

Development Management Sub Committee

Wednesday 6 November 2013

**Application for Planning Permission 13/02458/FUL
At 154 McDonald Road, Edinburgh, EH7 4NN
Alterations to and change of use from offices to form
residential accommodation (as amended).**

Item number	6.2(a)
Report number	
Wards	A12 - Leith Walk

Links

<u>Policies and guidance for this application</u>	LPC, CITH5, CITE4, CITD3, CITH2, CITH7, CITT3, CITT4, CITT5, CITT6, NSG, NSLBCA, NSDCAH, NSGD02,
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Executive summary

Application for Planning Permission 13/02458/FUL At 154 McDonald Road, Edinburgh, EH7 4NN Alterations to and change of use from offices to form residential accommodation (as amended).

Summary

The proposal is in accordance with the Edinburgh City Local Plan and non-statutory guidance. The proposed residential use is acceptable. The majority of units created will have adequate amenity. No road safety issues arise. Lack of car-parking is justifiable due to the nature of the existing site and proximity to the city centre. The proposal will not result in any loss of privacy or natural light to neighbouring residential properties and will not have any detrimental impact on neighbourhood character or amenity. There is no adverse impact on the listed building. No other considerations outweigh this conclusion.

Recommendations

It is recommended that this application be Granted subject to the details below (in section 3 of the main report).

Financial impact

The Council has considered the property surplus to requirements and the property has been marketed. Missives are being drawn up with the current applicant who will take ownership of the property from the Council. A capital receipt will result from the sale.

Equalities impact

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

Sustainability impact

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

Pre-Application Process

Pre-application discussions took place on this application.

Publicity summary of representations and Community Council comments

The application was advertised on 5th July 2013. 34 representations were received, all in objection, from parents of schoolchildren at Broughton Primary School, the Cockburn Association, the New Town and Broughton Community Council, Leith Central Community Council and Malcolm Chisholm MSP. The letters of representation raised the following material objections:-

- lack of housing mix
- lack of parking
- potential noise from the playground to the flats
- insufficient open space

The following non-material issues were raised:-

- alternative use of the building (including to meet classroom shortage),
- loss of privacy in the playground/ juxtaposition to the playground.
- lack of pre-consultation with the community,
- fire exits discharge into playground

Community Council

The New Town and Broughton Community Council (who represent the area) wrote in objection, as did Leith Central Community Council (representing the school catchment area to the north).

Both community councils raised the same concerns as parents regarding the proximity of the development to the school playground they queried lack of public consultation, mechanisms for ensuring Affordable Housing and mechanisms to address car ownership. They supported the proposed external alterations.

A full assessment of the representations can be found in the main report in the Assessment section.

Background reading / external references

- **To view details of the application go to**
- [Planning and Building Standards online services](#)
- Education, Children & Families Committee on 8 October 2013 – “Primary School Estate Rising Rolls” (Item 7.2).

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1. Background

1.1 Site description

The property was built as Broughton Higher Grade School in 1903 adjacent to Broughton Primary School and for most of its years serving as an annex to that primary school. The property ceased its school function many years ago and thereafter has served as office accommodation, originally for Lothian Regional Council but latterly leased out privately. The annex is listed category B as part of the main school, The buildings were listed on 10.3.1999 (ref.30041).

The building is three storeys high with some basement areas. Due to tall storey heights at ground and first floor the building is the equivalent of 5 or 6 storeys high in relation to surrounding buildings.

To the rear a U-shaped section in the rear of the building as been infilled c.1960 and a link added to the main school building at the north end, leading to the rear elevation being in a mixture of styles.

Surrounding uses are largely residential, but the large site to the immediate west is occupied solely by Broughton Primary School. A group of bowling-greens lie to the north-west on the opposite side of Broughton Road. A path to their side leads to St Mark's Park to the north. Adjacent to this path to the north-east stands Powderhall Refusal Disposal Plant.

1.2 Site History

20 February 2013 - Committee approved a housing development on land to the south of the school playground (12/04302/FUL)

27 June 2013 - A parallel application for listed building consent, covering the physical alterations to the building, was submitted (13/02459/LBC)

8 October 2013 - Education, Children and Families Committee, as part of their assessment of Primary School Estate Rising Rolls, note that the Working Group at its meeting on 18 September 2013 concluded that 154 McDonald Road could now be discounted entirely as this would not meet their needs.

