

**Approval of Reserved Matters
at
18 Muirhouse Bank
Edinburgh
EH4 4QT**

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

Proposal: New build residential flat (3-4 storey), townhouses (3 storey) and semi-detached houses (2 storey) (as amended), and amendment of condition 6 attached to outline consent 01/00890/OUT

Applicant: Redrow Homes (Scotland) Ltd.

Reference No: 03/00909/REM

1 Purpose of report

To recommend that the application be **GRANTED** subject to;

Conditions

1. 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 to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.

- 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 to the satisfaction of the Head of Planning.
2. Specification of cycle and bin stores shall be agreed by the Director of City Development prior to occupancy of the development.
 3. All living apartments facing Ferry Road shall be fitted with acoustic double glazing to the satisfaction of the Head of Planning & Strategy.
 4. Twenty four of the units which will be accommodated on site shall be affordable in terms of the Council's approved Affordable Housing Policy. These units shall be provided in advance of the 200th unit being occupied. If the site is subdivided, the above requirement shall remain applicable to the site as a whole. No individual part of the site shall be developed without the provision of the whole or pro rata element of affordable housing. All the above shall be to the satisfaction of the Head of Planning and Strategy.
 5. Prior to the issue of consent, the applicants shall enter into a suitable legal agreement to provide a financial contribution to the Council in respect of:
 - (a) education provision in order to alleviate school capacity constraints, at the rate of £15 per dwelling unit (£4950 in total).
 - (b) the following transport infrastructure provision:
 - Contribution of £10,000 to the Council's Cycle Budget.
 - Contribution of £7,500 to the Council's Safe Routes to School Programme.
 - Contribution of £25,000 to go toward traffic calming measures in the vicinity of the development
 - Contribution of £30,000 for the provision of a pedestrian crossing on Ferry Road adjacent to the development.
 - Contribution of £5,000 to go toward the maintenance of the above crossing.
 6. The pedestrian, cycle and emergency vehicles access to the north of the site shall tie in with the existing road and cycle path network, and construction and layout details of the access are to be submitted and approved by the Director of City development prior to the commencement of building works.
 7. The approved landscaping scheme shall be fully implemented within six months of the completion of the development, and thereafter shall be maintained by the applicants and/or their successors to the entire satisfaction of the planning authority; maintenance shall include the replacement of plant stock which fails to survive, for whatever reason, as often as is required to ensure the establishment of the approved landscaping scheme.
 8. Details of all boundary treatments shall be submitted to and approved in writing by the Head of Planning & Strategy before work is commenced on site.

9. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Head of Planning & Strategy before work is commenced on site;
Note: samples of the materials may be required.
10. Notwithstanding the provisions of the General Permitted Development Order, the houses shall not be altered externally or extended without the prior written approval of the planning authority.

Reasons

1. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
2. In order that these matters may be considered in detail.
3. In order to protect the amenity of the occupiers of the development.
4. In order to ensure an appropriate mix of housing on the site.
5. In order to ensure adequate capacity in existing infrastructure.
6. In order to satisfy the Council and emergency services that this is an effective access point.
7. In order to ensure that the approved landscaping works are properly established on site.
8. In order to enable the Head of Planning & Strategy to consider this/these matter/s in detail.
9. In order to enable the Head of Planning & Strategy to consider this/these matter/s in detail.
10. In order to enable the planning authority to consider this/these matter/s in detail.

2 Main report

Site description

The application site comprises the former BAE Systems site on the north side of Ferry Road, with access off Muirhouse Bank. The site comprises 3.7 Ha (9.2 acres) and is basically rectangular in shape, extending approximately 250m from Ferry Road in the south to the Muirhouse "Linear Park" in the north and 170m from east to west. The site slopes up slightly from north to south.

The site accommodated a complex of office and research and development buildings, ranging from single storey to four storeys. There are over 400 parking spaces currently within the site. There is also a small car park to the east of the main site which is leased from the Council, but does not form part of the current application site.

