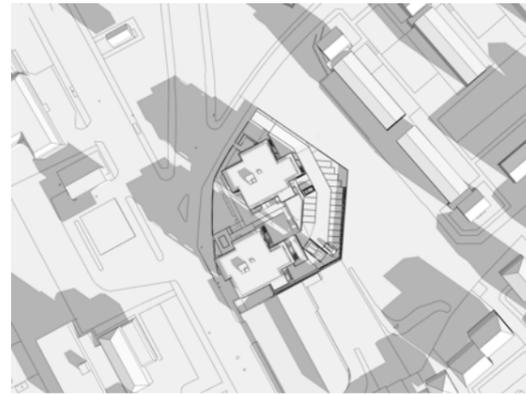


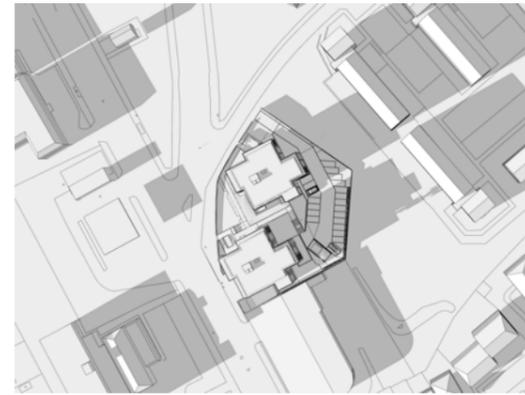
EQUINOX (MAR 20<sup>th</sup> - SEPT 22<sup>nd</sup>)



9:00



12:00

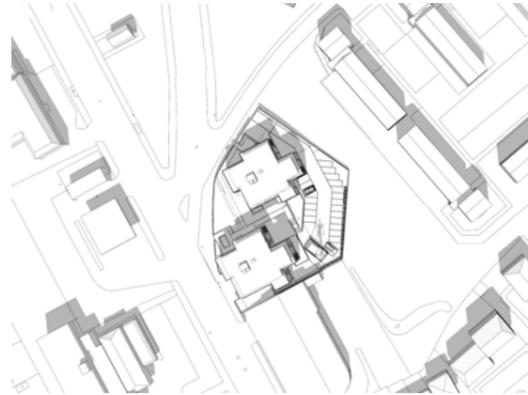


16:00

SUMMER SOLSTICE (JUNE 21<sup>st</sup>)



9:00



12:00



16:00

WINTER SOLSTICE (DEC 21<sup>st</sup>)



9:00



12:00



16:00

## Daylighting

The following study illustrates how the projects' massing affects the daylight and shadows within the site boundaries as well as in the neighbouring plots.

The buildings' density and massing appear sufficient for the provision of direct sunlight to the facades of the residential blocks. The permeability of the site also allows sunlight to reach the green spaces.

Due to the site's location and orientation the proposed development does not cast shadows on any existing development. By using the natural site topography and locating the car parking to the rear of the site, the effect of shadowing on the adjacent allotments to the East is minimised.

## Materials

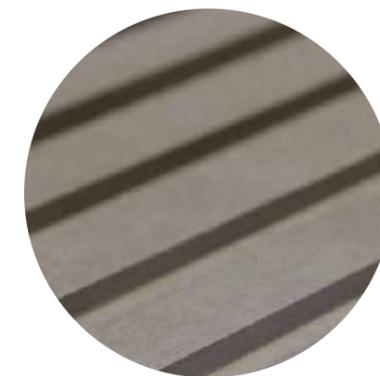
The proposal would be to use a high quality palette of materials with one primary material expressing the frame of the building and the secondary material acting as a lightweight infill.

These proposals show a natural sandstone frame with grooved black fibre cement cladding acting as the secondary cladding material.

Large areas of glazing are proposed to open living rooms out on the balconies and terraces with slot, vertical windows to all bedrooms (open-able and cleanable from, the interior).



Buff Ashlar Sandstone



Black Grooved Fibre Cement Cladding

Proposed North-West Elevation  
1:100



## Fire Strategy

The proposal has been developed with the intent to minimise the risk of fire.

The development consists of 2 domestic blocks over 11m with an existing commercial unit located at ground floor of one block. The residential and commercial accommodation are completely separated which will work to mitigate fire spread between the different occupations.

A single escape stair is provided centrally in each residential block with separating wall and floor constructions between apartments. Smoke ventilation is provided to protected lobbies and at the head of stairs.

The blocks have been designed to be more than 1 metre from the boundary to mitigate the risk of fire spread.

The material palette has been developed with consideration for the updated building regulations for domestic buildings over 11m. As such, a stone clad frame is proposed with fibre cement cladding with European Classification A1 or A2.

Willowbrae Road and Northfield Drive provide direct access to the common residential cores for fire and rescue services within the required 45m distance.



## 06 LANDSCAPE PROPOSALS

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- Landscape Strategy
- Landscape Masterplan
- Landscape Design - Key Spaces
- Landscape Materials
- Landscape Materials - Soft Landscape





## Landscape Masterplan

The landscape masterplan has been developed in response to the sites opportunities and constraints, and responds to the building arrangement and existing streetscene. It aims to unify the architectural proposals anchoring the built form to the immediate and surrounding streetscene.

The sites frontage with Willowbrae Road is key and the provision of a large area of soft landscape helps to soften the impact of the development on the streetscene. Long views to Arthur's Seat have informed the location of the communal garden, which provides residents with a quiet space to enjoy.

The site has limited existing vegetation, however the landscape character of the area includes the use of large trees along the main road corridor, with small species dispersed into the surrounding neighbourhood streets and gardens. The landscape proposals seek to enhance the existing peripheral tree planting, bringing it through into the site, helping to frame the buildings, add height to the landscape and reflect the existing character.

- 01. Accessible parking - 3no spaces total
- 02. North building site access and entrance plaza
- 03. Accessible footpath through site
- 04. South building site access and entrance plaza
- 05. Communal garden space
- 06. Stepped connection from car park
- 07. Screened telecommunications compound
- 08. Car park - 24no spaces (incl. 1no accessible & 3no undercroft spaces)
- 09. Private terrace

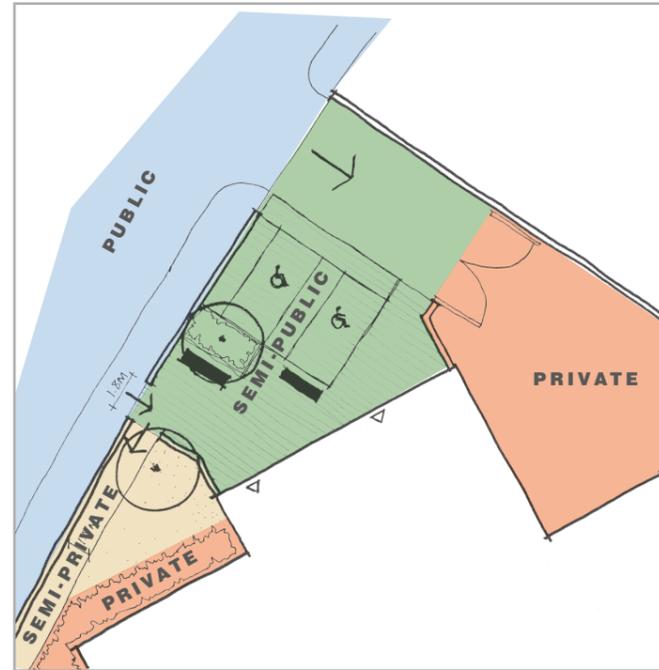
## Landscape Design - Key Spaces

### Entrance / Arrival Plazas

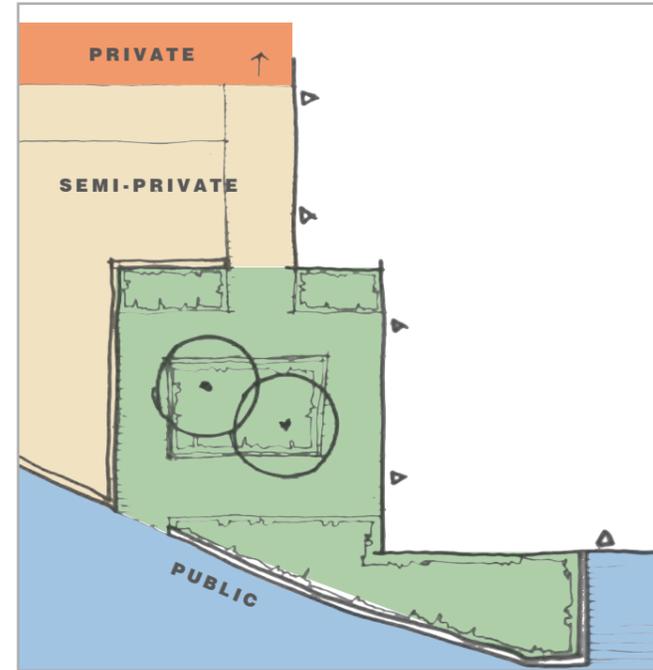
The entrance plazas at both the north and south buildings are designed in such a way to introduce the spatial hierarchy on entering the site.

Larger paving units are used for the semi-public spaces, which are partially enclosed with low walls, where there are seating opportunities and ornamental planting beds. The paving units become smaller as the spaces become more private, indicating a subtle change to users.

The northern arrival space also includes the 2no accessible parking spaces which serve both buildings. There is ramped and stepped access from the bays to the building entrance.



Concept Strategy - Northern Building Arrival Space from Northfield Drive



Concept Strategy - Southern Building Arrival Space from Willowbrae Road



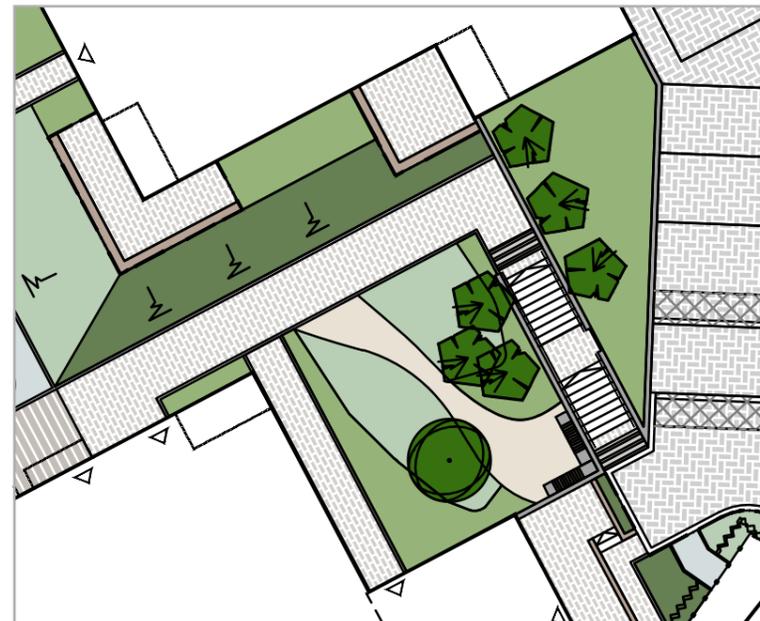
### Communal Garden

The proposed layout of the buildings creates a central communal space for shared use by the residents. The courtyard design will provide quiet spaces for residents to relax.

The material choices within the communal garden are to be robust and hard-wearing, providing a long term finish whilst ensuring a high quality aesthetic.

The soft landscape will help to create pocket spaces through the larger area, with a variety of evergreen shrubs, ornamental grasses and colourful perennials providing year round interest and increased biodiversity.