2. Main report

2.1 Description Of The Proposal

The application proposes alteration and change of use of the existing office building to create 73 studio flats. These will share several facilities such as laundry, gym, communal secondary kitchen/dining areas, plus a roof terrace to the rear.

The very high floor to ceiling heights enable each unit to have a mezzanine area to the rear of the room. Unit sizes range from 36 to 53sqm, averaging around 40sqm. Units are mainly single aspect, being formed from the previous classrooms around a central corridor spine. Only the four corner units on each floor are dual aspect, 12 in total, giving 61 single aspect units. The flats are accessed from the existing doors off McDonald Road and re-use the existing stairs.

External alterations include: the creation of a communal roof terrace with glass balustrade on an existing high level, flat roof section, to the west; addition of 14 solar panels between the terrace and the roof edge plus a further 12 on a high-level section of flat roof; minor alterations to some windows on the section below this to enlarge these to match windows on the original building; marginal widening of an existing service opening on the south gable at basement level.

All alterations other than the glass balustrade will be in stone to match existing.

No conventional parking is provided but two small spaces are provided for electric cars within the basement area, together with recharging facilities. These are accessed from the existing vehicular access at the south end of the building. Metal cycle lockers are added against the basement level facing McDonald Road, but the majority of cycle storage is within the basement in the form of two level metal racks.

630 sq metres of open space exists in the form of an area of land between the building and both McDonald Road and Broughton Road. This area will have soft landscaping added but will largely serve as visual amenity space. A rooftop terrace of 150sqm is proposed to be added, bringing the total open space provision to 780 sq metres.

Scheme 1

As originally submitted the scheme also had a rooftop lounge on the roof terrace but this was deleted from the proposal.

Supporting documents including a Design and Access Statement and Noise Impact Analysis are available to view on the Planning and Building Standards online services.

2.2 Determining Issues

Do the proposals preserve the building or its setting or any features of special architectural or historic interest which it possesses? If not, there is a presumption against the granting of consent. For the purposes of this issue, preserve, in relation to the building, means preserve it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character.

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?

2.3 Assessment

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

- a) the proposed use is acceptable;
- b) the proposal is compatible with the character of the existing building or its setting in terms of design and form and choice of materials;
- c) the proposal has adequately considered parking and road safety issues;
- d) the housing mix is acceptable;
- e) the proposal causes a loss of amenity to neighbouring sites;
- f) the proposed units will have adequate amenity;
- g) the representations raise issues to be addressed;
- h) the proposal will have any detrimental impact on equalities and human rights;
- i) any archaeological issues arise; and
- j) other considerations.

a) Principle of Use

Policy Hou5 Conversion to Residential Use supports conversion to residential use subject to compliance with other policy requirements. The proposal gives a new use to a listed building, ensuring its survival.

Section a) of this policy requires that a suitable residential environment is achieved. The building lies on a corner site, and although being at a traffic junction is set back from the roads and has good open aspects. The building benefits from unusually large windows giving excellent daylight levels.

Section b) requires that the use be compatible with nearby uses. The property lies within an established residential area with a primary school adjacent.

Section c) requires that adequate open space, amenity and parking standards are met. This is discussed within the further sections of this Assessment.

Section d) requires that other policies are met and that vulnerable uses are safeguarded. This is discussed within the further Assessment.

The proposal will comply with Policy Hou5.

Policy Hou7 on Affordable Housing requires 25% affordable housing units on site (18 units). The nature of the development is such that it is inherently "affordable" throughout, i.e. 100% are affordable, but a legal agreement is suggested to secure a link in accordance with policy requirements. An unsubsidised discount sale will be required on 18 units through a straightforward price cap.

b) Impact of Alterations on the Area and Setting of the Listed Building

The alterations to the exterior are minimal and will have no effect on the character or appearance of the building. The special character of the listed building is maintained.

The alterations to the roof are such that they are not visible from any nearby public viewpoint. There is no impact on the Protected Viewcone. The alterations have no negative effect on the special character of the listed building and are acceptable.

