

Development Management Sub Committee

Wednesday 7 October 2020

**Application for Planning Permission 20/00292/FUL
At Site 90 Metres South Of 2, Peffer Place, Edinburgh
Mixed-use residential led development comprising of
dementia care centre (Class 8), assisted living apartments
(Class 8), student accommodation (Sui Generis) and
commercial units (Class, 1, 2 or 3) with access, landscaping,
SUDS and car parking.**

Item number

Report number

Wards

B17 - Portobello/Craigmillar

Summary

The proposal will provide a mixed use development which is appropriate for the local centre setting. It will provide a range of care and supported residential accommodation which will meet the growing demands of the city's population in the future, alongside custom built student accommodation in a sustainable location which provides reasonable access to existing higher education facilities.

The layout and design of the building provides an appropriate response to the local context and will continue the regeneration of the Niddrie Mains Road corridor. The development will not impact adversely on the setting of nearby listed buildings and will provide a reasonable level of amenity to existing and future occupiers. Overall, the proposal complies with the Edinburgh Local Development Plan and there are no material considerations which outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LDPP, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LEN03, LEN09, LEN12, LEN16, LEN20, LEN21, LEN22, LTRA02, LTRA03, LTRA04, LHOU08, LRET05, NSG, NSGD02, NSGCDF, NSGSTU, LHOU02,

Report

Application for Planning Permission 20/00292/FUL At Site 90 Metres South Of 2, Peffer Place, Edinburgh Mixed-use residential led development comprising of dementia care centre (Class 8), assisted living apartments (Class 8), student accommodation (Sui Generis) and commercial units (Class, 1, 2 or 3) with access, landscaping, SUDS and car parking.

Recommendations

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

Background

2.1 Site description

The site is in the Craigmillar area of east Edinburgh. It is positioned to the immediate north of Niddrie Mains Road. The site extends to approximately 1.19ha and is within the urban area of the adopted Edinburgh Local Development Plan 2016 (LDP). It is located within the Craigmillar local centre as identified in the LDP.

The site slopes gradually from south to north, with a change in level of approximately 4m across the site. It is currently brownfield land, having previously being occupied by a DIY store which is now demolished. The central area of the site is rubble/hardstanding with some areas of self-seeded planting around the perimeter. There are a number of trees on the site which are mainly situated around the perimeter. These are most dense/ mature along the Niddrie Mains Road edge of the site.

Niddrie Mains Road forms the southern boundary of the site. The western site boundary is formed by a cycle/ pedestrian footpath beyond which lies a stone wall separating the site from the adjacent land, which is currently occupied by a mobile home park and Craigmillar police station beyond.

The East Neighbourhood Centre building is located immediately east of the site, fronting onto Niddrie Mains Road. The land behind this is currently under development for the new Castlebrae High School. On the site's northern edge is located a light industrial warehouse accessed via Peffer Place, which is currently in use as a Council transport services depot.

The site is located opposite the White House which is a two storey Category B listed art-deco style building (LB30325, listing date 7th December 1995). The Castlebrae Business Centre (formerly Niddrie Marischal Secondary school) which is Category B listed (LB49459, listing date 8th September 2003) comprising a two-storey flat-roofed quadrangular plan building with Art Deco Detailing lies to the north-east of the application site.

The site is located within the wider masterplan area for Craigmillar (reference 14/03416/PPP (varied by 14/03416/VARY). The PPP proposes a retail land use on the site. The Craigmillar Urban Design Framework also applies to the site.

2.2 Site History

Site

8 August 2013 - Revised Craigmillar Urban Design Framework (CUDF) approved by Planning Committee.

24 September 2015 - Planning permission granted for mixed use development inc. retail (class 1); financial, professional + other services (class 2); food + drink (class 3); business + employment (class 4); residential institutions (class 8); residential (class 9); assembly + leisure (class 11); sui generis flatted development + other associated works including car parking, public realm, access arrangements + works in general at Niddrie Mains Road Edinburgh (application reference 14/03416/PPP, varied by application 14/03416/VARY).

Surrounding area

23 February 2018 - Approval of matters specified in conditions for the erection of 194 new residential units, comprising 128 flats and 66 terraced houses, along with associated roads, pedestrian paths, parking courtyards, amenity space and soft landscaping (matters listed in conditions one i (a), two, three (excluding (h)), four, five and six) (as amended) at land at Niddrie Mains Road Edinburgh (Application reference 17/03244/AMC, varied by 17/03244/VARY).

10 May 2018 - Approval of matters specified in conditions for an educational, learning and teaching landscape design to the proposed SUDs basin (application reference 17/04998/AMC).

14 August 2019 - Planning permission granted for the erection of a new 3 and 4 storey secondary school with associated hard and soft landscaping, town square proposal, external sports provision and car parking at redevelopment site at Niddrie Mains Road Edinburgh (application reference 19/01771/FUL).

22 January 2020 - Planning permission granted for residential development comprising of 136 flatted units across 5 no. blocks; with associated parking, roads and landscaping at 100 Niddrie Mains Road Edinburgh EH16 4DT (application reference 18/02744/FUL).

Main report

3.1 Description Of The Proposal

The application is for full planning permission for the development of a mixed use development comprising student accommodation, 64 assisted living apartments and a residential care centre which specialises in dementia care facilities.

The dementia care facility will comprise 60 bedrooms for dementia care and 28 bedrooms for palliative care (88 bedrooms in total). The centre will care for residents with high dependency nursing needs as well as those living with dementia. The facility also includes shared communal spaces for residents including lounges and dining areas. Communal staff facilities are also provided. Entry to the facility will be via a main entrance onto the courtyard area. The facility will be secure for vulnerable residents, but is designed as a space which minimises the clinical character and provides a modern setting which specialises in dementia care.

The dementia care facility is positioned in the north of the site and will be three storeys in height (level -1 to level 1).

The assisted living accommodation includes 64 apartments, split across 46 one-bedroom apartments and 18 two-bedroom apartments. The facility is designed as bespoke specialist housing, designed to cater for the varying needs of those over 55 years of age. A range of communal areas for residents will be provided which includes a range of day spaces, gym, library and cinema room. Further communal and servicing space will be provided for staff facilities, laundry and kitchen spaces.

The assisted living accommodation is positioned in the east of the site, with the main entrance located via a reception area on Niddrie Mains Road. This part of the development will be three to four storeys in height (ground floor to level 3). Two commercial units will be provided on the ground floor of the assisted living accommodation block which will face onto Niddrie Mains Road.

Connections will be provided between the dementia care facility and the assisted living accommodation, with the intention that residents from both areas will be able to gather communally in a shared activity space. This space has been designed as a flexible area which could accommodate different group sizes and activities.

The proposal also includes student accommodation, with 153 bed spaces comprising 103 individual studio rooms and 50 bedrooms arranged in cluster units of five. The student accommodation building includes a range of shared amenity spaces including common rooms, a gym, recreation space and laundry facilities.

The student accommodation is located in the west of the site, and will be three to four storeys in height (level -1 to level 3, accommodating the change of level across the site). The principle entrance point to the student accommodation will be via Niddrie Mains Road, with a secondary entrance located within the central courtyard area.

Access into the site will be via the existing access junction on Niddrie Mains Road. Car parking will be provided in the central area of the site. There are 28 car parking spaces proposed and ten motorcycle spaces.

There is provision for 200 cycle spaces across the site. Secure indoor cycle parking is provided for the student accommodation (168 spaces) and shared provision for the supported living and dementia care facility (14 spaces). There are a further 18 visitor cycle spaces provided in the car parking area in the form of Sheffield cycle stands. The existing footpath along the western site boundary will be retained and enhanced.

Open space is provided in a range of character areas across the site. A garden area is located in the northern part of the site. Two outdoor courtyard spaces are located within the dementia care part of the building, which are accessed internally from the building. A third outdoor courtyard space is provided for shared use by the assisted living and student development, which has several access points from communal day spaces within the assisted living building. A strip of garden ground wraps around the eastern edge of the building. The roofscape includes some areas of sedum roofs which will not be accessible but will provide biodiversity opportunities.

Proposed materials include a palette of buff brickwork and a light shade of pre-cast concrete.

Public realm improvements are proposed along the frontage of Niddrie Mains Road including the introduction of street trees and the provision of an active frontage to the street.

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

- Planning Statement
- Pre-Application Consultation Report
- Design and Access Statement
- Townscape and Visual Appraisal
- Landscape General Arrangement Plan
- Noise Impact Assessment
- Air Quality Assessment
- Flood Risk Assessment
- Drainage Strategy Report
- Transport Statement
- Preliminary Ecological Appraisal
- Daylight Assessment Report
- S1 Sustainability Form
- Tree Assessment
- Tree Removal Statement
- Preliminary Bat Roost Assessment

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.

