

**Full Planning Application
at
46-46B Cammo Road
Edinburgh
EH4 8AP**

**Development Quality Sub-Committee
of the Planning Committee**

Proposal: Flatted residential development, amended scheme (19 units)
Applicant: Scotia Homes
Reference No: 03/03786/FUL

1 Purpose of report

To recommend that the application be **REFUSED** for the following reasons;

Reasons

1. The proposed development is detrimental to the character of the area by reason of its scale, form and setting contrary to policies ENV1 and H4 of the Lothian Structure Plan 1994, policies H4 and E5 of the North West Edinburgh Local Plan, Policies H2 and Env1G of the Edinburgh and the Lothians Structure Plan 2003 and Policies DQ6, H7 of the Draft West Edinburgh Local Plan, the Council's Non Statutory Guidelines on Daylighting, Privacy and Sunlight and The Edinburgh Standards for Urban Design.

2. The proposed development is not an appropriate use within a rural area and would have an adverse impact on the setting of the Greenbelt Contrary to Policy ENV12 of the Lothian Structure Plan 1994, Policies H8, ENV 2 of the Edinburgh and the Lothians Structure Plan 2003, Policy GE2, GE5,GE6 of the Draft West Edinburgh Local Plan and Policy E9 of the North West Edinburgh Local Plan.
3. The proposed development will adversely affect an area of nature conservation interest and urban wildlife site contrary to Policies ENV16, ENV24 of the Lothian Structure Plan 1994, Policy ENV1D of the Edinburgh and Lothians Structure Plan 2003, Policy E11 of the North West Edinburgh Local Plan and Policies GE11 and GE12 of the Draft West Edinburgh Local Plan.

2 Main report

Site description

The site is currently occupied by two detached houses located between the north side of Cammo Road and the River Almond. The Cammo Estate lies across the road to the south of the site and to the north the ground slopes steeply down to tree covered ground to the River Almond. The open landscape associated with Craighall House lies to the on the northern bank of the River Almond.

The houses on the site are 2 stories in height and set within mature gardens. To the front, the boundaries are 2-3 metre high hedges with some mature trees. The rear gardens have extensive wooded areas sloping down to the river. The houses lie in a line of houses of mixed scale and design, either single storey with dormers or two storeys in height with additions. The area is low density with the garden sizes being generous in scale. The house at number 46 has an open air swimming pool in the western side garden area. The combined site area extends to approximately 0.5 hectares.

Site history

There is no relevant planning history for this site.

Development

Scheme 1

The proposal is to demolish the two existing houses on the site and to construct a block of flats containing 24, two bedroomed flats. The flats would be 4 stories in height with a roof top deck area and pergola. The block would be visually split via a planar glass stair well which produces an asymmetrical split to the frontage. The western end has a treated hardwood clad stair which rises the full height of the building. Treated hard wood features as a material on the elevations along with smooth

white render, a blue slate and aluminium framing. A parking area for 30 cars would be located to the front the flats and this would be served by a single access off Cammo Road. There would be a timber board walk extending down the site towards the River Almond.

The footprint of the building covers approximately 15% of the site area. The applicants have submitted a supporting statement which provides a planning and context analysis, a design statement and photographs of similar developments throughout Edinburgh.

Scheme 2

The proposal is to build 3 separate blocks of flats containing a total of 19 residential units. The western and middle blocks would be 4 storeys in height (12 metres at the highest point), whilst the eastern block would be 3 storeys in height (9.1 metres at the highest point). The buildings are all flat roofed and each has a roof top terrace with glazed balustrades. The lower flats all have balconies which face the front (south). Windows serving the living rooms face to the front (south), bedrooms face the rear (north), bathrooms and kitchens windows face the sides (east and west). The corner rooms (living rooms and bedrooms) have windows which wrap round the corners.

The proposed materials would be treated hard wood, smooth white render, brathy blue slate with a honed finish, glazed balustrades and windows with gunmetal grey aluminium frames.

