

# Development Management Sub Committee

Wednesday 26 March 2014

**Application for Planning Permission 13/04232/FUL  
At Royal Edinburgh Hospital, 23 Tipperlinn Road, Edinburgh  
Planning permission in respect of the phase 1 development  
of the healthcare masterplan of the Royal Edinburgh  
Campus including erection of mental health and brain injury  
facilities (Class 8) together with various works including  
access and landscaping (as amended).**

Item number	6.1(a)
Report number	
Wards	A10 - Meadows/Morningside

## Links

### [Policies and guidance for this application](#)

LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITD6, CITE3, CITE6, CITE7, CITE11, CITE12, CITE17, CITE18, CITOS1, CITOS3, CITH8, CITT4, CITT5, CITT6, CRPCHI, CRPMER, CRPLEW, OTH, NSGD02,

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# Executive summary

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## Summary

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The proposed development seeks to provide new hospital accommodation and increase and improve access for all users, and include car parking and gardens/courtyards sitting within and surrounded by a high-quality landscape setting. No adverse amenity impacts will arise as a result of the development with regards to neighbours, flooding, noise and air quality. It is recognised that the proposed development would alter the existing townscape/landscape to varying extents, however mitigation is proposed by means of retaining the majority of trees on site and by proposing to plant a substantial number of new trees. The development is in accordance with the provisions of the Edinburgh City Local Plan.

## Recommendations

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

## Financial impact

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There are no financial implications to the Council.

## Equalities impact

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

## Sustainability impact

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This application meets the sustainability requirements of the Edinburgh Design Guidance.

## Consultation and engagement

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### Pre-Application Process

A proposal of application notice was submitted and registered on 24 April 2013. Copies of the notice were also issued to:

- Morningside Community Council
- Craiglockhart Community Council
- Merchiston, Marchmont and Sciennes Community Council
- Local councillors
- South Central Neighbourhood Partnership
- South West Neighbourhood Partnership

Community consultation events were held in June 2013. Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online Services.

A pre-application report on the proposals was presented to the Committee on 3 July 2013. The Committee requested that consideration is given to the requirement for a full traffic impact assessment and how the applicants might propose to work with the local authority on transport planning and the green transport agenda. The Committee also requested an examination of the location of the access road from Myreside; the densities of use proposed and the importance attached to green spaces within the development; issues of sustainability; and a specific issue of the bowling club site and whether there is an intention to retain or re-locate having regard to the siting of the proposed brain-injury clinic being located in the development.

### Publicity summary of representations and Community Council comments

The application was advertised on 22 October 2013 and a total of 12 letters of representation were received. Of this number, 10 letters expressed objections to the proposals, 1 supported the proposals and 1 letter was a general comment.

### Material Objections

- Loss of the bowling facilities;
- Lack of bus service for the general public;
- Proximity of the development to the school;
- Impact of additional traffic on Myreside Road;
- Loss of wildlife, including badgers;
- Loss of open space;
- Flooding issues;
- Damage to trees in orchard; and
- Lack of re-provision of horticultural resources.

### Comments in Support of the Application

- The need for more and better healthcare facilities at the hospital;
- The loss of the bowling club;
- The junction at Myreside should be signalised.

## General Comments

- The need to deliver the cycleway/footway to the south of the site at an early stage.

## Community Council Comments

Morningside Community Council supported several elements of the development relating to the proposed enhanced landscaping and continued public access. However, the Community Council objected to the development for the following reasons:

- The loss of green space and the impact on wildlife;
- Traffic impacts, particularly on Myreside Road; and
- The loss of Tipperlinn Bowling Club.

The Grange and Prestonfield Community Council is not a statutory consultee, however as an adjoining community council, comments were submitted in objection to the application. These comments relate to the loss of open space and bowling club as a result of the building footprint and the need to review the levels of car parking.

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

## Background reading / external references

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- [To view details of the application go to](#)
- [Planning and Building Standards online services](#)

## **Application for Planning Permission 13/04232/FUL At Royal Edinburgh Hospital, 23 Tipperlinn Road, Edinburgh Planning permission in respect of the phase 1 development of the healthcare masterplan of the Royal Edinburgh Campus including erection of mental health and brain injury facilities (Class 8) together with various works including access and landscaping (as amended).**

### **1. Background**

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#### **1.1 Site description**

The planning application site is within the grounds of the existing Royal Edinburgh Hospital situated in Morningside. The site is located on an area of open space to the west of the main hospital buildings and extends to 6.5 hectares in area.

The site is currently a mixture of grass, scrub and trees and includes the established orchard on the south-western part of the site. Also part of this application site a bowling green and clubhouse, located on the eastern boundary.

Immediately to the north of the site is George Watson's College including the playing fields that sit between the north-west corner of the site and Myreside Road. The south-western edge of the site is bounded by Myreside Road. To the south is the suburban freight line which physically separates the site from the buildings along Balcarres Street and the flats on Craighouse Gardens.

There are no listed buildings within the application site for phase 1, however within the wider hospital site, there are two listed buildings: MacKinnon House (category B, HB reference: 27718 listed on 12 December 1974) and the Church Centre (Category B, HB reference: 27713 listed on 30 March 1993). Tipperlinn Cottage was a category C listed building, but this has now been de-listed.

The topographical survey data shows that the site levels range from 76 metres to 84 metres above ordnance datum. In general, the site slopes up to the north.

The site is, in the main, well enclosed. Stone walls bound the site at Myreside Road and prominent mature belts of trees and groups of parkland and other ornamental trees bound the majority of the site. The exception is the northern boundary of the site where it is adjacent to George Watson's College, where this boundary treatment is a timber fence. The railway line which runs along the southern boundary of the site is set in a tree and scrub-lined cutting, which separates the site from the housing to the south. As a result, the site is visually self-contained.

There is a large number of trees on the site. These fall within the categories of young trees, woodland blocks and scrub and shrub growth. The bulk of the tree cover is located around the periphery of the site. A long linear strip of woodland on a north/south axis bisects part of the site, while there is a large orchard to the west of the

site. This orchard is well established and supports approximately 70 productive fruit trees.

The site also comprises large areas of open space and recreational resources including:

- Community Growing Gardens - horticultural activities involving volunteers from the general public, community associations, local charities, in-patients at the hospital and previous patients of the hospital are run by Edinburgh Cyrenians on the western part of the site. Horticultural activities on the growing gardens on the eastern part of the site are run by Artlink for hospital patients only;
- Bowling Green - the bowling green was leased to a private bowling club although this is now vacant;
- Orchard - this is a publicly accessible resource of mixed condition and accessibility (due to vegetation growth) and is used in part by patients. Within an area of the Orchard, Artlink has created a trail and involves patients with pruning activity;
- Growing Houses - the growing houses are run by Artlink as part of their hospital arts programme. The intention of the programme is to create opportunities for artists to work in collaboration with patients and staff;
- Open Meadow - this area on the site comprises rough scrub and grassland.

The hospital was historically regarded as providing innovative treatment in mental health care and in this respect, various occupational facilities were present, including pig farming, gardening and poultry keeping. Therefore these areas of open space have been attributed to providing important recreational and therapeutic resources for patients.

The site is covered by a non-inventory designed landscape designation.

The site has an existing accesses for vehicles from Myreside Road. However, this is a gated access and rarely used. Pedestrians can access the site via the main hospital entrance on Morningside Park.

The site is located in close proximity to several conservation areas as well as an Area of Great Landscape Value (AGLV) at Craighouse. Craiglockhart Hills Conservation Area and Local Biodiversity Area are located to the south-west of the site, Plewlands Conservation Area and the Union Canal Biodiversity site are to the south, Merchiston and Greenhills Conservation Area is to the north-west and Morningside Conservation Area is to south-east. The category A listed buildings on the Craighouse Campus to the south-west of the site also have a view over the application site.

## **1.2 Site History**

16 January 2014 - planning permission granted for temporary site offices (application number 13/03997/FUL).

## Current applications

10 October 2013 - planning permission in principle received for regarding the masterplanning of the Royal Edinburgh Campus for healthcare purposes (Class 8) and ancillary uses including refurbishment, redevelopment and reprovision of the REC and additional NHS services together with various works including access and landscaping. (application number 13/04292/PPP).

## 2. Main report

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### 2.1 Description Of The Proposal

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This application is for the erection of the phase 1 buildings in relation to the redevelopment of the Royal Edinburgh Hospital.

The proposal consists of the erection of the main 165-bed Mental Health Unit and the 20-bed Brain Injury Unit. These are two, free standing, predominantly single-storey buildings to the west of the existing Royal Edinburgh Hospital campus.

The Mental Health Unit is the largest of the two new units and is proposed to be located on the main area of open space within the site. Due to the size of the building, it stretches across the site on a north/south axis from the southern to northern boundaries. It is proposed that this building is broken into three distinct elements linked by glazed corridors with landscaped gardens between the elements. The building is proposed to be single storey with some 2-storey elements although this is mainly to accommodate plant and other services. The main entrance into the building is proposed to be located on the east side of the central element. There are also two chimneys of between 10 and 11 metres in height proposed in the central element of the building.

Also proposed as part of phase 1 is the demolition of the clubhouse and green associated with the Tipperlinn Bowling Club. This is to enable the construction of the proposed new Brain Injury Unit. This building is proposed to be single storey with a 2-storey section on the northern part of the building.

A total of 44 car parking spaces are proposed to serve phase 1 and the spaces are located to the immediate west of the proposed Brain Injury Unit.

There are currently 355 trees on site. As part of the development, 88 trees are proposed to be felled. This includes the felling of 23 trees for arboricultural reasons and a further 65 trees in order to deliver proposals.

The following information was submitted in support of the application:

### Supporting Information

- Environmental impact assessment;
- Transport assessment and travel plan framework;
- Planning statement;
- Clinical brief;

- Flood risk assessment and SUDS report;
- Tree survey;
- Design and access statement; and
- Pre-application consultation report.

A planning statement was submitted and examines the policy context of the development, the consideration of options and alternatives and the clinical strategy.

These documents are available to view on the Planning and Building Standards Online Service.

### Scheme 1

The footprint of the main building was arranged differently and did not include chimneys.

## **2.2 Determining Issues**

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 proposals comply in principle with the Development Plan;
- b) The proposals provide a development of appropriate design quality, scale and height;
- c) The proposals are acceptable in terms of the impact on the conservation areas and the setting of the listed buildings;
- d) The proposals provide an acceptable level of amenity to neighbours;
- e) The access, parking, and transportation arrangements are acceptable;
- f) The drainage, flooding and site remediation arrangements are acceptable;
- g) The proposals address issues of sustainability;
- h) The proposals have any impact on landscape, ecology and nature conservation;
- i) The proposals have any equalities or human rights impacts; and
- j) The representations have been addressed.

## a) The Principle of the Development

The proposals do not raise issues of a strategic nature and therefore can be assessed in terms of the local plan provision. This is due to the fact that the site is currently an operational hospital and therefore no change of use is proposed.

The Edinburgh City Local Plan allocates the site as an area of designated Open Space.

With regards to this designation, the relevant policy is OS1 (Open Space). Since the proposal involves the loss of open space, it does not comply with the provisions of this policy. However, this policy does not preclude the development of open spaces in all circumstances. It sets out the limited range of circumstances in which the loss of open space may be acceptable provided certain criteria are met. These criteria, (a) - (e) are examined in the following paragraphs.

Criterion (a) requires that there will be no significant impact on the quality or character of the local environment. The immediate local environment is characterised by the hospital buildings with its incidental and formalised open spaces. These open spaces vary in terms of quality and accessibility, however, the large area of open space to the west of the site is, in the main, publicly accessible and provides areas for growing spaces and walking. Therefore this area provides some level of amenity albeit there is little scope for recreational use given the level differences and poor maintenance of the land. The proposal to erect new buildings on this part of the site would impact on this amenity, however, the masterplan shows the construction of a new linear park which would improve the overall quality and accessibility of open spaces in this area. Therefore although the current contribution of this open space to the amenity of the area would be lost, the quality and accessibility of the linear park will ensure that the amenity of the area is retained.