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 the development is acceptable in this location;
- b) the impact of development on the setting of nearby listed buildings is acceptable;
- c) the design, scale, layout and materials are acceptable;
- d) the proposed landscape arrangements are appropriate;
- e) access arrangements are acceptable in terms of road safety and public transport accessibility;
- f) the flooding and drainage arrangements are acceptable;
- g) the proposal is detrimental to the amenity of neighbours or occupiers of the new development;
- h) the proposal meets the sustainable standards in the Edinburgh Design Guidance;
- i) material representations or community council comments raise issues to be addressed;
- j) the proposals have any equalities or human rights impacts; and
- k) there are any other material considerations.

a) The principle of the development is acceptable in this location;

The site is in the urban area as defined in the Edinburgh Local Development Plan (LDP) and is located within the Craigmillar Local Centre area. The Edinburgh LDP map shows an Indicative Shopping Proposal (S1) within the site boundary. This notes the opportunity to enhance the role of the local centre through the development of new retail units and other local facilities as part of the wider regeneration of Craigmillar.

The site has an extant planning permission in principle (PPP) in place which provides an indicative masterplan for the regeneration of the Craigmillar area. The majority of this masterplan has now been built out. This application is separate from the previous PPP consent, however the proposals within the PPP masterplan are a material consideration.

The revised Craigmillar Urban Design Framework (2013) identifies the local centre as indicated in the LDP. It notes that within this area, shops on both sides of Niddrie Mains Road with street frontages are sought. It also notes that the main shopping area in Craigmillar should be a destination, with shops, businesses, community uses, some housing and other uses, with the aim of creating a mixed use community heart.

The proposed development considered in this application does not reflect the proposal for a foodstore as set out in the PPP consent, however it provides a mix of uses which

are aligned with the objectives of the Craigmillar Urban Design Framework as noted above. It will also provide two new retail units on the northern side of Niddrie Mains Road, located on the ground floor of the assisted living block. The remainder of the building frontages onto Niddrie Mains Rd will be occupied by active spaces including common rooms and reception areas within the student accommodation and assisted living blocks.

It is considered that the proposed mix of ground floor uses will complement the existing retail provision on the southern side of Niddrie Mains Road, and will continue the existing active frontage formed by the library in the Neighbourhood Centre building, and the new Castlebrae High School to the east of the site. This will create an improved street character which is appropriate for the local centre setting.

The location of the site within Craigmillar Local Centre will also be of particular benefit to future residents of the assisted living accommodation and dementia care facility, as it allows for easy access to the existing local community and retail facilities for residents who may have limited mobility. Policy Hou 2 Housing Mix supports proposals which meet a range of housing needs, including housing for older people.

Policy Hou 8 supports the development of purpose-built student accommodation in locations within the city which are a) appropriate in terms of access to university and college facilities, and where b) the proposal will not result in an excessive concentration of student accommodation.

The application site is located around 2km east of the University of Edinburgh's King's Buildings campus. It is also located 3km west of Queen Margaret University Campus. There are other student generating facilities within closer proximity of the site including the University of Edinburgh's Medical School at the Royal Infirmary, which is around 1km south of the site and the University of Edinburgh's Peffermill playing fields located 800m west of the site.

Niddrie Mains Road acts as a key bus corridor from which frequent bus routes connect the site with all of these facilities, as well as the higher education facilities within the city centre. The site location is therefore considered to be a reasonable location in terms of access to university by active travel or public transport methods and is acceptable with regards to part (a) of Policy Hou 8.

The site is located within an area characterised by a mix of development uses including community uses, retail and residential. The purpose of part b) of policy Hou 8 is to ensure that the development of student accommodation does not adversely affect the established community. The student accommodation proposed is in a purpose-built block which ensures that it is well managed and regulated. There is not an over concentration of student accommodation in the local area at present.

The Council's non-statutory Student Housing Guidance supports Policy Hou 8 as it suggests that there should be a balance between student and non-student housing. It states that criteria in LDP will be applied to proposals for student housing using the locational and design guidance. This specifies a preference for student housing locations close to university or college campuses, where the cumulative impact of student housing and other land uses has been considered, and notes that on larger

sites (over 0.25ha), new build residential development should form a minimum of 50% of the total new build housing and student accommodation gross floor area.

In this case, the proposed use of the remaining area of the site is a dementia care facility and assisted living accommodation. Whilst these proposed uses are not Class 9 (Residential) uses but are Class 8 (Residential Institutions) they are clearly residential in nature, and will provide accommodation which contributes to the changing demands of aging residents in the city in the future.

The gross floor area of the proposed development is 19,913 sq m, comprising 4966sq m of student accommodation, 5472 sq m of dementia care facility, and 6,475 sq m of assisted living accommodation. The proportion of the total development footprint which is used for student accommodation is 29.4%, which falls significantly below the 50% threshold for student accommodation use as set out in the Student Housing Guidance.

The proposal also complies with the requirement of the Student Housing Guidance to create "safe and pleasant places" with a "mix of uses" to ensure adaptability. The proposed development allows for a mix of studio and cluster units within the student development which is an appropriate balance of accommodation. In this regard, the mix of uses is compliant with policy Hou 8 and is acceptable.

Overall, the mix of uses proposed is compliant with the provisions of the Local Development Plan and the Craigmillar Urban Design Framework and is acceptable.

b) the impact of development on the setting of nearby listed buildings is acceptable;

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 require proposals to have special regard to the desirability of preserving the character of listed buildings or their settings, or any features of special architectural or historic interest which they possess.

LDP Policy Env 3 seeks to protect listed buildings from development that may be detrimental to the architectural character, appearance or historic interest of the building, or its setting. The site is located opposite the White House which is a two storey Category B listed art-deco style building, sitting on the corner of Niddrie Mains Road and Craigmillar Castle Loan.

The proposed development will form a new frontage onto Niddrie Mains Road, directly opposite the White House. The existing pavements on this stretch of Niddrie Mains Road have already been widened, and the White House and the site boundary are separated by 21m. Whilst the proposed development will sit at four storeys, and is therefore higher than the existing development on the southern edge of Niddrie Mains Road, it is considered that the width of the street and the change in character and increase in density along Niddrie Mains Road that has already taken place through the development of the Local Neighbourhood Hub building and ongoing Castlebrae High School development is sufficient to accommodate the building height as proposed.

Furthermore, the proposed height of four storeys is in compliance with the guidance set out in the Craigmillar Urban Design Framework. Whilst this height increase will change

the character of the northern side of Niddrie Mains Road, it is considered that this change will be an improvement and will create a stronger urban feel which is more characterful of a local centre, and will not impact negatively on the setting of the street or the White House.

Castlebrae Business Centre (formerly Niddrie Marischal Secondary school) is a Category B listed property comprising a two-storey flat-roofed quadrangular plan building with Art Deco Detailing, including a central tower detail on the front elevation. The proposed development is located to the south west of Castlebrae Business Park, around 40 m from the rear elevation of the listed building.

The scale and massing of the development steps down to the rear of the site, and the site levels fall by around 4m from Niddrie Mains Road level. The building in the southern part of the site will be a maximum of 3 storeys, of which the lower floor will sit at -1 level. The proposed development will therefore sit into the landscape form, which will minimise its impact on the setting of Castlebrae Business Centre. The area of garden space between the building and the rear site boundary softens the relationship with the building and the surrounding built context and the proposed development is not considered to have a negative impact on the setting of the listed building.

The impact of development on the setting of both listed buildings within proximity of the site is therefore considered to be acceptable and the proposal is compliant with policy Env 3.

c) the design, scale, layout and materials are acceptable;

Edinburgh Urban Design Panel

The proposals were presented to the Edinburgh Urban Design Panel at pre-application stage on 19th December 2018. The EUDP report can be found in appendix 1, consultation section. The scheme presented to the panel proposed the same mix of uses as per this proposal, but within a different site layout.

The panel supported the opportunity for a mix of uses on the site to support social and inter-generation relationships within the Craigmillar community and to reduce isolation. They also identified the site's potential for connections to Higher Education campuses and Edinburgh Royal Infirmary and welcomed the prospect of external courtyard spaces that could provide therapeutic benefits, subject to design development.

A key matter raised by the panel for further consideration from the applicant was the need to ensure that the proposals responded to the design principles set out in the Craigmillar Urban Design framework, to ensure that the development could make a positive contribution to the local townscape and public realm. They also noted a need for the scheme layout to create a cohesive layout of buildings, access and outdoor spaces to provide opportunities for interaction, and to demonstrate that the proposed uses could be effectively integrated within the local centre.

The applicant has considered the issues raised and has submitted a complete redesign of the site layout following the comments raised at the Urban Design Panel.

Context and layout

In assessing the scale, layout and design of the proposals, LDP policies Des 1 (Design Quality and Context) to Des 8 (Public Realm and Landscape Design) provide a robust framework along with the Edinburgh Design Guidance.

Policy Des 1 (Design Quality and Context) requires development to demonstrate that the proposal will create or contribute towards a sense of place. Design should be based on an overall design concept that draws upon positive characteristics of the surrounding area.