The 3 blocks of flats would have 3 individual entrances off Cammo Road leading to car parks. The western and middle car parks would have spaces for 7 cars each, whilst the eastern car park would have space for 10 cars. Each car park would have a bin store located near their entrances.

The applicants have submitted a further supporting statement for this second scheme.

Consultations

Scottish Water

No objection to the Planning Application.

Comments:

The proposed development must be served by a completely separate system of drainage including suitable SUDS measures.

SEPA

Flood Risk

1. SEPA has no information to suggest that flooding would be an issue at this site. The advice on flood risk contained in this letter is supplied to you by SEPA in terms of Section 25(2) of the Environment Act 195 on the basis of information held by SEPA as at the date thereof. It is intended as advice solely to Edinburgh City Council as planning authority in terms of the said section 25.

Sewage Disposal

2. Sewage from the proposed development should be connected to the public foul sewer. Connection to the sewer is subject to the approval of Scottish Water (SW) and permission to connect may depend on the availability of spare capacity. Your attention is drawn to SW's consultation response for clarification of the position.

Surface Water

3. SEPA would request that any planning permission granted includes a condition requiring the applicant to treat surface waste from the site in accordance with the principles of Planning Advice Note 61 and "Sustainable Urban Drainage System Design Manual for Scotland and Northern Ireland", CIRIA C521 (<http://www.ciria.org.uk>). Such measures include the use of porous surfacing, filter drains, soakaways and roadside swales.

4. Temporary measures such as the provision of silt traps must be provided to deal with surface water runoff during construction and prior to the operation of the final SUDS. It is recommended that this aspect is covered by a planning condition.

Landscaping

5. Construction works associated with the development of the site must be carried out with due regard to the SEPA's guidelines on avoidance of pollution (PPG 5). A copy of the guidelines has been forwarded to the agents and it is recommended that they should be referred to in a planning condition (copy enclosed).

6. The development of the site may entail operations such as importation or removal of waste material such as soil, which may require a waste management licence or confirmation of exemption registered with SEPA.

Environmental and Consumer Services

This Department has no objection to the above proposed development. We do not have concerns in connection with noise from Aircraft therefore recommend the following condition.

The development shall be constructed so as to ensure that the internal noise environment is commensurate with a Noise Exposure Category A Site in terms of Aircraft Noise.

Finally, from the plans submitted, it has been noted that the internal arrangement for these flats is that the master bedroom of one flat will be

directly under the living space of another separate flat. In our experience, this is not an ideal internal arrangement and could be cause for neighbour dispute in the future.

Transport

The application should be continued for further discussions with the applicant with regard to access and parking arrangements.

Representations

Scheme 1:

The proposal was advertised on 18.11.2003 and 28 letters of objection have been received. Objectors include The Crammond Village Association, The National Trust for Scotland, Friends of Cammo. The issues raised are as follows:-

- road safety concerns
- adverse effect on natural habitats both within the site and on the wider countryside.
- Loss of trees
- Out of character with the surrounding area.
- Contrary to policy
- Unsympathetic design
- Overshadowing
- Adverse visual impact upon Cammo Estate

Scheme 2:

26 letters of objection were received. Objectors include The Crammond Village Association, The National Trust for Scotland, Friends of Cammo. The issues raised are as follows:-

- road safety concerns
- adverse effect on natural habitats both within the site and on the wider countryside.
- Loss of trees
- Out of character with the surrounding area.
- Contrary to policy
- Unsympathetic design
- Overshadowing
- Adverse visual impact upon Cammo Estate

Policy

The southern half of the site lies within an area mainly allocated for residential purposes, whilst the northern half of the site is designated green belt and an area of other nature conservation interest on the North West Edinburgh Local Plan area. The site is similarly split on the Draft West Edinburgh Local Plan. The southern half is allocated as an urban area, whilst the northern half is allocated as green belt, and an urban wildlife site.

The Lothian Structure Plan 1994 and the Edinburgh and Lothians Structure Plan 2003, both maintain this policy position.