The surrounding area is typically high-quality residential in character with a variety of house types and styles surrounding the hospital. The flats on Balcarres Street and Craighouse Gardens are closest in proximity to the application site and are characterised by modern four-storey flats. Being closest in proximity to the proposal, these are the most sensitive streets to the changes that would occur to the character of the area as a result of the development. In assessing the suitability of the development in terms of the character of the area, it is clear that the proposal would not be out of character within the existing hospital environment, nor the built form of the school to the north. The new buildings will not cause any detrimental impacts in terms of the character of the area by virtue of the fact that the site is currently used as a hospital and the low building height will mitigate any visual impacts.

The Townscape and Visual chapter contained within the Environmental Impact Assessment considers the extent to which the proposed development would influence the townscape and wider character of the area. The assessment identifies that the development would result in an overall moderate-minor magnitude of change. Therefore, although this area is sensitive in terms of its proximity to the site, no detrimental impacts on townscape or visual quality have been identified.

In addition, the Open Space Audit gives the green space within the application site a rating of 'fair' but the space has not been well maintained and is visually unattractive. Though the proposal involves a net loss of open space, the proposed development will increase the quality, appearance and accessibility of this open space.

Therefore, taking these mitigation measures and design considerations into account, the residential character of the area will be maintained and a general improvement to the open space will be achieved. It can be concluded at this stage that the proposal meets criterion (a).

Criterion (b) states that in considering the loss of open space, it requires to be demonstrated that the open space is a small part of a larger area or of limited amenity or leisure value and there is significant over-provision of open space serving the immediate area. The Council's Open Space Strategy (approved in October 2010) provides analysis of the city's open space provision to assist in the assessment of this criteria. The Open Space Strategy defines significant over-provision as existing when the loss of open space would neither create a deficiency in terms of the local and large greenspace standards, nor remove an opportunity to address an existing deficiency or need identified in the strategy. The local greenspace standard does not factor in size and type of open space, while the large greenspace standard recognises that people should have access to larger and higher quality open spaces in meeting neighbourhood needs, especially good quality parks. The Open Space Strategy provides analysis of current open space provision based on these standards.

Within the wider masterplan area, the creation of a green corridor will enable local public access to this open space and increase open space provision in the area.

The existing bowling green is not proposed to be retained. The bowling green was initially implemented for use by hospital patients and staff; however, it latterly came to be used as a private bowling club. The bowling club has since left the site after notice was served on the existing lease holder of the bowling green and there is no re-provision as part of the masterplan.

The Tipperlinn Bowling Club was an important facility on the site in terms of providing recreational use for both patients and the wider community. However, the applicants have advised that the retention of the bowling green as a private recreational resource does not fit with the NHS Lothian's wider ambitions for the open spaces within the site to be used first and foremost as therapeutic spaces for patients.

SportScotland was consulted as part of the proposals and specifically made comments in relation to the loss of the bowling club. SportScotland applied the tests of Scottish Planning Policy whereby playing fields and other outdoor sports facilities should not be redeveloped except where the development is ancillary to the sporting use; or affects only a small part of the facility which will not affect its use; or where the facility to be lost will be replaced by a new facility of comparable or greater benefit to sport; or where a playing field strategy has demonstrated a clear excess of supply.

SportScotland advised in its initial consultation response that the first 2 caveats do not apply and so in the absence of evidence of a clear excess of supply, compensatory provision should be provided. This approach seeks to ensure that the opportunity to engage in the sport is not lost. The applicant provided additional information indicating capacity at three local bowling clubs to accommodate the Tipperlinn Bowling Club members. The applicant also confirmed that agreement has been reached for the members of Tipperlinn Bowling Club to relocate to Merchiston which is in proximity to the existing Tipperlinn site.

On the basis that the opportunity to play bowls will not be lost to the Tipperlinn Club members and that the receiving club has capacity to accommodate this additional membership, SportScotland has no objection to the planning application.

The majority of the recreational facilities will be reprovided within the site and there will be scope for further recreational activities due to the formalisation and management of the open space and proposed linear park and new footway/cycleway across the site. The loss of the bowling club has been assessed and although it is not being reprovided on site, SportScotland is satisfied that the members have found a suitable alternative club.

Therefore, the proposal complies with criterion (b) of Os 1.

Criterion (c) requires that the loss of open space would not be detrimental to the wider network including its continuity or biodiversity value. The Open Space Strategy identifies the park as being part of the city's green network (defined as open spaces which are connected by habitat networks or the Council's Core Paths).

The proposed development would not be detrimental to the wider network as there is still good provision of open space in the area around the proposed development and the creation of a footpath/cycleway will enable greater access to a wider network of open spaces.

Finally, criterion (d) and (e) require that there would be either: a local benefit in allowing the development in terms of alternative provision being made or improvement to an existing public park or other open space; or that the development is for a community purpose and the benefits to the local community outweigh the loss.

Criterion (d) does not apply in this instance due to the redevelopment of the hospital site being a community facility and so is subject to criterion e). This criterion states that development will be permitted if the development is for a community purpose and the benefits to the local community outweigh the loss. The benefits of facilitating the improvement of hospital provision in Edinburgh are set out by the applicant and are of not just local benefit but regional importance. In addition, there are benefits in terms of open space improvements. Despite the loss of open space, the quality of the local environment would not be compromised due to open space being created within the development where demolition of buildings has occurred and through new tree planting throughout the site. The delivery of the green network route connecting the Union Canal to Morningside will make these areas of open space accessible to the public and is identified as a specific Green Network Action in the Open Space Strategy. Although a proportion of the current open space on the site will be lost, this will be outweighed by providing higher quality green space within the masterplan that will be accessible to the public. The orchard at the south-west corner will be retained and made accessible through the building of a footpath and installation of seating.

Policy Os 3 seeks to achieve the provision of new publicly accessible and useable open space in new development and that there will be an emphasis on the provision of links which will extend the network of green corridors when opportunities arise. The proposed development does take the opportunity to extend a green corridor which makes open space within the development accessible to the public. The information provided in the application indicates that the new open space provided will be useable and of a high quality. Overall, the proposed development complies with Policy Os 3.

The policy position of the Proposed Local Development Plan does not change in terms of open space policy from the adopted local plan. Therefore, the proposed development accords with the emerging policy position regarding open space.

Overall, therefore, the proposal is in accordance with the provisions of the relevant policies contained within the adopted and proposed local plans.

#### b) Design, Scale and Height

The application site is located on an area of previously undeveloped land within the hospital grounds. With the exception of the bowling clubhouse, the site largely comprises trees, hedgerows and scrub. Therefore, the development on this part of the site requires to be rigorously assessed in terms of the design, height and scale of the proposed buildings in order to determine their suitability for this part of the site.

The Environmental Impact Assessment identifies the overall visual impact of the new buildings as slight-moderate therefore the new proposed buildings should be compatible with the scale, pattern and character of the local suburban townscape.

In assessing whether the proposals would be compatible, the design of the proposed main building comprises three distinct pavilions linked together with glazed walkways and includes integrated therapeutic landscapes in the form of courtyards. This design response to the site is acceptable as it retains the majority of the existing trees as well as providing a high-quality patient environment. Overall, there are 355 trees on this site and of this, 88 trees are proposed to be removed. This is 65 trees to be felled to allow for the delivery of the development and 23 for arboricultural reasons. Additional tree planting is proposed in the courtyards and on the periphery of the site and this is acceptable. During the consideration of the application, the floor levels of the main building were amended in order to respond to the topography of the site. This assists in breaking up the visual mass of the main building, particularly when viewed from the south. However, the floor level of the southern section of the building will still sit higher than the existing ground level and therefore the main building will be elevated and could appear overly institutional, which would be contrary to the aims of the NHS for the redevelopment of this part of the site. The southern elevation was therefore also amended and has been modulated along the southern terrace to reduce this impression. The planting of additional trees along the southern boundary will also aid the visual appearance and therefore the design of the main building is acceptable.

The applicant has provided supporting information relating to the clinical need to keep the buildings low and therefore the pavilions are generally single storey (although there are some two-storey elements, particularly the main entrance). This is appropriate in terms of height due to the surrounding townscape. The proposed low heights also relate well to the existing landscape and do not overdominate in their setting.

The proposed brain injury unit is considerably smaller in scale than the main building and is proposed to be sited on the land currently used as a bowling green and clubhouse. The proposed building is proposed to form part of a larger building that will be constructed under a later phase. In terms of the design of the brain injury unit, it is similar in design and height to the main building and therefore appropriate in its setting.

As part of the consultation stage of the application, Architecture and Design Scotland (A+DS) commented on the proposals. A+DS stated that the site has a strong landscape identity with rich and varied open spaces that present a unique opportunity

to create a distinctive space for staff, patients, visitors and surrounding communities. The orchard and growing areas are valuable resources and these therapeutic amenities require careful integration with the new proposals. The retention of mature planting and features such as garden walls would significantly benefit the nature of the campus. A+DS welcomed the inclusion of the shared growing spaces for both public and therapeutic use. A+DS recommended that the detail of the proposals are further developed, particularly for the landscape around the southern and eastern areas of the site, and the articulation of the brain injury unit. The quality of materials and detailing in both the building and landscape features, and the visual richness of the planting scheme, will be crucial in bedding the development into its location and providing a positive first impression to all those approaching the facility and the wider site.

In assessing the proposed new buildings against the comments from A+DS, the design and positioning of the buildings in this phase have been amended to reflect the landscape setting of this site and the retention of trees will further benefit the development of the site. Further details regarding landscaping and materials are recommended as conditions of this permission.

In conclusion, the overall design and layout of the buildings has been informed by the character of the local environment as well as the clinical functionality of the buildings and this is evident in the siting of the buildings in order to retain the low townscape character and provide opportunities for additional landscaping.

#### c) Impact on the Conservation Areas and the Setting of the Listed Buildings

The impact of the design, scale and height of the development on the character and appearance of the various surrounding conservation areas has been assessed. None of the surrounding conservation areas will be physically affected as a result of the proposed development. However, the impact of the development on the setting of the conservation areas requires to be assessed. The development of the phase 1 buildings is proposed to take place on the undeveloped open space within the western end of the site and this will have the greatest visual impact on the conservation areas. However, this part of the site is visually contained by the existing walls and mature planting. The buildings and infrastructure are proposed to be between one and two storeys in height at this location and are sited to minimise tree loss. The retention of the orchard will also aid in the screening of the new buildings.

The individual design elements of the buildings has been assessed above, however, in general terms, the introduction of high quality new buildings, coupled with the low building heights will respect the existing predominantly unobtrusive visual character of the site and minimise visual intrusion when viewed from the conservation areas. A more structured public realm and infrastructure layout will form an attractive and more coherent setting to the area and the addition of new tree planting around the site will aid in the visual appearance of the site when viewed from the conservation areas.

With regards to the loss of the open space on the western part of the site, this requires to be assessed with regards to its historic nature as providing a therapeutic resource for patients. Historically, the site comprised a large house with four acres of land and as the hospital developed, this land was built upon in order to provide further hospital facilities. The majority of this land has now been developed and this development has been as a result of the continually evolving need to provide a contemporary approach to mental health care.

MacKinnon House is the dominant building and focus of the hospital grounds. The proposed buildings adjacent to the house are proposed to be scaled at two storeys to reinforce the prominence of MacKinnon House and maintain it as the heart of the campus.

In the wider area, the listed buildings on the Craighouse campus to the south west of the site have been identified in the Environmental Impact Assessment as sensitive to the changes that may occur on the hospital site. The Craighouse listed buildings are category A listed and are located on the north and east slopes of Easter Craiglockhart Hill, where there are extensive views across the city. In terms of the relationship between the hospital site and the Craighouse buildings, the site is visible although the presence of extensive tree planting on site is the prominent view. As a result, the proposed new buildings will not be readily visible from Craighouse. Even if these trees were removed, the proposed building heights would be similar to the existing townscape and therefore the views from Craighouse would not be altered.

