

Development Management Sub Committee

Wednesday 8 September 2021

**Application for Planning Permission 20/03901/FUL
At Kirkland House, 2 The Trefoil Centre, Gogarmuir Road
Change of use class from Class 8 Residential Institution (care home / hospice) to Class 9 houses. Removal of non original extensions to North & West of the property, replaced with new town houses. Internal alterations to retained property. Remove and replace existing glazing with double glazing & upgrade existing services. New parking and landscaping arrangements.**

Item number

Report number

Wards

B01 - Almond

Summary

The proposed change of use and redevelopment will allow a new use for this brownfield site and secure the future viability of the listed building. The development provides a good level of amenity and there are no concerns in relation to road safety.

The proposal complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 and will preserve the character and setting of the listed building.

While the proposal does not comply with the Development Plan as a result of failure to comply with Green Belt policy, the benefits of the proposal in relation to providing a new use for the listed building and improving its setting, are important factors outweigh the failure to meet Green Belt Policy. Therefore, planning permission should be granted. There are no material considerations that indicate otherwise.

Links

[Policies and guidance for this application](#)

HESEXT, LDPP, LHOU04, LHOU01, LHOU02, LHOU03, LHOU05, LDEL01, LDES01, LDES03, LDES04, LDES05, LDES06, LEN03, LEN04, LEN10, LEN12, LEN16, LEN21, LTRA02, LTRA03, LTRA04, NSG, NSGD02, NSLBCA, HES, HESSET,

Report

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landscaping arrangements.**

Recommendations

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

Background

2.1 Site description

The application site relates to a collection of buildings and surrounding grounds which have had a number of former uses. Originally a formal mansion style house which has been known as Kirklands. The site has previously been part of the Trefoil Centre, a special needs school and in long standing institutional use. The site was most recently in use as a temporary care home by St Columba's Hospice. However, they vacated the site in 2014.

The original house was built in 1868 as an L shaped mansion in a domestic Scots Baronial design which replaced an earlier cottage. It is a category B listed building (listing reference LB27642, listed 8 March 1994). The listing also includes the surrounding garden walls and a freestanding Corinthian column to the south of the house.

The building was first extended around 1890 to the west. However, its use as the Trefoil Centre from the early 1950s resulted in a number of considerable extensions including additions to create a further west wing, front extension and linked buildings to the north west.

Outwith the application site there are a number of buildings associated with the original house which are in residential use, including the original gate house, lodge house and a stable block.

The site is around 1.7 hectares and lies between the west of the A720 City Bypass and to the north of the M8. The site is accessed by Gogar Bank from the west. This road and the surrounding area contain a grouping of residential properties, Barnardo's Caern House and some commercial and farming uses.

The site is within the Edinburgh Green Belt and Gogar Special Landscape Area.

2.2 Site History

30 July 2003 - Listed building consent granted for internal alterations to rooms to provide additional bedroom accommodation and to improve corridor access for wheelchair users. Replacement of single glazed steel framed windows (03/00426/LBC).

5 April 2011 - Planning permission granted for alterations and extension to property including installation of plant (Application reference: 10/03440/FUL).

10 February 2011 - Listed building consent granted for alterations and extension of main building and erection of portacabin (Application reference: 10/03441/LBC).

2 August 2016 - Planning permission granted to erect side and rear extensions with internal refurbishment of an existing Gate Lodge (Application reference: 16/00715/FUL).

2 February 2017 - Planning permission granted for internal refurbishments and alterations comprising first floor internal downtakings, building to be converted into a hotel (Application reference: 16/06165/LBC).

15 September 2020 - Concurrent listed building application to alter residential institution (care home / hospice) to form houses. Removal of non original extensions to north and west of the property, replaced with new town houses. Internal alterations to retained property. Remove and replace existing glazing with double glazing and upgrade existing services. New parking and landscaping arrangements (Application reference: 20/03902/LBC).

Main report

3.1 Description Of The Proposal

It is proposed to change the site back into residential use. Ten units are proposed through a mixture of conversion, replacement extensions and a detached building. The original listed house and 1890 extension would be converted to contain four dwellings. The twentieth century extensions would be replaced with a smaller extension containing five dwellings. New parking and landscaping will be provided.

The east side of the original 1868 Kirklands building will be returned into use as a single dwelling with existing links to the west blocked up. The dwelling would be spread over two floors and contain six bedrooms. Within the 1890 extension and the original west offshoot of the house, four flats would be created. A fifth flat would be accommodated partially in the existing building and part within the proposed replacement extension.

Externally, windows would be refurbished to accommodate secondary glazing aligned with original frames or where necessary replacement sash and case windows used to a similar glazing pattern. An existing modern dormer would be expanded to the west

elevation and a window converted to a door. A modern metal fire escape stair would be removed from the east elevation. The existing slate and roof tiles will be retained.