Tree planting provides screening from the car park; species selected will be small – medium sized trees with eventual heights a maximum of 12m.



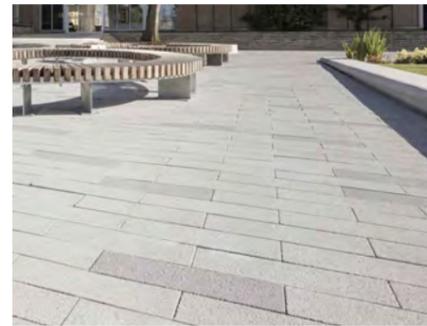
## Landscape Materials

High quality materials are proposed throughout the development, with character areas being defined by material choices, colours and laying bonds. The choice of materials has been influenced by the materiality of the local area, including ashlar stone walls which are prominent in the streetscene.

Differing boundary types define spaces and help to define the spatial hierarchy, which is presented through the site, whilst being careful not to close off areas or create uninviting spaces.



## Hard Landscape



Public / Arrival Spaces  
Concrete Plank Paving



Communal Space  
Concrete Block Paving



Parking Areas  
Permeable Concrete Block Paving



Communal Garden Space  
- Self Binding Gravel



Concrete & Timber Bench



Low Seating / Retaining Wall  
- Ashlar stone wall to match building finish

## Boundaries



Site Boundary Wall 1.2m  
- Ashlar stone wall to match building finish



Steel Vertical Bar Fence 0.9m



Timber Boundary Fence 1.2m



Timber Trellis  
- Visual barrier to neighbouring site



Steel Balustrade  
- Protective barrier where fall is > 600mm



Retaining Wall  
- to architect and engineer's design

## Landscape Materials - Soft Landscape

The soft landscape palette has been selected to provide year round interest and be robust enough to suit the shared residential use of the site, whilst still feeling domestic.

The proposal of trees along the front of the site will offset the heights of the buildings and provide a degree of screening to the street. Ornamental planting will have an evergreen structure with pops of colour and a variety of textures to help soften the hard landscape elements. Groundcover is to be used on slopes to provide a low maintenance green solution and helps to provide separation between private and semi-private spaces.

### Soft Landscape Palette

#### Large Feature Tree Planting



*Acer rubrum* 'October Glory'



*Betula albosinensis*



*Acer campestre* 'Elsrijk'

#### Small Feature Tree Planting



*Amelanchier lamarckii*



*Betula utilis jacquemontii*

#### Hedge Planting



Formal Hedge - *Griselinia littoralis*



Native Mixed Hedge

#### Ornamental / Groundcover Planting



*Ceanothus thyrsiflorus* 'Skylark'



*Cornus sanguinea* 'Midwinter Fire'



*Deschampsia cespitosa* 'Goldtau'



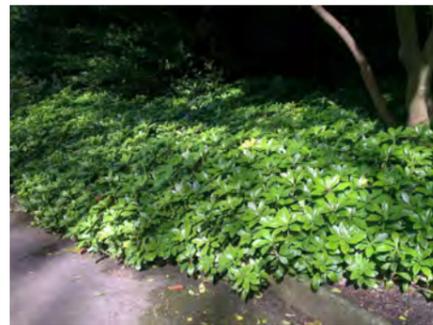
*Euonymus japonicus* 'Green Rocket'



*Lavandula angustifolia*



*Miscanthus sinensis* 'Morning Light'



*Pachysandra* 'Green Carpet'



*Polypodium vulgare*



*Sarcococca hookeriana digyna*



*Vinca minor* 'Gertrude Jekyll'



## 07 VISUAL IMPACT ASSESSMENT

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3D Visualisations











## 08 APPENDICES

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Pre-Application Consultation

## Community Council Presentation

The Proposed development was presented to the Willowbrae & Northfield Community Council on the 4th of March 2020.

It was explained that the intention is to build 48 flats, with parking for 26 cars, including 2 accessible spaces and full cycle parking. 25% of the homes would be affordable homes under policies set by the City of Edinburgh Council. The buildings have five storeys, with external balconies, surrounded by gardens and the main parking would be at the rear of the site. The material would be ashlar sandstone with black infill. A shop would be included, facing the other local shops, with the intention for the existing chip shop to relocate.

## Pre Application Consultation

We met with Paul Devaney and Julie Ross on the 26th June 2019 to discuss the principles of the proposed development. The following areas were discussed and asked to be considered prior to the submission of a detailed application:

- Assessment of the building typologies within the neighbouring vicinity to be carried out.
- Heights of the proposed development to be justified – proposed views of the development to be prepared.
- Suggestion to incorporate a perimeter wall to reflect the character of the area.
- Request for a detailed topographical survey to be carried out to inform the design.
- Engagement with Andrew Campbell at Environmental Health requested to review the following areas:
  - Provisions required should a takeaway premises be incorporated in to the development
  - Anti-social behaviour – is this an issue with this type of use?
  - Noise Impact Assessment – requirements to mitigate the kitchen noises and noises from the road.
  - Air quality assessment requirement due to proximity to garage
  - Any issues relating to the proximity to the telecomms mast.

## Environmental Health

Following the initial pre-app meeting we liaised with Andrew Campbell (CEC Environmental Health Officer) to discuss the proposals. A summary of what was discussed is noted below:

### Fast Food Premises

The proposal relocates the Barracuda, which is a fish and chip takeaway, from its current premises and in to the new development. The kitchen would be extracted through a riser within the building up to the roof level (highest point within the development proposal). Andrew Campbell noted the following:

- No development use within 30m of a 'class 3' premises unless the kitchen extract is terminated above the height of the proposed development.
- It would be easier to bring the Barracuda in to the application to ensure that the kitchen extract is managed appropriately with it's termination at roof level and above the residential use.
- The chimney will have to be designed to allow for 30 airchanges per hour.
- There are no issues with anti-social behaviour on the existing premises.

### Noise Impact Assessment

Andrew noted that a noise impact assessment would be required as part of the application to determine the impact of the road, the proposed kitchen operation and also the garage operation on the neighbouring premises.

### Air Quality Assessment

Andrew noted an air quality assessment may be required if the garage has spray painting operations within its premises. It has been confirmed by the garage that these operations do not take place on these premises and that it's primary use is a car showroom.

### Telecoms Mast

Andrew confirmed that residential use is suitable with these in close proximity. Testing was carried out a number of years ago which determined that they were safe from radioactivity.



Willowbrae Road, Edinburgh

Design & Access Statement

February 2020

**Comprehensive Design Architects**

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**BRIEF FOR CONSULTANCY:**

To undertake a noise impact assessment for the proposed mixed use development.

**Noise Impact Assessment  
Proposed Development  
Willowbrae Road  
Edinburgh**

Technical Report R-8654-EK1-RGM  
20 April 2020

**PREPARED FOR:**

Nicholas Saunders  
CDA  
16 Moray Place  
Edinburgh  
EH3 6DT



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## 1.0 Introduction

- 1.1 We were instructed by Nicholas Saunders of CDA, on behalf of Marc Teague of Evantyr Properties Ltd, to provide an acoustic impact assessment for the proposed development situated at Willowbrae Road, Edinburgh.
- 1.2 The development proposal is for the demolition of an existing small commercial unit, to be replaced with two 5-storey blocks of flatted residential accommodation with a small commercial unit (~100m<sup>2</sup>) on the ground floor of Building B.
- 1.3 The development is located on the junction of Willowbrae Road and Northfield Broadway/Drive. The location of the development site is shown on the site plan in Appendix A. The currently proposed floor plans are shown in Appendix B.
- 1.4 The site is bounded by Northfield Drive to the North and Willowbrae Road to the South/South-West. To the North and East there is existing residential and a garage (Motorchoice Edinburgh) to the South.
- 1.5 The report provides design advice for noise mitigation based upon the available information outlined above.

## 2.0 Planning guidelines

2.1 Planning conditions relating to noise are yet to be determined. However, based on the existing noise environment at the development site, the dominant noise source has been identified as road traffic on Willowbrae Road.

2.2 After visiting the site a number of times and speaking to garage employees, we understand that the premises operate primarily as a used car dealership and sales showroom and not as a car repair garage.

2.3 Additionally, as the proposed development will feature a commercial unit on the ground floor with residential properties both horizontally and vertically adjacent, the operational noise from the commercial unit will be required to be controlled to an acceptable level in order to protect residential amenity. Any fixed items of plant relating to the commercial unit will also be required to meet appropriate noise criteria to avoid potential disturbance to future residents.

2.4 The proposed criteria to be achieved in relation to the above are provided below.

### 2.5 Road Traffic Noise

2.6 A range of acoustic standards indicated by BS 8233:2014 '*Guidance on sound insulation and noise reduction for buildings*' appropriate for a residential assessment are outlined in Table 1.

Activity	Location	Time period	
		07:00 to 23:00	23:00 to 07:00
Resting	Living rooms	35 dB L <sub>Aeq,16hour</sub>	-
Dining	Dining room/area	40 dB L <sub>Aeq,16hour</sub>	-
Sleeping (daytime resting)	Bedroom	35 dB L <sub>Aeq,16hour</sub>	30 dB L <sub>Aeq,8hour</sub>

2.7 The following guidance notes accompany the numerical standards shown in Table 1:



*“Note 2 The levels shown in Table 4 [here Table 1] are based on the existing guidelines issued by the WHO and assume normal diurnal fluctuations in external noise. In cases where local conditions do not follow a typical diurnal pattern, for example on a road serving a port with high levels of traffic at certain times of the night, an appropriate alternative period, e.g. 1 hour, may be used, but the level should be selected to ensure consistency with the levels recommended in Table 4 [here Table 1]”.*

*“Note 7 Where development is considered necessary or desirable, despite external noise levels above WHO guidelines, the internal target levels may be relaxed by up to 5 dB and reasonable internal conditions still achieved”.*

2.8 The Note also recognises some situations where there are practical limitations in the application of these noise standards *“...However, it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited”.*

2.9 For external areas that are to be used for amenity space, BS8233 states that it is *“[...] desirable that the external noise level does not exceed 50 dB  $L_{Aeq,T}$ , with an upper guideline value of 55 dB  $L_{Aeq,T}$  which would be acceptable in noisier environments”.*

## 2.10 Commercial Noise Impact

### 2.11 Plant Noise Control

2.12 Table 2 below provides typical planning requirements for plant noise control to residential premises, determined via a windows open assessment.

Planning Criteria	Octave Band Centre Frequency						
	63 Hz	125 Hz	250 Hz	500 Hz	1k Hz	2k Hz	4k Hz
Plant Noise NR25	55	44	35	29	25	22	20

2.13 The method adopted will be to impose maximum permissible noise levels from any proposed future plant, for the attention of the project M&E Engineer.

2.14 The proposed accommodation should also be considered from the perspective of façade or separating wall/floor constructions.

### 2.15 Commercial Activities – Internal Noise Transfer

2.16 Commercial noise within the units will also need to be controlled to the apartments above. It is common practice for Local Authority Planning to request that “inaudibility” is achieved between commercial and residential accommodation. Depending on the source noise level, this can often require sound insulation performance beyond that required for Building Regulation Compliance.

2.17 Section 5, Noise, of the Non-Domestic Technical Standards requires an airborne sound insulation level of  $D_{nT,w}$  56 dB between residential and commercial spaces. This standard also applies between commercial spaces under different occupation.

2.18 For calculation and specification of separating wall/floor sound insulation, NR 15 is often used as an objective reference for inaudibility, as presented within Table 3.