Historic Scotland has been consulted as part of the application and is satisfied that there would be no direct or significant indirect impacts on nationally important heritage assets as a result of the above proposed development. Consequently, Historic Scotland has offered no objection to the proposals.

Therefore, there is no adverse impact on the conservation areas or the setting of the listed buildings.

#### d) Amenity of Neighbours

The site is within a predominantly residential area with a number of sports/recreation areas surrounding it including George Watson's College and Myreside Pitches (directly to the north and west). Therefore the impact of the development on the amenity of these areas, as well as the residential properties, requires to be assessed.

In terms of visual amenity, the applicant provided information that assessed the impacts of the new buildings within the site. Tree loss has been considered in relation to the visual impact of the development to nearby neighbouring properties. The notable impact in tree loss would result as a consequence of the construction of the pedestrian route into the site from the east, as well as the proposed compound for the phase 1 works. These areas are presently overgrown and consists of a number of young to semi-mature trees. To mitigate the impact, it is proposed to maintain a boundary of trees behind the stone wall boundaries to Myreside Road and George Watson's College, thereby reducing the visual impact of the development and by planting additional trees along the southern and western boundaries.

The impact of the proposed developments on the privacy of the school to the north of the site is also minimal. This is due to the building heights being kept low throughout the site and the fact that the existing screening will be retained and enhanced.

Two chimneys of between 10 and 11 metres tall are proposed within the main building to disperse fumes and odours from the operation of the proposed CHP plant and boilers. Calculations have been provided that show that these chimneys are in compliance with the Clean Air Act 1993. In this regard, Environmental Assessment is satisfied that the proposed height and distance of the chimneys are in compliance with the requirements of the Clean Air Act 1993. However, if there are any future changes to the proposed power plant or increase in proposed surrounding building heights, the

chimney height calculation will require reviewed and updated. In addition, any additional CHP or boiler proposals submitted in future detailed planning applications and phases should consider the requirement of a chimney calculation to be provided in support of those applications. An informative is attached in this regard.

A noise impact assessment has been provided which considers any possible noise impacts associated with the development upon surrounding noise sensitive properties. In addition, the assessment considers possible noise impacts from the proposal on the existing hospital operations. A combined heat and power plant (CHP) and other fixed ventilation plant are proposed within this development and further details are sought with regards to the noise arising from this plant. An informative is also recommended which seeks to ensure that noise from all plant is minimal and compatible with residential amenity.

Therefore there are no detrimental impacts on amenity of neighbours with regards to visual impact, noise or air quality.

#### e) Parking, Access and Transportation

The site proposes to accommodate 44 parking spaces to serve both the main building and the brain injury unit. Transport has no objections to this level of parking. Also proposed is a new formal access into the site from Myreside Road. Although there is an existing access at this location, it is controlled by a gate and there is no through-route to the rest of the hospital site beyond the tree-belt on the eastern side of phase 1. A service and pedestrian access is proposed to link the western and eastern parts of the site, although this will be for hospital vehicles and pedestrians only. Transport has made no comments on this regard, however a proposed signalised junction on Myreside Road has been discussed with the applicant but Transport considers a priority junction to be more appropriate due to the anticipated very low levels of traffic accessing the Myreside Road entrance. Further discussion will be required in this regard as the development phases are implemented in order to determine whether a signalised junction is to be pursued. Nevertheless, the applicant has stated that the infrastructure can be put in place at an early stage in order to install a signalised junction at a later stage if required. It is also noted that, although this site will see an increase in trips as a result of the consolidated hospital facilities, there is no net increase in trips anticipated on the network as a whole.

The applicant proposes to provide a shuttle bus between the site and other hospital facilities across the city. This is in order to reduce the number of staff bringing a car to the site and this is supported. The applicant does not propose to open up this service for use by the general public, however the site is well served by existing public transport, particularly to Morningside Road and Myreside Road. Therefore, there is no requirement at this stage to provide a shuttle bus service for the general public.

With regard to construction traffic, the origin of construction traffic is yet to be determined. However, based on the information provided in the Environmental Impact Assessment, the traffic and associated environmental impacts of construction traffic on the trunk road network will not be significant.

Environmental Assessment had concerns regarding the potential impacts this development may have on local air quality. This was partly due to the increase in numbers of car parking spaces. In an attempt to decrease such impacts, Environmental Assessment advised the applicant to keep parking numbers to a minimum and make

provisions for electric vehicle (EV) charging throughout the development which the applicant has been agreeable to. If Committee are minded to grant this application, a suitable informative relating to the provision of EV charging is recommended.

Therefore, the parking, access and transport arrangements are acceptable.

#### f) Drainage, Flooding and Site Remediation

The development proposes to adopt the principles of SUDS. Normally, roof water run-off is treated using permeable surfaces to car parking areas. However, in this case there is a relatively low ratio of car parking to building area and there would be insufficient space to achieve treatment using the car parking areas. Therefore, the additional storage and treatment volumes are proposed to be accommodated within the soft landscaped areas around the buildings. Road run-off is proposed to be treated and attenuated using a combination of swales and filter trenches. The key principles are that foul and surface water drainage will be separated and that run-off will be attenuated to greenfield run-off rates.

Regardless of the method of treatment and attenuation, both the foul and surface water will discharge into the public sewers. Under the current proposals, the development of this part of the site will drain to the west.

Scottish Water has confirmed that they are satisfied with the proposals on the basis that overall foul flows would not change significantly and that surface water flows would decrease substantially due to the replacement of the existing systems with SUDS. The only minor watercourse in the vicinity is the Jordan Burn and experiences flooding and is not suitable to receive surface water and hence no surface water will discharge into the burn.

With regards to flooding, indicative floodplain mapping provided by SEPA shows the site to be outside the 0.5% probability (1 in 200 year flood) zone indicating that there is no significant risk of flooding within the site boundary from fluvial or tidal sources. However, the mapping does not account for flooding arising from sources such as surface water run-off, surcharged culverts or drainage systems. The Jordan Burn is culverted through the site and SEPA mapping shows the downstream stretches of the watercourse to be within the 0.5% flooding probability zone (approximately 1.2 km east of the site). The applicant has advised that the improved surface water treatment will not result in increased discharge into the Jordan Burn and therefore there will be no increase in flood risk as a result of this development. SEPA has confirmed that it has no objections to the proposals in terms of flood risk.

With regards to site remediation, Environmental Assessment recommended a suitable condition be attached to the planning permission should Committee be minded to grant the application requiring the submission of a site survey prior to the commencement of works to examine the potential for contamination and that any required remedial and/or protective measures shall be implemented in accordance with the approved survey.

Therefore the mitigation measures regarding of flooding, drainage and site remediation are acceptable.

## g) Sustainability

The applicant has submitted a sustainability statement in support of the application. The points achieved against the essential criteria are set out in the table below:

Essential Criteria	Available	Achieved
Section 1: Energy Needs	20	20
Section 2: Water conservation	10	10
Section 3: Surface water run off	10	10
Section 4: Recycling	10	10
Section 5: Materials	30	30
Total points	80	60

In addition to the essential criteria, the applicant has provided a commitment to further sustainability measures as set out in the desirable elements sections. Additional measures include the use of sustainable timber as well as a commitment to achieving a BREEAM score of 'very good' for the new buildings.

## h) Landscape, Ecology and Nature Conservation

The majority of woodland and mature trees across the application site are proposed to be retained. However, as described above, the new developments would necessitate the removal of 88 trees. This loss is considered to be significant and requires to be assessed, particularly with regards to the impact on birds and bats and other protected species.

Vegetation clearance and construction in areas adjoining woodland habitats is proposed to take place outside the bird breeding season (March until August inclusive). Where this is not possible, the vegetation will require to be checked for nests by a suitably qualified ecologist prior to works commencing and should any nests be found, works will avoid this and a buffer suitable to the species will require to be implemented until the nest has been vacated.

The bat surveys identified that no roosts were present within any of the trees on this site. Nevertheless, there is a mitigation strategy which is proposed to consist of:

- Timing of works - works will be carried out when bats are least sensitive to disturbance, i.e. outside the summer season; and
- Working under the supervision of a licensed bat worker - a licensed bat worker will supervise the removal of any materials in the locations where bats were seen. The bat worker will also give a 'toolbox talk' to the contractors prior to the contractors starting work on site in order to advise on the legislation in relation to bats and how to limit disturbance to bats. In the unlikely event that bats are encountered, the bats may be removed by hand by the licensed bat worker or left to relocate, as appropriate;

Bats may continue to forage and commute across the site during operation of the new hospital facilities. Although the site will contain less grassland habitat than before, the new tree plantings, swale creation and enhanced path network are likely to result in continued opportunities for foraging and commuting bats, and the value of the site for foraging and commuting bats will not be significantly altered.

Ground clearance and construction will also result in the direct loss or disturbance of habitats within the site, although this will progress in stages and will be partly offset by

new landscaping, including tree planting and creation of swales with a network of linear features comprising landscaped paths and roads. Most of the woodland and orchard features will be retained. As such the quality of the site for foraging and commuting bats will not be significantly altered.

With regards to badgers, the redevelopment of the site is likely to affect badger setts within the site boundary. However, no main sett will be impacted and badgers are likely to mainly enter the site from areas outwith the site boundary. As such they are unlikely to depend upon setts within the application boundary. However, there is a potential for badgers to establish new setts within works areas prior to the commencement of construction. However, this remains uncertain given the mobile nature of the species and the unknown locations of future setts. Prior to construction, an updated badger survey of works areas will require to be carried out by a suitably qualified ecologist. This will determine the position, status and usage of any sett that may be affected by works.

The development will also result in a loss of suitable badger foraging habitat, such as grassland and scrub, within the site. However, this loss is unlikely to be significant relative to the large amount of suitable habitat outwith the site boundary, notably in the railway corridor to the south.

Setts are protected under the Badger Protection Act (1992 (as amended) and if Committee were minded to grant planning permission, mitigation is recommended as a condition of the permission.

With regards to the impact of the development on trees, woodlands and trees not subject to works will be protected within a minimum root protection zone in accordance with the relevant British Standard. In addition, tree planting will be undertaken. The loss of mature trees to enable development is not normally supported, however, the loss has been minimised due to the careful siting of buildings (primarily in phase 1 which affects the most trees) and the re-provision of new trees across the site will compensate for the loss.

Overall, the proposed development seeks to incorporate elements into the overall design for the benefit of the natural heritage and there are several matters which are supported. The proposed layout incorporates the retention of the orchard as an integral part of the redevelopment of the site. The site currently has large areas of open space, however, these are not well structured or easily accessible in all areas. The new layout provides aesthetic improvements to the built structure of the site whilst improving green space access and amenity. The orchard and the mature tree belts along the south boundary and throughout the grounds are important features within this environment and the retention of these elements is important in protecting the green space and character of the site. Provided that the mitigation and compensation measures are implemented to safeguard bats, badgers, hedgehogs and breeding birds, all residual negative impacts on valued ecological features will be suitably mitigated.

#### i) Equalities and Human Rights

An Equalities and Rights Impact Assessment has been carried out. There are no issues of equalities and rights due to the fact that the buildings have been designed to accommodate a wide range of users. There is level access to all buildings and since the buildings are single storey, they are fully accessible.

## j) Assessment of Material Representations

The letters of objection raised the following material issues:

- Loss of the bowling facilities, addressed in 2.3(a)
- Lack of bus service for the general public, addressed in 2.3(e)
- Proximity of the development to the school, addressed in 2.3(d)
- Impact of additional traffic on Myreside Road, addressed in 2.3(e)
- Loss of wildlife, including badgers, addressed in 2.3(h)
- Loss of open space, addressed in 2.3(a)
- Flooding issues, addressed in 2.3(f)
- Damage to trees in orchard, addressed in 2.3(h) and
- Lack of re-provision of horticultural resources, addressed in 2.3(a).

Comments in support of the application raised the following issues:

### **Comments in Support of the Application**

- The need for more and better healthcare facilities at the hospital, addressed in the description of development;
- The loss of the bowling club, addressed in 2.3(a);
- The junction at Myreside should be signalised, addressed in 2.3(e).