The proposed replacement extension will accommodate five new residential units; three will be three storeys high and two will be two storeys high. The two storey section will adjoin the original house. The elevations will be mainly of stone with sections of metal and timber cladding. Door and window frames will be aluminium framed. Solar panels and a sedum blanket will be installed on the flat roof.

A detached house i.e. a gate lodge house, will be constructed in place of the previous linked building next to the existing north access. It will be one and a half storeys high in a traditional form with slate pitched roofs, chimney and stone walls with modern interventions including full height glazing and timber. Rooflights are also proposed. It will be four bedroom.

The proposed conversion and extension will provide 10 dwellings in a mixture of houses, maisonettes and flats. Three two-bedroom, one three-bedroom, five four-bedroom and one six-bedroom units will be provided. The floor sizes will range from 103 and 108 square metres for the two bedroom dwelling units to 456 sq metres for the six bedroom house:

- One six bedroom dwelling at 456 sqm
- Five four bedroom dwellings between 174 and 227 sqm
- One three bedroom dwelling at 116 sqm
- Three two bedroom dwellings between 103 sqm and 112 sqm

Materials will be ashlar stone, slate, timber cladding, metal cladding. Windows and doors in the existing building will be timber framed and will be aluminium framed in the new building. Solar panels and sedum roofing are also proposed.

The three existing accesses will be used. Two of these will serve the new dwellings and one will serve all the other units. They will be shared access for different transport modes or users. A central area of parking will be provided and will be divided into two sections with landscaping. Seventeen car parking spaces are proposed with sixteen of the spaces being in two parking courtyards. A cycle storage structure is also proposed.

A bin storage area will be located in the car parking area.

Previous scheme

The plans have been amended to remove an additional dwelling proposed within the grounds, to reduce the amount of car parking and to amend landscaping arrangements.

Supporting documents

The following documents have been submitted in support of the application. These can be viewed on the planning portal:

- Conservation statement
- Design statement
- Planning statement
- Tree survey
- Bat survey
- Road safety audit
- Flood risk and drainage 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 proposal is acceptable in principle;
- b) the proposal will preserve the character and setting of the listed building/s;
- c) the proposal is of an acceptable scale, form and design;
- d) the impact on amenity is acceptable;
- e) the proposal will have any transport impacts;
- f) the proposal will have any impact on trees and/or biodiversity;
- g) there are any other material considerations; and
- h) any comments raised have been addressed.

a) Principle

The site is designated as green belt and part of the Gogar Special Landscape Area in the adopted Edinburgh Local Development Plan (LDP)

LDP Policy Hou 1 (Housing Development) part 1 supports development of housing within the urban area. Part 2 of the policy applies should there be a deficit in the housing land supply and gives criteria where development may be acceptable in the green belt. However, as evidenced by the latest Housing Land Audit reported to planning committee in October 2020, there is no deficit and Policy Hou 1 part 2 does not apply.

LDP Policy Env 10 (Development in the Greenbelt and Countryside) is the most relevant policy in assessing the principle of development in the green belt. The policy states that within the green belt and countryside development will only be permitted where it meets one of four criteria and would not detract from the landscape quality and/or rural character of the area.

The Council's non-statutory Guidance on Development in the Countryside and Green Belt also provides further information on the development in the green belt.

The proposal includes two elements for consideration under policy Env 10. The change of use of the original dwelling house back into residential and the proposed replacement development.

Change of use and conversion

Under criteria b) of policy Env 10, the change of use of an existing building is supported provided the building is of architectural merit and is worthy of retention. Buildings should be of domestic scale, substantially intact and structurally capable of conversion.

Kirklands and its 1890s extension have considerable architectural merit as an attractive B listed building of a relatively grand domestic scale. The conversion would see more units than the original conceived single dwelling. However, its size and proportion offers a good standard of accommodation that does not compromise its design and will allow internal features of interest to be restored. This change of use and conversion of the original and historic dwelling house complies with LDP policy Env 10 b). The full impact on the listed building is assessed under 3.3 b).

Replacement development

The other criteria of policy Env 10 relate to green belt uses, development relating to an existing use or building and replacement of an existing building with a new one in the same use.

The replacement development is not a green belt use and whilst the development does relate to an existing building, as noted above, the intention of this criteria is that it relates to extensions and ancillary development not new dwelling units. In addition, the replacement buildings will not be in the same use. The replacement development does not therefore comply with policy Env 10 and it should therefore be considered whether there are material planning considerations which would merit an exception to policy.

The non-statutory Guidance on Development in the Countryside and Green Belt advises that new houses not associated with countryside use will not be acceptable unless there are exceptional planning reasons for approving them. These reasons include the reuse of brownfield land and gap sites within existing clusters of dwellings.

