as set out above and we ask that these be taken into account in the assessment of this application.

Archaeology

No additional comments.

Communities and Families

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:

14 Flats (7 one bedroom flats excluded)

28 Houses

This site falls within Sub-Area BJ-2 of the 'Boroughmuir James Gillespie's Education Contribution Zone'.

The Council has assessed the impact of the proposed development on the identified education infrastructure actions and current delivery programme.

The 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' 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:
£293,594

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.

Transport Planning

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

1. The applicant will be required to:
 - a. Contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;
 - b. Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary;
 - c. Contribute the sum of £2,000 to promote a suitable order to introduce a 20pmh speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council. The applicant should be advised that the successful progression of this Order is subject to statutory consultation and advertisement and cannot be guaranteed;
2. In support of the Council's LTS Cars1 policy, the applicant should consider the provision of 2 car club vehicles. This would require the contribution of £12,500 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;
3. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;
4. A Quality Audit, as set out in *Designing Streets*, to be submitted prior to the grant of Road Construction Consent;
5. 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), 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) and timetables for local public transport;
6. The applicant should note that new road names may be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity;
7. The applicant should be advised that as the development is located in the extended Controlled Parking Zone, they will be eligible for one residential parking permit per property in accordance with the Transport and Environment Committee decision of 4 June 2013. See http://www.edinburgh.gov.uk/download/meetings/id/39382/item_7_7 (Category D - New Build and Category E - Sub divided or converted);

8. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property;

9. 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;

10. The developer must submit a maintenance schedule for any SUDS infrastructure for the approval of the Planning Authority.

Note:

- A total of 130 cycle parking spaces are being provided for the 49 units including: 1 space for the lodge, 100 spaces in Block H and 29 spaces within private garages. This is considered acceptable under the Council's standards.
- A total of 49 car parking spaces are being provided including 19 on-street, 29 in garages / porticos and 1 off-street for the lodge. There are 6 disabled spaces, 6 electric charging spaces and 3 motorcycle spaces. The 20 garages have electric charging provision.
- It is noted that a number of steps are proposed for the site. The applicant should satisfy themselves that they have addressed their responsibilities under the Equality Act 2010.

Flood Prevention

Given the constraints on this site it is a challenge to reduce the new build runoff down to greenfield levels as noted below. Whilst it is disappointing that the developer notes a discharge rate of 92.38l/s cannot be achieved with the current development arrangement we believe that it is possible should they change the development layout and reduce the number of units on the site and accommodate more attenuation for surface water. Planning should weigh up the other consultee inputs and consider whether an enforced change to the layout is appropriate for the submission (response dated 07/06/19).

Further clarification

Whilst the risk of flooding has been demonstrated to be acceptable to CEC, the principles of sustainable development have not. That being said Scottish Water are happy to accept the flows into their network. As a consultee Flood Prevention can only provide an opinion and the ultimate decision sits with Planning who must aggregate a number of different factors when recommending a decision (response dated 21/06/19).

Network Rail

We have examined the revisions to the proposal and do not have any new comments to make on the application.

Affordable Housing

WARD NO: B15

1. Introduction

Housing and Regulatory Services have developed a methodology for assessing housing requirements by tenure, which supports an Affordable Housing Policy (AHP) for the city.

Recommendation: Commuted Sum

- The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more.
- This is consistent with Policy Hou 6 Affordable Housing in the Edinburgh Local Development Plan.

2. Affordable Housing Provision

Application is for a development consisting of 48 homes and as such the AHP will apply, 12 units (25%) will be required to be provided as affordable housing.

In all instances for applications of 20 or more units, the Council expects the 25% affordable housing contribution to be delivered on-site, in a manner that is well-integrated. It is only in where the Council is satisfied that the affordable housing could not be viably delivered onsite by a housing association, that we consider alternative proposals.

Onsite RSL delivery was considered but discounted due to unusually high development costs associated with the project.

Cost Plan

- The applicant has submitted cost plan identifying the cost to build approximately £307,000 per unit. This figure is not inclusive of fees (at approximately 10%).
- CEC estates department asked independent surveyors Currie and Brown to carry out an appraisal of the development proposals. Currie and Brown ran their own appraisal using current standard development costs/assumptions and identified higher development cost than those submitted by the applicant. This figure is £338k per unit.
- o The costs submitted have therefore been verified as being accurate for the purposes of discussion of viability for an RSL to purchase in this location

Discrepancies between cost plans

Cost plan assessment by Currie and Brown identifies that overall there is a £1.4m discrepancy between the two submitted cost plans. Some of the costs submitted by the developer have been overestimated, however, there were some costs underestimated and this meant the overall figure has risen from £14.7m to £16.2m. This increase is due to the following main areas.

Underestimated Costs

- Fittings and Furnishings
- Services

Overestimated Costs

- External Works
- Substructure
- Superstructure

Places for People and LAR Hosing Trust have confirmed the project is not viable for them for to purchase units on this site, with unusually high development costs, presented to them at a rate of £307,000 per unit.

The reasons for these exceptionally high build costs are due to the presence of the listed building, conservation area requirements, such as natural stone for the new-build blocks.

These expensive-to-deliver requirements are not an area of cost savings that can be negotiated between the developer and the RSL. Any affordable housing would be expected to conform to these same standards in order to be integrated and tenure blind. RSLs operate within tight financial margins and could not meet the unusually high build costs associated with this project.

It is the view of RSLs and the housing service that the site would be non-viable even if the developer provided land for the RSL to design a 12 unit block on the site, as any new-build block would require the same natural stone and be subject to the same conservation area requirements as the proposed CALA units.

To summarise, if an RSL were to be in receipt of the maximum subsidy level, assisted by their own private borrowing, even with the maximum subsidy available the site would still face a shortfall 200,000 per unit to deliver for affordable housing, and is consequently non-viable.

RSL Purchase - Summary

- RSLs secure properties from developers at approximately £130,000 per unit.
- If the costs were closer to £130,000 there would be the potential to look at the use of commuted sums to support the development to make on site delivery viable.
- However, as they stand the opportunity does not present value for money, either in terms of the RSL own resources, or with the associated grant/commuted sums funding for an RSL to purchase at approximately £338,000 per unit
- There are some potential savings that could be identified for an RSL. However, the savings on space standards and on fittings and fixtures would not get close enough to £200,000 per unit required to bring into the realms of feasibility for an RSL.

Where the developer has clearly established that the development would not be viable for a housing association then the affordable housing policy allows for alternative methods of delivery to be considered. The developer has submitted an indicative sales cost, which makes golden share an unviable delivery model.

Summary

The housing service considers that options for onsite delivery have been explored and that as a last resort will accept a commuted sum payment in lieu of onsite affordable housing.

The developer will provide the commuted sum through a Section 75 agreement, paying the sum prior to the commencement of construction on the principal site. The sum will be used to support the delivery of affordable housing in the same or adjacent Ward of the city.

The commuted sum figure has been independently assessed by the District Valuer and is valued at £66,000 per unit.

The developer will be required to enter into a Section 75 legal agreement to secure the affordable provision. This should be included in the Informatives section of the report to committee. The commuted sum is likely to be paid in instalments, linked to site start. No project has been identified for the use of this sum to date but the Council and RSL development programme is ever increasing with an overall requirement for funding to support its programme.

Waste Planning

Thank you for getting the plans and swept path analysis to us. As discussed if the landscaping can be tightened up to allow the turning circles then everything else seems to be fine for waste collections. Please can you also ensure there is a dropped kerb at the bins store and areas where the kerbside bins will be pulled on to road from. I have attached our guidance and checklist for your information also.

Location Plan



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