The site is surrounded by residential uses, ranging from one and a half storey properties on Silverknowes View to four storey flats to the south, across Ferry Road. Part of the recently improved Muirhouse "Linear Park" adjoins the northwest corner of the site.

Site history

12 July 2001 - Outline Planning permission granted for housing development (Ref 01/00890/OUT), subject to the following conditions:

1. The approved development being commenced no later than five years from the date of Outline Permission or two years from the date of final approval of any reserved matter(s), whichever is the later.
2. Before any work on the site is commenced, details of the undernoted reserved matters shall be submitted to and approved in writing by the planning authority; the submission shall be in the form of a detailed layout of the site (including landscaping and car parking), and detailed plans, sections and elevations of the building/s. RESERVED MATTERS: layout, siting, design, height, external appearance, parking, access, traffic calming, landscape, open space.
3. A pedestrian and cycle path shall be formed from north to south through the site, with a link to the existing path in Muirhouse Park to the north and onto Ferry Road to the south.
4. A. Prior to the commencement of work on site,
 - i. a site survey (including bore hole testing where necessary) shall be carried out to establish, to the satisfaction of the Head of Planning & Strategy, either that the level of contamination of any land within the site is acceptable, or that remedial and/or protective measures could be undertaken to bring the contamination to an acceptable level in relation to the development, and
 - ii. a detailed schedule of any required remedial and/or protective measures, including their programming, shall be submitted to and approved in writing by the Head of Planning & Strategy;B. any required remedial and/or protective measures shall be implemented in accordance with the approved schedule to the satisfaction of the Head of Planning & Strategy.
5. All living apartments facing Ferry Road shall be fitted with acoustic double glazing to the satisfaction of the Head of Planning & Strategy.
6. A minimum of 10% of the proposed units which will be accommodated on the site, the subject of this outline consent, shall be affordable housing in terms of the Councils adopted Affordable Housing Policy. These units shall be provided prior to the occupation of any other housing unit.

If the site is sub-divided, the above requirement will remain applicable to the site as a whole. No individual part of the site shall be developed without the provision of the whole or a pro-rata reduced element of affordable housing.

7. The financial contribution required by the Developer to alleviate school capacity constraints, if any, is a reserved matter to be agreed between the Council and the Developer at the time of any reserved matters or detailed planning applications.
8. Prior to the occupation of any development on the site, transportation infrastructure improvements in the vicinity of the site shall be carried out. These shall include the provision of a pedestrian/cycle crossing of Ferry Road; a pedestrian/cycle link towards the National Cycle Route to the south of the site, and, where necessary, road junction improvements and traffic calming on adjacent public roads; details of these works to be submitted for the written approval of the Head of Planning and Strategy prior to commencement of works on the site.

24 April 2003 - Planning permission to remove the above condition relating to affordable housing refused (Ref 02/02451/FUL)

Development

The application is for the erection of 330 houses and flats, as amended to improve privacy and overshadowing criteria, and to provide an element of affordable housing. The application is for the determination of Reserved Matters relating to outline consent 01/00890/OUT.

The flats are 3-4 storeys, the townhouses are 3 storey and the semi-detached houses are 2 storey.

The development centres on a tree lined boulevard (The Crescent) accessed from Ferry Road, which also provides a cycle path through the site, terminating in an emergency vehicular access at the northern end of the site.

A detailed description of the development is contained and analysed in the Assessment section of this report.

Open Space provision, excluding private gardens, totals 1.023 hectares (landscaping 0.539 ha; communal amenity 0.458 ha and play space 0.026 ha.

Materials are brick and render, details of which are covered by condition.

Parking is provided for 300 vehicles.

Consultations

Housing

This Department would continue to support the provision of affordable housing at this location in order to achieve the objectives of the North Edinburgh Social Inclusion Partnership wherein this lies, in respect of the Council's aim to create socially integrated communities. To this end, affordable housing, particularly in some form of low-cost or shared ownership, would be welcome.