The glossary of the LDP gives a definition of brownfield as: *Land which has been previously developed. The term includes derelict land and land occupied by redundant buildings.*

The site at Kirklands had been in some form of institutional or residential care use for 60 years. However, these uses ceased in 2014 and leave a significant number of poor quality redundant buildings to the detriment of the listed building and grounds. The site's location within the countryside along with the age and condition of the facilities mean that new care use would be unlikely.

The land surrounding the site, which was formerly part of the Kirklands estate, has been developed for residential uses including the original gate house, lodge house and a stable block. The application site is within this cluster of development.

The proposed development would see the reuse of a vacant brownfield site within a cluster of dwellings. It would further allow for the reinstatement of a residential use to the listed building and improve its setting and condition through the removal of redundant buildings. The listed building and its setting are also a material consideration.

Material consideration of listed building

Historic Environment Scotland's (HES) Managing Change in the Historic Environment guidance note on the use and adaptability of listed buildings is applicable. It states that *for a building to remain in use over the long term, change will be necessary. This reflects changes over time in how we use our buildings and what we expect from them. A building's long-term future is at risk when it becomes hard to alter and adapt it when needed. Proposals that keep buildings in use, or bring them back into use, should be supported as long as they do the least possible harm.*

In the supporting planning statement, the applicants describe the site as becoming the Trefoil School in the early 1950s to provide help to physically disabled children. This later became a holiday respite facility for children. Following the closure of the facilities in 2002, the site was leased for use as a care home by the Council and latterly by St Columba's Hospice. The building has been empty since the temporary use as a care home ceased in 2014.

The conversion and redevelopment represent a proposal which allows conservation gain through removal of the incongruous 20th century extensions and restores the original Kirklands and 19th century additions back into residential use. The quality of the new build element ensures the setting of the listed building is enhanced.

Special Landscape Area

LDP policy Env 11 (Special Landscape Areas) states the planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas shown on the Proposals Map.

The Gogar Special Landscape Area is noted to reflect a series of relatively intact designed landscapes and gently undulating rectilinear fields. Kirkland forms part of a smaller scale designed landscape noted as being of national or local importance, though it does form part of the Historic Environment Scotland's Inventory of Gardens and Designed Landscapes.

As demonstrated by the Landscape and Visual Impact Assessment, the site and existing buildings are visually contained and screened within the landscape. The development is limited to areas already developed and does not exceed existing heights, as a result the special qualities of the wider landscape to the west of the City would be unaffected.

Overall, the proposals would not detract from the landscape quality and rural character of the area in accordance with LDP policies Env 10 and Env 11. The change back to the original domestic use of the listed Kirkland Lodge complies with Env 10 b) and the replacement additions will improve the setting and condition of the listed building on a brownfield site. An exception to policy Env 10 in terms of the replacement development is justified.

b) Listed Building

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

Policy Env 4 (Listed Buildings - Alterations and Extensions) in the LDP states that proposals to alter a listed building will be permitted where those alterations are justified; will not result in unnecessary damage to historic structures or result in a diminution of the building's interest; and any additions would be in keeping with other parts of the building.

Alterations to Listed Building

Historic Environment Scotland's guidance document entitled *Managing Change in the Historic Environment: Interiors* states *the interior of a historic building is important in defining its character and special interest. The interest, experience and enjoyment of a historic interior can be derived from a number of factors including its design, structural plan and layout, the quality of its decorative scheme, materials and craftsmanship, fixtures and fittings, any associated archaeology, and historical and cultural associations.*

The east side of the original 1868 Kirklands building will be returned into use as a single dwelling with existing links to the west blocked up. The dwelling would be spread over two floors and contain six bedrooms.

The building contains the most important features to the ground floor. The conservation statement advises rooms of note include the drawing room noted as having considerable significance and the vestibule, hall, dining room and staircase noted as having moderate significance. The proposed works will see little alteration to these key spaces with the exception of a series of rooms off the hall which are proposed to be converted to an open plan space containing the kitchen and dining area. These rooms are said to have comprised a small business room, library and morning room and have been subject to previous division, albeit historic. The dividing wall to the drawing room will be partially removed, though in accordance with best practice nibs will be retained.

Rooms to the first floor are described as being notably less ostentatious, with few decorative features, with the exception of the original master bedroom. This bedroom is retained within the proposed scheme. Modern partitions will be removed from other rooms and new bathrooms installed.

Within the 1890 extension and the original west offshoot of the house, four flats would be created. A fifth flat would be accommodated partially in the existing building and part within the proposed replacement extension. There would be alterations to the ground floor layout, though these would relate to areas of lesser importance and later additions. Principal rooms to the ground and first floor would be retained. A site visit has confirmed that there are no notable features to these rooms which would be harmed by the alterations. In addition to the layout changes, modern fixtures associated with the care home use would be removed including false ceilings, improving the condition of the listed building.