Table 3: Noise Rating Curve NR 15 (dB re 2 x 20 $\mu$ Pa)							
Planning Criteria	Octave Band Centre Frequency						
	63 Hz	125 Hz	250 Hz	500 Hz	1k Hz	2k Hz	4k Hz
NR15	47	35	26	19	15	12	9

### 3.0 Noise Measurements Details

- 3.1 All measurements were undertaken in accordance with BS 7445:2003 “Description and measurement of environmental noise — Part 1: Guide to quantities and procedures”.
- 3.2 The acoustical instrumentation used for the measurements conformed to a Class 1 integrating sound level meter specification in accordance with BS EN 61672-1: 2003. The microphone was fitted with a windshield at all times and positioned at a height of 2.5m from ground level.
- 3.3 The sound level meter was calibrated before and after the measurements. No deviation from the calibration level of 93.8 dB re 2 x 10<sup>-5</sup> Pa at 1000Hz was recorded.
- 3.4 All noise measurements were undertaken by Scott McCall, on the 21<sup>st</sup> November 2019, 29<sup>th</sup> November 2019 and 17<sup>th</sup> January 2020.
- 3.5 The local weather conditions during the measurement surveys were suitable for environmental noise measurements and are presented in the Table below;

Date	Temperature	Wind
21 <sup>st</sup> November 2019	7 °C	1 - 2 m/s, E
29 <sup>th</sup> November 2019	4 °C	0 - 1 m/s, W
17 <sup>th</sup> January 2020	5 °C	4 – 5 m/s SW

3.6 The following items of equipment were used during the measurement:

Equipment	Serial No.	Date of calibration expiration	Calibration certification no.
21 <sup>st</sup> & 29 <sup>th</sup> November 2019			
RION NL52 Modular Precision Sound Analyzer running Rion's programs NX-42EX	00142577	06/03/21	TCRT19/1168
RION Pre-amplifier Type NH-25	32605	06/03/21	TCRT19/1168
RION Condenser Microphone Type UC-59	05998	06/03/21	TCRT19/1168
Brüel & Kjær Calibrator type 4231	2326986	14/05/20	28549
17 <sup>th</sup> January 2020			
RION NL52 Modular Precision Sound Analyzer running Rion's programs NX-42EX	00142577	06/03/21	TCRT19/1168
RION Pre-amplifier Type NH-25	32605	06/03/21	TCRT19/1168
RION Condenser Microphone Type UC-59	05998	06/03/21	TCRT19/1168
Brüel & Kjær Calibrator type 4231	2326986	14/05/20	28549

3.7 A-weighted  $L_{eq}$ ,  $L_{90}$  and  $L_{10}$  noise levels were measured along with other standard acoustical parameters such as  $L_{Amax}$ .

## 4.0 Noise Measurements Results

### 4.1 Road Traffic Measurements

4.2 Table 4 and 5 provides the results of the road traffic noise measurements survey. The noise measurements were conducted, in so far as was practicable, according to the guidance document '*Calculation of Road Traffic Noise*'.

4.3 The noise measurement locations are shown in Appendix A as Measurement Position 1 and 2. The measurement position 1 was on Willowbrae Road approximately 3.5m from the kerb. The measurement position 2 was on Northfield Drive approximately 2m from the kerb.

**Table 4: Road traffic noise measurement results at Measurement Position 1 (dB re 20 µPa)**

Period	Date	Time	Duration (hh:mm:ss)	L <sub>Aeq</sub> (dB)	L <sub>A90</sub> (dB)	L <sub>A10</sub> (dB)	L <sub>AFmax</sub> (dB)
Daytime	21/11/19	12:51	01:00:00	69.4	60.0	72.6	86.8
Daytime	21/11/19	13:51	01:00:00	70.2	61.0	72.8	94.3
Daytime	21/11/19	14:51	01:00:00	70.1	61.9	72.9	93.8
Daytime	21/11/19	12:51	03:00:00	69.9	61.0	72.8	94.3

**Table 5: Road traffic noise measurement results at Measurement Position 2 (dB re 20 µPa)**

Period	Date	Time	Duration (hh:mm:ss)	L <sub>Aeq</sub> (dB)	L <sub>A90</sub> (dB)	L <sub>A10</sub> (dB)	L <sub>AFmax</sub> (dB)
Daytime	29/11/19	11:39	01:00:00	65.4	59.1	66.9	90.2
Daytime	29/11/19	12:39	01:00:00	64.9	59.5	66.9	87.3
Daytime	29/11/19	13:39	01:00:00	64.5	59.6	66.9	81.6
Daytime	29/11/19	11:39	03:00:00	64.9	59.4	66.9	90.2

4.4 During the day road traffic noise comprised of continuous traffic on Willowbrae Road and at Northfield Broadway/Northfield Drive. This included a number of HGV's and buses, which also resulted in the maximum noise events.

- 
- 4.5 In order to determine the  $L_{Aeq,16hour}$  daytime levels the methodology outlined in Calculation of Road Traffic Noise (CRTN) and guidance issued in the Transport Research Laboratory Report “Converting the UK traffic noise index  $L_{A10,18h}$  to EU noise indices for noise mapping has been used”. The methodology used is detailed in Appendix C.
- 4.6 Regarding the night time levels for Willowbrae Road, in our experience and from our extensive database of road traffic measurements, a correction of -3 dB should be applied to the calculated  $L_{Aeq,16hour}$  daytime levels in order to predict the  $L_{Aeq,8hour}$  night time levels. Willowbrae Road is a busy thoroughfare and night-time traffic flows do not drop as dramatically as for quieter, residential streets.
- 4.7 However, the Northfield Broadway/Drive is expected to have a much more reduced traffic flow at night and therefore the night time noise levels at this façade are expected to be as per the TRL calculations.
- 4.8 The predicted daytime level on the development site would therefore be  $L_{Aeq,day}$  68.9 dB at Measurement position 1 and 63.3 dB at Measurement position 2, while the night time level would be  $L_{Aeq,night}$  65.9 dB at Measurement position 1 and 55.8 dB at Measurement position 2.
- 4.9 **Background Noise**
- 4.10 Table 6 provides the results of the background noise measurements survey. The noise measurement location is shown in Appendix A as Measurement Position 3. The position was close to the existing building façade and would therefore be considered representative of the rear facing residential facades.

Period	Date	Time	Duration (hh:mm:ss)	L <sub>Aeq</sub> (dB)	L <sub>A90</sub> (dB)	L <sub>A10</sub> (dB)	L <sub>AFmax</sub> (dB)
Daytime	17/01/2020	11:41	01:17:00	54.1	50.8	55.5	77.7

- 4.11 The background noise comprised primarily road traffic on Northfield Drive with some contribution from road traffic on Willowbrae Road. Line of sight to Willowbrae Road was blocked due to a combination of a sloping topography and perimeter fencing around the development site.
- 4.12 These measurements would be relevant in an assessment of commercial noise impact (e.g. from the garage/car dealership) considering the residential areas to the rear of the proposed development. Such activities are yet to be determined and from numerous visits to site and discussions with employees, no activities that would cause noise disturbance have been noted.
- 4.13 Upon examination of the noise measurement results conducted at Measurement Position 3, these levels would be commensurate with what would be expected at this location due to propagation of road traffic noise from Northfield Drive (measurement positions is ~35m away from the kerb). No adverse contribution to the noise environment is therefore expected from the existing commercial operation, as confirmed subjectively by RMP personnel during site visits.
- 4.14 It is also noted that there are a number of existing residential properties on Duddingston Mills with private rear gardens that directly back onto the commercial operation’s rear parking area.
- 4.15 **Noise from proposed commercial unit – Internal Noise Transfer**
- 4.16 In order to determine the required sound insulation of the separating floor construction, assumptions as to the commercial unit’s expected use have to be made. We expect a proposed restaurant/takeaway will be the loudest, potentially



having low level background music, and this will dictate the core floor performance required.

4.17 Table 7 provides measurements results of a busy restaurant/takeaway with background music with voices being the dominant noise source. The open plan restaurant was finished with hard furnishings and was described to be fully booked.

4.18 Measurements were conducted on Friday the 31<sup>st</sup> of July 2015 by Nicola Symington BEng (Hons), PGDip, MIOA.

<b>Table 7: Octave band measurements of restaurant noise (dB re 2 x 20 µPa)</b>									
Description		63	125	250	500	1000	2000	4000	L <sub>A</sub>
Representative restaurant activity; voices, laughing, background ventilation noise, chairs being moved, low level background music.	L <sub>eq</sub>	75.7	73.9	72	78.2	76.5	74	67.8	81.5
	L <sub>Max</sub>	89.1	88.6	88.6	90.3	89.9	86	78.4	93.5

## 5.0 Residential façade design for road traffic noise

- 5.1 In undertaking our assessment of façade sound insulation requirements, corrections and assumptions have been made or applied to the road traffic noise levels to obtain the façade levels.
- 5.2 In order to obtain façade noise levels from free-field noise measurements, a +3 dB correction should be applied to the recorded noise levels. This is to account for reflections on the building façade.
- 5.3 The sound insulation of the façades has been taken as that of the window units and ventilators, as these are typically the acoustically weakest section.
- 5.4 As the measurements were carried out approximately at the proposed building line, no further attenuation due to distance was considered.
- 5.5 We have not included any reduction from room absorption effects.
- 5.6 Glazing on the most exposed façade overlooking Willowbrae Road is calculated in Table 8 below.

Description	Daytime $L_{Aeq,T}$ (dB)	Night time $L_{Aeq,T}$ (dB)
Road traffic free field noise level, $L_{Aeq}$	69	66
Façade correction, +3dB	72	69
Glazing insulation, $R_{Tra}$ 40 dB	-40	-40
Predicted Internal Level	32	29
Proposed Local Authority Criteria	$\leq 35$	$\leq 30$

- 5.7 Glazing providing  $R_{TRA}$  40 dB would be expected to provide around  $R_w$  47 dB, which may be provided by a high performing glazing unit such as *Saint Gobain Glass SGG Stadip Silence 8.8mm / 20mm / 12.8mm* (glazing / cavity / glazing).
- 5.8 For rooms on this façade we would recommend mechanical ventilation with the external ventilators on the rear facades or roof.

5.9 Glazing on the façade overlooking Northfield Broadway/Drive is calculated in Table 9 below.

<b>Table 9: Prediction of Internal Level – Northfield Broadway Façade (dB re 2 x 10<sup>-5</sup> Pa)</b>		
Description	Daytime L <sub>Aeq,T</sub> (dB)	Night time L <sub>Aeq,T</sub> (dB)
Road traffic free field noise level, L <sub>Aeq</sub>	63	56
Façade correction, +3dB	66	59
Glazing insulation, R <sub>TRA</sub> 32 dB	-32	-32
Predicted Internal Level	34	27
Proposed Local Authority Criteria	≤35	≤30

5.10 Glazing providing R<sub>TRA</sub> 32 dB would be expected to provide around R<sub>w</sub> 38 dB, which may be provided by a high performing glazing unit such as *Saint Gobain Glass SGG Stadip Silence* 6.4mm / 16mm / 4mm (glazing / cavity / glazing).

5.11 A reduction in the glazing and ventilation specification is possible for the facades that are at an increased distance from the road, have additional screening and/or at an angle to the road.

5.12 For facades that are not parallel to the main road traffic noise source, the angle of view correction contained with Equation 1 below has been applied.

$$\text{Angle of view correction} = 10 \times \text{Log}_{10} \left( \frac{\alpha}{180} \right) \quad (1)$$

where  $\alpha$  is the angle of view from the assessment façade to the road (degrees).