It is important that new developments in the area are not seen as exclusively private and unaffordable to local residents if we are to achieve social integration in north Edinburgh. Accordingly, this Department would support Planning if it were minded to refuse this application.

With regard to the layout of the proposed housing, I can see no evidence of a pedestrian/cycle access being provided to link this site to Muirhouse Millennium Park immediately to the north.

As part of its investment programme in the regeneration of Central Muirhouse, the Council and its partners including Communities Scotland and SEEL invested £1.325, in creating this new park for Muirhouse which creates linear area of green space and includes a walkway/cycle running from the northern boundary of the former BAE site to Muirhouse Parkway.

The vision for the park was that it would form the northern section of a green link which would ultimately, in the event that the BAE site was developed, allow pedestrian and cycle access from Ferry Road through to Muirhouse Parkway and to Silverknowes foreshore beyond.

Planning was consulted on the design of the redevelopment proposals for central Muirhouse (input from Carmen Duncan and Frances Jarvie) and were strongly supportive of the concept.

The proposed layout has a central road running through the site to its boundary with the Park, which it identified as an "emergency access". There is no indication of the walkway/cycleway continuing through the BAE site and there appears to be minimal public open space within the proposal.

The concept of the linear green space linking Ferry Road to Silverknowes and the requirements for a continuous pedestrian/cycle route is therefore completely lost.

This Department cannot support the application in its current form and requests that it be amended to take into account the comments above regarding links with Muirhouse Millennium Park.

Housing (Further comments 25.08.03)

Scheme 2

I refer to the above-amended proposal and offer the following comments.

This Department welcomes the provision of affordable units within the proposal and would be pleased to assist with the negotiations on the Section 75 planning agreement to deliver these houses.

I also support the continuous cycle route through the site to its northern boundary.

However, if you are minded to grant planning consent, I request that appropriate conditions are applied in order to ensure that the proposed walkway/cycleway is fully connected to the existing walkway/cycleway in Muirhouse Millennium Park immediately to the north. This is the final piece of the pedestrian/cycle link envisaged in the central Muirhouse Redevelopment Brief and would allow users off-road access from Ferry Road to Muirhouse Parkway and the Silverknowes Foreshore beyond.

Education

School Capacities

This site will be located within the catchment areas of the new Muirhouse/Silverknowes (the new Craigroyston) Primary School, Craigroyston High School, St David's Roman Catholic Primary School and St Augustine's Roman Catholic High School.

Muirhouse/Silverknowes (the new Craigroyston) Primary School should have spare capacity available to accommodate this development.

St David's Primary School has some spare capacity at present, but this school is expected to accommodate the denominational children from the waterfront development. An extension to the school would be required to achieve this. Accordingly a contribution of £4,950 should be sought towards this extension.

Craigroyston and St Augustine's Schools have sufficient capacity to accommodate this development.

The forecasts are based on 2002 Start of Session School Rolls and housing completions identifies in the Housing Land Audit 2001. Revised child to house ratios have been applied.

Summary

A contribution of £4,950 (£15 per unit) is required for an extension to St David's Primary School. There is spare capacity in all other catchment schools to accommodate this development.

SEPA

Sewage Disposal

1. 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

2. The plans accompanying the above application provided no indication of the SUDs scheme proposed for the site. SEPA are currently awaiting receipt of this information, at which stage comments below provide general guidance on SEPA's requirements regarding control of surface water on a site this size.

3. The majority of urban Edinburgh drains via combined foul and surface water sewers, which are the responsibility of Scottish Water (SW). SW often seek where practicable, to exclude surface water from the foul sewer and to dispose of it via a separate system. Scottish Water will need to confirm the position in this regard.