Other Policy Considerations:

The Edinburgh Standards For Urban Design

Provides guidance on the relationship of buildings and spaces.

Relevant Policies:

North West Edinburgh Local Plan

Policy H1 supports the development of identified housing sites (HSG 1 - HSG 13) in the local plan, provided proposals are in accordance with other local plan considerations, including the need to protect amenity and safeguard land of recreational and landscape significance.

Policy H3 requires all new housing development to make provision for landscaping and open space in conformity with the Council's standards.

Policy H4 requires new development to be sympathetic in scale and density with its surroundings. In conservation areas and defined "areas of interest" in particular, special care is required to protect local character and amenity.

Policy T3 supports measures intended to improve conditions for public transport and pedestrian and cycle movement.

Policy T4 states that adequate provision for car parking must be made by developers in all new development in conformity with the Council's adopted standards.

Policy E5 states that new buildings, in terms of design, materials and landscaping, should make a positive contribution to the overall quality of the environment and regard should be had to their setting and neighbouring development.

Policy E9 states that planning permission will not be given for new development or redevelopment in the Green Belt for purposes other than agriculture, forestry, outdoor recreation or other uses appropriate only to a rural area, except where it can be shown to be necessary and no suitable location exists.

Policy E11(a) states that areas of high nature conservation value are to be protected from damaging development, and that the impact of development proposals on wildlife habitat will be taken into consideration.

Draft West Edinburgh Local Plan

Policy DQ6 states that new development should make a positive contribution to the quality, accessibility and safety of the environment, having regard to the character, opportunities and constraints of the site and its surroundings and the basic character of the city

Policy DQ7 states that the new development should include proposals for new tree planting and robust landscaping to achieve a suitable visual setting for new building and enhance open spaces and boundaries, and should be designed to minimise its impact on any trees subject to a Tree Preservation Order and other healthy trees worthy of retention.

Policy GE2 states that permission will not be given for development in the Green Belt except:

- a) where necessary for the purposes of agriculture, horticulture, forestry and uses appropriate to its open character;
- b) changes of use of existing buildings provided these are of a substantial construction;
- c) changes of use of listed buildings and other buildings of an attractive visual character in their context;
- d) minor extensions of existing buildings where this would not lead to the unacceptable intensification of an existing non-conforming use.

Policy GE5 requires that the development proposals in the Green Belt should demonstrate that rural amenities and local landscape character and distinctiveness can be maintained and enhanced

Policy GE6 seeks to ensure that new development adjacent to the Green Belt or clearly visible for the Green Belt pays special regard to it in terms of setting, form, scale and design. A high standard of landscaping to provide better definition of the Green Belt/urban boundary is encouraged.

Policy GE12 seeks to limit development's impact on wildlife, habitats and geological features.

Policy H1 General housing Policy seeks to encourage residential development, providing a satisfactory level of residential amenity can be achieved.

Policy GE11 states that development within or affecting Urban Wildlife Sites will not be permitted unless it can be demonstrated that appropriate mitigation measures can be incorporated into the development to enhance or safeguard the nature conservation value of the site

Policy H7 Housing Development Quality seeks to make best use of land without affecting the character of the area whilst make provision for amenities.

Policy H12 states that development which would result in an unacceptable reduction in amenity for residents in the locality will not be permitted.

Policy T1 Impact of new development, expects that new development with the potential to generate a significant amount of personal travel should be in locations accessible by a range of modes of transport.

Policy T8 requires that private car parking provision conforms with the Council's adopted parking standards and should be sited and designed to minimise its visual impact and effect on neighbouring properties and to take account of community safety.

Non Statutory Guidelines

Non-statutory guidelines 'DAYLIGHTING, PRIVACY AND SUNLIGHT' set criteria for assessing proposals in relation to these issues.

Non-statutory guidelines on 'OPEN SPACE REQUIREMENTS IN NEW DEVELOPMENT' set the required standards for open space provision.