5.13 For a façade at 90° to the road source, the receiver level is 3 dB(A) lower resulting in a corresponding reduction in glazing specification.

5.14 The acoustic attenuation between source and receiver locations is modelled as a line source; the form of correction is provided in Equation 2.

$$\text{Distance attenuation} = 10 \log(d_1/d_2) \quad (2)$$



, where  $d_1$  is the distance from source to measurement location, and  $d_2$  is the distance from source to receiver location.

- 5.15 For rear facing facades, barrier attenuation and reflections are accounted for.
- 5.16 Appendix B provides mark-up floor plan layouts with recommended acoustic specifications. These factors in the additional acoustic attenuation considerations discussed.
- 5.17 In relation to Appendix B, Table 10 below provides a summary of the glazing and trickle vent specifications and their general application.

<b>Table 10: Minimum Façade Glazing and Ventilator Requirements</b>			
Specification	Application	Glazing	Ventilator
A	Façades on Willowbrae Rd	$R_{Tra}$ 40 dB	Mechanical - ventilated to rear or roof
B	Façades on Northfield Broadway/ additional distance from Willowbrae Rd	$R_{Tra}$ 32 dB	$D_{n,e,w}$ 46 dB
C	Façades with angle of view/barrier correction	$R_{Tra}$ 28 dB	$D_{n,e,w}$ 42 dB
No acoustic rating	Rear (Easterly) facing facades	Standard double glazing unit	Standard Ventilators

- 5.18 If multiple ventilator units are installed within the same room, the individual acoustic ventilator performance will need to be increased by a factor of  $10 \times \log_{10}(n)$ , where  $n$  is the number of vents installed per room (i.e. if 2 ventilators are required then the acoustic rating of each ventilator should be  $D_{n,e,w} \geq x + 3$  dB).
- 5.19 Consideration should be given to the use of mechanical ventilation, ventilated to rear facades or roof, within Specification B also.

## 6.0 Commercial Noise Impact

### 6.1 Noise generated within Commercial Unit

6.2 Table 11 below provides a prediction of the required sound insulation to be achieved in order to achieve inaudibility (NR15) for maximum restaurant noise levels.

Description	63	125	250	500	1000	2000	4000
Maximum restaurant noise event, $L_{Max}$	89	89	89	90	90	86	78
NR 15	47	35	26	19	15	12	9
Required Insulation	42	54	63	71	65	70	69

6.3 The approximate required on-site sound insulation to achieve inaudibility for the maximum events is  $D_{nT,w}$  72 dB, which may be difficult to achieve with a standard residential wall/floor construction. This is reduced upon consideration of the average restaurant noise levels ( $L_{Aeq}$ ), for which we would recommend  $D_{nT,w}$  60 dB, but should remain as a design target.

6.4 Such a level of insulation would be achieved with a concrete floor structure, a deep floating floor construction (i.e. resilient cradles), and a resilient suspended ceiling system.

6.5 For the separating wall this levels of insulation would be achieved with a 215mm dense concrete blockwork wall, finished to one side with high-density plasterboard on dabs and to the other side with an independent steel frame off-set from the blockwork by 30mm, incorporating 50mm mineral fibre and finished with two layers of high-density plasterboard.

6.6 We would recommend that a clause is written into the tenancy/lease arrangements for the unit, requiring an internal level within the upper bedrooms of NR15 not to be exceeded at any time.

---

6.7 Plant Noise

6.8 The location of the plant serving the commercial unit is not known yet. Once the location, type and number of the items of plant are confirmed, a maximum permissible level can be derived for the attention of the M&E Engineer.

6.9 If the planning requirement (NR25) is exceeded for any of the items of plant, additional engineering noise control methods (e.g. silencers, enclosures and louvres) may be applied to ensure compliance.

## 7.0 Conclusion

- 7.1 We were instructed by Nicholas Saunders, on behalf of Marc Teague of Evantyr Properties Ltd to provide an acoustic impact assessment for the proposed development situated at Willowbrae Road, Edinburgh.
- 7.2 The report provides design advice for noise mitigation based upon the available information outlined above. Further design development will be required to refine the assessment including; tenancy details/commercial noise and plant locations.
- 7.3 Recommendations for achieving the proposed planning requirements in relation to road traffic noise control, have been provided with corresponding façade sound insulation requirements contained in the floor plan mark-up drawings in Appendix B.
- 7.4 Sound insulation standards have been recommended for the control of commercial noise, and may need revising depending on the tenant use.
- 7.5 Plant noise relating to the commercial unit will be examined once tenant use and location of plant has been determined. At that point, maximum permissible levels can be derived for the attention of the M&E Engineer.

Prepared by:

Approved by:

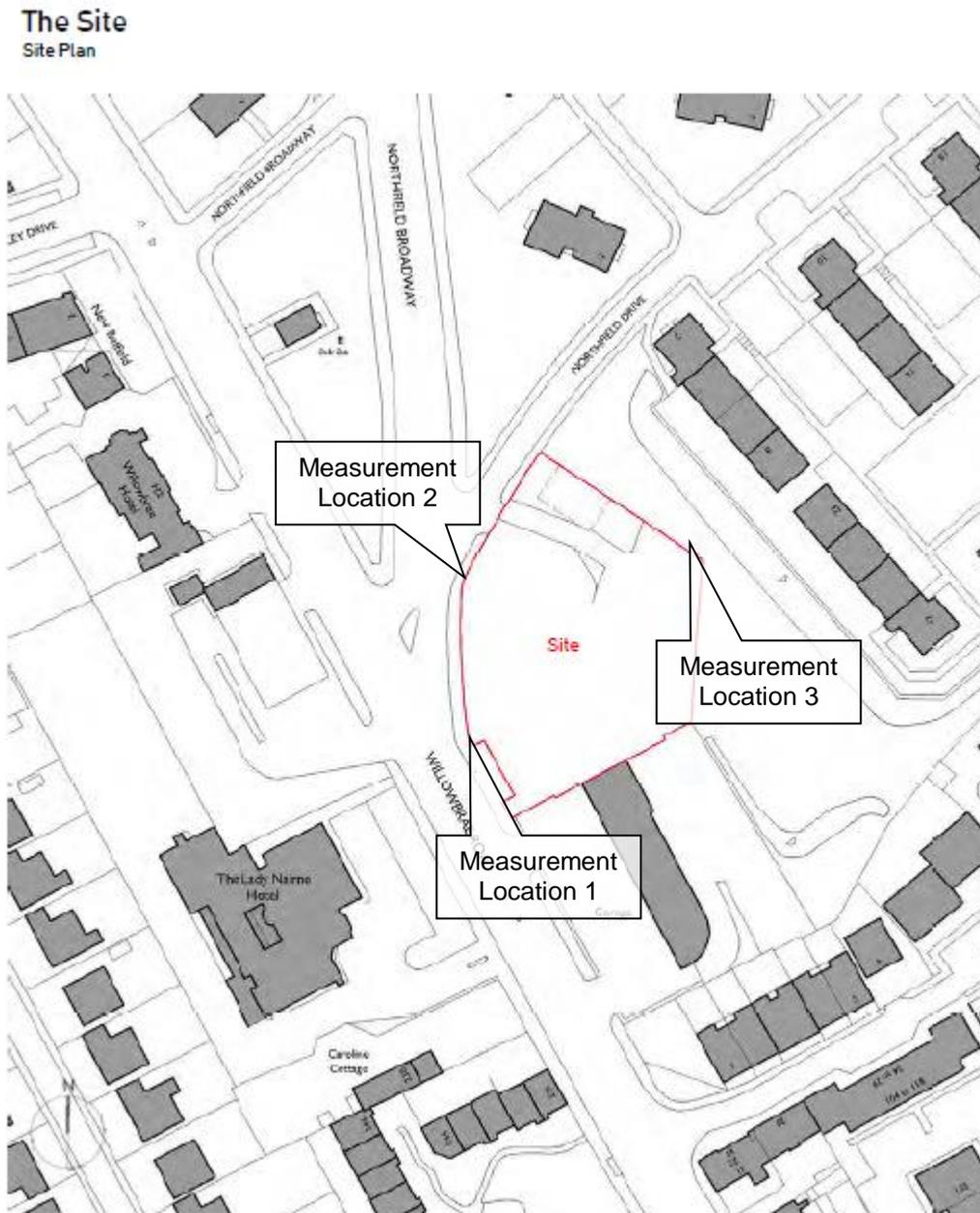
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**Eleni Kontesidou**  
BSc (Hons), MSc, MIOA