4. Either way, the specification of the drainage system must comply with the SUDWP/CIRIA design manual for sustainable urban drainage systems (SUDs) (ISBN 0-86017-521-9). The proposed surface water drainage arrangement will need to meet the requirement of SW, the road authority and SEPA area staff. As drainage systems based on SUD principles will have implications for site layout, there must be agreement on the scheme before planning permission is granted. SEPA also recommends the imposition of a planning condition which makes reference to the requirement for an integrated SUDS scheme.

5. SUD systems may be susceptible to damage because of mud and silt generated during site preparation and construction activity. Work must therefore be phased to ensure minimum risk and temporary silt traps should be provided where necessary.

Landscaping

6. There may be waste management licensing implication arising from the importation of waste material such as soil for landscaping or for any other purpose. Generally, waste material can only be imported to a site if a waste management licence is in effect or if an activity exempt from licensing has been registered with SEPA. Similarly, any waste removed from a site must be deposited either at a suitably licensed site or at a site for which a relevant exempt activity has been registered. SEPA regards all soils, including topsoil, removed from sites as waste.

7. Where waste is either imported to or exported from a site, applicants and their contractors should be fully aware of the relevant requirements relating to:

- i) the transport of controlled waste by registered carriers
- ii) the furnishing and keeping of duty of care waste transfer notes

Other Issues

8. For a proposal of this scale, it is recommended that there is provision of a waste recycling and collection facility to serve the development. A planning condition to this effect would be welcomed.

Environmental and Consumer Services

This Department has no objections to this proposed development, subject to the following conditions:

All living apartments facing Ferry Road shall be fitted with acoustic double glazing to the satisfaction of the Head of Planning.

1. Prior to commencement of work on site:

- a) a site survey (including bore hole testing where necessary) shall be carried out to establish, to the satisfaction of the Head of Planning, whether that the level of contamination of any land within the site is acceptable, or that remedial and/or protective measures could be undertaken to bring the contamination to an acceptable level in relation to the development and
- b) a detailed schedule of any required remedial and/or protective measures, including their programming, shall be submitted to and approved in writing by the Head of Planning.

2. Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule to the satisfaction of the head of Planning.

Lothian and Borders Police

Crime Profile

The area covered by this application is situated in a medium to high-risk area.

The crimes perpetrated cover the whole spectrum with crimes such as theft by housebreaking, attempt housebreaking, malicious mischief and vandalism being particularly prevalent.

Having examined the plans provided, I am of the opinion that the proposed development has the potential to gain the 'Secured by Design' award and hopefully you will encourage the architects, as I will, to consider applying for SBD.

The only point I would raise at this time is the security levels of the emergency access at the south end of the development. It is important that the access is only used by emergency vehicles therefore a robust barrier should be installed.

Transport Planning

No objections to the application subject to the following conditions being applied.

1. The developer is to enter into a suitable legal agreement to provide for the following:

- Pedestrian crossing on Ferry Road adjacent to the development.
- Contribution of £5,000 to go toward the maintenance of the above crossing.
- Contribution of £10,000 to the Council's Cycle Budget.
- Contribution of £7,500 to the Council's Safe Routes to School Programme.
- Contribution of 25,000 to go toward traffic calming measures in the vicinity of the development.

The pedestrian crossing must be provided before any occupancy in the development and the specification and location are to be agreed by the Director of City Development prior to construction.

All of the above contributions are to be paid before commencement of building works.

Reason: To encourage sustainable forms of transport and lessen the traffic impact on local roads caused by the development.

2. The pedestrian, cycle and emergency vehicles access to the north of the site must tie in with the existing road network. Therefore, construction and layout details of the access are to be submitted and approved by the Director of City development prior to the commencement of building works.

Reason: To satisfy the Council and emergency services that this is an effective access point.

3. Specification of cycle stores to be agreed by the Director of City Development prior to occupancy in the development.

Reason: All access 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.

Representations

Scheme 1

It has been certified that neighbours were notified, and the application was advertised on 4 April 2003.