A key underlying principle of the Craigmillar Urban Design Framework is to strengthen the vitality and increase the viability of the local centre on Niddrie Mains Road. The applicant has submitted supporting information to demonstrate how the design of the scheme will sit within the context of this local centre. The surrounding built environment is characterised by a mix of urban form and massing and is subject to ongoing change through the regeneration of Craigmillar.

The proposed development introduces a new mix of uses into the local centre, which are complementary to the existing community and retail uses and provide a new opportunity for vulnerable groups to live within the context of an active local centre.

The site layout has been arranged to accommodate the varying specific needs across the mix of uses. The dementia care centre is located at the rear of the site, in order to allow this part of the building to be kept secure for vulnerable residents. The garden space to the rear of the building and two internal outdoor courtyards will be completely secure to allow safe use by residents of the centre.

The assisted living apartments are located in the eastern part of the site, with a frontage onto Niddrie Mains Road. The student accommodation is located in the western part of the site. These uses will have a greater connection to the local centre in terms of residents' daily needs, and therefore are well located within the development in this regard.

The assisted living and student accommodation blocks facing onto Niddrie Mains Road will help to activate the street frontage through their ground floor uses which will include their main entrances, communal areas within the building, and two retail units on the ground floor of the assisted living apartments. This is in line with the guidance set out in the Craigmillar Urban Design Framework which seeks an improved level of street activity within the local centre area. The proposed layout will provide a strengthened edge to the northern side of Niddrie Mains Road and will clearly define the edge of the block.

The main internal courtyard area within the scheme will have a semi-private character, which will allow residents of the assisted living and student accommodation to share the open space provision.

The student accommodation building will overlook the existing footpath which runs down the western edge of the site. The layout will improve the setting of this route by providing natural surveillance, improved lighting and a safer, more attractive pedestrian connection for users.

The built footprint of the student accommodation along the western edge of the site has been redesigned during the application assessment process in order to provide a reasonable set back from the site edge. There is a set back between the building and the western site boundary of between 5.6m and 8.5m. This allows for the existing footpath to be widened to a minimum of 4m and provides a reasonable set back to ensure that any future development on the adjacent land to the west is not prejudiced.

To the eastern site boundary, there is a strip of garden ground between the building and site boundary which provides a minimum width of 3m. The existing set back and shared garden ground provision along the east of the site is considered to be sufficient given the existing land uses on the adjacent site.

Height, density and massing

Policy Des 4 (Impact on Setting) requires that proposals respond positively to the surroundings in relation to height and form, scale, proportions, positioning and materials. Furthermore, the Craigmillar Urban Design Framework notes that "architecture within an urban block should respect and respond to its adjacent sites."

The development site drops in level by approximately 4m from south to north. The site proposed massing of the building has been designed to account for this change in level, and the building steps down in height into the landscape. The building forms a four storey frontage onto Niddrie Mains Road, dropping to three storeys (including a basement -1 level) at the rear of the site.

The variation of height across the site allows a strong urban edge to be formed fronting onto Niddrie Mains Road, which meets the aspirations set out within the Craigmillar Urban Design Framework for the local centre. The height of the student accommodation block along this frontage has been revised from five storeys to four storeys during the assessment process in order to improve the scale and massing of the development. By stepping down to the rear, the development changes in character and is able to be absorbed into the surrounding townscape effectively. The proposed building heights respond appropriately to the adjacent built form and the physical characteristics of the site.

Whilst responding to the site characteristics and guidance set out within the Craigmillar Urban Design Framework, the massing of the building is also distributed according to each accommodation type. This allows for a lower domestic scale to be achieved at the rear of the block where the dementia care centre is located.

The applicant has undertaken a visual and townscape appraisal in support of the application. In terms of key city views, the proposed development has been assessed from six potential affected views. The appraisal concludes that the development will be visible from three key views. Of these, two viewpoints (S19 and S20 from the former A68 near Dalkeith) are located a significant distance from the site. The development as proposed will have a negligible impact on these receptors due to its scale and distance from the viewpoints.

The visual appraisal notes that the development will be visible from key view S12A Craigmillar Castle to Inchkeith Island. This is a panoramic view across the cityscape towards the Firth of Forth. The visual impact of the development on this viewpoint has been assessed as moderate and slight adverse during construction/ short term, but once the building is completed and the sedum roofs are established the impact is assessed to be minor and slight beneficial. The impact on this viewpoint is considered to be reasonable in the context of the wider regeneration of the Craigmillar area and is acceptable.

With regards to local views, the introduction of new developments in Craigmillar such as the Neighbourhood Centre building and the emerging Castlebrae High School building have already changed the density and massing of development along the Niddrie Mains Road corridor. The applicant has provided an assessment of local views which finds the visual impact of the proposals along Niddrie Mains Road and Peffermill Road to be medium, with a moderate-minor and slight adverse effect during construction phases. Once the landscaping strategy for the site has been implemented in the medium to long term, this impact is assessed to be minor and beneficial.

It is noted that the proposed development has been amended during the assessment process to remove an element of five storey development from the Niddrie Mains Road frontage as part of the student accommodation block. This amendment has reduced the visual impact of the development on local views along Niddrie Mains Road.

The proposed landscape strategy for the site will include the introduction of street trees along the Niddrie Mains Road frontage which will relate to proposals for the new Craigmillar Town Square area of public realm. This will create overall improvements to the streetscape and is in keeping with the design principles set out in the Craigmillar Urban Design Framework.

The new development has been designed to address the existing and emerging street scene and whilst it will result in a change of character to the street, is considered to be acceptable in terms of impact on the local townscape and an appropriate addition to the local centre.

In summary, the development will sit within a wider context of change within Craigmillar and is not considered to have any significantly adverse impacts on the townscape characteristics of the area. The proposed mix of building height and massing is reflective of new development in the wider Craigmillar area. It is appropriate to the context of this site within Craigmillar local centre and is acceptable for this location.

Design and materials

The building is designed as a single footprint in order to allow for the creation of internal connections between the assisted living accommodation and the dementia care facility. It will also allow the dementia care facility and its garden area to function as a secure and attractive space for residents.

Proposed materials include a palette of buff brickwork and a light shade of pre-cast concrete. The suggested colour palette seeks to draw on the Art-Deco precedent that exists in the local area. The specifications of materials are not approved at this stage and a condition will be added to the consent to allow this to be addressed at post-consent stage.

The dementia care facility part of the building has been designed to incorporate bay windows along the southern, eastern and internal courtyard elevations. This design feature will break up these elevations visually, minimise the sense of massing in this lower part of the site and maximise the opportunity for natural light to reach all bedrooms. This will also allow the south facing rooms to have high quality views towards Arthur's Seat, which will provide a good level of visual amenity for the residents occupying these rooms.

The elevational treatments of the student accommodation block and assisted living accommodation block will comprise a simple form with regular fenestration detailing and a good balance between solid and void. Full height windows are utilised across the development to maximise natural light. The principle southern elevation onto Niddrie Mains Road will include a brick finish for ground and first storeys, with pre-cast concrete proposed at upper storeys. This presents a simple elevation to the streetscape which will complement the existing built environment. A higher proportion of glazing will be incorporated at ground level to increase visual connection between the building and street level.

A simple mix of elevational treatments using the same palette of materials will be utilised on the east, west and internal courtyard treatments for the student accommodation and assisted living. Part of the roof will be finished with sedum, which helps to provide biodiversity opportunities and minimise the visual impact of the roofscape. The design and materials proposed for the building provide a simple and contemporary design solution for the site which is appropriate for the setting.

It is concluded that the design, scale, layout and materials are acceptable and the Local Development Plan policies in respect of design principles and guidance set out in the Edinburgh Design Guidance and Craigmillar Urban Design Framework are met.

d) the proposed landscape arrangements are appropriate;

Landscape strategy

The proposed landscape strategy for the site seeks to create a range of character spaces as follows;

An area of shared green space will be provided to the north of the building, which will be accessed via the dementia care centre, and will be kept secure for those residents. This space will include a SUDs area managed as a rain garden that will provide interest as well as a range of informal seating areas, new tree planting and green spaces.

Two internal courtyards are located within the dementia care centre, which will provide further outdoor space which is secure for residents use. These will be a mix of hard and soft landscaping to provide access to residents with seating areas provided.

A larger courtyard area will be provided beside the assisted living block which will be open for use by students and residents of this block. This space will include a mix of hard and soft landscaping treatments with a mix of grassed areas, hardstanding and ornamental shrub planting.

Improvements will be made to the Niddrie Mains Road frontage which align with the improved public realm character to the east of the site. New street trees will be provided along the building frontage which will extend the existing character of the improvements made outside the East Neighbourhood Centre and the new Craigmillar Town Square.

The general layout of the open space provides a mix of character spaces. The detailed specification and proposed maintenance plan for the proposed landscape strategy is not confirmed at this stage. A condition is attached to this application to allow these matters to be addressed at pre-commencement stage.