Externally, windows would be refurbished to accommodate secondary glazing aligned with original frames or where necessary replacement sash and case windows used to a similar glazing pattern. An existing modern dormer would be expanded to the west elevation and a window converted to a door. A modern metal fire escape stair would be removed from the east elevation. These external alterations respect the character and appearance of the existing building and are acceptable.

The freestanding Corinthian column is proposed to be relocated to sit within the proposed garden to the front of the main listed building. It is accepted that the statue currently no longer sits within its original position and its proposed location will be complimentary to the main listed structure.

The alterations to the main listed building do not affect its special interest and are acceptable, subject to a condition in relation to windows.

Extensions

Historic Environment Scotland's guidance note *Managing Change in the Historic Environment: Extensions*, sets out the principles that apply to altering historic buildings. It states that '*an addition or extension should play a subordinate role. It should not dominate the original building as a result of its scale, materials or location*'.

The existing 20th century extensions to Kirklands are particularly dominant as a result of their scale, positioning and coverage of the site, with a footprint of approximately 930 square metres. The proposed replacement extension and building would cover substantially less of the site at 520 square metres. The extension though large, would

be limited to the west of the building only. Reducing the existing negative impact on the northern façade and entrance of the listed building posed by the existing extensions.

The proposed extension would be set back from both north and south elevations. It would be stepped down in height where it adjoins and overall would not exceed the ridge or overall height of the listed building.

The contemporary design would offer a suitable contrast to the listed building. It would utilise a high quality palette of materials including stone to complement the existing building along with metal and cedar cladding. The arrangement of large glazed areas to the south east and elements of fenestration to the north west take suitable cues from the listed building.

Historic Environment Scotland (HES) has commented that the proposed removal of extensions will have a positive impact on the listed building. However, whilst they do not object, they consider the scale of the proposed extension would be harmful to the character and special interest of the listed building. It is suggested that the extension should not be replaced as an adjoining structure and a freestanding or series of free standing building should be considered and that this would allow the form and footprint of the original listed building to be restored.

It is appreciated that a freestanding building would improve the visual prominence of the original house. However, the original house has been significantly altered since conception both with historic and modern interventions and has not been a standalone structure for a significant period of time. The proposed replacement extension can be viewed as a further iteration of this history.

The proposed replacement extension, though not detached, would be suitably contrasting and subservient to the existing building. In addition, a detached, or series of detached structures would also add to further erosion of the green belt and could fundamentally alter the designed landscape forming part of the setting of the building.

The proposed detached dwelling would be suitably sited away from principal facades of the listed building and would not detract from its character or special interest.

The proposals have special regard to the desirability of preserving the building and its setting and will not adversely impact on its special architectural and historic interest.

With reference to the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, the proposals preserve the setting and character of the listed building.

c) Housing and amenity

LDP Policy Des 5 (Development Design - Amenity) requires development proposals to demonstrate that neighbouring amenity of a development will have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook. It further requires new development to offer suitable level of amenity to future residents.

Amenity of future occupiers

The Edinburgh Design Guidance also seeks to address the criteria of an acceptable level of amenity for future occupiers of the development.

The proposed conversion and extension will provide 10 dwellings in a mixture of houses, maisonettes and flats.

All dwellings would be dual aspect and exceed the internal space requirements set by the Edinburgh Design Guidance. They offer a suitable mix of housing types under LDP policy Hou 2 (Housing Mix).

All units will have good levels of daylighting.

LDP Policy Hou 3 (Private Green Space in Housing Development) requires developments to provide adequate provision for green space to meet the needs of future residents.

The existing building is set in extensive grounds, part of the original designed landscape part of the listed house. The grounds will provide a mixture of communal and semi-private open spaces for each dwelling, with some properties having their own terraces. Whilst each house does not have its own substantial garden, this approach preserves the important setting and existing designed landscape and provides an acceptable level of amenity for residents.

Neighbouring amenity

The proposed properties are positioned a suitable distance away from other dwellings in order to ensure that there are no concerns in relation to noise, sunlight, privacy and immediate outlook.

The proposal complies with LDP policy Des 5 and Hou 3.

e) Transport

LDP Policies Tra 2 - Tra 4 sets out the requirements for private car and cycle parking. The Council's Parking Standards are set out in the Edinburgh Design Guidance.

The site will provide 17 car parking spaces which is in excess of the Council's parking standards. The Road's officer has advised that this is acceptable in this instance due to the rural nature of the site.

Cycle parking will be provided within the curtilage of the site with individual bike stores.

The Roads Authority has no objections to the proposals subject to conditions and informatives. This includes provision of one disabled space and three electric vehicle charging points.

f) Other Considerations

Trees

The applicants have submitted a tree survey, tree protection plan and method statement. Eight trees are proposed for removal on site. These were assessed as six category U trees which are unsuitable for retention and one category C tree meaning that it is of low quality with no material conservation or other cultural value. The remaining tree is assessed as being in category B meaning that it has value. However, the tree is noted as having some decay to the base. Six new replacement trees are proposed.