A total of 15 letters and one petition (9 signatures) have been received, objecting on grounds of privacy and daylight loss, traffic, access arrangements, development not respecting the existing community, overdevelopment, excessive height, loss of outlook,

Davidson's Mains and Silverknowes Association suggest a reduction in height, traffic management, and express concern over parking provision and the general design of the proposed development, including overdevelopment.

Councillor Hinds, The Lord Provost, supported an element of affordable housing, and expressed concern on overdevelopment, height, pedestrian and cycle access and the "green link" from Ferry Road to Silverknowes foreshore.

Scheme 2

No additional notification was undertaken, as the changes were not considered to raise any new issues. The Committee should therefore take all objections into account.

Policy

Relevant National Planning guidance includes:

a) NPPG2 (Business & Industry) which recognises that vacant and derelict sites are a 'wasted resource' and their reuse can relieve development pressure from elsewhere, particularly in relation to housing.

b) NPPG3 (Land for Housing) which recognises the useful "contribution which infill sites make to housing supply and in giving people a wider choice of housing.

c) NPPG17 (Transport & Planning) which advocates the selection of housing sites which can be well integrated into effective networks for walking, cycling and public transport, in an effort to promote sustainable development.

d) Designing Places - provides Government advice on design

The Draft West Edinburgh Local Plan which has been approved for consultation purposes, is a material consideration in dealing with this application. In the draft West Edinburgh Local Plan the site is identified as suitable for housing development (HSG14). The following policies are therefore relevant:-

- Policy DQ6 seeks to promote good design
- Policy DQ7 seeks to ensure that tree planting and landscaping provide a suitable visual setting
- Policy DQ8 provides guidance for prominent sites
- Policy H1 supports new housing development in principle
- Policy H3 designates the site as HSG14 on which development for housing will be supported, subject to there being no new access on to Ferry Road.
- Policy H6 gives policy support for requiring a proportion of affordable units where there is a demonstrable unmet housing need.
- Policy H7 seeks to promote high quality design in new residential developments
- Policy H8 sets standards for open space provision
- Policy H9 seeks to promote a balanced housing mix
- Policy H15 states that the requirement for developers to meet the costs of extra educational facilities in areas where there is a shortage of school places
- Policy T1 seeks to promote sustainable transport

North West Edinburgh Local Plan defines the site as an existing business/industrial area, where these uses are to be retained.

Relevant Policies:

Policy E1 seeks to ensure that, in Conservation Areas, the traditional character is retained and enhanced, and supports greater accessibility to the archaeological remains at Cramond.

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 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 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.

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

Non-statutory guidelines on 'AFFORDABLE HOUSING' sets out the requirements for the provision of affordable housing within housing developments.

Gives guidance on the situations where developers will be asked to make financial or other contributions towards the cost of providing new facilities for schools.

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

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

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

(a) the principle of developing the site for housing purposes is acceptable in land use terms

(b) the design and layout, including access, parking and landscaping are acceptable

(c) the proposal represents an acceptable housing mix

(d) neighbouring amenity will be adversely affected.

(a) The principle of developing the site for housing has been established by the grant of outline consent for this purpose

(b) The proposal, as amended, represents an acceptable form of development in the context of the wider area.

The proposal has two driving concepts:

1. To connect the linear park at Muirhouse with Ferry Road using a landscape boulevard ('The Crescent')
2. To connect the cycle path at the south west of the site through a linear park into the crescent and continue through to the linear park at Muirhouse.

Residential units front onto the pedestrian and cycle routes providing natural surveillance and improving community safety. The development takes every opportunity to integrate with the existing vehicle, cycle and pedestrian routes. The proposal will therefore link existing pedestrian, vehicle and cycle routes together via well designed, overlooked spaces and recognises and fulfils the 'opportunities for creating easier movement' highlighted in Designing Places.