Trees

Policy Env 12 seeks to protect trees or any other woodland worthy of retention from removal from a site unless necessary for good arboricultural reasons.

A tree survey has been undertaken by the applicant, which is supported by an additional appraisal of the existing trees on the site and their value to the character of the surrounding neighbourhood. The site has 50 trees on it at present, which are largely located around the perimeter of the site, with a cluster along the Niddrie Mains Road frontage of the site. The tree survey states that the site has one Category A tree, 14 Category B trees with the remaining trees of lesser quality.

The trees on site are a mix of species with some planted as part of the landscaping for previous uses on the site, and others self-seeded. The existing trees fronting onto Niddrie Mains Road were previously part of a longer tree belt which ran east from the site along the street frontage. This line of trees is now largely gone following the development of the adjacent sites to the east. It is proposed that all trees on site will be removed and replaced with tree planting selected specifically for the landscape strategy on the site and to fit with the changing townscape character of Niddrie Mains Road.

The character of Niddrie Mains Road of which the tree belt was once part of has now significantly changed, with the recent formation of a stronger built frontage onto the northern side of the street due to the development of the East Neighbourhood Centre and the ongoing development of Castlebrae High School. The area formerly occupied by the historic tree belt has been replaced in part with a high quality, connecting public realm, with new tree planting to mitigate the loss of the historic trees.

The proposed layout for the site seeks to continue this built frontage along to the northern edge of Niddrie Mains Road, and in order to achieve this, it is difficult to retain the existing trees on site. Furthermore, the applicant has identified that the majority of trees along the northern edge of Niddrie Mains Road are not an appropriate species mix to be integrated as street trees, due to the form of their roots beneath the ground. The viability of the existing trees as part of a future streetscape is therefore limited, and would impact adversely on the creation of a continued strong urban frontage along the northern side of Niddrie Mains Road.

The proposed development will provide new street trees along the frontage of Niddrie Mains Road which will tie in with existing street trees in place at the East Neighbourhood Centre and the proposals for Craigmillar Town Square, which is currently under construction as part of the Castlebrae High School public realm proposals. The detailed landscape specification for the site will be dealt with by condition, and the applicant will be required to demonstrate that a satisfactory mix of species in terms of mix and maturity will be provided in order to ensure that the emerging streetscape is of a high quality that reflects the surrounding changes of the local centre and the aspirations of the Craigmillar Urban Design Framework. Taking the above into consideration, the loss of existing trees on site is considered to be acceptable.

e) Access, road safety and parking arrangements

Transport impacts

Policy Tra 1 of the LDP aims to reduce travel demand and encourages accessibility to major development by modes alternative to the car. The site is located immediately adjacent to Niddrie Mains Road, which provides a frequent bus service with bus stops located within 100m of the site. A transport statement has been submitted in support of the application and has concluded that the amount of traffic generated will not impact adversely on the surrounding network. The Roads Authority has raised no objections to the application in this regard.

Access and servicing

Vehicular access to the site will be taken via the existing access point into Niddrie Mains Road. A service layby is proposed on Niddrie Mains Road.

Both of these aspects will require to be considered in further detail through the road construction consent process and a Section 56 Roads Opening Permit process. This process will ensure that the proposed access junction and the proposed servicing layby on Niddrie Mains Road are designed to allow for the appropriate level of pedestrian priority that is required, and to ensure that the existing bus stop on Niddrie Mains Road will not be adversely impacted.

It is also noted that the Council has longer term plans for Niddrie Mains Road in terms of active travel, and any infrastructure that forms part of the road could be altered or removed as part of any future project. An informative has been added to the consent to address the matters noted above.

The existing footpath to the west of the site will be retained. The proposed layout of the site makes an allowance for the footpath to be widened up to a minimum of 4m along the site boundary. The amenity and safety of this route will be improved by the location of the student accommodation, which will face onto this route, and the footpath lighting will be upgraded to current standards.

Improvements will be made to the public realm of the existing footpath along Niddrie Mains Road including the introduction of street trees. This will complement the existing public realm improvements that are planned at the east of the development site at the new Craigmillar public square and will contribute to the urban character of the townscape.

Internally, the scheme has been designed to be fully accessible. All main entrances will be at grade with the surrounding streets, and lifts are provided within the development to allow for access for all.

Parking

Parking will be located in the central area of the site, adjacent to the student accommodation building and will not impact on the character of the streetscape along Niddrie Mains Road. The scheme includes provision for 28 car parking spaces and ten motorcycle spaces which falls significantly below the maximum permitted level of parking allowed for the proposed mix of uses.

Six car spaces will be for the student accommodation. Of these, four spaces will be for staff use and two spaces will be available for students for use on arrival/ departure dates. The two occasional use spaces will be secured by bollards to prevent uncontrolled use. There will be no day to day parking provision for students.

The remaining 22 car spaces will be allocated for use by the assisted living accommodation and dementia centre.

The parking provision includes four accessible spaces and five spaces fitted with electric vehicle charging facilities. The proposal complies with the guidance set out in the Edinburgh Design Guidance in this regard.

Cycle parking provision for the scheme meets the requirements of the Edinburgh Design Guidance. Provision is made for 168 cycle parking spaces for the student block, which will be located on the lower ground flood and is accessed via the existing footpath running along the west elevation. A further 14 secure internal cycle spaces will be provided for shared use by the supported living and dementia care centre. Visitor parking for 18 cycles will be provided in two locations within the car parking area by way of Sheffield type stands.

The proposed car and cycle parking strategy for the development meets the policy and guidance requirements. There are no Transport objections to the proposal subject to the recommended informatives. A contribution will be sought for footway and carriageway works and the provision of City Car Club vehicles as noted in the informatives attached to this application. The proposal complies with Local Development Plan Transport policies and is acceptable.

f) the flooding and drainage arrangements are acceptable;

LDP policy Env 21 aims to ensure that the development will not result in an increase in flood risk for the site being developed or elsewhere.

The application is supported by a Flood Risk Assessment and a Drainage Impact Assessment. The flood risk assessment concludes that the development is at low risk of flooding from pluvial and fluvial sources. The applicant has agreed appropriate finished floor levels with CEC Flood Planning to ensure that these are satisfactory.

Policy Des 6 (Sustainable Buildings) requires that new development does not contribute to any flood risk on the site. The proposed underground storage SUDs strategy for the site has been reviewed by CEC Flood Planning and is deemed appropriate given the proposed end use of the site. CEC Flooding advise that they are satisfied with the proposed drainage and flood prevention strategies for the site. The proposal complies with LDP policy Env 21.

g) the proposal is detrimental to the amenity of neighbours or occupiers of the new development;

Policy Des 5 (Amenity) relates to the amenity of existing and future occupiers and seeks to ensure that new development does not result in detrimental impacts on local existing and proposed amenity of residents including daylight, sunlight, overshadowing, privacy and noise.

There are no existing residents surrounding the site boundary, with the surrounding land currently in use for a range of non-residential purposes.

Daylight

The building has been designed to incorporate full height windows on all elevations. The dementia care facility in the north of the site includes bay windows along the north and eastern elevations, and within the courtyard spaces. This allows each bedroom to receive the maximum possible amount of daylight.

The applicant has undertaken a daylight assessment to support the proposal. This applies the no skyline method to the proposal, as recommended in the Edinburgh Design Guidance. The assessment concludes that all accommodation will receive an adequate amount of daylight. The proposal is therefore acceptable in this regard.

Sunlight

The Edinburgh Design Guidance sets out guidance on the acceptable amount of sunlight that should be received within open spaces in new development. The Edinburgh Design Guidance notes that half the area of outdoor open spaces should be capable of receiving potential sunlight on the spring equinox (21st March) for three hours. The applicant has submitted a sunpath assessment of the open spaces which demonstrates that these standards are achieved across the site as a whole.

Privacy

The layout allows for a reasonable distance to be provided between habitable rooms in buildings whilst achieving an appropriate density of development and is acceptable.

Open Space

The total green space proposed on the site is approximately 26% of the total site area (excluding car parking areas which do not contribute to open space amenity). The provision of open space on the site is designed to accommodate the particular needs of future residents and provides a good mix of character areas. This is acceptable.

h) the proposal meets the sustainable standards in the Edinburgh Design Guidance;

The applicant has submitted a sustainability statement in support of the application. The application is classed as a major development and has been assessed against Part B of the standards.

The proposal meets the essential criteria in terms of energy needs and satisfies policy Des 6 of the Local Development Plan.

i) material representations or community council comments raise issues to be addressed;

No comments have been received for this application.

j) the proposals have any equalities or human rights impacts; and

The application is not found to have any impacts on equalities or human rights. All users within the building will be provided with level access entrances and the development will be required to meet with current building standards.

k) there are any other material considerations.