The survey indicates the conflict with other trees on site including two category A mature Cedar trees at the entrance to the walled garden. Units 9 and 10 will be close to the existing root protection areas. The positioning of the existing hydrotherapy pool is also within this area and as a result tree roots are unlikely to have spread into the area proposed for redevelopment.

A condition has been applied to ensure no further trees are affected by the development.

Ecology

Policy Env 16 (Species Protection) ensures development will not have an adverse impact on species protected under European or UK law.

A Bat Survey was submitted with the application. This has been reviewed by the Ecology Officer who has confirmed the findings that no bats were found on site.

Archaeology

The City Archaeologist has commented that the refurbishment of the existing listed house may impact upon and reveal evidence for earlier phases of buildings. It is recommended therefore, that as part of the overall archaeological programme of works that it a historic building survey (photographic and written survey, phased plans and elevations) is undertaken both prior to demolition and during any internal stripping/alterations.

Surface water management

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

The applicant has a Flood Risk Assessment, Drainage Strategy and Surface Water Management Plan demonstrating that the development provides suitable drainage and flood protection. These measures have been confirmed as acceptable by the Council's Flood Protection Officer.

The sewage is to be dealt with through means of a septic tank. In their consultation response SEPA initially raised objections on this matter due to lack of information.

However, following this response SEPA informally noted they did not wish to comment on the application further.

The applicant has provided a statement noting the population equivalence of the proposed development with the former care home use. An informative has been added to the application requiring the applicant to seek further confirmation with SEPA on this matter.

Waste

The Council's waste officer has advised that arrangements are acceptable subject to confirmation of a swept path analysis. This has been provided and is subject to an informative with the Roads Authority.

Environmental Protection

Environmental Protection raised concerns relating to noise, parking and electric vehicle charging and use of fossil fuels. They recommended a condition in relation to contaminated land.

The scheme has since been amended and now has reduced parking and includes the provision of three electric vehicle charging points. The development includes provision of solar panels in accordance with requirements to provide energy on site.

In terms of noise, the installation of an acoustic barrier would not be appropriate for the landscape setting. Windows within the new build element will be modern glazed units with good noise insulation. Windows within the listed building are to be refurbished where appropriate to provide secondary or double glazed units.

Edinburgh Airport

Edinburgh Airport has commented that the proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. They have made no objection to the proposal subject to an informative on the use of cranes on site.

g) Developer Contributions

LDP Policy Del 1 sets out the policy context for developer contributions.

This site falls within Sub-Area SW-1 of the South West Education Contribution Zone. A contribution is required in relations to the provision of primary and secondary education infrastructure to a total of £98,376. This will be subject to a legal agreement.

h) Public Comments

Material comments - Objection

- concerns on overlooking - this is addressed under 3.3 c);
- sewage tank capacity - this is addressed under 3.3 f) and subject to an informative;

- road safety - a road safety audit has been provided and no concerns are raised by the Roads Authority;
- houses should be built in footprint of existing - plans have been amended to ensure all building are within existing development footprint;
- trees should be maintained - this is addressed under 3.3 f) and subject to a condition.

Material comments - Support

- brings property and site back into use;
- supports quality and design of development.

Non-Material comments - neutral

- access should be maintained to LPG tanks - there is no proposal to change this;
- access to be maintained for wall maintenance.

Community Council

Ratho and District Community Council has raised concerns on road safety in relation to Gogarmuir Road access and lack of public transport.

As noted above the Roads Authority has no objections in relation to road safety and parking numbers have been reduced. It is acknowledged that there is only limited public transport.

Conclusion

The proposed change of use and redevelopment will allow a new use for this brownfield site and secure the future viability of the listed building. The development provides a good level of amenity and there are no concerns in relation to road safety.

The proposal complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 and will preserve the character and setting of the listed building.

While the proposal does not comply with the Development Plan as a result of failure to comply with Green Belt policy, the benefits of the proposal in relation to providing a new use for the listed building and improving its setting, are important factors outweigh the failure to meet Green Belt Policy. Therefore, planning permission should be granted. There are no material considerations that indicate otherwise.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. 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.
2. No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (historic building recording, excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.
3. Only the tree/s shown for removal on the approved drawing/s shall be removed, and no work shall be carried out on the remaining trees at any time without the approval of the Planning Authority.
4. The trees on the site shall be protected during the construction period by the erection of fencing, in accordance with BS 5837:2012 " Trees in relation to design, demolition and construction".
5. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.
6. i) 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.
7. A window survey shall be submitted and any necessary replacement window details agreed by the planning authority prior to removal of any windows within the listed building.
8. The 3 electric charging points shall be installed and operational prior to the occupation of the development hereby approved.