The internal alterations in relation to the listed building character are considered within the parallel application for listed building consent (13/02459/LBC).

c) Transport Issues

There is no scope for standard vehicle parking on site. Two small spaces are provided with electric cars and recharging points within the basement. Transport has no objections to the absence of parking subject to appropriate legal agreements.

Guidelines on Parking Standards for studio flats requires 33% parking provision but a relaxation is made for affordable units with 0% being acceptable in this zone (zone 3).

Four City Car Club spaces are to be provided on-street. A legal agreement seeks a contribution of £18,000 to ensure this provision. A contribution towards the tram project of £70,791 is also sought.

Guidelines for Parking Standards requires 100% cycle parking for studio flats. Secure cycle parking (one space per flat) is provided on site, partly internally, but also in the form of secure cycle lockers along the base of the building on McDonald Road. The internal spaces make use of a customised double-decker rack system to increase capacity. Due to restricted ceiling height in the basement this limits cycles on the upper rack to a maximum height of 1.05m, but this should accommodate most adult size cycles. Requirements are met.

d) **Housing Mix**

Policy Hou2 on Housing Mix seeks a mix of unit sizes in all developments "where practicable". Since all units are bed-sit/studio flats, the lack of mix to unit size is not seen to be an issue, as it directly addresses a shortage of such units in this area. The lack of larger units is not critical given the predominance of two and three bed flats in the area. The existing form of the listed building lends itself well to the creation of such units with minimal intervention to existing structure. It is not considered practicable to deliver larger units without a detrimental effect on the character of the listed building. In the light of the building's location a mix is not considered necessary.

The building is not suited to conversion to family housing due to its lack of open space and inability to accommodate parking and particularly in light of its location.

e) Effects on Neighbouring Amenity

The closest housing stands on the opposite side of McDonald Road.

Privacy and overshadowing are unchanged.

Alterations do not raise any privacy issues.

f) Amenity of the Proposed Units

Unit sizes range from 36sqm to 53sqm (averaging around 40sqm). This is above average for developments of this type. All meet the minimum standard laid down in Urban Design Guidance (36 sq.m).

Policy Hou 3 on Private Open Space requires 10sqm per flat. This would equate to 730sqm. The surrounding open space totals around 630sqm, but all lies between the building and the surrounding roads. No usable private garden area is available to the units, and this outer space largely serves to improve visual amenity. Policy requirements that a minimum of 20% of the site should be green space cannot be met as this is dictated by the existing building on site. In mitigation it is noted that the property lies close to St Mark's Park (270m) and within easy walking distance of Pilrig Park (600m).

Further mitigation of this lack of open space is addressed through a communal rooftop terrace. This space will be accessible to all residents and will offer a good quality amenity space.

The physical constraints of the existing building render it impossible to comply with open space standards. The rooftop terrace and proximity to public parks address this deficiency of open space on the site.

Guidelines on new housing require all units to have good daylight levels and avoid single aspect flats. Due to the nature of the existing building 61 out of the 73 created flats are single aspect. All units facing the outer roads will have adequate daylight and privacy. The exceptional window size further benefits amenity levels and all exceed policy requirements.

Units facing the rear orientate to the south-west and most units here greatly exceed requirements for daylight and sunlight. However, windows on the lower floors of the northern section are overshadowed by the existing Broughton Primary School which stands only 9m from the rear. Daylight levels to the outer walls of 8 flats are substandard due to the overshadowing caused by Broughton Primary School. However, this is mitigated by the large window size, which greatly exceed minimum window size and compensates for the low daylight levels reaching the building. This brings standards within each room up to acceptable levels. Those windows in this area which exist as smaller windows are all increased in size to match the others. Daylight within all rooms therefore is sufficient in policy terms. All units get at least two hours of sunlight.

Privacy to the proposed flats in this same rear location, closest to the school windows does not breach privacy policy as the schoolrooms are not apartments.

Environmental Assessment object to the proposal primarily on the grounds of adverse impact on amenity from traffic noise. McDonald Road is not a main traffic route and is primarily a residential street along its length. School buildings surrounded by residential tenements is a common feature in the central area of the city. The applicant has submitted a Noise Assessment Report which demonstrates that impacts from road traffic, rail traffic and the waste transfer facility at Powderhall are negligible. Potential noise issues associated with the roof terrace, internal gym and communal boiler are more appropriately dealt with by the management of the development.