Environmental Protection

Site Investigation

Environmental Protection has raised no objection to the application, subject to compliance with conditions relating to completion of a site survey prior to the commencement of development, and where necessary, the preparation of a detailed schedule of any remedial and/ or protective measures for the site.

Noise

The applicant has submitted a Noise Impact Assessment to support the application. Environmental Protection has reviewed this report and note that it is satisfactory on the basis that a condition is attached to ensure that recommendations made in the report are met in relation to glazing requirements.

Air Quality

The applicant has submitted an air quality assessment to support the application. Environmental Protection is satisfied within the report on the basis that conditions are met. These relate to the provision of electric vehicle charging points (six no. required) and the restriction of use on the proposed commercial units to Class 1, 2 or restricted Class 3 (i.e. no cooking on the premises) uses. A condition is attached to this effect.

Archaeology

With regards to archaeology, the site occupies land formerly used as a brewery, and is therefore considered as an area of archaeological potential. It is essential that an archaeological mitigation strategy is undertaken in this area prior to development. Therefore, following the advice of the city archaeologist, a condition is recommended to ensure that a programme of archaeological works is carried out prior to the commencement of development. There is also a requirement noted within the attached landscape condition to explore a public realm strategy for the site which interprets the site's heritage as a brewery.

Waste

The waste requirements of the development will be serviced by a private contractor. CEC Waste Services has been consulted on this application and had confirmed that this is acceptable. In the case that the applicant choses to amend their private waste uplift agreement and revert to CEC Waste Services then the development will be required to meet the CEC guidance at their own cost. An informative is added to the consent to this effect.

Ecology

A preliminary Ecological Survey has been carried out for the site. The ecology survey identified the potential for bats within the trees on site, and therefore a supporting Bat Survey has been undertaken by the applicant. The bat survey has assessed the potential for buildings within the site to support bats and to identify the presence and location of any bat roosts on site. The bat study has found no bat activity on site and therefore these are not considered to be a constraint to development. The requirements of policy Env 16 Species Protection have therefore been met.

Conclusion

The proposal will provide a mixed use development which is appropriate for the local centre setting. It will provide a range of care and supported residential accommodation which will meet the growing demands of the city's population in the future, alongside custom built student accommodation in a sustainable location which provides reasonable access to existing higher education facilities.

The layout and design of the building provides an appropriate response to the local context and will continue the regeneration of the Niddrie Mains Road corridor. The development will not impact adversely on the setting of nearby listed buildings and will provide a reasonable level of amenity to existing and future occupiers. Overall, the proposal complies with the Edinburgh Local Development Plan and there are no material considerations which outweigh this conclusion.

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

3.4 Conditions/reasons/informatives Conditions

1. 1. Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
 - ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
2. The following noise protection measures to the proposed development, as defined in the Cundal 'Environmental Noise Assessment' report (Ref 1022791-RPT-AS-001), dated 9 December 2019:
 - Glazing units with a minimum insulation value of 4/16/4mm double glazing shall be installed for the external doors and windows of the 1F Bedroom E, 1F Day Lounge E and 2F Bedroom W with supporting trickle vents allowing for a minimum sound reduction of $D_{n,e,w}$ 27dB.
 - Glazing units with a minimum insulation value of 6/16/8.8mm double glazing shall be installed for the external doors and windows of the Ground Floor

Common Room SW, and 1F Studio S with supporting trickle vents allowing for a minimum sound reduction of $D_{n,e,w}$ 35dB.

shall be carried out in full and completed prior to the development being occupied.

3. Cooking, heating and reheating operations on the premises shall be restricted to the use of a Panini machine, toasty machine, baked potato oven, soup urn and one microwave only; no other forms of cooking, heating and reheating shall take place without prior written approval of the Head of Planning and no odours shall be exhausted into any neighbouring premises.
4. A minimum of Six parking space shall be served by 7Kw (32amp) Type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied.
5. A fully detailed landscape plan, including details of all hard and soft surface and boundary treatments and all planting, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site. Full details of the proposed landscape maintenance plan should be included in this submission. This will include;
 - i) Provision of a hardworks plan including details and materials for all surfacing, walls, fences, gates, street furniture and any other boundary treatments. It is noted that all kerbs are required to have a minimum 50mm upstand to allow for equal access for all;
 - ii) The location of all new trees, shrubs and hedges within the residential area, including details of tree trenches, tree pits and raised planters;
 - iii) A schedule of plants to comprise species, plant size and proposed number/density;
 - iv) Details of a public realm strategy which provides interpretation of the site's brewing heritage. This should be designed to facilitate general interest, create a sense of place and help promote the wellbeing agenda by stimulating the care of dementia sufferers who will reside on site.
 - v) Programme of completion and subsequent maintenance of landscaping.

The approved landscaping scheme shall be fully implemented within 6 months of the completion of the development.

6. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication, public engagement and interpretation) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.
7. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.

Reasons:-

1. In order to ensure that the site is suitable for redevelopment.
2. In order to protect the amenity of the occupiers of the development.
3. In order to protect the amenity of the occupiers of the development.
4. In order to ensure that adequate provision for electric vehicle charging is provided on site.
5. In order to enable the planning authority to consider this/these matter/s in detail.
6. In order to safeguard the interests of archaeological heritage.
7. In order to enable the planning authority to consider this/these matter/s in detail.

Informatives

1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
3. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
4. Prior to occupation of the development, details demonstrating that noise from all plant (including air source heat pump system) complies with NR25 within the nearest residential property (with window partially open for ventilation purposes) shall be submitted for written approval by the Head of planning and Building Standards.
5. A rapid taxi charger should be installed - 70 or 50kW (100 Amp) DC with 43kW (63 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.
6. A chimney height calculation will need to be submitted in accordance with the Clean Air Act if a gas boiler is being considered.
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;

For avoidance of doubt the proposed access junction and layby on Niddrie Mains Road is not agreed at this stage (see note IV for further detail);

In support of the Council's LTS Cars1 policy, the applicant should consider contributing the sum of £18,000 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;

The applicant should note that the Council will not accept maintenance responsibility for underground water storage / attenuation;

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

All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;

8. The developer must submit a maintenance schedule for the SUDS infrastructure for the approval of the Planning Authority.
9. The applicant is encouraged to provide details of tree-pits in both hard and soft landscape areas to control quality of implementation of new trees.
10. Tree guards or other suitable protection are recommended for trees in public open spaces to protect them from vandalism.
11. Swift bricks should be incorporated into the building. Proposed locations should be approved by the planning authority.
12. The applicant has agreed that waste uplift will be carried out by a private operator. Should the applicant wish to revert to waste uplift from CEC Waste Services they will be required to meet CEC guidance on this matter at their own cost.

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 meets 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

Pre-Application Process

The application was subject to pre-application advice.

A Proposal of Application Notice was submitted and registered on 25th April 2019 (19/02043/PAN) and presented to Development Management Sub-Committee on 19 June 2019.

Public exhibition events were held on 18th June 2019 at Craigmillar Library. The event was advertised in the Edinburgh Evening News and via a poster/ leaflet drop campaign and other social media methods.

Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online services.

The application was considered by the Edinburgh Urban Design Panel in December 2018.

Public summary of representations and Community Council comments

Neighbour notification was undertaken on 28 January 2020. No comments were received from members of the public regarding the application. No comments were made by Craigmillar Community Council.

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 located in the urban area of the Local Development Plan. It is within the Craigmillar Local Centre. The provisions of the Craigmillar Urban Design Framework apply to the site.

Date registered

24 January 2020

Drawing numbers/Scheme

01, 02, 03A - 13A, 14, 15A, 16 - 19,

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Julie Ross, Planning Officer

E-mail:julie.ross@edinburgh.gov.uk

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

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 Des 7 (Layout design) sets criteria for assessing layout design.

LDP Policy Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

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 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 20 (Open Space in New Development) sets out requirements for the provision of open space in 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 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 Hou 8 (Student Accommodation) sets out the criteria for assessing purpose-built student accommodation.

LDP Policy Ret 5 (Local Centres) sets criteria for assessing proposals in or on the edge of local centres.

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.

Non-statutory guidelines 'The Craigmillar Urban Design Framework' sets out a vision and principles for development of the Craigmillar area.

Non-statutory guidelines Student Housing Guidance interprets local plan policy, supporting student housing proposals in accessible locations provided that they will not result in an excessive concentration.

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.

Appendix 1

**Application for Planning Permission 20/00292/FUL
At Site 90 Metres South Of 2, Peffer Place, Edinburgh
Mixed-use residential led development comprising of
dementia care centre (Class 8), assisted living apartments
(Class 8), student accommodation (Sui Generis) and
commercial units (Class, 1, 2 or 3) with access, landscaping,
SUDS and car parking.**

Consultations

Urban Design Panel

The Panel welcomed the opportunity to provide design advice for this proposal at an early stage in the design process and noted with interest the proposed concept to mix student housing, assisted living and dementia care within a local centre location. However, the Panel, felt strongly that the integration of much needed care facilities with each other and the local townscape presented a series of challenges to the site layout and design which had not yet been satisfactorily addressed.