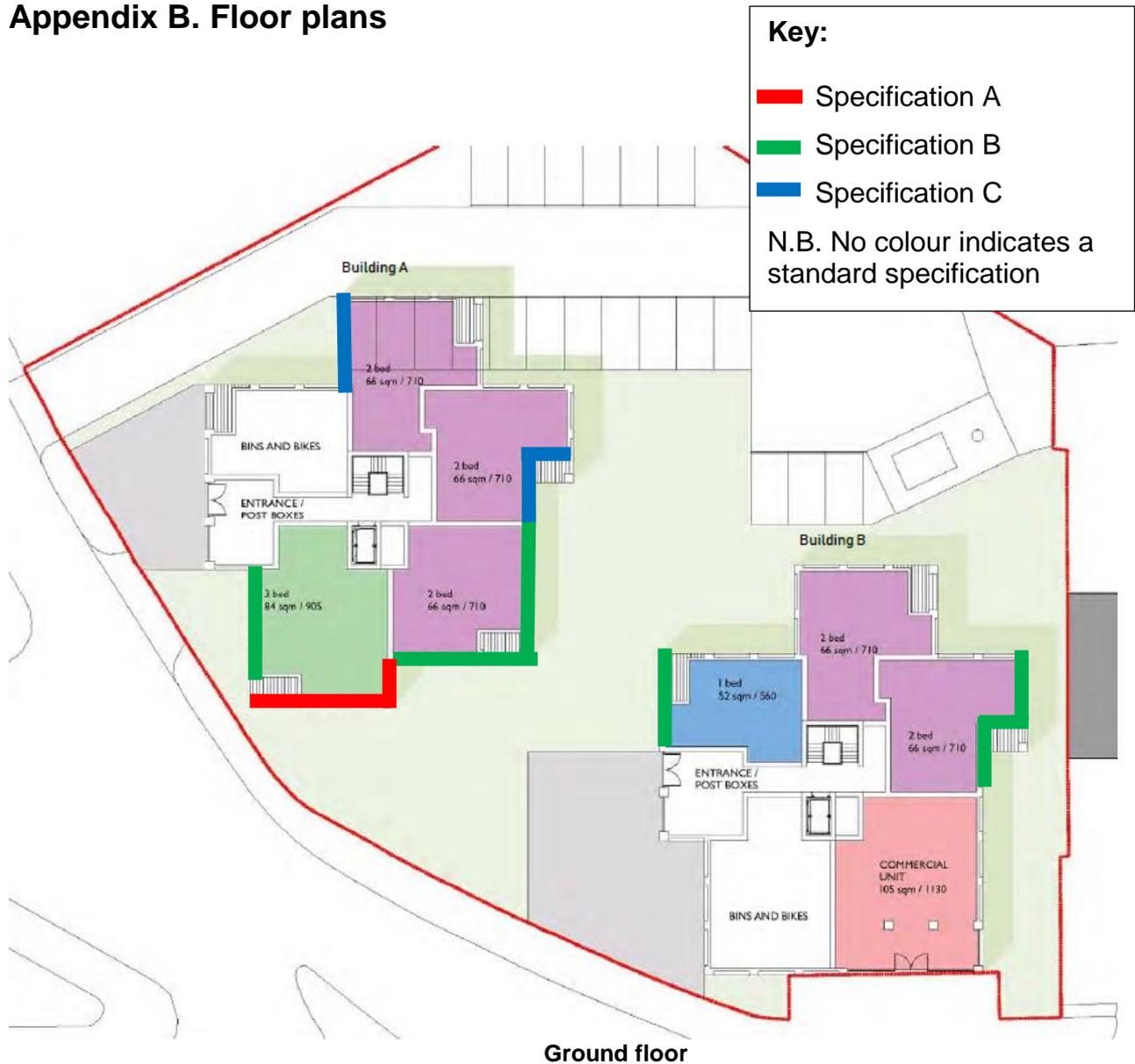
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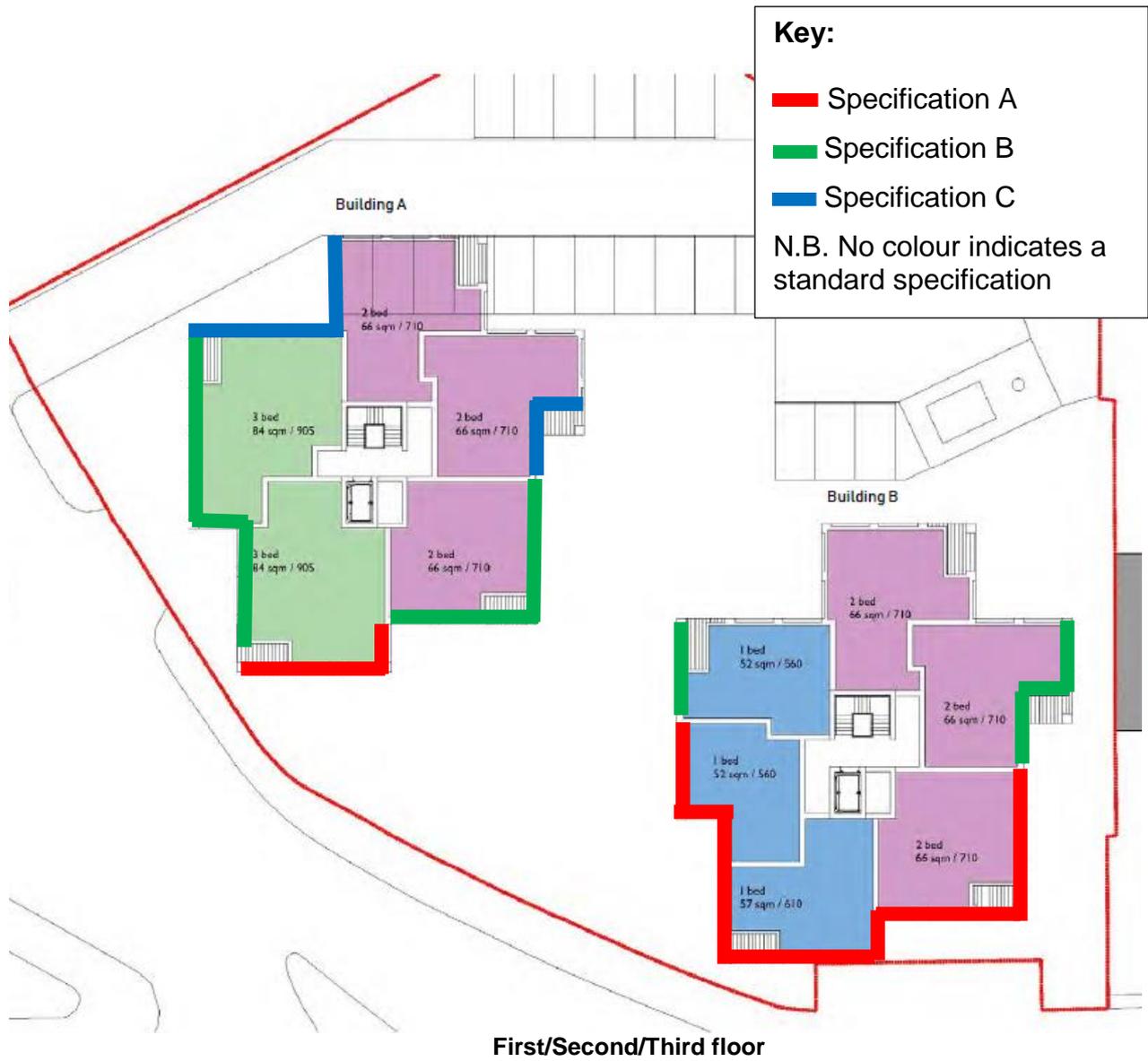
**Richard Mackenzie**  
BSc, PGDip, FIOA, MInst SCE

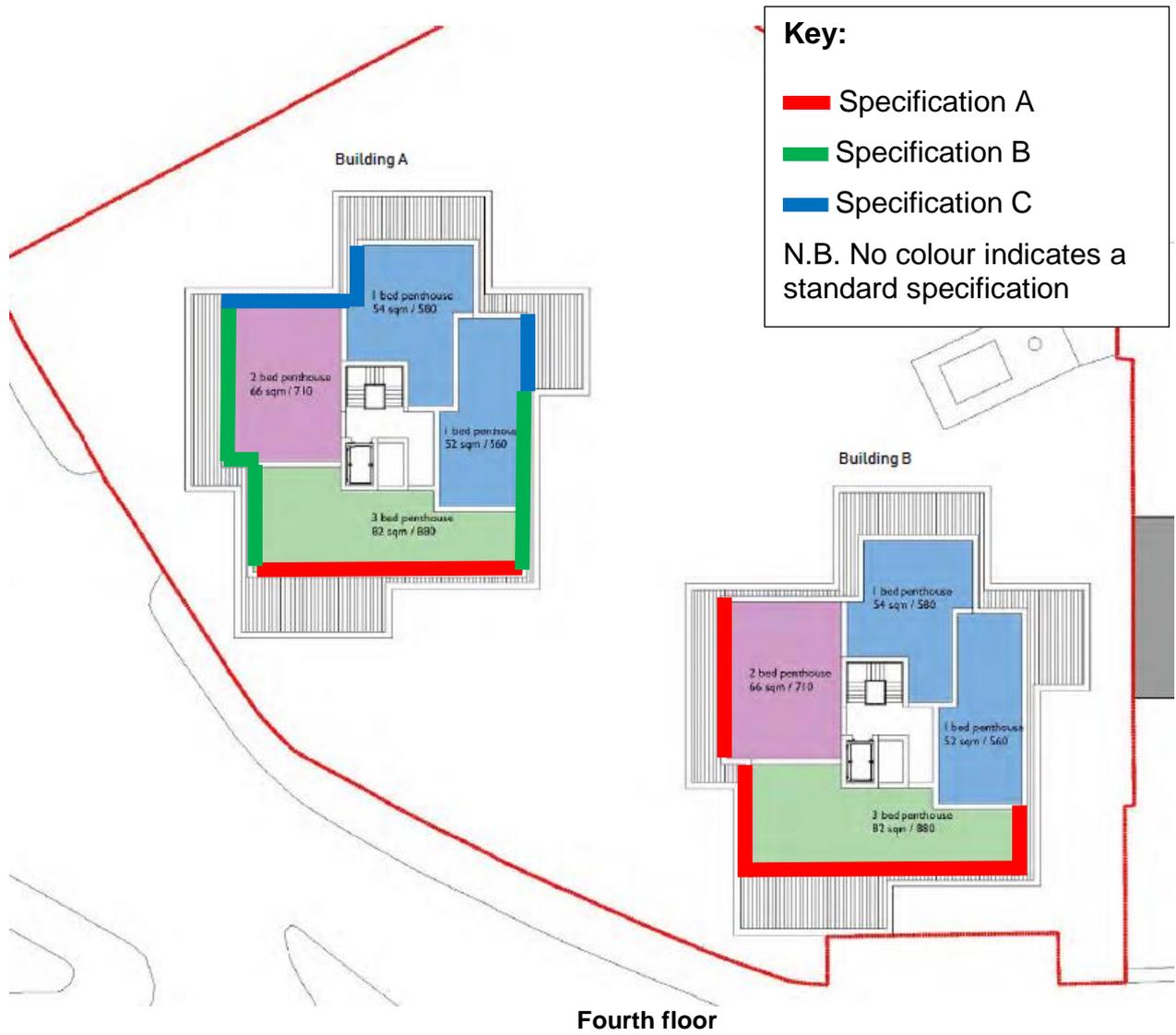
## Appendix A. Site location plan



## Appendix B. Floor plans









## Appendix C. Conversion of Noise Metrics

The conversion of data from the Calculation of Road traffic Noise (CRTN) survey measurement result to the BS 8233 assessment indices has been performed using the following steps:

Step	Conversion	Reference
1	$L_{A10\ 3\ hr} \Rightarrow L_{A10\ 18\ hr}$	CRTN §4.3 Equation 1
2	$L_{A10\ 18\ hr} \Rightarrow \begin{matrix} L_{Aeq\ 07:00 - 19:00} \\ L_{Aeq\ 19:00 - 23:00} \end{matrix}$	TRL <sup>1</sup> §4.5.2 Equation 2 Equation 3
3	$\begin{matrix} L_{Aeq\ 07:00 - 19:00} \\ L_{Aeq\ 19:00 - 23:00} \end{matrix} \Rightarrow L_{Aeq\ 07:00 - 23:00}$	- Equation 4

$$L_{A10,18hr} = L_{A10,3hr} - 1\text{ dB(A)} \quad \text{Equation 1}$$

$$L_{Aeq,07:00-19:00} = L_{A10,18hr} \times 0.9471 + 1.4385 \quad \text{Equation 2}$$

$$L_{Aeq,19:00-23:00} = L_{A10,18hr} \times 0.9697 - 2.8702 \quad \text{Equation 3}$$

$$L_{Aeq,07:00-23:00} = 10 \times \text{Log}_{10} \left( \frac{12}{16} \times 10^{\frac{L_{Aeq,07:00-19:00}}{10}} + \frac{4}{16} \times 10^{\frac{L_{Aeq,19:00-23:00}}{10}} \right) \quad \text{Equation 4}$$

<sup>1</sup> Transport Research Laboratory Report PR/SE/451/02, Abbott P.G., Nelson P.M."Converting the UK traffic noise index  $L_{A10,18h}$  to EU noise indices for noise mapping".

RMP works in partnership with Edinburgh Napier University's Institute for Sustainable Construction bringing together a wide range of specialist expertise in construction innovation.



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## OFFICES

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Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: [planning.support@edinburgh.gov.uk](mailto:planning.support@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100392605-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Suzanne McIntosh Planning Limited		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Suzanne	Building Name:	
Last Name: *	McIntosh	Building Number:	45C
Telephone Number: *	07792230979	Address 1 (Street): *	Bath Street
Extension Number:		Address 2:	Portobello
Mobile Number:		Town/City: *	Edinburgh
Fax Number:		Country: *	United Kingdom
		Postcode: *	EH15 1HB
Email Address: *	smcintoshplan@gmail.com		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text" value="Mr"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text"/>
First Name: *	<input type="text" value="Marc"/>	Building Number:	<input type="text" value="79A"/>
Last Name: *	<input type="text" value="Teague"/>	Address 1 (Street): *	<input type="text" value="Salamander Street"/>
Company/Organisation	<input type="text" value="Evantyr Properties Ltd"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="Edinburgh"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="Scotland"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="EH6 7JZ"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="REDACTED"/>		

## Site Address Details

Planning Authority:	<input type="text" value="City of Edinburgh Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="229 WILLOWBRAE ROAD"/>
Address 2:	<input type="text"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="EDINBURGH"/>
Post Code:	<input type="text" value="EH8 7ND"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="673274"/>	Easting	<input type="text" value="329131"/>
----------	-------------------------------------	---------	-------------------------------------

## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

A residential led development consisting of 48 apartments over 2 apartment buildings with a commercial unit at ground floor

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Grounds for Review Document

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

A Separate list of supporting docs is provided

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

20/02101/FUL

What date was the application submitted to the planning authority? \*

03/06/2020

What date was the decision issued by the planning authority? \*

14/01/2021

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may select more than one option if you wish the review to be a combination of procedures.