Concerns regarding lack of information and safety both related to the boiler flue which was not originally illustrated. This information is now provided. A standard flue extract is placed at roof level.

g) Public Comments

Material representations

Lack of mix of units - addressed in section d)
Lack of open space - addressed in section f)
Lack of parking - addressed in section c)
Noise from the playground - addressed in section f)

Non-material representations

An alternative use should be sought (especially classroom use)
Loss of privacy to children
Lack of pre-consultation
Proximity to playground - the status quo is preserved as the building already exists
Fire exit positions - this is a warrant and legal issue.

Community Council comments

New Town and Broughton Community Council objected to the lack of community consultation, juxtaposition to the playground, and lack of car parking. They also queried the affordability of the units. This is addressed in sections a) and c) above.

Leith Central Community Council (representing parents in the catchment area north of the school) objected to the use and lack of mix within unit size. This is addressed in section d).

h) Equalities and Human Rights

No equality issues arise.

Several objectors inferred Human Rights issues pertained to the proximity of the proposal to the playground. Education does not oppose the relationship between the proposed use and their playground.

i) Archaeology

The site has no known archaeological significance. No external works are proposed other than the soft landscaping of existing tarmac.

j) Other Considerations

1. Potential Prejudice to Development Rights in the School Grounds

The sale of the land by the Council includes a Burden on the school playground restricting building within certain areas. Children and Families are aware of this effect.

2. Proximity to the School Playground

Whilst concerns have been raised regarding the relationship to the school playground, this relationship already exists with the current building.

As an existing office, the building was historically occupied during school hours and could continue to operate this way with no need for planning permission.

Children and Families has no concerns regarding the proximity of the flats to the playground.

CONCLUSION

The proposal provides a solution customised to the special character of the listed building.

In conclusion, the proposed residential use is acceptable. All units created will have adequate amenity. No road safety issues arise. Lack of car-parking is justifiable due to the affordable nature of the housing and proximity to the city centre. The proposal will not result in any loss of privacy or natural light to neighbouring residential properties and will not have any detrimental impact on neighbourhood character or amenity. There is no adverse impact on the listed building. No other considerations outweigh this conclusion.

3. Recommendations

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

3.2 Conditions/reasons

1. No development shall take place until the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.

Reasons:-

1. In order to safeguard the interests of archaeological heritage.

Informatives

It should be noted that:

1. Prior to the issue of consent the applicant shall enter into a suitably worded legal agreement to ensure:

- a) A payment of £18000 towards the City Car Club
- b) A payment of £70791 towards the Edinburgh Tram Project

2. The applicant shall enter into a suitably worded legal agreement with the Council to ensure that an appropriate ratio of the flats remain affordable in terms of adopted Council policy.

3. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

Statutory Development

Plan Provision

The property lies within an area shown as Urban Area in the Edinburgh City Local Plan.

Date registered

27 June 2013

Drawing numbers/Scheme

1-14,15a,16a,17-21,22c,23c,24b,25,26a,

Scheme 4

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Acting Head of Planning and Building Standards

Links - Policies

Relevant Policies:

Relevant policies of the Edinburgh City Local Plan.

Policy Hou 5 (Conversion to Housing) sets criteria for assessing the change of use to residential.

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

Policy Des 3 (Development Design) sets criteria for assessing development design.

Policy Hou 2 (Housing Mix) requires the provision of a mix of house types and sizes in new housing developments.

Policy Hou 7 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

Policy Tra 3m (Tram Contributions) requires contributions from developers towards the cost of tram works where the proposed tram network will help address the transport impacts of a development.

Policy Tra 4 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in supplementary planning guidance, and sets criteria for assessing lower provision.

Policy Tra 5 (Private Cycle Parking) requires cycle parking provision in accordance with levels set out in supplementary guidance.

Policy Tra 6 (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 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

Non-statutory guidelines on Developer Contributions and Affordable Housing gives guidance on the situations where developers will be required to provide affordable housing and/or will be required to make financial or other contributions towards the cost of, providing new facilities for schools, transport improvements, the tram project, public realm improvements and open space.