In particular the Panel supported:

- the site's potential for connections to Higher Education campuses and Edinburgh Royal Infirmary;*
- the opportunity for the mix of uses to support social and inter-generational relationships within the community and reduce isolation; and*
- the prospect of external courtyard spaces that could provide therapeutic benefits subject to design development.*

In developing the proposals, the Panel suggested the following matters be considered further:

- ensure design principles from the Craigmillar Urban Design Framework are followed to make a positive contribution to the local townscape and public realm;*
- demonstrate that the proposed uses can be effectively integrated within the local centre, seeking advice in the fields of landscape architecture and design for older people and those with cognitive impairments; and*
- review the site layout concept to improve permeability, integration with boundaries and adjacent uses to create a cohesive layout of buildings, access and outdoor space to provide for social interaction and therapeutic benefits.*

2. Planning Context

An application will be submitted for full planning permission.

The site is approximately 2.9ha hectares in area and lies to the north of Niddrie Mains Road in Craigmillar. The site was previously occupied by a retail warehouse and subsequently was granted planning permission for a temporary change in use of the vacant site to an overspill vehicle parking area for the neighbouring depot. The site currently comprises an area of open scrubland and hardstanding. The southern boundary of the site is formed by Niddrie Mains Road. To the west, adjoining land includes a residential caravan site and Craigmillar Police Station. A solid 2m boundary fence forms the southern and western boundary treatment. Land to the north of the site is occupied by the Castlebrae business and industry area. Land to the east is bounded in part by the Craigmillar East Neighbourhood Centre, and an area of open space, on which the future development of the relocated Castlebrae High School is planned.

Development is proposed on site for a mixed residential development. The uses are to comprise an assisted living facility, a dementia care unit and student accommodation. The proposal will also include access, landscaping and garden space, Sustainable Urban Drainage, car and cycle parking and associated infrastructure.

The proposal is located in the Craigmillar Local Centre area as set out in the Adopted Edinburgh Local Development Plan (2016). Any development proposal should comply with the relevant LDP policies. The site is also located within the area covered by the Craigmillar Urban Design Framework (2013). An application for a mixed use masterplan on land including the site and to the east of the existing East Neighbourhood Centre was granted in September 2015 (ref: 14/03416/PPP). Subsequent applications have been approved for individual plots within the wider masterplan area.

A temporary planning application (ref: 14/00091/FUL) for a change of use from the vacant site to an overspill parking area was granted in March 2014. This consent was effective for a three year period and has now expired.

In the surrounding area, an application for public realm works at Craigmillar town square on land between the immediate south of the site boundary and Niddrie Mains Road was approved in June 2016 (ref: 16/02697/AMC).

No declarations of interest were noted.

This report should be read in conjunction with the pre-meeting papers.

This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations who are represented at the Panel forming a differing view at the proposals at a later stage.

3. Panel Comments

The Panel had detailed comments as follows:

The Panel welcomed the opportunity to offer advice on the proposals at this very early stage of the design process.

Land Use

The Panel noted with interest the intention to mix student accommodation, assisted living and dementia care within the local centre location. This brought with it opportunities for those residing within assisted living apartments to access vital services, maintain a degree of independence and reduce isolation, whilst for students it offered access by sustainable means of transport to Higher Education campuses and Edinburgh Royal Infirmary.

The Panel expressed concern, however, that levels of activity in the local centre and its environs could make it extremely challenging to create a calm environment for older people and those with dementia, given proximity to Niddrie Mains Road, Castlebrae High School site and business and industry use to the north. To ensure the proposed uses could be satisfactorily integrated in this location, the Panel expressed the need for specialist advice in landscape architecture and the clinical care and design for those with cognitive impairments. Dialogue with the design team for Castlebrae High School was also encouraged.

Layout Concept

The Panel referred to the need to reflect the vision and planning principles for development set out in the Craigmillar Urban Design Framework. In particular, how the site's built form and landscape structure sit within the wider urban grain.

The circular design for the dementia unit was noted in terms of providing a self-explanatory layout. However, the Panel felt that this clarity was not reflected by the overall configuration of buildings on site, which appeared divided into three functions and did not express their inter-dependent relationship.

The Panel recommended further analysis of the local centre context, existing and committed developments (including Castlebrae High School) to ensure the layout, access arrangements and landscape structure respond positively to adjacent uses.

The Panel noted that the proposed student accommodation related in part to the scale of the East Neighbourhood Office and Craigmillar Library but felt it did not maximise the site's south facing aspect and could overshadow the dementia unit and gardens.

The Panel considered that other uses might lend themselves to the local centre location and street frontage. Bringing the assisted living apartments closer to community life on Niddrie Mains Road could enable a degree of independent living for less mobile residents. The design must also respect the setting of the category B Listed White House.

The Panel suggested that the arrangement of the accommodation blocks needed to be reviewed in terms of their relationship to the proposed Castlebrae High School and to play a mediating role between land uses. The link between the dementia care facility and assisted living apartments should be strengthened offering a more cohesive layout of buildings and external courtyard to support health and social interaction.

Open Space and Public Realm

The Panel emphasised the importance of a providing an innovative landscape strategy to offer therapeutic benefits for residents and create an environment for young and old

to interact. The site layout should allow ease of access to outdoor spaces for both patients and staff.

The Panel considered that site layout should be informed by macro analysis of the wider landscape context, green and active travel networks and views to Arthur's Seat, alongside site specific evaluation of local character and opportunities.

The Panel were concerned that the proposed layout did not maximise the available land to provide useable open space and gardens, including private open space for those in assisted living apartments. This would be essential to deliver benefits in terms of health and social interaction. In particular, the open land to the north and car parking to the south were missed opportunities. Re-aligning buildings closer to the perimeter of the site might generate larger interior open spaces.

The Panel wished to see the landscape framework more fully integrated with the existing off-road path network to the west and better aligned with Castlebrae High School and its grounds, should this be accessible outwith teaching hours for community use.

The Panel emphasised the need for the layout to provide an active frontage to the public realm on Niddrie Mains Road and to consider the potential to retain some of the existing boundary trees.

Access and links

The site's potential for connectivity with public transport and wider green networks such as the Innocent Railway Core Path and Craigmillar Castle Park was noted as beneficial by the Panel. The Panel reflected on the relatively enclosed nature of the site due to the adjacent land uses and encouraged the layout to improve permeability and integration within the surrounding townscape. The proposed access road between the site and Castlebrae High School could also become a barrier in the townscape.

The Panel supported the need to provide a secure environment for those with dementia but considered that the main site access to the east did not provide direct pedestrian access from Niddrie Mains Road, could be unwelcoming and lack surveillance. Equally, it did not maximise links for older people from the site to public transport stops on Niddrie Mains Road.

Provision should be made for secure cycle storage within the buildings to enable active travel. The Panel questioned the quantity of parking, its location and allocation to provide dedicated access and servicing to the care facilities.

Community safety

The Panel noted that the proposals provided for a number of vulnerable groups and that a balance required to be struck between creating an accessible facility, integrated with the surrounding streets and community life and the need for secure boundaries and layout.

Archaeology

Site 90m South of 2 Peffer Place

Further to your consultation request, I would like to make the following comments and recommendations concerning the above planning application for mixed-use residential led development comprising of dementia care centre (Class 8), assisted living apartments (Class 8), student accommodation (Sui Generis) and commercial units (Class, 1, 2 or 3) with access, landscaping, SUDS and car parking.

The site comprises the site of the former Raeburn Brewery (1901-1975). The area also occurs to the west of the important Newcraighall Colliery. Recent archaeological evidence in the form of the remains of bell pits has shown that the Industrial coal mines of the 19th and 20th centuries were built at centre of a much wider area of mining activity stretching across Newcraighall, Brunstane, Niddrie and Edmonstone and going back to the 16th/17th centuries if not much earlier.

As stated, above development site has been identified as being of archaeological 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 DES3 & 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.

Buried Archaeology

The site has clearly been affected by modern development nevertheless there is a low-moderate potential for the survival of significant archaeological remains associated with Brewery and to a lesser extent the potentially early coal mining activities (e.g. post-medieval bell pits). Ground-breaking works associated with construction of the new development could therefore disturb significant remains. Accordingly, it is recommended that a programme of archaeological work is undertaken prior to development with any significant remains uncovered fully excavated and recorded.

The first phase of this programme of archaeological investigation will be the undertaking of an archaeological evaluation (max 10%) of the western extension site, the site associated with the Raeburn Brewery. The results of this work will inform what level of further archaeological excavation, recording and analysis and including Public engagement/open-days would be required to be carried out prior and/or during development and if applicable where preservation may be required.