Reasons:-

1. In order to safeguard the character of the statutorily listed building.
2. In order to safeguard the interests of archaeological heritage.
3. In order to safeguard protected trees.
4. In order to safeguard protected trees.
5. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
6. In order to ensure that there is no risk to health.
7. In order to safeguard the character of the statutorily listed building.
8. To ensure climate change mitigation is actioned.

Informatives

It should be noted that:

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

These matters are:

Education contribution

The applicant will be required to:

- Contribute the sum of: £98,376.00

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

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

5. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details
6. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of, 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.
7. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property.
8. 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.
9. The applicant should demonstrate that the sewage treatment plant they intend to connect to (authorised by WPC/E/0022871) is adequate for the increased population equivalent of the new development. They are advised to contact SEPA's local environment protection team for advice and to discuss at ELB@sepa.org.uk.

10. The applicant should consider the implementation of acoustic measures to offset potential noise from the M8.
11. Given the nature of the proposed development it is possible that a crane may be required during its construction. Should a crane be required, this should be in accordance with the British Standard Code of Practice for the safe use of Cranes. Crane operators should consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
12. In accordance with Policy Des 3 Development Design, opportunities should be sort for the erection of bat boxes in the grounds surrounding the Kirklands House.

Financial impact

4.1 The financial impact has been assessed as follows:

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

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

The application received four objections, two letters of support and two neutral comments.

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**

Adopted Local Development Plan (November, 2016)

Date registered

15 September 2020

Drawing numbers/Scheme

01-07, 08B, 09A-14A, 15, 16,

Scheme 3

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Lynne McMenemy, Senior Planning Officer
E-mail:lynne.mcmenemy@edinburgh.gov.uk

Links - Policies

Relevant Policies:

Managing Change in the Historic Environment: Extensions sets out Government guidance on the principles that apply to extending listed buildings.

Relevant policies of the Local Development Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

LDP Policy Env 10 (Development in the Green Belt and Countryside) identifies the types of development that will be permitted in the Green Belt and Countryside.

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

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

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

LDP Policy 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.

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 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

Relevant Government Guidance on Historic Environment.

Managing Change in the Historic Environment: Setting sets out Government guidance on the principles that apply to developments affecting the setting of historic assets or places.

Appendix 1

**Application for Planning Permission 20/03901/FUL
At Kirkland House, 2 The Trefoil Centre, Gogarmuir Road
Change of use class from Class 8 Residential Institution
(care home / hospice) to Class 9 houses. Removal of non
original extensions to North & West of the property, replaced
with new town houses. Internal alterations to retained
property. Remove and replace existing glazing with double
glazing & upgrade existing services. New parking and
landscaping arrangements.**

Consultations

Roads

No objection to the application subject to the following being included as conditions or informatives as appropriate;

1. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;
2. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of, 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;
3. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property;
4. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote

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

5. 3 EV charging spaces are required;

Note:

- a) 17 car parking spaces being proposed does not comply with the Council's parking standards. However, due to the rural nature of the site it is considered acceptable. 1 disabled parking space to be provided.
- b) Cycle parking will be provided within the curtilage of the site.

Archaeology

Kirkland House 2 The Trefoil Centre Gogarmuir

Further to your consultation request I would like to make the following comments and recommendations concerning this application for the change of use class from Class 8 Residential Institution (care home / hospice) to Class 9 houses. Removal of non-original extensions to North & West of the property, replaced with new town houses. Internal alterations to retained property. Remove and replace existing glazing with double glazing & upgrade existing services and new parking and landscaping arrangements.

The current B-listed Kirkland House was constructed c.1868, replacing an earlier house possibly dating back to the 18th or 17th century. As detailed in Simpson and Brown's accompanying 2016 Conservation Plan the site has a complex history of occupation as it forms part of the site of Over Gogar. This settlement is recorded on maps dating back to the 17th century, however it is first mentioned at the start of the 14th century as an estate/farm centre established from a sub0divison of the earlier Gogar Parish. The Victorian villa was added to in the 20th century to form the Trefoil Centre for the disabled.

Accordingly, this listed building and site have been identified as occurring within an area of archaeological and historic significance. Therefore, this application must be considered under terms of Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), PAN 02/2011, HES's Historic Environment Policy for Scotland (HEPS) 2019 and CEC's Edinburgh Local Development Plan (2016) Policies ENV2 & ENV4, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

The proposals will see the demolition of substantial demolition of 20th century additions to the House associated with the Trefoil Centre use. Although part of the listed building it is considered that their removal would not have a significant archaeological impact given the retention of the historic core of the House. In addition, refurbishment of the existing listed house may impact upon and reveal evidence for earlier phases of buildings. It is recommended therefore, that as part of the overall archaeological programme of works that it a historic building survey (photographic and written survey,

phased plans and elevations) is undertaken both prior to demolition and during any internal stripping/ alterations.