Please select a further procedure \*

By means of inspection of the land to which the review relates

Please explain in detail in your own words why this further procedure is required and the matters set out in your statement of appeal it will deal with? (Max 500 characters)

A site inspection is essential to ascertain whether each of the reasons for refusal stands. The LRB is considering the case de-novo and as such must examine the issues relating to the impact of the proposal on its setting. To do this the LRB must be familiar with the site and the locality. A video has been provided to assist in this regard given the current restrictions.

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mrs Suzanne McIntosh

Declaration Date: 12/04/2021

**GROUNDS FOR REVIEW  
CITY OF EDINBURGH  
LOCAL REVIEW BODY**

Refusal of planning permission 20/02101/FUL:  
Residential led development: 48 apartments over 2  
apartment buildings & a commercial unit at ground floor

at  
229 Willowbrae Road  
Edinburgh  
EH8 7ND

EVANTYR PROPERTIES LTD

SUZANNE MCINTOSH PLANNING LIMITED  
11.4.21

## 1. INTRODUCTION

Under the council's delegated powers the Planning Officer at City of Edinburgh Council refused the application for a residential led development consisting of 48 apartments over 2 buildings with a replacement commercial unit at ground floor at 229 Willowbrae Road, Edinburgh.

The reasons for refusal are:

1. *The proposal is contrary to policy **Des 1** as it does not draw on the positive characteristics of the area. It represents overdevelopment of the site and fails to comply with the Edinburgh Design Guidance, particularly in terms of its height, impact on local views and its relationship with the wider surroundings.*
2. *The height and form of the proposal would not integrate well with its surroundings, is inappropriate in its context and would adversely impact on local views contrary to policy **Des 4** Development Design – Impact on Setting.*
3. *The provision of green space within the development does not meet requirements of policy **Env Hou 3** (sic) Private Green Space in Housing Development or the Edinburgh Design Guidance in terms of amount and quality of space provided for end users.*

The applicant therefore seeks an independent review of the delegated decision by the Local Review Body (LRB).

The LRB to consider the applicant's case based on:

- Well founded evidence based on a sound urban design methodology;
- Public opinion of the proposed scheme and the level of support that has been lodged;
- The technical assessments undertaken in all of the supporting documents.

Importantly for the LRB the proposal essentially complies with the council's adopted policies and supplementary guidance.

It is a high quality architectural and urban design solution for this site, creates much needed apartments accommodation in the area and will kick start the regeneration of this site and the area to the north beyond it.

At every stage – pre and post application submission the applicant has been asked to produce reports, evidence, engaged with the consultees and a provide a justification for the proposal. All of these requirements have been met at every step.

The end result - a report of handling from the Planning Officer is peppered with inaccuracies that are pointed out in a letter to the Head of Planning dated 26.1.21 which is submitted in this appeal. The response received did not fully address these points. The applicant is therefore forced to appeal to obtain an

independent view on the issues stated in the reasons for refusal. To assist the LRB the applicant has lodged a video of the scheme with the appeal.

The applicant would like the LRB to note that all the discussions to date with the Planning Officer have failed to give clear advice on their exact position on matters of design. However the lack of a competent, robust design critique from Planning, together with the cumulative extent of the errors in how this decision has been arrived at, particularly in the report of handling have resulted in this appeal.

The LRB are respectfully requested to consider all these matters in arriving at their decision.

The LRB is also asked to note that the Grounds for Review does not replicate all of the information provided in each of the supporting documents but draws out the issues relating to the reasons for refusal only. All of the answers to any questions they may have can be found in the Design and Access Statement and the applicant's response to CEC on the consultees and representations; as well as the extensive technical reports and drawings package.

The applicant is of course happy to be included in the hearing session and answer any questions the LRB may have first hand rather than relying solely on the Planning Advisor who will not have been involved in this application at all.

## **2. Grounds for Review.**

The appellant wishes the LRB to consider all of the information lodged to support the application: the package of drawings, Design and Access Statement (D&AS), supporting letter explaining how the appellant has dealt with the objections raised and each of the technical reports pertinent to the proposal

### **Reason for Refusal 1:**

The decision notice states that the proposal is contrary to Des 1 as it *'does not draw on the positive characteristics of the area'*. Although the reason does not go as far as to say what these are. It does state that the proposal is *'an over development of the site and fails to comply with the EDG in relation to height, impact on local views and its relationship with the wider surroundings'*.

Looking to Policy Des 1 this policy advises that planning permission will be granted where the development demonstrates that it will create or contribute towards a sense of place. It goes on to require that design be based on an overall design concept that draws upon positive characteristics of the surrounding area.

There is no doubt that this proposal will contribute to the local area as a high quality, sustainable design. This proposal has been designed based on evidence and analysis of the locale; a solid understanding of the urban design fabric and grain of the area as evidenced by the applicant in the Design and Access Statement. This document will be critical to the LRB's decision.

The proposal represents a good design solution, entirely appropriate for this site and will not result in damage to the character and appearance of the area. The Design and Access Statement provides the proof of this for the LRB.

The applicant's video also lodged with the appeal show how appropriate a fit in this locale the development will be to this site.

On the specific issues of CONTEXTUAL SCALE, HEIGHT AND MASSING the LRB is asked to refer to D&AS for detail that informed the design of the proposed development following a detailed analysis of the surrounding townscape / landscape characteristics. Chapter 2 of the D&AS (pages 16 – 25) thoroughly analyses the surrounding context.

Various layout options were considered within the D&AS (page 28) for this challenging corner site with reasons identified for the decision to develop the option for 2 pavilion type buildings.

The massing and sunlight were analysed to fully understand the impact the pavilion buildings would have on the site and the neighbouring land (Please refer to pages 42 – 44 of the D&AS)

ANIMATION/ VIDEO: The short animation shows the benefits of splitting the building form to reduce the mass, allow for light to penetrate through the site, while also allowing dual aspect apartments throughout. The benefits of the pinwheel arrangement with dual aspects brings its own inherent self policing of the site as it is fully overlooked.

With regard to BUILDING LINES AND FRONTAGE PATTERNS The buildings were designed to sit within the site, behind a walled perimeter. A contextual response to the neighbouring area (please refer to pages 16 and 18 D&AS). The introduction of the perimeter wall was discussed and encouraged at pre-application due to the added merits of security, while improving the quality of the amenity space within for the residents. The height of the wall was considered and limited in height to minimise the impact of the wall, allowing for views into the site without dominating the space, allowing the development to be adopted as part of the neighbouring instead of turning its back.

In terms of the POSITIONS OF BUILDINGS ON SITE The buildings were set back from the site perimeter to allow them to breathe and appear to sit within the well considered and organised landscaped garden spaces with hierarchies of space considered (Please refer to pages 49 and 51 of the D&AS).

Whilst 'walled' the applicant introduced 'semi-public' courtyards that allow a transition between the public footpath and the private / semi- private gardens for the residents. This allowed a comfortable relationship with the footpath while protecting the amenity space from the reality of the busy roads.

The conclusion the LRB is asked to take is that the proposal does indeed consider in detail the requirements of Des1 and demonstrates an effective

knowledge of the local area, a need for a statement development on this site and one that relates well to the surrounding area. The proposal achieves that.

A full justification is provided within the D&AS to express how this proposal integrates with the neighbouring context which has a varied typologies and characteristics. The reason for refusal and the report of handling do not critique this nor present an alternative yet these fundamental and thorough documents are simply disregarded. That is not the level of good planning we are normally presented with from CEC. The applicant does not know from the report of handling what the positive characteristics are that the Planner is so keen to preserve nor the extent to which they deem this to be overdevelopment – is it too high, are there too many units or is it the footprint; the applicant is left wondering. No decision notice or report of handling should ever leave an applicant in that frame of mind.

### **Reason for Refusal 2:**

This reason focuses on Des 4 and integration with surroundings, context/height, local views etc. A number of these issues are also covered above in the narrative on reason 1, the D&AS and are also relevant here. Policy Des 4 states that: *Planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to:*

- a) height and form
- b) scale and proportions, including the spaces between buildings
- c) position of buildings and other features on the site
- d) materials and detailing

The reason for refusal is specific to height and form. These issues are examined in detail in Reason 1 and in the D&AS referred to above. The building form relates directly to the context within it's immediate vicinity and has been informed by the character of the listed buildings and the villas within the neighbouring area. The reason for refusal doesn't present a definitive view nor the report interrogate this issue.

The LRB is asked to discount this reason for refusal as a repeat of the issue in reason 1 and for the reasons set out in the D&AS and the supporting documents.

### **Reason for Refusal 3:**

This reason states that the provision of green space within the development does not meet the requirements of Policy Env Hou3 (sic) or Edinburgh Design Guidance in terms of amount and quality of space provided for end users.

Policy Hou3 (Env Hou 3 does not exist hence the use of sic above); states that: *'Planning permission will be granted for development which makes adequate provision for green space to meet the needs of future residents.*

*a) In flatted or mixed housing/flatted developments where communal provision will be necessary, this will be based on a standard of 10 square metres per flat (excluding any units which are to be provided with private gardens). A minimum of 20% of total site area should be useable greenspace.'*

The information provided to the Planning Officer during the application period determines that the amenity provision greatly exceeds the minimum standards set out within the Edinburgh Design Guidance hence we are at a loss as to where the figures have come from that the officer refers to.

The applicant's documents analyse in detail the type, purpose, nature, location and amount of open space provided in the development. Supporting drawings also analyse this. There is extensive open space provided throughout this development.

While the amenity space complies with the local policy, a large percentage of apartments enjoy their own private gardens, terraces or balconies which provides further amenity to the residents.

The report of handling states that there is to be 530 sqm of amenity space. This is inaccurate - there would be 951sqm of amenity space (30.5% of the site). In addition to that there is also 145sqm of semi-private amenity (a further 4.5% of the site) which is useable with bench seating / planting. This information was itemised in the supplementary documentation submitted to CEC planning department dated November 2020 and is included in this appeal, but it appears to have been ignored by the Planning Officer.

The buildings have been designed and orientated to allow sunlight to penetrate through into different parts of the gardens throughout the day. The visuals on the following pages provide further detail showing how each space benefits from the sunlight throughout the day.

The open space has also been designed to be completely overlooked. The apartment buildings are arranged in a pinwheel configuration with a central core to allow for dual aspect apartments throughout. This allows for natural surveillance of the whole site with all areas overlooked.

The landscape design was integral to the development proposal and landscape architects were engaged at an early stage to input into the design and ensure that all spaces were thoroughly considered and designed to create good quality amenity space and enhance these spaces for the residents.

Please refer to pages 49 – 53 of the D&AS for further detail of the considerations made.

With regard to the Sunlight analysis and impression on amenity spaces the solar study illustrates how the design and configuration of the buildings encourage

and allow sunlight to penetrate through the centre of the development to allow light to all parts of the site at varying times of the day.