These routes divide the site into three sections which the applicant has decided to theme as different types of development, they are:

1. The Courtyard.
2. The Villas
3. The Street

Each of these sections are intended to provide for a mix of housing type ranging from affordable housing, 1, 2 and 3 bedroom room flats, maisonettes, townhouses and family houses. Wherever possible houses have been designed with sufficient gardens to accommodate future extension as family needs change. Flats have also been designed to allow future internal modification. The application therefore recognises and fulfils to the 'opportunity for making places adaptable' highlighted in Designing Places.

The scale and density of each area is intended to reflect the scale and mass of the housing that immediately surrounds it.

1. The courtyard will reflect the four storey housing along Ferry Road.
2. The villas reflect the single and two storey buildings at Silverknowes
3. The street reflects the higher density building to the north east in Muirhouse.
4. The dwellings that front onto the crescent are a mixture of town houses and flats

The design therefore integrates the proposed urban form with its surroundings by:

1. continuing the linear park through to Ferry Road
2. connecting the cycle way to the linear park.
3. providing buildings of a similar mass and density those that are in the immediate vicinity.

The buildings have been used successfully to divide the public streets and crescents from the communal and private gardens resulting in well designed useable communal open spaces and clearly defined streets. Front doors and active uses face the street, crescents and linear parks, which will improve the overlooking and natural surveillance of the public realm. Car parking has been provided either on street, in front gardens of the property or in courtyards. Where cars are parked on street or within courtyards, landscape has been used to minimise the impact of the cars. Height to width ratios are sufficient to allow open spaces to have the potential to receive direct sunlight. The design therefore recognises and fulfils the 'opportunity for creating safe and pleasant spaces highlighted in Designing Places.

Open space provision, at 1.023 hectares, represents 78% of the requirement for a site of this size (1.32 hectares), but is well designed, overlooked and useable. The open space provision calculation excludes private gardens which add a further 0.5687 hectares "green" space to the development, bringing the total to 1.5917 hectares (120% of requirement).

In key locations, such as the entrance to the site off Ferry Road, the buildings have been designed with interesting facades that avoid blank gables. The public realm has been designed as a series of external rooms through which pedestrians and cyclist can move and buildings used as highlights in the townscape to aid orientation. In combination with the main door access from the public realm and the natural surveillance this will contribute to create a sense of welcome on accordance with Designing Places.

Summary

The scheme recognises and fulfils the opportunities for creating successful places highlighted in "Designing Places". This has resulted in a density higher than the surroundings, which has well designed public realm, and communal spaces and buildings of architectural quality.

(c) The condition relating to affordable housing will ensure that an appropriate housing mix is achieved on the site. This condition replaces the original condition attached to the outline consent.

(d) The proposed layout has been amended to improve privacy and daylighting to surrounding residential property. These now comply fully with the relevant guidelines.

The comments by SEPA cannot be incorporated as this was not a reserved matter. but will be addressed in the process of other statutory regimes.

The proposals do not comply with the relevant adopted Local Plan, but are compliant with the terms of the outline consent, replacement Local Plan, and Non-statutory guidelines.

There are no material considerations which outweigh this conclusion.

It is recommended that the Committee approves this application, subject to the conditions stated.

Alan Henderson

Alan Henderson
Head of Planning and Strategy

Contact/tel Michael Paton on 0131 529 3902 (FAX 529 3706)