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 and landscape, in Edinburgh.

Appendix 1

Consultations

Children and Families (Education)

The Children and Families Department would have no objections to the property being converted to residential use; many of the Authority's schools are immediately adjacent to and/or overlooked by residential properties. Purchasers of the residential units would not be expected to hinder the operation of the school (for example, making any complaints about noise) when they would be buying their property in the full knowledge that the residential units are alongside an existing and fully operational school.

This is not a Children and Families department property (it is not an annexe of Broughton Primary School). Regarding why the building itself is not suitable for the expansion needs of the school this is not a planning matter. I would refer you to a recent report to the Education Children and Families Committee on 8 October within which the reasons for McDonald Road having been rejected as an option are explained on pages 21 and 22. [http://www.edinburgh.gov.uk/download/metings/id/40853/item 7 2-primary school estate rising rolls](http://www.edinburgh.gov.uk/download/metings/id/40853/item%207%20primary%20school%20estate%20rising%20rolls).

Property

There is a burden [on the school playground] against building on the green shaded area on the attached plan. This ties in with the Building Regulations that would prevent any development being undertaken in such close proximity to the existing building. Therefore this would not affect any proposed new development of classrooms within the playground.

Housing

I refer to the consultation request from the Planning Department about this planning application.

Services for Communities have developed a methodology for assessing housing requirements by tenure, which supports an Affordable Housing Policy (AHP) for the city.

- The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more.
- This is consistent with Policy Hou 7 Affordable Housing in the Finalised Edinburgh City Local Plan.

As this application is an application for a maximum of 73 residential units, the AHP will apply. 25% of the units are required to be of approved affordable housing tenures, which are found in PAN2/2010 and described within the Council's Affordable Housing Policy. A total of 18 affordable homes would be required within this development.

The applicant has made a commitment to provide the full requirement of 18 affordable homes on site, which is welcomed by the department. The applicant has proposed that these completed homes would be provided directly by the developer, without requiring any public subsidy. They would be unsubsidised discounted sale properties, which is an approved affordable housing tenure that meets a significant and identified affordable housing need in the city. They would be retained as affordable housing in perpetuity through a straightforward price cap. The applicant has agreed to secure these as affordable homes by Section 75 Agreement.

The applicant has discussed the affordability aspect of these homes in great detail with the Council over the past 18 months. While 25% of the homes require to be secured as affordable, and will be secured in the legal agreement, the applicant expects 100% of the homes to fall within a price range that meets Edinburgh's existing and identified affordable housing need. This is very welcome.

The Housing Need and Demand Assessment estimates that 16,000 affordable homes (and 20,000 market homes) are needed in Edinburgh over a ten year period. At least 5000 of the affordable homes are required for households in employment and earning between minimum wage and median income levels (which are currently £36,025, with figures updated annually). The range of tenures that meets this need includes low cost home ownership tenures like shared equity, golden share and unsubsidised discounted sale properties. In fact, unsubsidised discounted sale properties are especially welcomed by the Department because they not only meet an identified housing need today, they are retained as affordable in perpetuity through a Deed of Conditions (which is straightforward, and added to the property Title).

Edinburgh is the only Local Authority in Scotland delivering the full range of approved affordable housing tenures, some with the assistance of public subsidy, and others (like in this case) being delivered without subsidy. In January 2013 the Council received a strong indication about the extent of the affordable housing need that exists in Edinburgh amongst households earning between minimum wage and median income levels. Through our involvement in the National Housing Trust initiative, 1800 households applied for the first 12 NHT affordable homes. Applicants in that case had to be earning between minimum wage and £36,025. This level of need is significant, and initiatives like this proposed development will help to address this need. Households within this earning bracket are increasingly being priced out of the private rental market (which is often more expensive than what it would cost if paying a monthly mortgage for the same property). This earnings group also find it difficult to save for the required deposit for mortgages, and they would not be a priority group for social rented housing in the city.