Morningside Community Council supported several elements of the development relating to the proposed enhanced landscaping, continued public access and the new pedestrian and cycle route through the grounds. However, the Community Council objected to the development for the following reasons:

- the loss of green space and the impact on wildlife, addressed in 2.3(a) above;
- traffic impacts, particularly on Myreside Road addressed in 2.3(e) above;
- the loss of Tipperlinn Bowling Club addressed in 2.3(a) above; and
- the lack of integration with public transport addressed in 2.3(e) above.

Morningside Community Council also commented that the timetable for the completion of the pedestrian/cycleway along the southern boundary of the site should be amended, and this is dealt with as a condition of the consent.

### Overall Conclusion

The proposed development seeks to provide new hospital accommodation and increase and improve access for all users, and include car parking and gardens/courtyards sitting within and surrounded by a high-quality landscape setting. No adverse amenity impacts will arise as a result of the development with regards to neighbours, flooding, noise and air quality. It is recognised that the proposed development would alter the existing townscape/landscape to varying extents, however mitigation is proposed by means of retaining the majority of trees on site and by proposing to plant a substantial number of new trees. The development is in accordance with the provisions of the Edinburgh City Local Plan.

### 3. Recommendations

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

#### **3.2 Conditions/reasons**

1. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.

2. Prior to the occupation of the development, a draft travel plan shall be submitted to the Head of Planning and a final travel plan shall be submitted within 12 months of that date and thereafter the recommendations of measures contained within the travel plan shall be implemented.

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

4. Prior to the commencement of any development on site, a detailed plan outlining the final design of all hard and soft landscaping including planting species, location and quantity; tree protection measures and a maintenance schedule shall be submitted to and agreed in writing by the Head of Planning. Thereafter the agreed scheme shall be implemented in accordance with the agreed plan.

5. The relevant mitigation measures for European Protected Species outlined in sections 10.7 - Mitigation and Enhancement and 10.9 - Summary and Conclusions of the Environmental Statement dated 9 October 2013 shall be implemented and adhered to.

6. i) Prior to the commencement of construction works on site:

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

b) Where necessary, a detailed schedule of any required remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.

ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

7. Prior to the occupation of the development, the cycleway/footway adjacent to the southern boundary of this phase of development shall be implemented and maintained thereafter.

#### **Reasons:-**

1. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
2. For the Head of Planning to consider and to require the implementation of a sustainable travel plan serving the site.
3. In the interests of cultural heritage.
4. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
5. In the interests of natural heritage.
6. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
7. In order to provide pedestrian access into the site in order to connect to later phases of development.

#### **Informatives**

It should be noted that:

1. All surface or foul water arising from the development must be collected and diverted away from Network Rail Property. (Any Sustainable Urban Drainage Scheme should not be sited within 10 metres of railway infrastructure and should be designed with long term maintenance plans which meet the needs of the development).
2. If not already in place, the applicant must provide a suitable trespass proof fence of at least 1.8 metres in height adjacent to Network Rail's boundary and provision for the fence's future maintenance and renewal should be made. We recommend a 1.8 metre high 'rivetless palisade' or 'expanded mesh' fence. Network Rail's existing boundary measure must not be removed without prior permission.
3. Where trees/shrubs are to be planted adjacent to the railway boundary these should be positioned at a minimum distance from the boundary which is greater than their predicted mature height. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary.
4. Details of all changes in ground levels, laying of foundations/piling works and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a fail-safe manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a

possession which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.

5. Prior to occupation of the development, details demonstrating that noise from all plant complies with NR25 within the nearest residential property (with window partially open for ventilation purposes) shall be submitted for written approval by the Head of Planning.

6. Prior to the occupation of the phase 1 site, the electric vehicle charging outlets should be provided at the positions indicated on the approved site plan (Drawing number; ERZ/13/04/P01 and dated 19/12/2013).

<b>Statutory Development Plan Provision</b>	The site is zoned in the Edinburgh City Local Plan as open space.
<b>Date registered</b>	10 October 2013
<b>Drawing numbers/Scheme</b>	01, 02A-04A, 05, 06A-12A, 13-17,

**David R. Leslie**

Acting Head of Planning and Building Standards

## Links - Policies

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### Relevant Policies:

#### **Relevant policies of the Edinburgh City Local Plan.**

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

Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effective development of adjacent land or the wider area.

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

Policy Des 4 (Layout Design) sets criteria for assessing layout design.

Policy Des 5 (External Spaces) sets criteria for assessing landscape design and external space elements of development.

Policy Des 6 (Sustainable Design & Construction) sets criteria for assessing the sustainable design and construction elements of development.

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

Policy Env 6 (Conservation Areas Development ) sets out criteria for assessing development in conservation areas.

Policy Env 7 (Historic Gardens & Designed Landscapes) establishes a presumption against development that would be detrimental to Historic Gardens and Designed Landscapes.

Policy Env 11 (Landscape Quality) establishes a presumption against development which would adversely affect important landscapes and landscape features.

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

Policy Env 17 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Policy Env 18 (Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Policy Os 1 (Open Space Protection) sets criteria for assessing the loss of open space.

Policy Os 3 (Open Space in New Development) sets out requirements for the provision of open space in new development.

Policy Hou 8 (Inappropriate Uses in Residential Areas) establishes a presumption against development which would have an unacceptable effect on the living conditions of nearby residents.

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.

The Craiglockhart Hills Conservation Area Character Appraisal emphasises the outstanding quality of the natural topography and its visual relationship with the city, the high quality buildings set within a mixture of wooded and open slopes, the use of natural stone and slate as the traditional building materials.

**The Merchiston & Greenhill Conservation Area Character Appraisal** emphasises the consistent domestic grain, scale and building mass; the high quality stone built architecture of restricted height, generous scale and fine proportions enclosed by stone boundary walls and hedges which define the visual and physical seclusion of the villas; the uniformity resulting from the predominant use of traditional building materials; and the predominance of residential uses within the area

The Plewlands Conservation Area is mainly comprised of two storey residential terraced development. The predominant height is two storeys with a small number of flatted elements of mainly three and four storeys. The buildings are complemented by mature trees, extensive garden settings, shallow stone boundary walls and spacious roads.

### **Other Relevant policy guidance**

**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

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### Scottish Water comment

*Due to the size of this proposed development it is necessary for Scottish Water to assess the impact this new demand will have on our existing infrastructure. With Any development of 10 or more housing units, or equivalent, there is a requirement to submit a fully completed Development Impact Assessment form. Development Impact Assessment forms can be found at [www.scottishwater.co.uk](http://www.scottishwater.co.uk).*

*Glencorse Water Treatment Works currently has capacity to service this proposed development.*

#### *Water Network*

*Our initial investigations have highlighted there may be a requirement for the Developer to carry out works on the local network to ensure there is no loss of service to existing customers. The Developer should discuss the implications directly with Scottish Water.*

#### *Wastewater Network*

*Our initial investigations have highlighted there may be a requirement for the Developer to carry out works on the local network to ensure there is no loss of service to existing customers. The Developer should discuss the implications directly with Scottish Water.*

*In some circumstances it may be necessary for the Developer to fund works on existing infrastructure to enable their development to connect. Should we become aware of any issues such as flooding, low pressure, etc the Developer will be required to fund works to mitigate the effect of the development on existing customers. Scottish Water can make a contribution to these costs through Reasonable Cost funding rules.*

*If this development requires the existing network to be upgraded, to enable connection, the developer will generally meet these costs in advance. Scottish Water can make a contribution to these costs through Reasonable Cost funding rules. Costs can be reimbursed by us through Reasonable Cost funding rules*

*A totally separate drainage system will be required with the surface water discharging to a suitable outlet. Scottish Water requires a sustainable urban drainage system (SUDS) as detailed in Sewers for Scotland 2 if the system is to be considered for adoption.*

*If the connection to public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s). This should be done through a deed of servitude.*

*It is possible this proposed development may involve building over or obstruct access to existing Scottish Water infrastructure. On receipt of an application Scottish Water*

*will provide advice that advice that will require to be implemented by the developer to protect our existing apparatus.*

*Should the developer require information regarding the location of Scottish Water infrastructure they should contact our Property Searches Department.*

*If the developer requires any further assistance or information on our response, please contact me on the above number or alternatively additional information is available on our website.*

### **Network Rail comment**

*Whilst Network Rail has no objections in principle to the proposal, due to its close proximity to the operational railway, we would request that the following matters are taken into account, and if necessary and appropriate included as conditions or advisory notes, if granting the application:*

*Uncontrolled drainage towards the railway may have a direct impact on the reliability and frequency of the rail transport in your area.*

*o All surface or foul water arising from the development must be collected and diverted away from Network Rail Property. (Any Sustainable Urban Drainage Scheme should not be sited within 10 metres of railway infrastructure and should be designed with long term maintenance plans which meet the needs of the development).*

*The railway can be a dangerous environment. Suitable barriers must be put in place by the applicant to prevent unauthorised and unsafe access to the railway.*

*o If not already in place, the applicant must provide a suitable trespass proof fence of at least 1.8 metres in height adjacent to Network Rail's boundary and provision for the fence's future maintenance and renewal should be made. We recommend a 1.8 metre high 'rivetless palisade' or 'expanded mesh' fence. Network Rail's existing boundary measure must not be removed without prior permission.*

*The proximity and type of planting proposed are important when considering a landscaping scheme. Leaf fall in particular can greatly impact upon the reliability of the railway in certain seasons. Network Rail can provide details of planting recommendations for neighbours.*

*o Where trees/shrubs are to be planted adjacent to the railway boundary these should be positioned at a minimum distance from the boundary which is greater than their predicted mature height. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary.*

*Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.*

*o Details of all changes in ground levels, laying of foundations/piling works and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a*

*"possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.*

*The developer must contact our Asset Protection Engineers regarding the above matters.*

### **Police Scotland comment**

*The area surrounding the Royal Edinburgh Hospital experiences a low to medium recorded crime rate. The majority of the crimes recorded are from inside the hospital itself and range from crimes of dishonesty to assaults.*

- o It is recommended that the developer applies for secure by design and meets with Police Architectural Liaison Officers to discuss further*
- o There appears to be external access to the large courtyard in the most southerly end of the main building accessed via the service/FM access & drop off for proposed building. It is recommended that this is access controlled.*
- o On the eastern edge of the southernmost section of the main building is a large recess. There does not appear to be anything on the plan to explain this recess and it is recommended that recessed such as this are avoided.*
- o The plans suggest the service loop will be access controlled. Vehicular access within the site should be restricted to the minimum possible and only to those areas necessary i.e. parking and service areas. Physical features to enforce this restriction may include bollards, double curbs, walls, and substantial landscaping and access control. The access control may require a link to a security office or control room. A manually operated gate is likely to be left open.*
- o Lighting should be one of the main considerations for this site. A successful lighting scheme requires good but not oppressive levels of light that is evenly distributed and allows clear colour rendition. Well-positioned lighting deters and reveals potential intruders and reduces the fear of crime. It is currently not sufficiently lit for pedestrian access to the buildings. Footpaths that are to include lighting should be lit to the relevant levels as defined in BS5489. This should be a co-ordinated approach to avoid conflict between lighting, tree canopies and any CCTV.*
- o Consideration should be given to the Park Mark award and any parking should be designed with this guidance in mind.*
- o All shrubs and hedges shall generally have a maximum growth height of 1m, whilst all trees should be pruned up to a minimum height of 2.2m, thereby maintaining a clear field of vision around the site. Mature trees shall not mask lighting columns nor become climbing aids. All hard landscaping and street furniture shall be robust and securely fixed to prevent removal, vandalism and use as potential ammunition.*

### **Historic Scotland comment**

*Our comments focus on our statutory remit at the national level for scheduled monuments and their setting, category A listed buildings and their setting, and battlefields and gardens and designed landscapes appearing in their respective Inventories.*