Non-Statutory guidelines on 'QUALITY OF LANDSCAPES IN DEVELOPMENT' sets detailed design principles for hard and soft landscaping, including the retention of existing features, and relates these principles to different types of development.

Non-statutory guidelines on 'TREE PROTECTION' supplement local plan green environment policies, and support the retention of healthy trees of landscape or amenity significance, encourage new tree planting wherever appropriate within new development and promote a substantial renewal of the city's woodland resource.

Lothian Structure Plan

Policy ENV1 of the Lothian Structure Plan seeks to encourage the development of infill sites, the redevelopment of brownfield land and the conversion of existing buildings:

A. While ensuring open space provision in the locality or urban amenity are not adversely affected; and

B. Provided sites can be serviced without excessive resource commitment by the Regional Council; and

C. Provided developments are consistent with other Structure Plan Policies.

Policy ENV8 maintains a continuous Green Belt around Edinburgh for the purposes of preventing coalescence, providing recreational countryside and maintaining landscape settings.

Policy ENV12 presumes against development in the Green Belt unless necessary for agriculture or other stated rural uses.

Policy ENV16 presumes against isolated development in the countryside except where essential for the operation of a countryside activity, and sets out criteria for exceptions to that approach.

Policy ENV24 sets out nature conservation policies covering development in protected areas including Ramsar Sites, National Nature Reserves, SSSIs and Regional or Local Areas of Nature Conservation.

Policy H4 encourages proposals for the improvement of housing stock, the conversion of existing buildings, the development of infill sites and the redevelopment of brownfield land for housing.

Edinburgh and The Lothians Structure Plan

Policy ENV1D states that local plans should include policies for protecting and enhancing Regional and Local Natural Built Environment Interests.

Policy ENV1G states that local plans should include policies and where appropriate proposals to promote a high quality of design in all new development.

Policy ENV2 presumes against development in the Green Belt unless for the purposes of agriculture, horticulture, forestry or uses appropriate to the rural character of the area.

Policy HOU2 supports the development of suitable urban brownfield sites for housing through re-use, redevelopment or conversion.

Policy HOU8 presumes against new housing on greenfield sites other than to meet Policy HOU1 and HOU3 requirements.

3 Conclusions and Recommendations

DETERMINING ISSUES

The determining issues are:

- 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?

ASSESSMENT

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

- a) The principal of a residential use is acceptable in this location,
- b) The design of the proposed flats is acceptable given the setting of the site,
- c) The proposed flats would be detrimental to the residential amenity of the surrounding neighbours
- d) The access and parking arrangements are acceptable.
- e) There would be any adverse effects on the area of Nature Conservation / Urban Wildlife Site

a) The southern half of the site is allocated as urban area on the adopted local plan and as such the proposed use on that section of the site accords with the local plan allocation, providing other Local Plan policies do not indicate otherwise and provided a satisfactory level of residential amenity can be achieved.

The northern half of the site is Green Belt, Nature Conservation Area and an Urban Wildlife Site. The use of the area of green belt as garden ground has been established by the existing housing development. However disturbance to this environment is minimal given the low density of the associated houses. The flatted nature of the development with its communally shared gardens for 19 residential units would intensify the potential disturbance to wildlife and the area of nature conservation contrary to Policy E9 of the North West Edinburgh Local Plan and Policies GE2, of the Draft West Edinburgh Local Plan. The increase in scale of flatted development in comparison to the two houses which occupy the site at present would have an adverse effect on the on the adjacent green belt contrary to Policy GE6 of the Draft West Edinburgh Local Plan.

b) Design of new development

The character of the area is one of low density houses which lie in a line along a country lane which has no pavements. The houses form a narrow strip of development lying between the River Almond valley and the Cammo Estate. The character of the area is predominately rural. The houses have generously proportioned individual gardens to the front and rear and these soften the impact the houses have on the surrounding countryside. The houses themselves are mostly 2 stories in height, some have attic conversions which add another habitable floor to them, but in general they are not high houses with pitched roofs. Their impact upon the surrounding countryside is low and this is reinforced by the mature landscaping and generous garden areas associated with them.