The central courtyard space benefits from the sun from the early morning through to mid-day and the again in the later evening once the sun has moved west.

The amenity space to the west of the site which is sheltered by the perimeter wall, benefits from the sun throughout the day.

For the above reasons Reason 3 falls and should be dismissed.

### **Other Material Considerations**

Representations are material considerations in planning applications. The LRB have been provided with 77 letters of support in relation to this application. All from people who were astounded it had been refused. It is not commonplace for people to write in support of a planning application and their silent views are often ignored in the planning process. Thirty people had written to object to the proposal however more than double that had written in support of the appeal. That is an issue the LRB must take into consideration.

The LRB is advised that there was at the point of decision correspondence undertaken with the Planning Department to raise the issues that can be summarised as three main areas of concern:

1. Errors in the report of handling;
2. A potentially flawed decision not based on the correct package of supporting information and consultation responses; and
3. Flawed lines of communication from the Planning Authority

Those complaints remain unresolved. The decision of the LRB on this case will be critical as to where those issues are taken.

### **Errors in the Report of Handling**

Below is a list of the points that are inaccurate in the report of handling that have led to a flawed decision being taken. The numbers below relate to the part of the report of handling they refer to.

These are not points of interpretation but matters of fact, figures, stats and comprehensive analysis. Had the correct information provided by the applicant been used in the report then would a different conclusion have been reached? Our conclusion must be that it quite possibly would have.

2.1 Site Description: the site description contains 2 fundamental errors: The site is not 3,052sqm; it is 3,114sqm as specified within the application form.

2.2 Site History: the history set out in 2.2 isn't the history of the site and is entirely irrelevant to this proposal. No history is quoted for this site.

3.1 Description of the Proposal: the report states that there is to be 530 sqm of amenity space. This is incorrect - there would be 951sqm of amenity space (30.5% of the site). In addition to that there is also 145sqm of semi-private amenity (a further 4.5% of the site) which is useable with bench seating / planting. This information was itemised in the supplementary documentation submitted to CEC planning department which appears to have been ignored at worst or not referred to in this report.

The report states that there are 2 separate bike stores. This was updated following discussion with CEC roads and waste services to combine the bin stores. This moved the point of collection away from the busy road junctions. The result was that the bike stores were combined. The updated site layout and floor plans were resubmitted to CEC planning department for consideration prior to determination of the application in November 2020 and again do not appear to have been looked at.

### 3.3 Assessment

(b) the Impact of the development on the setting of nearby listed buildings is acceptable:

The listed buildings range between 1 ½ and 3 storeys (with a further developed roof). Within their immediate context are number of 4 storey apartment buildings. The closest edge of the application site is 62m from the nearest listed building. The development relates in scale with the buildings in its immediate vicinity – the hotel opposite, the 5 storey apartment buildings to the north and north-east and the 4 storey apartment building on Willowbrae Road. The impact therefore of the proposed development on the listed buildings is minimal. The report however makes no reference to this and effectively exaggerates the issue of the impact of the proposal on listed buildings and setting as though there is a close, intervisible relationship or a shared setting – that is clearly not the case. We did wonder reading this section in particular if the case officer had visited the site. The proposed development was informed by the characteristics of the listed villas in the area with the proposed form set back into the site with a perimeter wall to reflect on these local characteristics. The above rationale was comprehensively detailed within the D&AS submitted as part of the detailed application.

#### (c) Scale, Design and Materials

This section acknowledges that the surrounding built environment is urban with a mix of building materials and styles.

'This part of Willowbrae Road is characterised by a historic pattern of buildings largely fronting directly onto the street, and set back from the busy street frontage within generous garden grounds.' The applicant would comment that this informed our design which mimics these characteristics by setting the building back within a walled garden with generous garden grounds (as detailed within the supplementary planning documentation). The Planning Authority has a full design statement and methodology that rigorously details why design solutions have been presented as they have. At no point in the

course of the application did the Planning Officer say – we are recommending refusal – this is unacceptable. At each point we were asked to justify our proposals which we have only to find none of this has been incorporated in the report or even mentioned.

The positioning of the proposed buildings does not successfully address the street frontage, nor provide adequately generous amounts of open space around them to sit comfortably within the prevailing urban pattern.’. The applicant would comment that: The site is located on the corner of Willowbrae Road and Northfield Broadway. It also fronts on to Northfield Drive. The buildings were set back, to reference local context as described above. They were designed to allow the buildings to turn with the site to address all 3 streets without simply creating a perimeter type development which would have been contextually wrong. The characteristics of the ‘villa’ typology were adopted to allow the buildings to sit back, and directly address all 3 streets. The open space as designed provides a large area of shared amenity space – some 35% of the overall site.

‘The site layout devotes a large portion of the available open space to car parking.’ The applicant would comment that the amount of car parking was considered and reduced to minimise the impact of the hardstanding and the number of cars for this development. The site has a fall of 3m and the car parking sits at the lower part of the site. Vehicular access is also required to the existing telecoms mast. The proposal restricts parking numbers, with some concealed by an undercroft while the amenity space which sits on the upper plane further concealing it from view.

The applicant would comment that there is a considerable fall on not only our site but down towards the 5 storey apartment buildings on Northfield Drive. Their ground floor levels naturally sit lower than our site due to the topography of the area. These 5 storey buildings which are larger in overall mass are the closest structures to the development site therefore must be considered relevant for consideration. The top storey of the proposal was stepped back to reduce the visual impact of the top storey.

Materials and Detailing:

‘...the composition of the elevations in terms of balance between solid and window areas lends itself to commercial rather than domestic appearance. The applicant would comment that the proportions and the ratio of solid to glazed areas is typical of a contemporary new build ‘villa type’ apartment building found throughout the city.

‘...and does not present a clear representation of the buildings proposed end use.’ The applicant would comment that the use of the ashlar stone and materials specifically selected to have a tactile appearance along with the introduction of corner balconies provide human scale, and a relatable appearance clearly defining it's residential use.

(d) The proposal is detrimental to the amenity of neighbours or occupiers of the new development: the proposal is detrimental to the amenity of neighbours or

occupiers of the new development new residents – Daylight 'No supporting information has been provided by the applicant to allow for an assessment of daylighting to properties to be carried out as required in the Edinburgh Design Guidance.' Comment: An assessment was not requested at any point during dialogue with CEC planning department.

Sunlight: The built form was spilt to allow light to penetrate through to all parts of the site. Different parts of the gardens benefit from sunlight from different parts of the day.

Open Space Provision: The report states 530sqm of amenity space stating that we fall below the Edinburgh Design Guidance of 20% minimum. There is 951sqm of amenity space (30.5% of the site). In addition to that there is also 145sqm of semi-private amenity (a further 4.5% of the site) which is useable with bench seating / planting. A detailed analysis of these areas were illustrated and itemised within the supplementary documentation submitted to CEC planning department. This shows that the proposal exceeds the minimum requirements set out within the Edinburgh Design Guidance.

'The usability of the green space on site is constrained by the site layout, with the majority positioned onto the frontage of the site adjacent to a busy road. This does not maximise the opportunity for the provision of good quality open space.' The applicant would comment that the gardens identified sit adjacent to the quieter Northfield Broadway and is enclosed by a stone perimeter wall. This was designed to give further shelter to the gardens by providing enclosure. Further to this large area of amenity, a further amenity courtyard is located in the between the two proposed apartment buildings. This area of landscaped amenity is located well within the site and is sheltered by prevailing winds etc by the form of the apartments.

e) Road Safety and Parking: The report states than an agreement has not been met between the applicant and the transport officer. This is incorrect. Changes were made to the proposal on receipt of the consultation from the Roads department. The applicant reviewed the detail and made changes which were deemed acceptable to the transport officer. This was confirmed in writing to CEC Planning by the transport officer and the changes agreed were reflected within the amended drawings submitted to the planning department.

h) Other material considerations: Site investigation, energy sources, noise and ventilation. A chimney flue from the commercial unit was shown on all floor and roof layouts within the application drawings. A condition noting the air changes required could have been applied to any consent.

Waste: The report states an agreement has not been met between the applicant and waste management. Changes were made to the proposal on receipt of the consultation from CEC waste management. We reviewed the detail and made changes which were deemed acceptable to waste management. This was confirmed in writing to CEC planning department by waste management and the changes agreed were reflected within the amended drawings submitted to the planning department.

Telecommunication Infrastructure: We have not been made aware of any consultation / dialogue / comment from the operator of the telecoms mast.

### **3. Conclusions**

The LRB is respectfully requested to take into the account the applicant's comprehensive package of information lodged with the request for review and the information contained in this document and comprehensive appeal documents, including the MP4 video. All of this information provides a solid, robust case that will allow the LRB to support the proposal and overturn the delegated decision allowing the appeal subject to conditions as one would normally expect on this type of application.

*Suzanne C McIntosh MRTPI Hon FRIAS*

11.4.21

## Proposal Details

Proposal Name	100392605
Proposal Description	A residential development consisting of 48 apartments over 2 apartment buildings with a commercial unit at ground floor
Address	229 WILLOWBRAE ROAD, EDINBURGH, EH8 7ND
Local Authority	City of Edinburgh Council
Application Online Reference	100392605-001

## Application Status

Form	complete
Main Details	complete
Checklist	complete
Declaration	complete
Supporting Documentation	complete
Email Notification	complete

## Attachment Details

Notice of Review	System	A4
APP3 CEC Decision Notice	Attached	A4
APP2 Delegated Report of Handling	Attached	A4
APP1 Planning Application Form	Attached	A4
APP4 Letters of Support	Attached	A4
APP11 Transport Response	Attached	A4
APP10 Response to CEC on Planning and Stat Consultees Nov 2020	Attached	A4
APP34 Revised Drawings BATCH1	Attached	A1
APP35 Revised Drawings BATCH 2	Attached	A1
APP20 Appendix 8 Hardly Haddow1	Attached	A1
APP21 Appendix 9 Harley Haddow 2	Attached	A1
APP22 mp4 video of the site and proposal	Posted	Not Applicable
APP19 RMP Noise Impact Assessment	Attached	A4
APP15 Sweco Transport Statement	Attached	A4
APP23 WBR CDA SW 00 DR A PL 001 P2	Attached	A1
APP33 WBR CDA BB ZZ DR A PL 0017 P2	Attached	A1
APP24 WBR CDA SW 00 DR A PL 002 P2	Attached	A1

APP25 WBR CDA SW 00 DR A PL 004 P2	Attached	A0
APP27 ED12858 WA 00 22 RR L 4000 PO1	Attached	A1
APP28 ED12858 WA 00 22 DR L 4100 PO1	Attached	A1
APP14 HH SWMP	Attached	A4
APP13 1776 FLOOD RISK ASSESSMENT	Attached	A4
APP31 WBR CDA SW 04 DR A PL 0012 P2	Attached	A1
APP29 WBR CDA SW B1 DR A PL 0005 P3	Attached	A1
APP32 WBR CDA SW RF DR A PL 0013 P2	Attached	A1
APP26 WBR CDA LW ZZ DR A PL 0003 P2	Attached	A1
APP30 WBR CDA SW ZZ DR A PL 0011 P2	Attached	A1
APP5 Letter of Support	Attached	A4
APP6 Letters of Support x 15	Attached	A4
APP7 Letters of Support x21	Attached	A4
APP8 LRB Decision Notice communications with CEC	Attached	A4
APP9 Letter SMP to CEC 26 Jan 2021	Attached	A4
APP12 SCOTTISH WATER RESPONSE	Attached	A4
APP16 DAS PART1	Attached	A4
APP17 DAS PART2	Attached	A4
APP18 DAS PART3	Attached	A4
Appellant Grounds for Review	Attached	A4
List of Productions	Attached	A4
Notice_of_Review-2.pdf	Attached	A0
Application_Summary.pdf	Attached	A0
Notice of Review-001.xml	Attached	A0