### *The development proposal*

*We understand that the development comprises the redevelopment of the existing Royal Edinburgh Hospital site into new, high quality, fit-for-purpose mental health care facilities including the provision of mixed use development, improved access, landscaping and open space. Phase 1 includes the erection of buildings westward into existing green space.*

### *Historic Scotland's position*

*We are content that there shall be no direct or significant indirect impacts on nationally important heritage assets as a result of the above proposed development. Consequently, we offer no objection to the proposal.*

### *The environmental statement*

*We have assessed the ES and consider that there is enough information within it to form a view on the development. We are content that the cultural heritage and archaeology chapter provides an analysis of the predicted impacts that the proposed development could have on sites within our remit. We agree that none of the potential impacts on these sites would be significantly adverse.*

*Additionally, while outwith our remit for EIA consultations, the environmental statement recognises that there are two B listed buildings on the development site, and that some proposals will involve changes to these buildings or their curtilage. Any such changes may require listed building consent (LBC). For information, and as you may already be aware, we have been involved in the discussions with regard to potential listed building consent issues. We will be happy to continue our engagement as required.*

*We have no further comments to make other than to suggest seeking information and advice from your Council's Archaeology and Conservation Service on the adequacy of the assessment of the likely impacts and mitigation proposed for sites of regional and local importance identified in the ES.*

### **Archaeology comment**

*The site occupies the eastern half of the grounds of the historic Royal Edinburgh Hospital constructed in 1813. The site majority of the Phase 1 site has remained relatively free from significant development with historic maps indicating its use as open farmland and subsequently Hospital market garden, the exception being the site of 'Old Myrside Cottage'. This historic cottage was demolished in the 20th century and stood adjacent to the eastern entrance to the site. Clearly recorded on all 19th century maps of the site from 1817 onwards the cottage may also be seen on the earlier General Roy's map of the 1750's, and historically the site is recorded from as early as 1583 (Harris S, Place Names of Edinburgh). As such this site is of much greater archaeological significance than the accompanying Env Statement alludes to in part due to miss locating the site on the 1750's map.*

*Accordingly this application must be considered under terms Scottish Government's Scottish Planning Policy (SPP) and Scottish Historic Environment Policy (SHEP) and also CEC's Edinburgh City Local Plan Policy 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.

### *Buried Archaeology*

*As stated the development site as a whole is regarded as being of archaeological significance primarily in terms of its medieval and post-medieval archaeology relating to the development of the Old Myrside cottage, the Royal Edinburgh Hospital and potential for prehistoric remains. The proposed development will require extensive excavations in terms of construction, demolition, utilities, roads, landscaping etc. Such works are regarded as having on the whole a low-moderate impact upon the buried archaeological resource.*

*Accordingly it is recommended that a programme of archaeological works is undertaken prior to development/demolition. In essence this will see a phased archaeological programme of works across the area, the initial phase being an archaeological evaluation of each development area up to a maximum of 10% of the site. The results of which would allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or full excavation, recording and analysis of any surviving archaeological remains affected. In addition associated isolated works such as new associated services which require ground breaking works will require also appropriate archaeological mitigation to be agreed*

### *Historic Buildings*

*The proposals will see the demolition of a range of 20th century buildings including the Hospitals Bowling Club. Although in off their selves these structures are not of intrinsic significance, in my opinion they do however have a local historic importance when considered as part of the overall history and development of the Royal Edinburgh Hospital. Accordingly it is recommended that if consent is granted that an archaeological historic building survey (level 1: photographic and written record) is undertaken to provide a permanent record of them prior to their loss.*

*It is essential therefore that a condition be applied to any consent granted to secure this programme of archaeological works based upon the following CEC condition;*

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

*The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.*

### **Morningside Community Council comment**

*Morningside Community Council (MCC) wishes to object to the above applications as follows. The objections should be considered under both of the above application*

references, since so much of the documentation, and hence the responses to it, are common to the two applications.

## Overview

Overall, MCC broadly welcomes the decision that the REH plans to stay in Morningside since it is a major source of employment in an area where commercial premises have increasingly been replaced by residential development. It is good to have a nationally important healthcare facility in our community.

MCC is committed to working towards a top-class facility of which our community and the City can be proud and it looks forward to further dialogue with NHS Lothian and the Planning Authority to achieve this aim.

We particularly welcome some features of the plans.

- o The commitment to retaining and enhancing the landscape to the south of the development
- o The commitment to continuing public access
- o The planned pedestrian and cycle route through the grounds

However, residents have made us aware of some specific concerns about the published plans

- o The amount of green space lost by building and the consequent impact and damage to wildlife.
- o The impacts on traffic, especially in Myreside Road, which is a "school run road" and the focus of some heavily used commuter routes across the City.
- o The planned closure of Tipperlinn Bowling Club.
- o The failure to integrate access more closely with public transport, especially for elderly and infirm users of the REH who face a very long walk from a bus-stop.
- o The timetable for the completion of the walking and cycle way along the southern boundary of the site.

These concerns have been voiced at the June and October meetings of MCC and at a public meeting on 5th November 2013. The last was called specifically to gather as wide a range of views from local residents as possible so that MCC was better able to represent local opinion in its comments to the Planning Authority.

## Comments (as requested) on the Pre Application Consultation

MCC had a number of concerns over the PAC as follows.

There was only a single, planned public consultation event (6 June 2013) at the Eric Liddell Centre at which the presentation material gave only an outline of the area for Phase 1. (A further consultation was held at the hospital itself, but we do not regard this as a public event but more for the benefit of staff at the hospital.) There were no details of the buildings or, crucially, the footprint of the buildings in relation to the open space. MCC were disappointed that the public consultation was based on such sparse information and made available within such a limited period for public access.

*There was a second presentation of the same material to MCC on 19 June 2013. As CC meetings are open to the public, this could be counted as public consultation but it was at the request of the CC and not advertised by the developers.*

*At the 19 June MCC meeting, a number of concerns raised by residents were minuted. The minutes were agreed by the consortium spokesman present but are not covered in the PAC report. A brief summary was submitted by MCC just before the end of the consultation period and this is reproduced in the PAC report, however the comments on it are somewhat superficial and unhelpful.*

*Although more detailed plans were presented at meetings in August with a joint CCs group and with Tipperlinn Bowling Club, these were not public meetings and were in any event outside the PAC period. The public were therefore not given the necessary information to allow meaningful comment on many aspects of the proposed redevelopment.*

*The opinions expressed at MCC's October meeting were that the submitted plans bore no relation to the presentations, that the PAC was unacceptable and that NHS Lothian appeared unwilling to provide information. This is contrary to the purpose and spirit of the PAC process.*

*At the Morningside Community Council meeting on Wednesday 20th November 2013, it was agreed that the following objections are made on specific aspects of the above planning applications:*

#### *Loss of Open Space*

*MCC objects to the loss of designated Open Space, contrary to the Edinburgh City Local Plan Policy Os 1. The decision to make so much of the Phase 1 accommodation single storey is questioned since this greatly enlarges the footprint of the building, leading to a significant loss of green space with consequent impact on the natural environment of the area. MCC considers that the case for single storey is not adequately justified in the supporting documents to the planning applications.*

#### *Effect on Biodiversity and Wildlife*

*MCC objects to the impact of the Phase 1 proposals on the biodiversity and wildlife of the area. Under the Nature Conservation (Scotland) Act 2004, all public bodies have a duty to further the conservation of biodiversity. The current proposals appear neither to satisfy this Act nor the adopted Local Plan Policy Des 3 which requires the biodiversity of the site to be protected and enhanced. This policy is reiterated in the development's Planning Statement but the proposals do not then go on to give effect to this obligation. In particular, members of MCC consider that more of the existing mature landscape should be preserved with particular regard for the existing trees.*

*MCC also has specific concerns about badgers on the site. We welcome the undertaking in the Environmental Statement (para 10.7.5) to re-survey for badgers before work starts and we note the acknowledgement that establishment of new setts on the site is probable. However, we question whether the ES pays sufficient attention to the requirements of Adopted Local Plan Policy ENV16 in respect of alternative foraging habitat. It is supposed (para 10.6.11) that the railway corridor to the south is the most notable alternative but it has not been surveyed (para 10.5.7) and we consider that it is restricted compared to the large area within the REH site.*

*We applaud the measures proposed for enhancing the value of the site for birds (ES para 10.7.9). However we believe that this would carry more conviction if it was based on better information about birds actually on the site. The list has some 75 species within 2 km but only 2 species recorded on site. This obviously reflects a lack of observation on the site itself. In view of the surrounding diversity, and the size of the site, we would expect that a full survey of birds using the site would precede an analysis of impacts, mitigation and enhancement.*

#### *Loss of Tipperlinn BC*

*MCC notes that the new Brain Injury Unit is to be positioned on the site of the present Bowling Green used by Tipperlinn Bowling Club. MCC objects to this most inappropriate action since the bowling club has been a long established facility in the existing hospital complex where patients, former patients, staff and members of the public could mix and socialise to the benefit of all concerned. The existing bowling club facility can be said to provide the very essence of the stated aims of the development and set out as objectives in the NHS Lothian submission. In this context, two such aims should be quoted from the Planning Statement here as "Therapeutic spaces for patients will be key however to the Campus strategy in going forward" and "A Public Social Partnership to ensure community involvement continues at the REH site will be integral in going forward".*

*The proposed removal of the bowling green and its clubhouse/pavilion building is considered contrary to Edinburgh City Local Plan Policy Os2 on Playing Fields Protection.*

*MCC notes that the above mentioned planning applications completely fail to detail the planned demolition of the Tipperlinn Bowling Club Clubhouse and considers that this demolition requires its own specific planning application since the site is subject to an Environmental Impact Assessment. "Removal" of the pavilion is merely mentioned briefly in the Environment Statement (para. 7.9.12). Other references to demolition are in a general context. This is not considered acceptable or an adequate detailing of this proposed building operation.*

*MCC supports therefore Tipperlinn Bowling Club in their complaint over the loss of the existing facilities and calls for the bowling green to be re-provided elsewhere in the green space area if it cannot be left where it is at present. If re-provision is not possible, MCC calls for adequate compensation to be paid to Tipperlinn Bowling Club for their loss of facilities, and their past investment in the facilities, such compensation to be determined in consultation with Sportscotland and this made a condition of the Phase 1 planning application.*

#### *Walking and Cycle Route linking Craiglockhart (Union Canal) and Morningside*

*MCC welcomes the planned provision of the walking and cycling route, designed to link the Union Canal with Morningside, along the southern edge of the development site. Phase 1 of the development however only proposes a third of the route leaving the uncertainty over whether future phases will ever continue this route. MCC therefore wishes to object to the lack of a clear and reasonably foreseeable timetable for the completion of the through route. The submitted plans fail to show how the partially completed route will qualify as Family Friendly nor how it will link to the existing path network, if at all. It is noted with concern that Landscape Management Plan*

*ERZ/12/24/MP03 does not show any walking and cycling route through the site, contrary to other documentation.*

*MCC therefore calls for the Planning Permission in Principle to set a reasonable timescale for the completion of this through walking and cycling route, preferably as part of Phase 1 and no later than the completion of Phase 2. Both adequate lighting and security monitoring will be required to allow full and safe use of this facility by the all sections of the community. We are concerned that the need for some ongoing security overview is not mentioned in the development proposals for this route.*

#### *Access for the visiting public*

*MCC objects to the failure to integrate public bus services into the site, unlike that which exists at the comparable Western General and Royal Infirmary sites. This is considered to be far from satisfactory, particularly given the walking distance for visitors and patients from Morningside Road and Colinton Road. In particular, we reject the assertion in the Transport Assessment Para 2.3.2) that "there is no requirement for public transport services to enter the development". This statement is made without sufficient justification and requires to be further challenged. We also challenge the statement (para 6.2) that "Bus services are available within a 5 minute walk of the site and it is not, therefore, necessary for services to enter the site", since 5 minutes might get one from the site boundary to a bus route but certainly not , for example, from Morningside Road to the Phase 1 development.*