Tenures such as discount low cost home ownership fill that gap, and have a clear role to perform in Edinburgh. From the point of view of the public purse, they are very efficient to deliver. They require no public subsidy. They are built and marketed entirely at the developer's expense, with the developer carrying all of the risk. The clauses that we apply in Edinburgh within legal agreement to cap the price have been examined and approved by the Council of Mortgage Lenders as a lendable prospect. The administration of these properties, and retaining them in perpetuity, is also a very efficient process. As the price cap sits on the Title to the property, any prospective buyer will come across this when seeking to purchase the property, and their conveyancing solicitor and mortgage lender will always pick up on this requirement. The Council only performs two roles within the administration of these tenures, for the first sale and any subsequent resales. Acting as a referee, the Council approves the price (using the formula contained in the Section 75) and we check that the purchaser is an eligible purchaser (a straightforward income check, of bank statements, pay slips and mortgage offer, to assess that the purchaser could not have afforded this property on the open market).

This tenure is therefore an approved tenure, that meets an identified affordable housing need, is an efficient mechanism to provide affordable housing in perpetuity, and it will be secured through a Section 75 legal agreement.

We would ask that this is added to the Informatives Section of the Committee Report.

Services for Communities is very supportive of this application and would be happy to assist with any queries around the affordable housing requirement for this development.

Police

I am writing on behalf of Police Scotland to provide comments on the above planning application.

It is recommended that this application seeks SBD accreditation, it has to be noted that the guidance will be changing in the near future from 2010 to 2013, which will determine the requirements.

All ground floor entrance doors and windows have to meet the PAS 24 standard with impact tested laminate glass as well as balcony doors, windows and any window that is accessible from design features above ground floor. The seating, garden area, cycle racks and bins should be access controlled so that is for residents use only, failure to do this may see the area being misused.

Cycle Storage it would be better if the entry door to cycle store is directly into the common stair as there is no natural surveillance of the door in its current location. It should be a windowless room with a 44 mm solid core door with lock to BS 3621:2007 or a PAS 24 door. Ideally keys for the cycle store should only be issued to those residents who want to use the facility. There is no natural surveillance of the garage door, so the entry door into the garage has to be to LPS 1175 SR1. The entrance door from the garage into the common stair has to be PAS 24 or higher and should be a key lock or locking system that prevents unwanted movement from the garage into the common stair and if fire safety permits that a key turn is required from the stair into the garage - the mopeds stored in the garage could be particularly prone to theft, unless there are robust anti-theft measures built into the moped or that there is an additional cage to access the moped. Again it could be advisable to have a windowless room the security of the window area will be paramount to prevent unwanted access and the proposed bin location may obscure windows.

The gym has an entry point, it is unknown if this is to be just a fire exit. This has the potential to be an easy entry point, ideally this door should be secured with a magna lock and be alarmed so that it is not opened to 'air' the facility. Depending on the equipment installed in the gym for instance a flat screen TV for use by users. The entrance door into the gym should be access controlled, ideally a card system that persons who have left the premises can be removed easily from the system and not allowed entry (if push button access locks require to be recorded at least monthly and a secure method of passing the code to residents, so that the facility does not get used by non residents). Ensuring that the area is alarmed out of hours will discourage misuse. Windows for the gym should not be able to be opened or closed by users to ensure that they are left insecure and offer an opportunity for criminals.

The Plant room should have an entrance door to LPS 1175SR 3 or greater and no window - consideration should be given to alarming the area to ensure that there is no unwanted intrusion into the area - this is core infrastructure for the smooth running of the premises and needs to be protected accordingly. In terms of the 'General Storage' it is unclear what would be stored and who would use it - understanding those parameters would determine any recommendations made. The entrance door on the eastern side of the building has limited natural surveillance and consideration should be given to the entrance meeting the standard LPS 1175SR3.

The main entrance on McDonald Road has some natural surveillance from the properties on the opposite side of the road. Post Delivery to flats should either be by means of a mail box which allows delivery of mail from outside the premises and collected by residents inside or an 'airlock' created with an outer door with an access control button and an inner door with no access control button but mail delivery boxes located between the two doors. The lift in the entrance lobby would have to be access controlled if an airlock was created at the main entrance for mail delivery, unless the area was subdivided to allow for mail delivery and a controlled entrance into the common stair to the stairs or lifts. The switch room should have a PAS 24 or a higher standard door, again the area alarmed to prevent unwanted access into the area. Ideally meter reading should be done by service providers electronically (remotely) or from outside the stair so that access is not required into the premises. All doors into the concierge's office require to be PAS 24 to ensure the security of the residential property. The visibility window at the concierge's office should be a fixed PAS 24 window with laminate glass to prevent unwanted intrusion, consideration should also be given to alarming the area.