The houses which are proposed for demolition, whilst of differing designs, are typical of the types of house in the immediate vicinity. The existing side gardens of the two houses, particularly the space occupied by the swimming pool at number 46, contribute to the spacious character of the existing housing. That space and the associated landscaping would be removed by the proposal. The western elevation of the proposal would be 4 stories high; 12 metres in height, located 5 metres from the western boundary. The neighbouring house to the west is two stories in height with a large pitched roof at a height of 10.9 metres in height. This house sits on slightly higher ground so that the ridge height is similar to the flat roof of the western block on the development. Despite the resultant height relationship between the proposed western block and the neighbouring house being similar, the proposal overly dominates its neighbour by being a large flat roofed building with two stories of accommodation higher than its neighbour. Instead of a pitched roof providing a tapering finish to the top of the building which reduces its visual impact, the proposal has a large square roof line. The resultant effect in terms of the size and contrast in design, creates an unacceptable relationship which is out of character with the area.

The eastern block is 3 stories in height but has a stepped roof taking the eastern gable down to a level which is lower than the ridge of the neighbouring house. However the 3 storey element of the eastern block would have a height similar to the ridge of the adjacent house. Whilst the resultant overall heights are similar, it is the square block form of the proposal with its lack of eaves and sloping roof which would overly dominate the neighbouring houses.

The line of three square blocks rising vertically above the eaves of the neighbouring houses in the street will produce an overly dominant element into the street scene to the detriment of the character of the area.

The increase in size of the building blocks on the site combined with their height and shape mean that the open views through the large gaps between the houses which exist at present, will be significantly reduced. The loss of rural views of trees and fields beyond the development will not make a positive contribution to the quality of the environment, contrary to Policy E5 of the North West Edinburgh Local Plan and Policy H7 of the Draft West Edinburgh Local Plan.

The development would introduce an alien form of development into the character of this area which would not create or contribute to the existing sense of place or enhance the local distinctiveness of the area. The development would not connect visually or functionally with its surroundings. The development is therefore contrary to Policy DQ6 of the Draft West Edinburgh Local Plan and Policy H7 of the Draft West Edinburgh Local Plan.

The amount of open space which has been provided, complies with Council's Policy on open space provision. However the location of that open space is mainly to the rear, in an area of Green Belt and nature conservation interest such that its use would require to be limited if disturbance to habitats, wildlife and adverse impact on this area were to be avoided. The use of that land for amenity open space associated with a flatted housing development is considered inappropriate because of the potential disturbance to habitats and wildlife.

The existing houses and the neighbouring houses all have large front gardens which provide a green setting for them and provide them with a visual softening. The proposed use of the front garden as the car parking area is out of character with the area. The parking area also removes the softening gradation between the Green Belt of the Cammo Estate across the road and the flatted proposal. The existing boundary on the front of number 46 has thick screening approximately 5-6 metres deep, there is frontal screening to a lesser extent on the frontage of number 46b. The space between the proposed car park and Cammo Road would be reduced and the ground levels altered. The existing landscaped screen would therefore be significantly compromised to reduce the impact of the car parking area. The predominant feature to the front of the flats would be a car park and bin store, this would not provide an area of usable amenity open space and be out of character with the area. The remaining areas of open space would be incidental to

the car parks at the front, or side areas between the three blocks of houses or the steeply sloping ground to the rear which forms part of the urban wildlife site. The car park and the communal nature of the associated open space are out of character with the area and be detrimental to the area of nature conservation/urban wildlife site.

The mature trees to the rear of the site are a very important feature of the area. The flatted element of the proposal does not appear to significantly physically affect them. However an accurate survey would be required to confirm this. The visual impact of the development would greatly increase screening of the trees when viewed from the front, to the detriment of the overall appearance of the rural back drop landscape.

The proposal would also be contrary to Policy GE6 of the Draft West Edinburgh Local Plan in that a development of this height, mass, scale and design does not reflect the existing urban edge and introduces a more prominent urban intrusion into the area to the detriment of the adjacent Green Belt.