Public Realm Interpretation

In addition to archaeological open days and on site temporary historic interpretation recommended as part of the above excavations, given the nature of the project it is recommended that the public realm interprets the sites important brewing heritage. Such work including possible public art as well as tradition methods of interpretation of should be designed to facilitate not only general interest but also to aid and stimulate the care of dementia sufferers and create a Sense of Place and help promote the Well-Being Agenda.

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

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication, public engagement and interpretation) 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.

Environmental Protection

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

20/00292/FUL | Mixed-use residential led development comprising of dementia care centre (Class 8), assisted living apartments (Class 8), student accommodation (Sui Generis) and commercial units (Class, 1, 2 or 3) with access, landscaping, SUDS and car parking. | Site 90 Metres South Of 2 Peffer Place

The applicant proposes a mixed-use development including a care centre, assisted living apartments, student accommodation and some commercial uses including class 1,2, and 3 and 28 car parking spaces.

The site is located on Niddrie Mains Road with residential use and a Police Station located to the west. There is a similar existing use neighbouring to the north west corner of the site. Industrial/office units are located to the north, north east. To the east there is a new high school currenting being developed and the existing neighbourhood office is also to the east.

The applicant has submitted various supporting documents including a noise impact assessment and air quality impact assessment which we have assessed by Environmental Protection.

The noise impact assessment has investigated the main noise sources and including transport noise and noise from plant on the neighbouring buildings as well as proposed plant as part of this application. The noise impact assessment has highlighted that upgraded glazing units will be required to mitigate the transport noise. Conditions will be recommended to ensure this is addressed. Noise from the neighbouring units was not highlighted in the noise impact assessment as something that required any further mitigation. The noise report did state that any new plant installed by the proposed development will need to meet the noise criteria and may require further assessment as the details of this plant are not currently available. This is not unusual, and an informative will be required to ensure that any new plant will not adversely impact amenity.

Current proposals for the café/community shop unit to the east of the entrance from Niddrie Mains Road involve the potential provision of 2 units which could include hot

food takeaway facilities. Odours produced through cooking processes in hot food takeaways can cause amenity problems, particularly in areas which are residential in character. As this is a detailed planning application Environmental Protection would require specific details on any commercial ventilation system that would need to terminate at roof level. Having looked at the drawing there is no mention of ducting on any of the drawings including the roof drawings. Without this level of detail Environmental Protection would not be able to support a full class 3 use in these units. If no cooking was being proposed, then a restricted class 3 use could be considered. This would mean no cooking on the premises and a list of standard café equipment being conditioned for use on the site.

The applicant has also submitted a supporting air quality impact assessment. It is noted that there is a significant amount of development in the local area which has already seen congestion on the Niddrie Mains Road increase. The cross junction to the west of the development site is a location where there is often queueing traffic. The area is not in an air quality management area, but we must ensure that the local air quality levels are not negatively impacted by developments such as this. The applicant is only proposing 28 car parking spaces which is welcomed. The applicant has advised that most journeys will be done in taxis.

The applicant must be made aware that they will need to provide at least 6 electric vehicle charging points as part of the developments. This is in line with the Edinburgh Design Standards minimum requirements. Any chargers installed must be a minimum of 7Kw (32amp) type 2 sockets. However, it is strongly recommended that the applicant installs a rapid 50Kw charger for taxi use. The taxi trade in Edinburgh is mainly converting over to electric vehicles and if this is going to be the main mode of transport used by occupiers of the development then they should make charging provisions for them.

At this stage the applicant does not have specific details on the proposed energy systems. If the applicant is proposing an energy centre or centralised boilers you will need to ensure that information is submitted and if required a supporting chimney height calculation as per the Clean Air Act which is anything above 366Kw. The Pollution Prevention and Control (Scotland) Regulations 2012 were amended in December 2017 to transpose the requirements of the Medium Combustion Plant Directive (MCPD -Directive (EU) 2015/2193 of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants). The purpose of the MCPD is to improve air quality. All combustion plant between 1 and 50 MW (net rated thermal input) will have to register or have a permit from SEPA. Environmental Protection will require that secondary abatement technology is incorporated into any plant above 1MW (accumulate assessment).

Environmental Protection would need the applicant to demonstrate that they have maximised the potential for onsite renewable energy production and storage before considering any fossil fuel even gas. The applicant must consider ground/air source heat pumps and photovoltaic/solar panels linked to energy storage and possibly the electric vehicle charging points.

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any

remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable).

As the applicant is proposing student accommodation this may require an House of Multiple Occupation Licence. The applicant should ensure that any proposed HMO's will meet all the relevant Scottish standards. It is recommended that you contact our HMO team to ensure any proposals will comply.

Environmental Protection have concerns with the proposed class 3 unit and will not be able to support that aspect. We have made a suggestion of a condition to restrict the use of the class 3 unit. If this condition is accepted then we would offer no objections subject to the following conditions being attached to any consent;

Conditions

1. Prior to the commencement of construction works on site:

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.

ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

2. The following noise protection measures to the proposed development, as defined in the Cundal 'Environmental Noise Assessment' report (Ref 1022791-RPT-AS-001), dated 9 December 2019:

- Glazing units with a minimum insulation value of 4/16/4mm double glazing shall be installed for the external doors and windows of the 1F Bedroom E, 1F Day Lounge E and 2F Bedroom W with supporting trickle vents allowing for a minimum sound reduction of $D_{n,e,w}$ 27dB.

- Glazing units with a minimum insulation value of 6/16/8.8mm double glazing shall be installed for the external doors and windows of the Ground Floor Common Room SW, and 1F Studio S with supporting trickle vents allowing for a minimum sound reduction of $D_{n,e,w}$ 35dB.

shall be carried out in full and completed prior to the development being occupied.

3. *Cooking, heating and reheating operations on the premises shall be restricted to the use of a Panini machine, toasty machine, baked potato oven, soup urn and one microwave only; no other forms of cooking, heating and reheating shall take place without prior written approval of the Head of Planning and no odours shall be exhausted into any neighbouring premises.*

4. *A minimum of Six parking space shall be served by 7Kw (32amp) Type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied.*

Informative

I. *Prior to occupation of the development, details demonstrating that noise from all plant (including air source heat pump system) complies with NR25 within the nearest residential property (with window partially open for ventilation purposes) shall be submitted for written approval by the Head of planning and Building Standards.*

II. *A rapid taxi charger should be installed - 70 or 50kW (100 Amp) DC with 43kW (63 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.*

III. *A chimney height calculation will need to be submitted in accordance with the Clean Air Act if a gas boiler is being considered.*

Transport

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;*

2. *For avoidance of doubt the proposed access junction and layby on Niddrie Mains Road is not agreed at this stage (see note IV for further detail);*

3. *In support of the Council's LTS Cars1 policy, the applicant should consider contributing the sum of £18,000 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;*

4. *The applicant should note that the Council will not accept maintenance responsibility for underground water storage / attenuation;*

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), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;*

6. *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;

Note:

I. The application has been assessed under the 2017 parking standards (updated January 2020). These permit the following:

a. A maximum of 61 car parking spaces. 1 space per 5 beds for residential institution (64 bed assisted living and 88 bed dementia care), 1 space per 6 bed for 164 bed student accommodation and 1 space per 50m² of retail use. 28 car parking spaces are proposed;

b. A minimum of 174 cycle parking spaces. 1 space per 15 beds for residential institution, 1 space per bed for the student accommodation and 1 space per 250m² of retail use. 200 cycle parking spaces are proposed;

c. A minimum of 12% of the car parking to be designated as accessible, this would result in a requirement for 3 spaces. 4 accessible spaces are proposed;

d. A minimum of 1 of every 6 car parking spaces should be equipped for electric vehicle (EV) charging. This would result in a requirement for 5 spaces. 5 EV spaces are proposed;

e. A minimum of 10 motorcycle parking spaces. 10 motorcycle spaces are proposed;

II. Whilst no definitive justification was provided for the proposed level of car parking, it is considered acceptable as it complies with current parking standards and based on the proposed uses and the sites accessibility to public transport and local services and amenities.

III. A transport statement has been submitted in support of the application. This has been assessed by transport officers and is considered to be an acceptable reflection of both the estimated traffic generated by the development The submitted document is generally in line with the published guidelines on transport assessments and estimates that a development on this size and nature would generate 23 two-way vehicle trips in the AM peak and 31 two-way vehicle trips in the PM peak. A worst-case scenario has been assumed and a mode shared that favours a higher amount of vehicle use has been utilised. It should also be noted that no trip assessment of the previous use (large retail unit) has been provided, it would be expected that a comparison vehicle trip generation of the proposed development against the existing/previous use would likely lead to a net reduction in vehicle trips over the course of a day (24hrs).