The ground floor guest toilets should be access controlled, so that they are not misused. It is recommended that the lounge area use is restricted to predetermined hours. The properties on the north-west side of the building are accessed via a corridor and do not have natural surveillance, consideration should be given to the corridor being access controlled and only accessible to the two residents in these properties. Consideration should be given to access controlling the sun room and roof terrace. As there is roof access, careful consideration should be given to security for the solar panels to prevent theft.

Due to the layout of the premises, it is suspected that the concierge would be a live in position, they may not be present on the premises at all times so the it is recommended that the alarmed areas would be monitored/confirmed alarms linking to an alarm receiving centre such an alarm can be linked to police response for a one off fee, staff levels permitting at the time of activation.

City Archaeologist

Further to your consultation request I would like to make the following comments and recommendations concerning the above planning application for change of use from offices to form residential accommodation.

This B-listed Edwardian School building was constructed around 1903 and formed of original Broughton Primary School. The school was constructed across the site of Blandfield House shown on Ainslie's 1804 Plan of Edinburgh and which was demolished by the 1890's OS map of the site. Accordingly this application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh City Local Plan (2010) policy ENV4 & 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 conversion of this former Edwardian School will see significant internal alterations and changes to the original layout. It is considered however that although significant such changes have a low archaeological impact especially to the fabric of the building. Nevertheless it is considered important that a programme archaeological historic building survey (level 1: annotated phased plans/elevations, photographic and written survey) of the existing former school building is undertaken prior to the commencement of alteration/construction works in order to record this listed building. This should be linked to an appropriate programme of archaeological works (watching brief) during any associated ground breaking works.

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

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (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 would be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.

Environmental Assessment

Environmental Assessment has concerns in relation to this application.

The proposed residential properties are situated at the busy road traffic junction of Broughton Road and McDonald Road. In this regard, road traffic noise is considerable and the internal noise level of the proposed properties is likely to be high and cause sleep disturbance to future occupants. In addition, the proposal includes a gym and plant room in the basement floor, lounge and laundry on the ground floor and a roof terrace (for private entertainment). All of these aspects of the proposal have the potential to affect residential amenity by way of noise for the future occupants. In particular, it is not recommended that a gymnasium be sited immediately below residential properties due to the potential for noise and vibration to affect the properties above. Noise and vibration issues can become particularly exacerbated when proposed within a conversion property such as this. Gymnasiums tend to require a bespoke solution (e.g. concrete separating floors) to ensure that noise and vibration does not affect surrounding residential properties.

With regards to the noise issues highlighted above, a traffic noise assessment was provided which was insufficient for purpose and has not addressed the concerns of this section. The properties are single aspect and therefore traffic noise will be a major factor in ensuring a suitable level of amenity is attained within the development. In terms of the other noise issues highlighted above, no information has been provided at all from the agent or applicant in an attempt to address the highlighted concerns.

The proposal also includes a communal heating plant room on the basement floor. In addition to the noise and vibration concerns highlighted above from the heating plant operations, Environmental Assessment requested that information be provided which demonstrated that the heating plant flue extract position could be sited in a safe place. The proposal indicates that the plant room will be sited on the basement floor with no indication of where the flue gases will be extracted to. Combined heating system flues must be sited in compliance with The Clean Air Act in terms of ensuring that safe discharge heights and distances are adhered to in relation to surrounding residential properties. This section requested further information from the agent for the application in an attempt to ensure that the above legislation would be complied with however no information has been provided in this regard.

Therefore, Environmental Assessment is not in a position to support this application due to insufficient information being provided to allow a full assessment of the proposal. In conclusion, Environmental assessment recommends that the application be refused on the grounds that residential amenity and possibly public safety could be detrimentally affected should this application be granted.

Transport

The proposed development does not meet current Council standards which require cycle parking provision to be secure and undercover. A number of stands are within the building but the remainder will be outside building and adjacent to McDonald Road. There also appears to be no motor cycle parking. I would therefore ask that the application is continued to allow the applicant to address these issue.