Ward affected 07 -Muirhouse/Drylaw

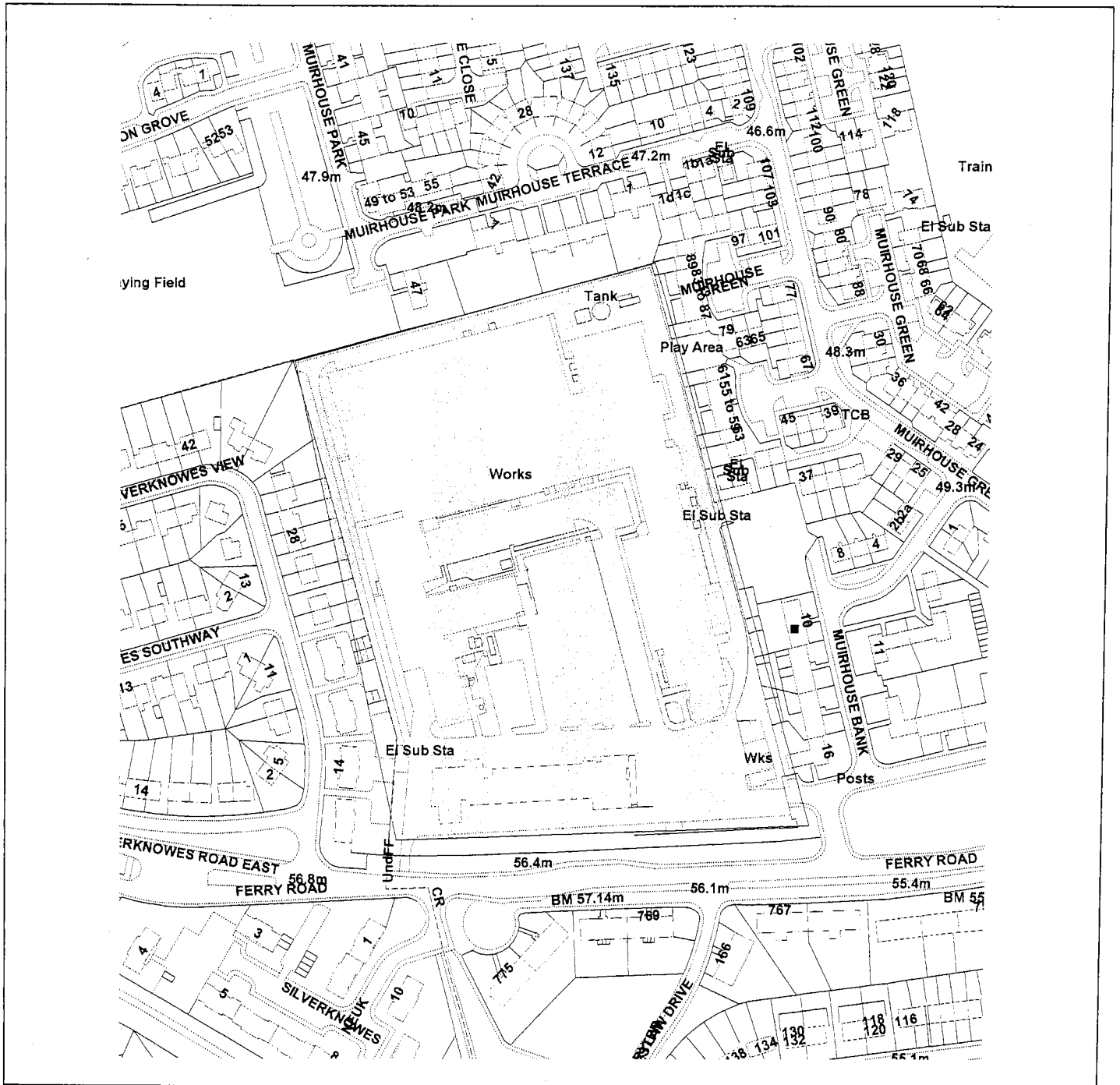
Local Plan North West Edinburgh

**Statutory Development
Plan Provision** Business

File

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**Drawing numbers/
Scheme** 13-
Scheme 2



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PLANNING APPLICATION

Address	18 Muirhouse Bank		
Proposal	New build residential flat (3-4 storey), townhouses (3 storey) and semi-detached houses (2 storey) (as amended), and		
Application number:	03/00909/REM	WARD	07- Muirhouse/Drylaw
THE CITY OF EDINBURGH COUNCIL			
THE CITY DEVELOPMENT DEPARTMENT- PLANNING & STRATEGY			