IV. The applicant should be aware that planning permission does not absolve them from acquiring subsequent permissions from the Council as Roads Authority, this includes road construction consent and a Section 56 Road Opening Permit, which will be required for the access junction alterations and the proposed servicing layby on Niddrie Mains Road.

a. The proposed access junction design is not considered appropriate as it doesn't provide the appropriate level of pedestrian priority that is required. The applicant should note the Edinburgh Street Design Guidance Fact Sheet G7 - Priority Junctions when considering this junction design.

b. Currently Transport do not consider the proposed servicing layby appropriate due to the impact on the pedestrian environment and the nearby bus stop. Waiting and loading restrictions and a effective level of enforcement would be required to ensure that the layby is used appropriately which places an additional burden of resource on

the Council. It should also be noted that the Council has longer term plans for Niddrie Mains Road in terms of active travel, and any infrastructure that forms part of the road could be altered or removed as part of any project including this layby;

V. It is understood that the proposals make an allowance for the footpath on the western boundary of the site to be widened to a minimum of 4m (and potentially up to 5.6m) along the site boundary;

Flood Planning

Response 1 - 29 January 2020

Thank you for the consultation request. I have reviewed the documents on the portal and have the following comments to be addressed by the applicant:

- 1. The SWMP recommends a minimum finished floor level (FFL) of 46.2m AOD - 600mm above the 1:200-year event. As the development is deemed Civil infrastructure, CEC request that the recommended FFL be 600mm above the 1:1000-year+40%CC event. If a 600mm freeboard above the 1:1000-year+40%CC event is not deemed technically feasible, then a freeboard assessment will be required to confirm that a lower freeboard is appropriate. CEC will not accept a freeboard of less than 300mm.*
- 2. It is proposed to discharge surface water to the proposed regional SuDS basin. Could the applicant please confirm where the regional SuDS basin will ultimately discharge to.*
- 3. Once received, could the applicant please provide written confirmation that Scottish Water agree with the proposed surface water discharge to the proposed surface water sewer and that you have permission to discharge to the proposed regional SuDS basin.*
- 4. Underground storage tanks are proposed to attenuate surface water. CEC Flood prevention request that surface water assets, in particular attenuation structures, are above ground and not below ground for easier maintenance and identification of potential reduction in storage capacity or blockages. Could the applicant please confirm why above ground storage is not feasible.*
- 5. Drawing 4489 C3.02 notes that flooding from the 1:200-year event remains accommodated on site. Could the applicant please confirm whether the 'depression in soft landscaped area' will also accommodate the modelled 1:1000-year+40%CC flooding. Could you confirm that flooding in the 1:1000-year+40%CC event will be managed to not cause flooding to the proposed civil infrastructure.*

Response 2 - 13th March 2020

Below are my remaining comments, in response to your clarifications.

- 1. Your approach to determining the FFL for the development is acceptable. Can you confirm if the FFL recommendation will change.*
- 2. We believe the neighbouring SuDS system discharges to the Niddrie Burn. As you are attenuating your surface water within your site boundary, we have no concerns with your proposal.*
- 3. Once received, could you confirm that Scottish Water agree with your proposed surface water discharge to the surface water sewer and neighbouring SuDS.*
- 4. In this instance, underground storage feature is deemed appropriate.*

5. Could you provide a statement on the 1:1000-year+40%CC flood risk and provide a flow path drawing to confirm that water will be routed away from the 'civil infrastructure'.

Response 3 - 27th April 2020

We have only the following remaining comment to be addressed by the applicant:

1. Once received, could the applicant confirm that Scottish Water agree with the proposed discharge to the surface water sewer and neighbouring SuDS

Response 4 -6th August 2020

Scottish Water's response notes that it is proposed to connect to a private surface water sewer and SuDS pond. Is the applicant able to confirm they have approval to connect to the private system?

Response 5 - 14th August 2020

Thank you for the additional documents. This application can proceed to determination, with no further comments from our department.

Waste

Response 1 - 30th January 2020

As this is to be a development with student accommodation and trade waste, waste and cleansing services would be expected to be the service provider for the collection of domestic waste (Only).

Waste strategy agreed at this stage - No

I have looked at the drawings available in the planning portal file, we would require further input to the points raised below in conjunction with our instruction for architects guidance to ensure waste and recycling requirements have been fully considered.

1. Confirmation of design, the bin store for the Student area would require some adjustments to conform and confirmation of numbers/units using the store to agree numbers of bins.
2. We would require to review any swept path analysis drawing for the vehicle manoeuvre around the site and to any bin store locations conforming to our guidance for a 12m vehicle.

In view of these factors and the size of this development I would ask that the Architect/developer contact myself directly Trevor.kelly@edinburgh.gov.uk or Waste Services on 0131 608 1100 at the earliest point to set up a meeting to agree their options so that all aspects of the waste & recycling service are considered.

Response 2 - 26th August 2020

If all the waste is going to be uplifted by a private contractor we only need a note in the agreement you provide stating that this cannot be reversed without the development meeting our guidance at their cost.

Coal Authority

Mixed-use residential led development comprising of dementia care centre (Class 8), assisted living apartments (Class 8), student accommodation (Sui Generis) and commercial units (Class, 1, 2 or 3) with access, landscaping, SUDS and car parking; SITE 90 METRES SOUTH OF, 2 PEFFER PLACE, EDINBURGH

Thank you for your consultation notification of the 28 January 2020 seeking the views of The Coal Authority on the above planning application.

The Coal Authority Response: Material Consideration

I can confirm that the above planning application has been sent to us incorrectly for consultation.

The application site does not fall with the defined Development High Risk Area and is located instead within the defined Development Low Risk Area. This means that there is no requirement under the risk-based approach that has been agreed with the LPA for a Coal Mining Risk Assessment to be submitted or for The Coal Authority to be consulted.

The Coal Authority Recommendation to the LPA

In accordance with the agreed approach to assessing coal mining risks as part of the development management process, if this proposal is granted planning permission, it will be necessary to include The Coal Authority's Standing Advice within the Decision Notice as an informative note to the applicant in the interests of public health and safety.

Edinburgh Access Panel

1) we hope the corridor along the west side of the site, connecting Peffer Place to Niddrie Mains Rd, will be shared-use for cyclists and pedestrians, with barriers (if any) spacious enough to permit passage of long or unusual bikes;

2) since there is a large student accommodation component, we would like the developers to consider which colleges/universities the students are likely to be attending, and hence consider any contributions which would encourage the students to cycle there.

We imagine these might be Queen Margaret, to the east, and Edinburgh, to the west. The main arteries these students might use are the Innocent Path (off-road), and Niddrie Mains Rd (on-road). We believe the Active Travel Department might have some plans for the latter - in which case the developers of this site might make a contribution. For the former, some contribution towards better access to the Innocent Path would be in order.

We recognise these contributions would be outwith the site itself, but there is increasing recognition that developers need to take into account how future residents (etc) might travel to/from the site, and make efforts to ensure that sustainable transport receives the support it needs.

Police Scotland

I write on behalf of Police Scotland regarding the above planning application. We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.

Scottish Water

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

Water

There is currently sufficient capacity in the Glencorse Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Foul

This proposed development will be serviced by Edinburgh Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website at the following link <https://www.scottishwater.co.uk/Business-and-Developers/Connecting-to-OurNetwork> The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Infrastructure close to boundary

According to our records, the development proposals may impact on existing Scottish Water assets. The applicant should identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at service.relocation@scottishwater.co.uk. The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Scottish Water Disclaimer

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to

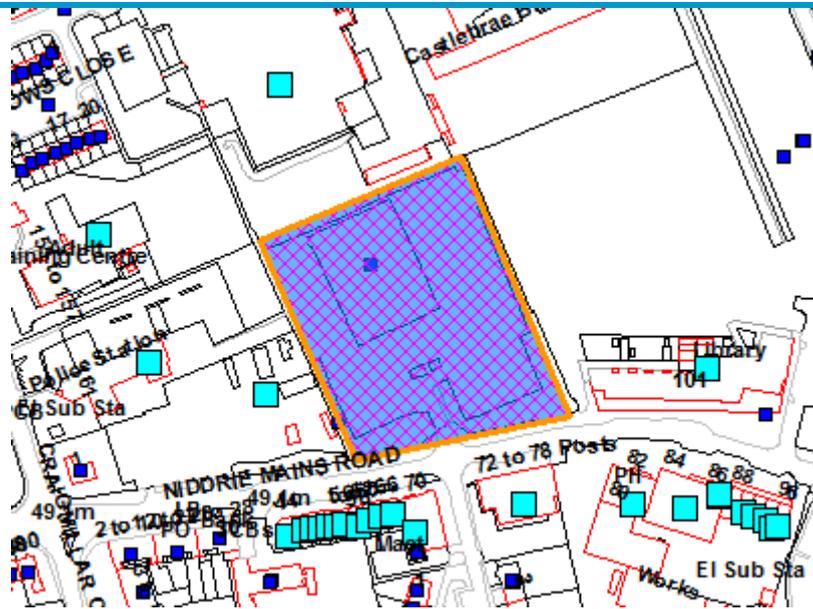
confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted. Greenfield sites will not be considered and a connection to the combined network will be refused.

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

Location Plan



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