*We believe that the connectivity of the site to public transport (Lothian Buses 23, 38 and 41) could be transformed by provision of a pedestrian and cycle link bridge from Balcarres Street over the southern suburban railway, either into Bruce Street or, better still, by partnership working with the City Council, into the existing redundant Council yard on Balcarres Street. This link might also facilitate the connectivity of some utilities, a subject understood to already be the subject of discussion with Network Rail.*

*Such a link would offer excellent access into the heart of the development, shortening walking times and reducing the pressure on car usage. This would meet many of the city's objectives of encouraging walking and Family Friendly cycling and increasing use of public transport all as set out in the City's Transport 2030 Vision and Active Travel Action Plan.*

#### *Car Parking*

*Integral to the above issue is the amount of car parking to be provided on the site. MCC objects to the proposed provision of 450 spaces as this figure seems exceptionally high and perhaps based on views held prior to, and as yet uninfluenced by, the development of the above Council policies. Such a number of spaces may be "nice to have" but we question whether they may assume historic patterns of everyday commuting by staff. We are promised an intensification of the use of this site in the future and an increase in car traffic through local residential streets will not be acceptable.*

*City Council Policies Tra 1 and Tra 2, as set out in the adopted Local Plan and in the Proposed Local Plan March 2013, seek a reduction in the reliance on car travel where redevelopment of site takes place. MCC calls for evidence of action to comply with these policies to be demonstrated. The Transport Assessment requires to address the requirement for car traffic reduction.*

## *Shuttle Bus*

*MCC notes the plan to have a shuttle bus serve the site. MCC calls for this to provide a pick up service to passengers at specific points on Colinton Road and Morningside Road. Allowing some close public access to this service could facilitate access, particularly for the less able, and again allow parking demand to be reduced.*

## *Traffic Concerns*

*MCC notes that the Environmental Impact Assessment (para 1.4.33) claims that there will be "an overall negligible effect on the operation of the surrounding road network". If this is the case once the development is completed then this is welcomed, however the situation during the construction of Phase 1 will be very different. Myreside Road is a very busy Morningside bypass route with a high level of school run traffic. It is also busy with pedestrian traffic connected with local schools. We request that a traffic light controlled crossing be installed at least during the construction phase of the project to assist with pedestrian safety and to allow delivering vehicles the chance to take a wide swing into the site whilst other traffic is stationary. In any event, a Family Friendly cycle crossing will be required on completion of the development, to allow safe access to and egress from the walking and cycling route.*

## *Community Garden*

*MCC very much regrets the loss of the Myreside Community Garden but recognises that the ground was occupied on a temporary basis. MCC welcomes the proposed new community garden area but requests that comparative areas are quoted to establish whether the growing area is comparable and hence acceptable. MCC objects to the apparent loss of spaces for social interaction between patients and the public of which the loss of the bowling green and the community garden are but two examples.*

## *Drainage*

*MCC has a concern about the impact of the planned development on existing surface water and foul drainage services. We note that the Phase 1 development is expected to drain westwards subject to some improvement in the existing combined sewer provision. We request further consultation in the event of any drainage proposal involving discharge east of the site, given the history of flooding in the Balcarres Street area.*

## *Summary*

*Morningside Community Council broadly supports the redevelopment of the Royal Edinburgh Hospital but seeks improvements, and conditions applied, to the proposals in response to the objections and comments made above.*

## **Morningside Community Council comment on revised plans and Environmental Statement**

*Morningside Community Council were surprised to find on studying all the new documentation that no cognisance appears to have been taken, as yet, of community comments and that, in particular, our comments on the apparent reliance on car-based*

*transport and the desirability of a link to public bus services to the south of the site, have not been addressed.*

*The Community Council's conclusion is that the changes are relatively minor and do not affect our existing objections of 21 November 2013, or require further objections. The changes are claimed to reflect "engagement with the City of Edinburgh Council and other stakeholders". However the Community Council do not appear to have been considered as a stakeholder in this case.*

*Morningside Community Council thus wish to sustain our earlier objections and express disappointment that none of our views have been taken into account in the revision.*

### **Grange/Prestonfield Community Council comment**

*This Community Council has carefully considered these applications and agreed to submit these comments at its meeting yesterday evening. You will appreciate that our area adjoins that of Morningside Community Council in which the Royal Edinburgh Hospital (REH) is situated. The representations in this letter cover both applications and concentrate on the impact which the REH proposals may have on GPCC residents, whether patients, visitors, staff or local business people and may therefore have a different perspective from those living close by the site. There is also a 3rd planning application (13/03997/FUL) for temporary project offices in the northeast corner of the Phase 1 site and we have no comments on this application.*

*This Community Council welcomes the continuation of the long-term commitment by NHS Lothian to the REH site evidenced by these planning applications. June this year was the bicentenary of REH and its setting in the South Edinburgh community brings considerable economic, social and green space benefits. REH is a welcome employer in the midst of residential areas, which in recent years have seen a decline in local employment opportunities with the redevelopment for housing of some local institutions and businesses. Our comments on these applications are intended to enhance the scope for embedding REH further in the local community and strengthen those long established links.*

### *The 2013 Edinburgh Planning Concordat*

*The CEC Case Officer, Lesley Carus, held a very constructive meeting on 25 October with representatives of Morningside CC and GPCC in the context of the 2013 Planning Concordat and this was very helpful in clarifying details of the applications and the issues for CCs to consider.*

### *The Pre-Application Consultation (PAC) Report on Proposal of Application Notices (PANs)*

*The planning application documentation includes the same PAC Report on each PAN, 13/01468/PAN for Planning Permission in Principle (PPP) for master planning of the whole REH site and 13/01470/PAN for full Planning Permission of the Phase 1 site. The public consultation was two events held on the same day 6th June 2013 and the following comments are based on that held at the Eric Liddell Centre attended by GPCC representatives:-*

- a) *Holding two events on the same day at different times limited public participation for those unable to attend on that day. It would have been better for each event to have been held on a different day.*
- b) *We think that the information presented to support the PPP PAN was adequate with concept illustrations supporting what might be in the PPP application.*
- c) *At the time of the public events on 6th June very little specific information was given about the Phase 1 detailed application and we think this PAC was really a non-event.*
- d) *During the public consultation we think it was not then made clear that Phase 1 includes the loss of the Bowling Green and Clubhouse.*
- e) *Much is made in the PAC Report of consultation with professionals, staff and user groups on which we cannot comment, but overall we think engagement with the public was inadequate.*

*13/04292/PPP - Planning Permission in Principle for Masterplanning of the whole REH site*

*The PPP documents present an imaginative concept for redevelopment of the 20.5Ha REH site and if approved it will replace the present Planning Brief adopted in March 1998.*

*The indicative timetable for the Masterplan is:-*

*Phase 1: Adult Mental Health and Brain Injury Unit: Construction Delivery: Nov. 2014 - Oct. 2016*

*Phase 2: a) Learning Disabilities. b) Estates facilities relocation etc: ditto: Oct. 2015- Oct 2017*

*(Phase 2b will not start until Phase 1 is complete.)*

*Phase 3: Mackinnon House Refurbishment: Construction Delivery: June 2016 - June 2019*

*Phase 4: Alcohol Inpatients and Integrated Rehabilitation etc, Lanfine Unit, Bell: July 17-June 19*

*Phase 5: Future Expansion and Elderly: no timetable stated but beyond the above. (It is understood that this Phase may also include extra bed capacity if Astley Ainslie, Liberton and Corstorphine Hospitals are closed, which currently have about 467 beds in total.)*

*Thus the indicative timetable is for the first Four Phases to be completed within the next 6 years with Phase 5 extending beyond this time frame, to about a ten-year time horizon.*

*Comments by GPCC on the PPP Application (13/04292/PPP):-*

*1.*

*Masterplan to allow for future uncertainties: As the PPP application makes clear there is no firm funding commitment beyond Phase 1, so it is possible that later Phases may be substantially changed or not proceed. Also in parallel with the REH Redevelopment, the policy of Integrating Health and Social Care will be implemented, maybe leading to further unforeseen changes in treatment provision on hospital sites. Therefore we think that the likelihood of future substantial changes to the REH Masterplan should now be*

considered to a greater extent than the PPP documentation currently does. For instance if nothing proceeds further for some time after completion of Phase 1 how will site traffic, car parking and pedestrian and cycle movements be managed and Design and Access requirements met? If later phases do proceed how will construction traffic be integrated with functioning hospital facilities including Phase 1? If Phase 5 includes the decanting of capacity from other hospitals as referred to above then this could mean greatly intensified use of the REH site and intolerable pressure on the accesses from Myreside Road and Tipperlinn Road. We think these possibilities ought now to be addressed in the Masterplan so that decisions are not taken which might inhibit access and other improvements later.

2.

*Pedestrian Access, Public Transport & Car Parking: Accessibility, transport and parking issues are further addressed in 5 & 6 below in the context of the Phase 1 scheme, but should also be read as applicable to the Masterplan proposals. The commitment to a public pedestrian and cycle route west to east along the southern boundary of the site is welcomed. It will greatly help the safe movement of pedestrians and cyclists and as part of a continuous commitment to Active Travel we think it must be fully established as part of Phase 1. This route is already safeguarded in the Edinburgh City Local Plan and forms part of the South Central Open Space Action Plan for a Green Network linking Union Canal to Maxwell St. and its completion in full we think should be a condition of any approval of Phase 1 and not left for later phases of the Masterplan.*

3.

*Objection: There is much in the Masterplan which GPCC supports but in view of the above comments and what is stated below about Phase 1 and how that impacts on the Masterplan, GPCC objects to the PPP application as submitted.*

*13/04232/FUL - Full Planning permission for Phase 1 in the SW corner of the REH Site*

*Some of the extensive documentation with this application is similar to that submitted for the PPP. The site is currently open space with trees, including an old orchard, and undergrowth, but also includes the Tipperlinn Bowling Green and Pavilion. The entire Phase 1 site including the Bowling Green is scheduled in the Edinburgh City Local Plan (ECLP) as Open Space and also in the emerging Edinburgh Local Development Plan (LDP). It is recorded in the CEC Open Space Audit under appropriate categories of open space use. Also included in Phase 1 is that part of the new Southern cycle and walking route within the Phase 1 site from the opened up Myreside Road entrance eastwards to the Phase 1 site boundary at the western side of the Affleck Centre. Phase 1 also includes that part of the Masterplan landscaping and planting scheme within the Phase 1 site. The Phase 1 buildings are to be mainly single-storey with some offices, meeting rooms and other facilities on an upper floor over part of the buildings.*

*Comments by GPCC on the Full Planning Application for the Phase 1 Site (13/04232/FUL):-*

4.

*Phase 1 Buildings Footprint: The extensive footprint of the proposed buildings on the Phase 1 Site will result in significant loss of Local Plan Open Space and numerous trees. These losses will only be partially compensated by the landscaping proposals in later phases of the Masterplan, quite likely to be changed as referred to above. Surely the case for such a loss of open space in Phase 1, contrary to ECLP Policy Os 1, ought*

*to be unassailable and yet we cannot find justification for this on planning grounds in the submitted documentation, whatever other reasons may be given for the adoption of the single-storey ward and courtyard format. We understand that the ratio of buildings to landscaping is about 40/60, the 60% landscaping including paths etc and this is a great reduction on what is currently approaching 100% Phase 1 Open Space safeguarded in the Local Plan. We understand the requirements for clinical adjacency and other factors which have influenced how the detailed proposals have emerged, but this loss of Open Space coupled with the almost immediate loss of the Bowling Green, with its long-established therapeutic benefits, would be a great price to pay. Before a decision on the Phase 1 application is made, we urge therefore that an independent specialist review be undertaken of the case for the Phase 1 design, utilizing other expertise and not just that of NHS Lothian. The purpose of this review would be to find out if another clinically acceptable scheme could be developed with smaller building footprint, which might also save the Bowling Green. If no other reasonable alternative scheme emerges from this review, then those concerned about the present proposals would at least know that a serious and balanced effort had been made to consider other possibilities. In view of the foregoing comments GPCC objects to the extensive building footprint in the Phase 1 proposals as submitted.*

5.