In addition, the site may contain archaeological evidence associated with the development of not only the House but also the Kirkland's/Over Gogar settlement from the medieval period onwards. The impact therefore of associated ground-breaking works (demolition/construction/services/landscaping etc) for this development must be regarded as having a potential significant but low archaeological impact. It is recommended therefore that a programme of archaeological works is undertaken to fully excavate, record and analysis all significant remains.

Accordingly, it is recommended that the following condition be attached to any permission, if granted, to ensure that this programme of archaeological works is undertaken;

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

The work must 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.

SEPA

13/11/20 - We object to this planning application on the grounds of lack of information on appropriate provision for foul drainage.

The applicant has not demonstrated that the sewage treatment plant they intend to connect to (authorised by WPC/E/0022871) is adequate for the increased population equivalent of the new development. They are advised to contact SEPA's local environment protection team for advice and to discuss the additional information that will be needed to support this planning application and allow us to review our objection. The applicant should contact this team in the first instance at ELB@sepa.org.uk

13/04/21 - SEPA Objection / applicant advises resolved - this application is for change from care home/hospice to residential and therefore a reduction in flood risk vulnerability - we would not wish to comment on this type of development in future

Waste

Acceptable subject to confirmation of swept path analysis.

Environmental Protection

The applicant proposes to convert and extend the former hospice into 11 residential dwellings with 22 car parking spaces. The site is in a rural setting with the M8 located just to the south of the development. It is noted that the existing use of the property as a

care home is deemed a sensitive receptor so the change to residential use is not deemed a significant change with regards impacts on amenity from an Environmental Health perspective.

The site is exposed to high levels of traffic noise. The applicant is proposing to introduce upgraded glazing to mitigate the noise from the M8. Environmental Protection would recommend that the applicant conducts a noise impact assessment to determine what sound reduction levels will be required to ensure a satisfactory noise level can be achieved internally in accordance with BS8233. The noise levels effecting the external areas will also be high, we would recommend that any noise impact assessment investigates this and aim to achieve levels below that stipulated by the World Health Organisation for outdoor amenity. Mitigation could be in the form of an acoustic barrier located between then proposed development and the M8.

It is only a recommendation for this to be conducted and will be suggested as an informative.

The applicant proposes a total number of spaces of 22 car parking spaces. The site is not well served with Public Transport, so a higher level of parking is expected. Therefore, travel by car will be the most popular mode of transport. We need to ensure that the applicant is future proofing the development and ensure that adequate provisions for electric vehicle charging is provided. The applicant has confirmed and, in the design, and access statement that 4 no charge points are to be provided within communal parking area Unit 1 and 3-11. 1 no charge point is to be provided for Unit 2.

It's not clear how many electric vehicle charging points are being installed. The applicant will need to include the electric vehicle charging points on a drawing to ensure it is clear where they are going to be located. The drawings should also confirm the minimum specification for the chargers which should be 7Kw type 2 sockets (32AMP). Environmental Protection would recommend that all spaces have access to a charging point. One charger can potentially serve two space. Environmental Protection will need this confirmed before we can fully support the application.

The applicant should be advised to ensure emissions are kept to a minimum. The applicant should consider the inclusion of solar panels which is a good mitigation measure to reduce energy demand and emissions. The applicant should also investigate the installation of photovoltaic panels and use ground and air sourced heat pumps linked to energy storage. The applicant should be aware of the Climate Emergency and Edinburgh's Zero Carbon targets. Therefore, no fossil fuels should be considered.

There are some previous uses on the site that will need to be considered with regards potential land contamination, a condition will need to be attached to ensure that this is addressed.

Therefore, on balance Environmental Protection cannot support the application until confirmation on where and what type of electric vehicle charging points will be installed.

Once this information is provided a condition will be recommended for the chargers along with the following;

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.

i) 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.

Informative

1. The applicant shall investigate the installation of further renewable energy technology and storage to ensure no fossil fuels are required to service heat and energy demands for the units.

2. A noise assessment should be conducted and all acoustic mitigation measures it recommends considered to improve the level of amenity

Edinburgh Airport

The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We therefore have no objection to this proposal, however have made the following observation:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)

Communities and Families

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

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

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

Assessment and Contribution Requirements

Assessment based on:

Eight Houses and two flats

This site falls within Sub-Area SW-1 of the 'South West Education Contribution Zone'.

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

The education infrastructure actions that are identified in the Action Programme are appropriate to mitigate the cumulative impact of development on local primary schools. The proposed development is therefore required to make a contribution towards the delivery of these actions based on the established 'per house' rate for the appropriate part of the Zone (£5,212 per house, £1,216 per flat - as at Q4 2017).

The development will have a further impact on secondary schools. A contribution will be required to support the active project to rebuild of Currie High School, which will increase its capacity. The pro-rata contribution rate for secondary school provision, which is set out in the Supplementary Guidance, should also be applied to the proposed development (£6,536 per house, £980 per flat - as at Q4 2017).