# **LIST OF APPELLANT PRODUCTIONS APPEAL TO THE LRB**

Refusal of planning permission: 20/02101/FUL  
Residential led development: 48 apartments over 2  
apartment buildings & a commercial unit at ground floor

at  
229 Willowbrae Road  
Edinburgh  
EH8 7ND

EVANTYR PROPERTIES LTD

SUZANNE MCINTOSH PLANNING LIMITED  
11.4.21

## LIST OF DOCUMENTS LODGED AS PART OF THE REVIEW

APP1 Planning application form  
APP2 Officer Report of Handling  
APP3 Refusal Notice 14.1.21

APP4 BATCH 1 SUPPORTING LETTERS X31  
APP5 BATCH 2 SUPPORTING LETTERS X10  
APP6 BATCH 3 SUPPORTING LETTERS X15  
APP7 BATCH 4 SUPPORTING LETTERS X21

APP8 Email from Paul Devaney CEC 8.4.21  
APP9 Letter SMP to CEC 26.1.21  
APP10 APPLICANT Response to CEC on all material Planning,  
Representation and Statutory Consultees issues raised Nov 2020  
APP11 Transportation Response  
APP12 SW response

### Reports

APP13 Flood Risk Assessment - Kaya  
APP14 Surface Water Management – Harley Haddow  
APP15 Transport Statement - Sweco  
APP16 Design and Access Statement – PART 1 CDA  
APP17 Design and Access Statement – PART 2 CDA  
APP18 Design and Access Statement – PART 3 CDA  
APP19 Noise Impact Assessment – RMP  
APP20 HH APPENDICES  
APP21 HH APPENDICES

APP22 MP4 VIDEO

### Drawings

APP23 Location Plan: WBR CDA SW 00 DR A PL001 P2  
APP24 Existing Site Plan: WBR CDA SW 00 DR A PL 002 P3  
APP25 Proposed Demolition Plan: WBR CDA SW 00 DR A PL 0004 P2  
APP26 Existing site sections AA BB CC: WBR CDA SW ZZ DR A PL 0003 P2  
APP27 Proposed Landscape Plan: ED12858 WA 00 ZZ RR L 4000 P01  
APP28 Proposed Softworks General: ED 125858 WA 00 22 DR L 4100 P01  
APP29 Proposed Lower Ground Plan: WBR CDA SW B1 DR A PL 0005 P3  
APP30 Proposed 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> floor plans: CDA SW ZZ DR A PL 0011 P2  
APP31 Proposed 4<sup>th</sup> Floor plan: WBR CDA SW 04 DR A PL0012 P2  
APP32 Proposed Roof Floor Plan: WBR CDA SW RF DR A PL 0013 P2  
APP33 Proposed Building B sections: WBR CDA BB ZZ DR A PL 0017 P2

APP34 BATCH 1 REVISED PROPOSALS 2020 INCLUDING:

- Proposed Site plan: WBR CDA SW 00 DR A PL 0006 P3
- Proposed Sections: WBR CDA SW ZZ DR A PL 0007 P3
- Proposed Context Elevations: WBR CDA SW ZZ DR A PL 0008 P3
- Proposed Lower Ground Floor Plan: WBR CDA SW B1 DR A PL 0009 P3

APP35 BATCH 2 RFEVISED PROPOSALS 2020 INCLUDING:

- Proposed Ground Floor Plan: WBR CDA SW 00 DR A PL 0010 P3
- Proposed Building A elevations: WBR CDA BA ZZ DR A PL 0014 P3
- Proposed Building A sections: WBR CDA BB ZZ DR A PL 0015 P3
- Proposed Building B elevations: WBR CDA BB ZZ DR A PL 0016 P3

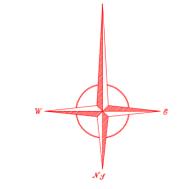


**LEGEND**

➔ Surface Water Flowpath

Rev.	Date	Description	By	Eng
Status		<b>PLANNING</b>		
<b>HARLEY HADDOW CONSULTING ENGINEERS</b> 124-125 Princes Street, Edinburgh, EH2 4AD T: +44 (0) 131 226 3331 Email: e.sing@harleyhaddow.com www.harleyhaddow.com <small>Institution of Consulting Engineers Member Firm                  Edinburgh &amp; Glasgow &amp; London</small>				
Project Title: MNM Developments Ltd Willowbrae Drive Edinburgh				
Drawing Title: Pre Development Surface Water Flowpath Layout				
Date:	Scale:	Engineer:	Technician:	
Jan 2020	1:250	RD	DC	
Drawing Number:	Rev.			
305610-FP1	-			

A1

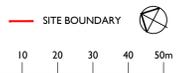


LEGEND

➔ Surface Water Flowpath

Rev.	Date	Description	By	Eng
Status: <b>PLANNING</b>				
<b>HARLEY HADDOW CONSULTING ENGINEERS</b> 124-125 Princes Street, Edinburgh, EH2 4AD T: +44 (0) 131 226 3331 Email: e.din@harleyhaddow.com www.harleyhaddow.com <small>Institution of Consulting Engineers Member                  Edinburgh &amp; Glasgow &amp; London</small>				
Project Title: MNM Developments Ltd Willowbrae Drive Edinburgh				
Drawing Title: Post Development Surface Water Flowpath Layout				
Date:	Scale:	Engineer:	Technician:	
Jan 2020	1:250	RD	DC	
Drawing Number:	Rev.			
305610-FP2	-			

A1



Location Plan

P2 17.04.20 CLIENT UPDATED P1 30.01.20 FIRST ISSUE			project Willowbrae Road, Edinburgh			job no E1908			drawing WBR-CDA-SW-00-DR-A-PL-0001			revision P2		
Rev	Date	Description	SS	NS	client	status	scale	date	drawn	checked	SS	NS		
			SS	NS	client	PLANNING	1:1250@A1	25.11.19			SS	NS		
drawn Evantyr Properties Ltd														



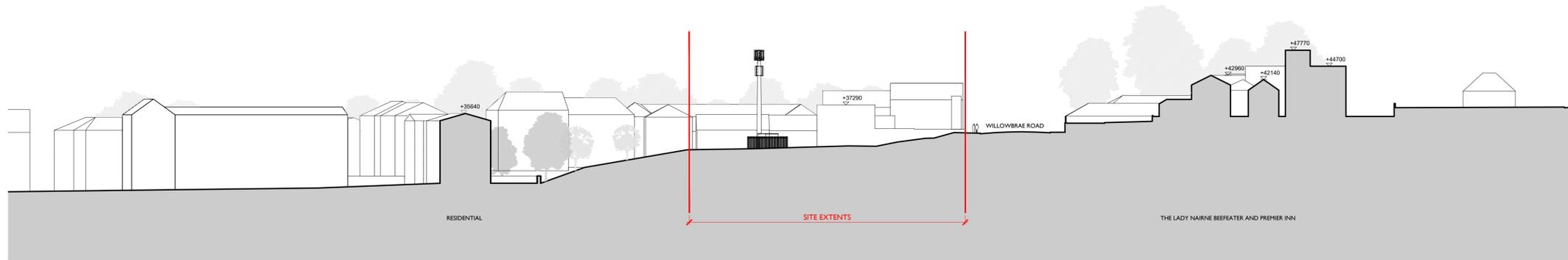


Existing Site Plan

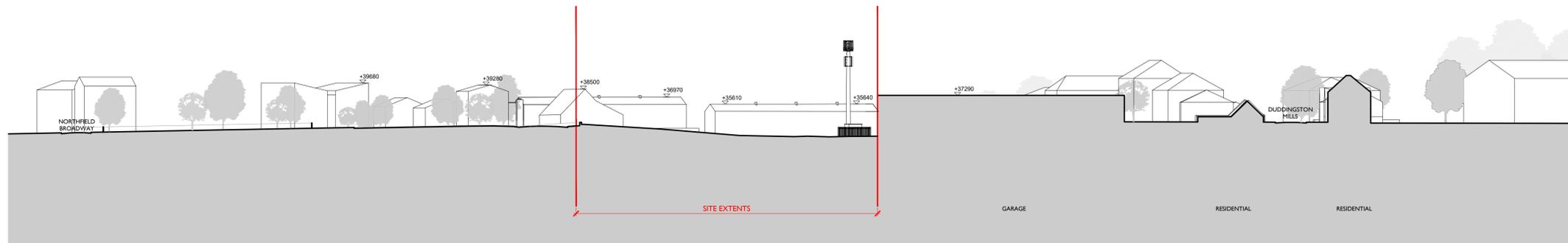
P1 21.05.20 OWNERSHIP BOUNDARY UPDATED P2 17.04.20 CLIENT UPDATED P1 30.01.20 FIRST ISSUE			project Willowbrae Road, Edinburgh		job no E1908		drawing WBR-CDA-SW-00-DR-A-PL-0002		revision P3	
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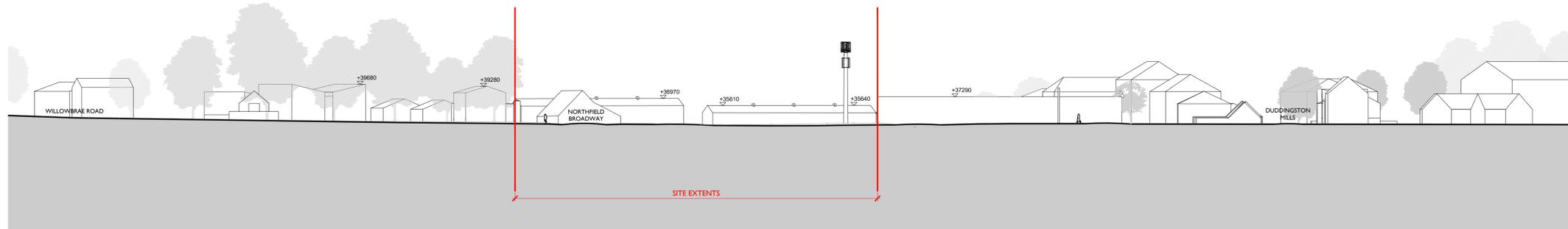
— SITE BOUNDARY  
- - - PROPOSED DEMOLITION  
 PROPOSED DEMOLITION



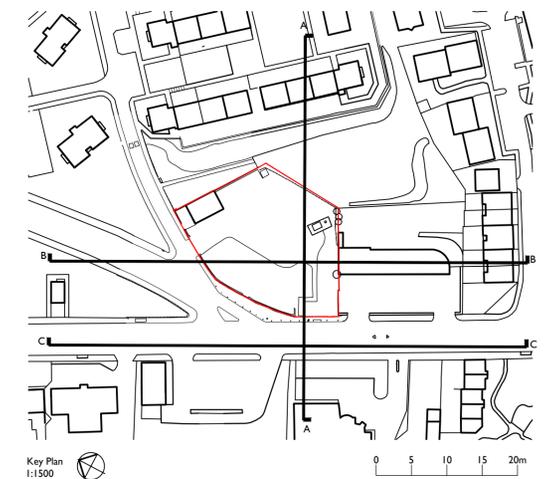
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Section B-B  
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Section C-C  
1:500



	Existing Site Sections AA, BB & CC			project Willowbrae Road, Edinburgh		job no E1908		drawing WBR-CDA-SW-ZZ-DR-A-PL-0003		revision P2	
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