*Car Parking: The present car parking problems for staff and visitors are well known and will greatly increase as construction takes place, facilities are relocated and the use of the REH site intensifies, unless there is much more effective management of available parking space from now on through Phase 1 implementation and all later Phases. Shorter walking distances from improved bus services would reduce car use as suggested in 6 below. Eventually the car parking provision on site is proposed to be much the same as at present if the Masterplan is carried out as proposed. We think it would be better to couple this with a commitment continuously to review through each Phase of development what car parking is essentially needed so that over time hopefully a reduction in on site parking is achieved. This should also allow what car parking is needed to be more discretely located with less visual impact. The REH car parking provision should then comply more fully with the Travel Policies in the ECLP and LDP than the proposals currently do. This commitment should be part of the Travel Plan Framework.*

6.

*New Access for Pedestrians & Cyclists & Link to Buses: By reference to national planning guidance the Transport Assessment attempts to justify the considerable distance pedestrians will have to cover from bus stops in Myreside Road and Morningside Road to the Phase 1 facilities and the rest of the REH site. However we think this ignores the needs of those with mobility problems who may have to get to the site by public transport. Over time this demand can only grow with an increasingly aged population. Access to the REH site would be greatly improved for all if a new shared pedestrian and cycle access could be created over the railway into the REH site from Balcarres Street. Such a shared access with two demarcated lanes would have to have a ramped slope suitable for disabled use, with rail height clearance, but we think such a project is feasible. One possibility would be to utilize part of the CEC Recycling Centre site opposite Baclarres Court where there should be space to develop the ramp required and the railway is partially in cutting, with plenty of space opposite on the REH site. This would offer a safe and easy route for cyclists and pedestrians to the heart of the REH site, with a link also to the proposed east to west access along the southern boundary. We note that Spokes supports the idea of this new cycle access. We understand also that NHS Lothian are investigating a possible route for a pipe bridge*

and so maybe this could also be incorporated into the suggested structure. The benefits to public transport users of this new access are neatly illustrated by figure 4.3 on page 12 of the Transport Assessment showing the distance from bus stops, where it can be seen that the suggested new access over the railway from Balcarres Street would plug the gap between the Myreside Road and Morningside bus stops, utilizing convenient bus stops in Balcarres Street served by the 23, 38 & 41 routes. (Increased demand would require improved bus frequency at weekends.) We ask that this suggested new cycle and pedestrian access over the railway from Balcarres Street into the heart of the REH site be investigated in detail and that this be a condition together with its implementation of any planning consent so that it is ready when Phase 1 is completed. This proposal would enable the Phase 1 scheme and the Masterplan to comply with Transport Policies, particularly Tra 1, in the ECLP and LDP to a much greater extent than the submitted applications.

7.

*Southern Route:* As stated in 2 above we think that the new cyclist and pedestrian route along the southern site boundary is so necessary and beneficial that it should be completed throughout its full length through the REH site as part of the Phase 1 scheme. At the eastern end it offers safe exits now onto Morningside Terrace and subject to negotiations over access maybe later onto Maxwell Street. We note that SfC Transport Planning (Development Control) in its identical comments on both the Phase 1 and Masterplan Applications supports this route. However we note that this Department does not address the site access and public transport issues dealt with in 6 above.

For the reasons stated above in paragraphs 4 to 7 GPCC objects to the Phase 1 application as submitted.

### Summary

To summarise, GPCC objects to both the Masterplan PPP Application (13/04292/PPP) and the Full Application for Phase 1 (13/04232/FUL) as submitted. If the measures suggested above are adopted we think our objections could then be removed and both applications fully supported.

### **Grange/Prestonfield Community Council comment on revised plans and Environmental Statement**

Thank you for the Notification dated 17th January 2014 of the submission of revisions to the above planning applications, comprising Scheme 2, together with the separate notice about the submission of Environmental Statements. We have not accessed this latter documentation and do not feel we are in a position to make comments on the Environmental Statements. However we have studied the changes made to the two planning applications and we consider that the comments we made in our letter of 21st November 2013 are still valid, summarized as follows in respect of both applications:-

a) We note that a "clinical justification" for the Phase 1 building format has now been submitted dated January 2014 which confirms that there is a "sizable ground floor land take". This is not justified simply by stating that "it is interspersed with clinically invaluable courtyard space" even taking into account the other reasons given which do not all support the ground floor ward format. The large overall footprint of the Phase 1 development is on land almost all of which is Open Space safeguarded in the current

*Local Plan and the emerging LDP and we believe that the case for such a large sacrifice of open space has not been made. (Point 4 of our letter of 21st November)*

*b) In view of the great benefits offered, the Southern pedestrian & cycle route should be fully implemented in Phase 1 throughout its entire length within the REH site. (Points 2 & 7 of the 21st November letter)*

*c) To shorten the distance from bus stops for pedestrians, including the elderly and infirm, a new crossing over the railway both for pedestrians and cyclists should be provided from Balcarres Street into the REH site, to be conditioned as part of any Phase 1 consent so that it is ready when Phase 1 is finished. (Point 6 of the 21st November letter and illustrated by Figure 4.3 of the Transport Assessment)*

*d) The Masterplan should allow much more for future uncertainties, as we think that the only certainty in any health provision masterplan is uncertainty. (Point 1 of the 21st November letter)*

*With reference to Montagu Evans letters of 10th January 2014, the Scheme 2 changes do not reflect stakeholder engagement if community councils fall within this definition, but we hope that there may still be an opportunity for this. In view of what is stated above we maintain our objections to these applications and ask that this letter be read in conjunction with ours of 21st November 2013.*

### **Scottish Natural Heritage comment**

*The content of both the Masterplan application in principle and the Phase 1 application in full are comprehensive. The overall Environmental Statement (ES) is suitably detailed, providing a thorough and clear overview of the direction of this development.*

*We have provided comments for both applications within this response, as the phase 1 planning closely follows the previously agreed principles and structure of the Masterplan. There are positive elements to this application which reduce potential impacts from this development and/or enhance the natural heritage features of this site. We recommend that these measures are taken forward although it is for the planning authority to determine, within the context of its own policies, whether conditions are necessary to secure the mitigation and detail within the ES and masterplan.*

#### *Comments for Planning Permission in Principle of the Masterplan*

*We note the good intentions of the Masterplan to incorporate elements for the benefit of the natural heritage into the design for the necessary re-development of the Royal Edinburgh Hospital. In particular, the following matters have been well considered:*

*The proposed layout incorporating open space - the site currently has large areas of open space, however these are not well structured or easily accessible in all areas. The new layout provides aesthetic improvements to the built structure of the site whilst improving green space access and amenity. The Orchard and the mature tree belts along the south boundary and throughout the grounds are important features within this environment, and the retention of these elements is important to protecting the green space and character of the site.*

*The extension and formalisation of pedestrian access - we support the development of green networks within the City, therefore the creation of a footpath / cycle way along*

*the south of the site linking Morningside Terrace and Myreside Road is welcome. It will provide an active transport connection for the wider community east of the hospital grounds to Easter Craiglockhart Hill and also access to the Union Canal to the west.*

*Tree protection plan - we note that all trees not directly affected by the proposal will be protected through the presence of an Arboritoreal Clerk of Works (ACoW) and fencing. We advise that the Method Statements for the Cycle / Walking Path Implementation and Existing Trees and Surfaces are suitable, and if these are adhered to the retained trees on site will be appropriately protected.*

*Chapter 10 of the ES, regarding the nature conservation interests of the site both for habitats and species, provides a comprehensive baseline and suitable methods and mitigation to ensure that any adverse impacts are minimised, and all opportunities to benefit the site are taken.*

*Protected species including European Protected Species (EPS) - We advise that if the measures outlined in sections 10.7 - Mitigation and Enhancement and 10.9 - Summary and Conclusions are adhered to then we agree with the conclusions of the ES that there should be no residual negative effects resulting from this development.*

*We recommend that the detail provided within the ES, in particular for those areas detailed above, is considered by the Council to be taken forward as conditions, to ensure that the implementation of the individual Phases of development will be progressed in line with the Masterplan. However, it is for the planning authority to determine, within the context of its own policies, whether conditions are necessary to secure this mitigation and detail.*

#### *Comments for the Phase 1 Planning Permission*

*The Phase 1 application for planning permission incorporates the new building of the Adult Acute Mental Health, Intensive Psychiatric Care Unit, Mental Health Rehabilitation, Older People Mental Health Assessment, and the Brain Injury Unit. In addition to initial tree removal, the western portion of the Cycle and Footpath is to be implemented as part of Phase 1 as far as the central shelterbelt. Our comments regarding this and all other aspects of the natural heritage within this phase of the development are provided above.*

#### **Transport Scotland comment**

*With reference to recent correspondence on the above development, we write in our role as Term Consultants to Transport Scotland - Trunk Road and Bus Operations Directorate (TRBOD) in relation to the provision of advice on issues affecting the trunk road network.*

*We have downloaded a copy of the Environmental Statement report prepared on behalf of NHS Lothian in support of the above development. Having reviewed the information provided, we would make the following comments on behalf of Transport Scotland.*

#### *Development Proposals*

*We understand from the information submitted that the application relates to the first phase of the redevelopment and re-provision of the Royal Edinburgh Hospital Campus for healthcare purposes at the existing Royal Edinburgh Hospital site at Morningside in*

Edinburgh. It is noted that we have already responded on the application for the wider masterplan proposals (Planning Ref: 13/04292/PPP). The first phase of the development relates to the construction of a new Mental Health and Brain Injuries facility along with access and landscaping works.

The development site is located to the south of Edinburgh City Centre and is bound to the north by George Watson's College, to the east by an existing residential development, to the west by Myreside Road and to the south by a railway line. Myreside Road provides access to the A702 which in turn provides access to the A720 City of Edinburgh by-pass which is the nearest trunk road to the site.

#### *Access Strategy, Traffic Impacts and Environmental Impacts*

*It is noted that access to the site is from the local road network and in these circumstances, Transport Scotland have no specific comments to make on the actual access points themselves.*

*With regard to the traffic impact, we note that the A720 City of Edinburgh by-pass is the closest trunk road to the site. However from the information provided, we are satisfied that the proposals will have a negligible traffic impact on the trunk road network during construction and once operational. We are also satisfied that there will be no significant environmental impacts associated with increased traffic on the trunk road network and its adjacent receptors.*

#### *Air Quality, Noise and Vibration*

*Given the scale of the development and the likely associated vehicle movements, we are satisfied that there will be no significant Noise or Air Quality impacts associated with additional traffic on the trunk road network.*

*From review of the information provided, we can confirm that Transport Scotland have no objection to the development in terms of traffic or associated environmental impacts on the trunk road network and no further information is required.*

#### **Environmental Assessment comment 27/01/2014**

*The application proposes Class 8 hospital premises including plant within the grounds of an existing hospital. A school with associated grounds is situated to the north and a railway line bounds the site to the south. Residential properties surround the site to the west and east with a sports ground situated to the north-west.*

*A combined heat and power plant is proposed within the development which is likely to create noise during its operation. It is likely that bespoke mitigation can be proposed to ensure that any surrounding residential properties will be suitably protected from noise. Some supporting noise information has been provided relating to the whole site which is not specific to the actual plant proposed in this phase one application. A condition is therefore recommended which requires further specific information to be provided prior to occupation of the development.*

*Two chimneys in the region of 10 and 11 metres tall are proposed within the development to disperse fumes and odours from the operation of the proposed CHP plant and boilers at an appropriate height and distance from surrounding sensitive receptors. In this regard, calculations have been provided to this section in compliance*

*with the Clean Air Act 1993. In this regard, this section is of the opinion that the proposed height and distance is in compliance with the requirements of the Clean Air Act 1993. However, if there are any future changes to the power plant proposed or increase in proposed surrounding building heights, the chimney height calculation will require reviewed and updated.*

*Therefore, Environmental Assessment has no objections to this proposed development subject to the following conditions:*