In relation to the Council's Standards on Urban Design, the proposal is on the edge of the Green Belt and that edge provides the City's setting. The proposal would cause unsympathetic change to that edge. The standards states that all new development should integrate with its wider surroundings and harmonise with the general height of buildings prevailing in the area. Whilst the actual heights of the buildings are similar, their square block form rising above the pitched roof form of the neighbouring development is clearly contrary to that guideline. Development should re-inforce and not detract from valued skyline and views. This proposal will adversely affect views of important landscape features such as the trees on the banks of the River Almond. The guideline also states that new build should not be higher nor of greater mass than adjacent existing development, unless there are special townscape reasons. In this case, the proposal provides no special townscape reasons for the development that would enhance or reinforce the area's character.

Recycling and Rubbish.

There is provision for the storage of wheely bins at the entrance to each of the three car parks. The provision of such facilities should be considered as part of the overall design of a proposal,

a) and not require additional structure occupying more open space within the development.

b) The proposed location of the bin stores adds to the urbanisation of the front garden space to the detriment of the character of the area.

c) The proposal is to replace 2 houses with 19 residential units in a flatted development. The proposed increase in density at the site is significant. Whilst policy and guidance exists which encourages more efficient use of land for development, this is tempered by the need to protect the character and amenity of existing areas.

Most of the windows face to the front and the rear so they do not introduce any issues of loss of privacy. However there are windows which wrap around the side of the building and all the kitchen areas have side facing windows at distances less than 9 metres from boundaries. Views from the roof terraces will also significantly reduce the privacy of the houses on either side of the proposal. The proposal will therefore reduce the amenity of neighbouring residents, contrary to Policy H4 of the North West Edinburgh Local Plan, Policy H7 of the Draft West Edinburgh Local Plan and the Council's Non Statutory Guidelines on Daylighting, Privacy and Sunlight.

d) There is adequate car parking provision associated with the proposal. However the visitor parking for the 3 blocks is all located in the eastern car park and not distributed between the blocks. The Transport section of the department have asked that the proposal be continued until the results of a traffic assessment is known, particularly in relation to the junction at Queensferry Road and Cammo Road. Discussions would also be required in relation to parking and access. This information or discussion has not been sought since the proposal is not considered acceptable because of other aspects of the development.

The proposal does not cater for the needs of cyclists contrary to Policy T3 of the North West Edinburgh Local Plan. The requirement to provide these could be imposed by a condition if the overall development were to be considered acceptable. However the provision of such facilities should be considered as part of the overall design of a proposal and not require additional structures occupying more open space within the development.

e) The use of the greenbelt area and the area of nature conservation/urban wildlife for amenity ground would have implications for wildlife in the area, whereby disturbance to wildlife would require to be assessed and care taken to protect the Urban Wildlife site from contamination during construction. The proposal would therefore be contrary to Policy E11 of the North West Edinburgh Local Plan and policies GE11/G12 of the Draft West Edinburgh Local Plan in that the proposal will have a negative impact on the amenity and nature conservation value of the Urban Wildlife Site/Site of Nature Conservation Interest.

It is recommended that the Committee refuses the application for the reasons stated.

Alan Henderson

Alan Henderson
Head of Planning and Strategy

Contact/tel David McFarlane on 0131 529 3512 (FAX 529 3716)