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

Total infrastructure contribution required:

£98,376.00

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

Historic Environment Scotland

Kirkland House (AKA Kirklands Lodge) is listed at category B and was built on the site of the former Kirklands Cottage in 1868. An extension was erected (circa 1890), featuring a red clay tiled roof that purposefully contrasts with the grey slate roof of the original house it adjoins.

Kirkland House forms part of a historic estate with policies that include a walled garden with a freestanding Corinthian Column, as well as parkland, a steading (now separate) and lodge house to the East (listed separately). The building was extended frequently over the course of the 20th Century, while operating as the Trefoil Centre.

Proposals

The application is for the demolition of the modern 20th century extensions to the listed building, and the erection of a replacement extension adjoining the original Kirkland House. The proposals also feature two new build units within the listed building's curtilage. Our comments are set below.

Comments

We have no concerns with the removal of the modern 20th century additions that extend to the North and West of the listed building, as we do not consider them to add to the character and appearance of Kirkland House. However, we do have concerns about the following elements of the proposals:

Proposed Extension

Extensions to a listed building must protect the character, appearance and architectural interest of the existing historic building in their design. They should also be subordinate in scale and form, not overplaying principal elevations.

We acknowledge the design of the proposed extension has been set back from the principal elevation of Kirkland House and is also lower in height. However, we still consider that the scale of the proposed extension would be harmful to the character and special interest of the listed building.

We would suggest that, rather than replace the extension, consideration is given to a freestanding new building instead. This would allow the form and footprint of the original listed building to be restored. Siting a new building away from the main listed building (like the proposed freestanding Unit 11) would, in our view, improve the visual prominence of the original house and its c.1890 extension, enabling its historic and architectural significance to be better understood and appreciated. Its significance would stand out more clearly within the wider residential scheme. The 1868 service wing could be absorbed into Unit 5 or the plan could otherwise be adapted.

Existing building - Roof

We note the red clay tiles (or pantiles) of the c.1890 extension are proposed to be replaced with reclaimed slate to match the roof of the original 1868 house. Our view is that this element of the proposals should be resisted, to preserve the individual character of the c.1890 extension. The clay tiles, popular in Arts and Crafts design, form part of this historic extension's original design and fabric. They are an important element in defining its distinct appearance as a separate development from the original house and are therefore part of the listed building's special architectural interest. They should remain.

Windows

For the avoidance of doubt, there is a presumption in favour of the retention of original or historic windows because they make a significant contribution to the character and appearance interest of a listed building.

From the conservation plan provided, it appears there may still be some original or historic windows surviving within the original 1868 house (and its c.1890 extension). We therefore advise that ways to overhaul, repair and upgrade these windows are explored first, before further consideration is given to their proposed replacement.

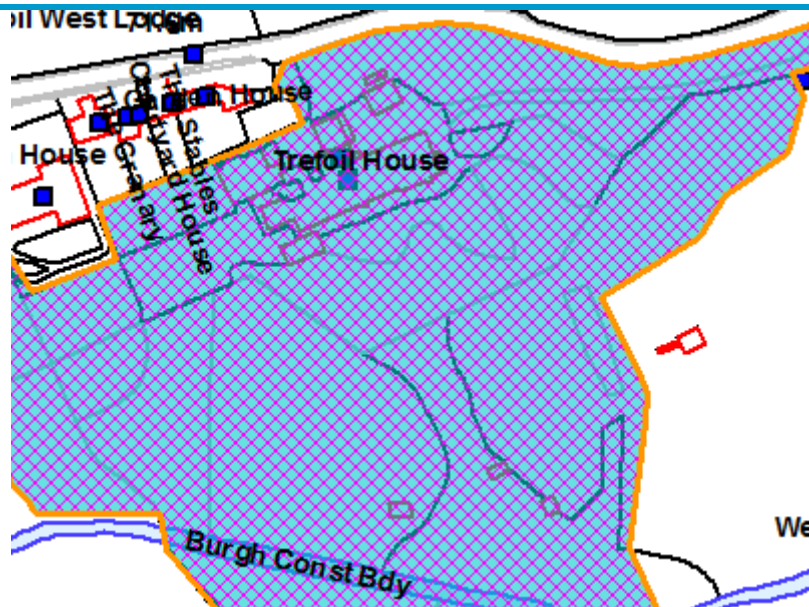
Conclusion

Although there is a precedent for an extension, we would strongly suggest it is not replaced. The removal of the C20th extension and the conversion of the free-standing listed building would be a conservation gain. Alternative accommodation could be planned in an appropriate manner within its setting.

The building was listed despite the C20th extension, and the major works currently proposed represent an opportunity to better the character and special interest of the listed building.

Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object. However, our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on listed building consent, together with related policy guidance.

Location Plan



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