#### *Site Remediation*

*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 remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.*

*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.*

#### *Plant Noise*

*Prior to occupation of the development, details demonstrating that noise from all plant complies with NR25 within the nearest residential property (with window partially open for ventilation purposes) shall be submitted for written approval by the Head of Planning and Building Standards.*

#### *Electric Vehicle Charging Points*

*Prior to the occupation of the phase 1 site, the electric vehicle charging outlets should be provided at the positions indicated on the approved site plan (Drawing number; ERZ/13/04/P01 and dated 19/12/2013.*

#### *Addendum*

*As stated above, Environmental Assessment has no objections to the approval of the application subject to the recommended conditions being attached to any consent.*

*NB. However, should all of the above conditions not be applied to any consent, Environmental Assessment will require to review the recommendation. In such event, it is imperative that this is notified immediately to the Environmental Assessment case officer.*

#### *Background*

*Our comments regarding the above planning applications were requested initially on 15 October 2013, to which we responded on 25 November 2013.*

*Following discussions between the developers and relevant stakeholders some alterations have been made to both the overarching Masterplan and the Phase 1 detailed plans, resulting in the current submission of the amended plans for re-consultation.*

#### *SNH position*

*We do not intend to provide any additional comments at this time. Our comments as provided in our response of 25 November 2013 remain valid, and we request that you continue to refer to this letter with regard to the current applications.*

#### **SportScotland comment**

*SportScotland responded to these 2 consultations on 4th November 2013.*

*At that stage, we advised that our role as a statutory consultee is in relation to the proposed loss of the bowling green.*

*We apply the tests of SPP whereby playing fields and other outdoor sports facilities should not be redeveloped except where the development is ancillary to the sporting use; or affects only a small part of the facility which will not affect its use; or where the facility to be lost will be replaced by a new facility of comparable or greater benefit to sport, or where a playing field strategy has demonstrated a clear excess of supply.*

*We advised in our initial consultation response that the first 2 caveats do not apply; and so in the absence of evidence of a clear excess of supply, compensatory provision should be provided. This approach seeks to ensure that the opportunity to engage in the sport is not lost.*

*The applicant has now provided additional information indicating capacity at 3 local Bowling Clubs to accommodate the Tipperlinn Bowling Club members. The applicant has also confirmed that agreement has been reached for the members of Tipperlinn Bowling Club to relocate to Merchiston; which is in proximity to the existing Tipperlinn site.*

*On the basis that the opportunity to play bowls will not be lost to the Tipperlinn Club members, and that the receiving Club has capacity to accommodate this additional membership; then I can confirm that sportscotland does not object to these planning applications.*

#### **Architecture + Design Scotland comment**

*The development falls within the scope of work that A+DS carries out with partners in the NHS to consider design quality within the business case process; the NHSScotland Design Assessment Process (NDAP). A workshop was held with the client body, their delivery team, Design Forum panellists and representatives of the planning authority in June 2013 to provide interim feedback to inform the developing proposals. Further advice and support has been provided through the autumn.*

*The appraisal below is based on the Phase 1 drawings submitted to Planning in January 2014, and should be read in conjunction with our response to the Masterplan dated 12.11.2013 in respect of the application for Planning Permission in Principle (13/04292/PPP). This response relates only to matters of interest in Planning; an assessment of compliance with healthcare design standards etc has not been included in this paper.*

## **DESIGN ASSESSMENT**

*The project is supported; however there are a number of areas where we consider further development in the detailed design stage would be beneficial. These are included below.*

### **1.0 Site Response**

*The Phase 1 development consists of the main 185 bed Mental Health Unit (MHU) and the 20 bed Brain Injury Unit (BIU). These are two, free standing, predominantly single-storey buildings to the west of the existing Royal Edinburgh Hospital (REH) campus. The scale and nature of the development, and the topography of the site, present particular challenges in meeting the client's brief for a facility that is non-institutional and 'more like a residential campus'. This objective recognises that the impression of such facilities is vital, both to address issues of stigma associated with mental health institutes of the past, but most importantly to provide an element of comfort to patients and visitors on their approach, at a time of great stress.*

*The approach of breaking the main building into three distinct elements, linked by glazed corridors, with landscaped gardens flowing between the parts is a positive move in this regard. The masterplan establishes a strong landscape setting for the development. The Phase 1 proposition continues this by extending the 'landscape' nature of the walks into and through the building.*

*The decision to modify the floor levels to respond, in part, to the topography, assists further in breaking the visual mass of the MHU. However the need to retain barrier free access between wards has prevented the whole of the development being set close to grade: the floor level at the southern range of the building, at Older People's Mental Health wards (OPMH), will sit some considerable height above existing ground level. The appearance of the building from the route along the south of the site will provide a key impression of the facility for members of public traversing the site and for staff, visitors, and any patients, arriving from the east.*

*The combination of the long rectilinear building sitting atop a largely monotonous grassed bank could appear highly institutional. The elevation has been modulated along the southern terrace to reduce this impression. We recommend the landscape to the south and east of the OPMH wards be similarly, and significantly, developed.*

*The design of the constructed landform, escape routes, and the planting proposals in these areas should be developed to respond to the different natures of internal spaces, to provide visual variety, appropriate privacy and, ideally, pockets of public amenity. Visually enriching the banked ground and public realm to the south will draw attention away from the building, improving privacy for residents. Further, providing a stronger landscape character close to the building, and visible from patient areas, will reduce perceptions of being significantly above grade which could disorient patients who otherwise feel they are at ground floor level. The new ground level drops away below*

*sightlines when seated so the views from bedrooms would generally be directly across to tree canopies - see Internal Site Section XX.*

## *2.0 Arrival Experience*

*The arrival experience is largely established by the masterplan. Wayfinding is clear, and the mature landscape setting is a real bonus in establishing a positive impression for the facilities. However, there are a few aspects that would benefit from further development, as below:*

*2.1 Vehicular arrival: The approach by vehicle is from the east along the car and pedestrian axis, giving clear view to the BIU and glimpses of the MHU through a mature tree belt. The entrance to the MHU would not be visible until after entering at the car park area. The landscape features at the end point of the road axis should be developed further to be an attractive visual destination, potentially incorporating the language of wayfinding markers indicated elsewhere in the masterplan.*

*2.2 Arrival at MHU : The intended pedestrian arrival experience (on completion of the masterplan) of walking through the gardens and arriving at a public space at the front of the MHU has significant potential. The public court is shown breaking through the treeline to provide clear views of the entrance to the MHU. This route narrows at an 'portal', and continues between landscaped areas to a doubly articulated entrance; the arrival point consisting of a protruding doorway set within a larger portico form. The concept and intent of the arrival sequence - of clear visual markers, shared surfaces and generous areas of planting - is supported. However, we are concerned that the series of perceptual gateways to the facility may appear as a sequence of barriers, especially in the initial phase of occupation when all routes to the facility go through narrow breaks in a 1.2m high walls to access the public space, thereby requiring patients and visitors to pass three 'threshold' points on arrival and exit.*

*The nature and number of these landscape 'gateways' should be examined in detail, and in 3d, to ensure the design provides the appropriate expression of welcome and integration, rather than of separation. In this, the detailed proposals for the shared space should also be reviewed to ensure the location of parked cars does not produce a further 'gateway', block visual links or desire lines. The means for controlling vehicular access and use of this space requires careful handling; institutional measures such as painted boxes on the ground indicating 'no parking' and 'no smoking' zones should be avoided.*

*2.3 Arrival at the BIU would be a less ceremonious experience than that indicated for the MHU. The building has comparatively blank elevations and would therefore look more austere than its neighbour: arrival is straight off the 'street' through double doors punched into a north facing facade. The nature of the arrival space, the entrance doorway, and views on entry would benefit from significant development to achieve a standard for patients of BIU closer to that envisaged for patients of the MHU. The design should be developed further to improve the articulation of the elevations, improve amenity landscaping in the arrival area, better signal the entrance door and, ideally, provide a view through into the south facing landscaped court immediately upon entry.*

### 3.0 Architectural Response and Amenity

*The proposals use a simple palate of warm materials; textured brick, with timber cladding indicating key areas of the MHU such as arrival, circulation, and social spaces, providing a softer feel to these areas. Landscape is integrated well into the design of the MHU so that all waiting and social areas, and most primary circulation routes have good views into to planted courtyards. Small resting spots are provided around the main circulation routes encouraging informal social interaction and engagement with the therapeutic landscape. However, the detailing of both the built elements and the associated landscape will be critical in ensuring the simple approach to the building design (without significant variety in roof form, window pattern, etc.) produces a humane and comforting appearance, particularly when seen from the wider site from which the softer, timber heart of the development is less evident. We encourage the team to be rigorous in their approach to specification, detailing and construction to ensure the development looks good from opening and well into the future.*

*The general level of amenity that will be afforded to patients and visitors to the MHU is welcomed. There are, however, a couple of areas where further development of the detailed proposals would be beneficial, as below:*

*3.1 The northern ward block (Adult Acute) has one of the few long internalised corridors, this route is a key experience of all people using the four wards. Rooflights are shown over ward access points (punching up through PV arrays) to provide beneficial daylight. However we are concerned about the overall visual effect of two tall, top-lit spaces; longer, darker, internalised areas with recessed seating bays; and a glazed, potentially bright, viewpoint at the end of the route. This area would benefit from further detailed design development in plan and section to ensure that the design of each space, and the overall impression of walking through the sequence of spaces, is positive, with good daylighting and appropriate levels of light contrast.*

*3.2 The drawings show a rich concept for the landscape on arrival and within courtyards. The built features of these, and particularly the shelters, will play a key role in enriching the visual environment. The design of these elements should be developed to compliment the architecture of the building so that the combined impression is harmonious, not appearing as later, incongruous additions.*

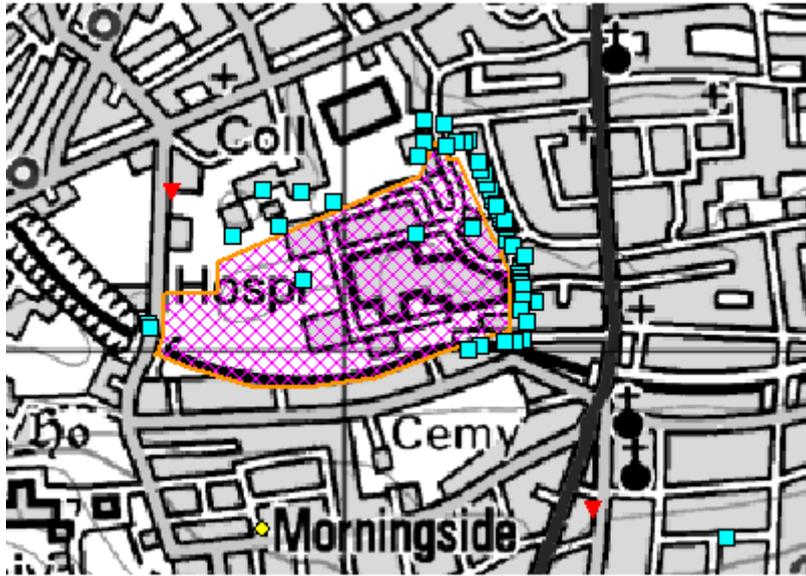
*3.3 The proposals do not currently show any areas of landscape where staff can conveniently take some respite from their duties during their breaks, and this should be developed. The flat roofed area immediately adjacent to the rest room would offer one opportunity for such provision.*

### CONCLUSION

*The development will be an important facility for improving the quality of care for mental health patients, and is designed to provide a good level of amenity for building users. We recommend the team further develop the detail of the proposals, particularly for the landscape around the southern and eastern areas of the site, and the articulation of the BIU. The quality of materials and detailing in both the building and landscape features, and the visual richness of the planting scheme, will be crucial in bedding the development into its location and providing a positive first impression to all those approaching the facility and the wider site. The Health Board and their delivery team should therefore ensure that the qualitative aspirations for the development are embedded through the detailed design a.*

## Location Plan

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