Ward affected 05 -Cramond

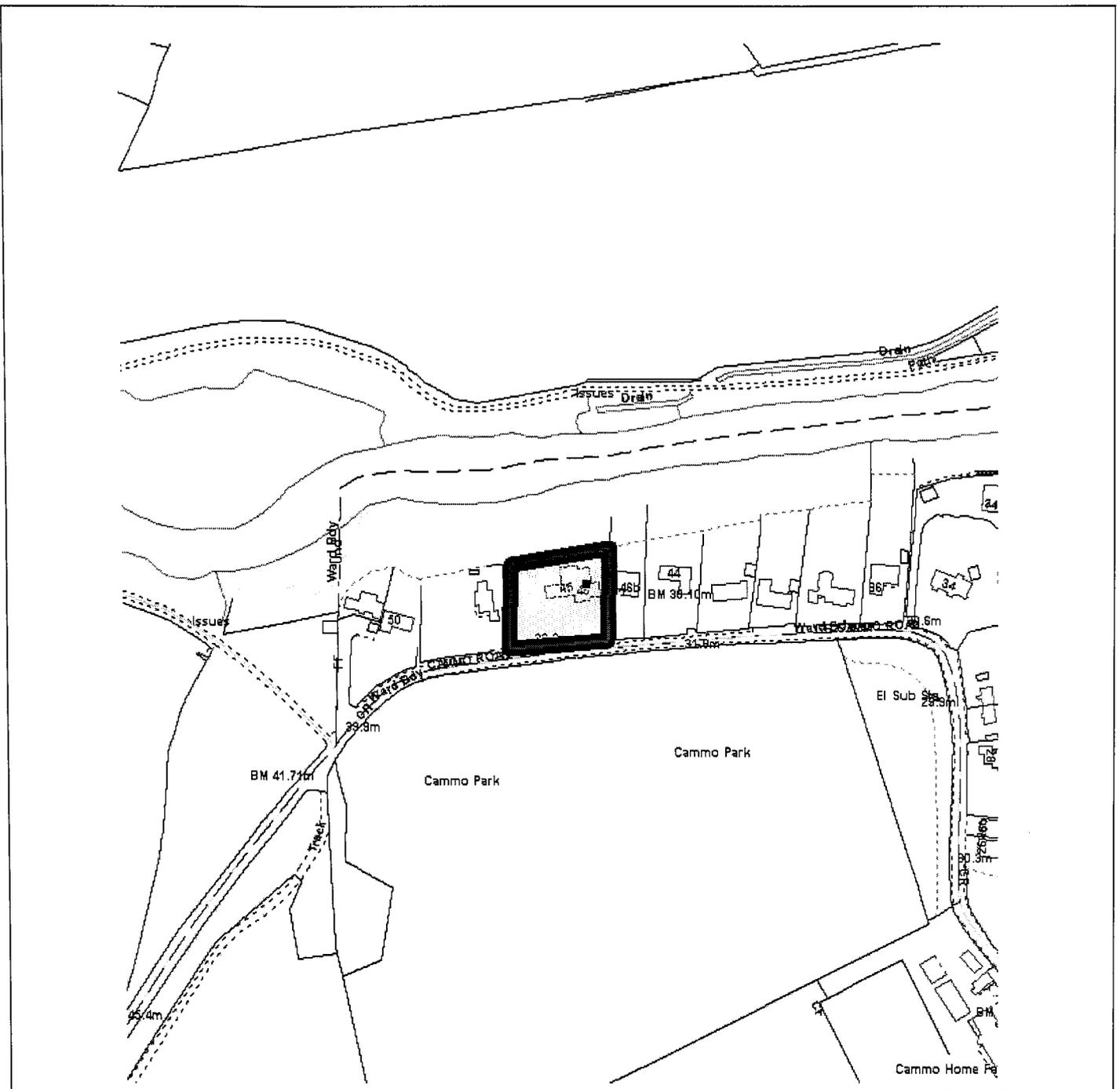
Local Plan North West Edinburgh Local Plan

**Statutory Development
Plan Provision** Residential and Area of Nature Conservation Interest

File

Date registered 6 November 2003

**Drawing numbers/
Scheme** 5,6,7,8,9,10,11
Scheme 2



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PLANNING APPLICATION

Address	46-46B Cammo Road, Edinburgh, EH4 8AP,
Proposal	Flatted residential development, amended scheme (19 units)

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THE CITY OF EDINBURGH COUNCIL
THE CITY DEVELOPMENT DEPARTMENT- PLANNING & STRATEGY