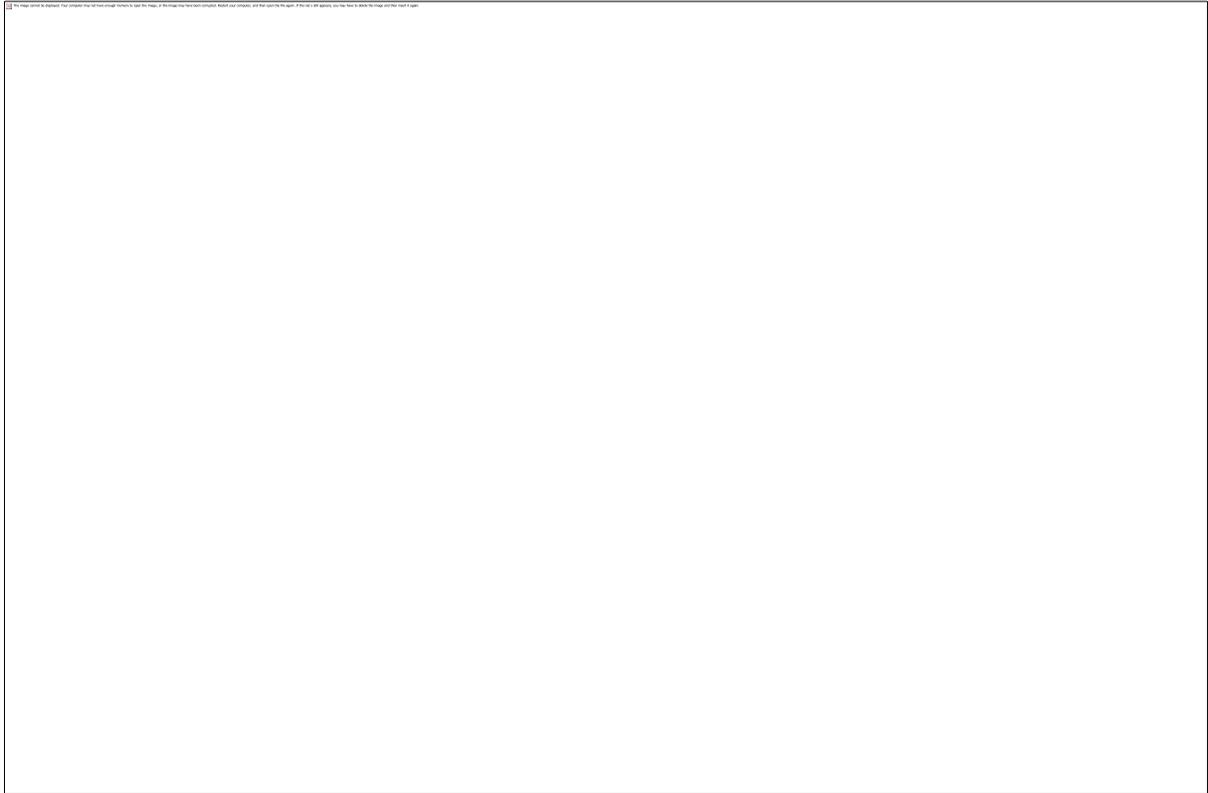
If the application is granted, the following should be included as conditions or informatives as appropriate:

1. Consent should not be issued until the applicant has entered into a suitable legal agreement to provide:
 - a. a contribution of £18,000 to provide 3 car club spaces in the vicinity of the site;
 - b. a contribution of £70,971 to the Edinburgh Tram;
2. Any gate or gates must open inwards onto the property;
3. The applicant should be informed that prior to carrying out any works to form a footway crossing a Minor Roadworks consent must be applied for and secured;
4. The works to form a footway crossing must be carried out in accordance with "Development Roads – Guidelines and Specification".

Note:

In accordance with the decision of the Council's Transport and Environment Committee (4 June 2013, Item 7.7) conversion of properties with no off-street parking in the Controlled Parking Zone is permitted where the building is listed. The applicant should be informed that each unit will be eligible for one resident's permit only.

Location Plan



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