

# Development Management Sub Committee

Wednesday 26 March 2014

## Application for Planning Permission in Principle 13/04292/PPP

At Royal Edinburgh Hospital, 23 Tipperlinn Road, Edinburgh  
Planning permission in principle re 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.

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

### Links

<a href="#">Policies and guidance for this application</a>	LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITD6, CITE3, CITE9, CITE12, CITE17, CITE18, CITOS1, CITOS2, CITOS3, CITT4, CITT5, NSG, NSGD02, CRPMON, CRPLEW, CRPCHI, CRPMER,
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# Executive summary

## **Application for Planning Permission in Principle 13/04292/PPP**

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### Summary

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The proposed development offers the opportunity to sensitively modernise the existing key built assets including improving the setting of the listed buildings, upgrade facilities on the site, increase and improve access for all users, and include new areas of well-designed buildings, car parking and gardens/courtyards sitting within and surrounded by a high-quality landscape setting, consistent with the non-Inventory designed landscape setting. No adverse amenity impacts will arise as a result of the development with regards to neighbours, flooding, noise and air quality and the proposed 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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This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

### 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 14 letters of representation were received. Of this number, 10 letters expressed objections to the proposals, 2 supported the proposals and 2 letters were general comments.

### **Material Objections**

- damage to trees in the orchard;
- loss of glasshouses and adjacent horticultural land;
- loss of the bowling club;
- flooding issues;
- damage to badgers' habitat;
- traffic impacts; and
- loss of privacy to adjoining school.

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

- retention of hospital on site; and
- redevelopment is much needed.

## General Comments

- cycle route through the site should be completed at an early stage;
- cycle route should connect to Maxwell Street; and
- cumulative impact with potential development at Craighouse should be considered.

No non-material comments were raised.

## Community Council Comments

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;
- traffic impacts, particularly on Myreside Road;
- the loss of Tipperlinn Bowling Club; and
- the lack of integration with public transport.

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 that the proposed shuttle bus should provide a service for patients and visitors.

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 uncertainty in the delivery of the masterplan and the delivery of the publicly accessible routes through the site.

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](#)

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### **1. Background**

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#### **1.1 Site description**

The planning application site is the existing Royal Edinburgh Hospital situated in Morningside. The site is 20.5 hectares in area and comprises the various hospital buildings, bowling green, a nursery, lecture facilities, an orchard, community gardens and chapel.

The site is set back and separated from the main retail and other facilities of Morningside Road by stone detached/semi-detached/terraced houses and tenement flats of the residential areas of Morningside Park, Morningside Terrace and Miller Crescent which are to the east of the site. Immediately to the north and north-west 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.

The hospital's facilities are housed in several disparate buildings throughout the site and include 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. MacKinnon House is the main building of the Royal Edinburgh Hospital and following a review of the listed buildings on the site, the boundary wall to MacKinnon House was removed from the listing. The Church Centre is a rare example of a well-preserved iron 'kit' church. It was originally built in North Merchiston in 1876 but was re-erected within the grounds of the hospital in 1884.

Also on site are ancillary hospital facilities including the Scottish Ambulance Service national headquarters and the University of Edinburgh's Department of Clinical Psychiatry. The buildings on the site are a mix of heights, ranging from single storey to 16-storey, and a mix of different architectural styles ranging from traditional to modern.

The topographical survey data shows that the site levels range from 76 metres to 86 metres above ordnance datum. In general, the site slopes up to the north, where the maximum elevation of 86 metres AOD is in the north east corner.

The site is, in the main, well enclosed. Stone walls 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 are approximately 644 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 the western half 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 western part of the site comprises rough scrub and grassland and is currently an underused resource.

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 2 main accesses for vehicles and pedestrians. One is from Morningside Terrace to the southeast of the site and the other is from Tipperlinn Road to the northeast. There is a further access point to the west of the site on Myreside Road, however, this is an informal and unused access. There are approximately 351 formal spaces on site, with a further 107 informal spaces outwith designated bays. There is a cycleway/footway safeguard to the south of the site.

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**

### **Previous Applications**

13 May 1998 - planning permission granted for erection of 8 bedroom healthcare house for adult residents with learning disabilities (as amended) (application number 98/00411/FUL).

27 April 1999 - planning permission granted for the creation of a site access at the Royal Edinburgh Hospital (application number 99/00118/FUL).

10 May 1999 - listed building consent granted for the creation of a temporary site access at the Royal Edinburgh Hospital (application number 99/00118/LBC).

10 July 2008 - planning permission granted for a proposed replacement chimney and clearance of sundry boiler-house modules (application number 08/02115/FUL).

26 February 2010 - listed building consent granted for the removal of non-original, non-load bearing partitions and sanitary fittings, erection of new partitions and suspended ceiling and installation of new mechanical, electrical and sanitary services (application number 09/03185/LBC).

16 March 2010 - listed building consent granted for the stripping off existing sheet covering to roof and steeple, carrying out local repairs and re-roofing (application number 09/03186/LBC).

### **Current applications**

10 October 2013 - planning permission applied for 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 (application number 13/04232/FUL).

24 September 2013 - planning permission applied for temporary site offices (application number 13/03997/FUL).

## 2. Main report

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### 2.1 Description Of The Proposal

This is an application for planning permission in principle for the redevelopment of the hospital site. The main purpose of the redevelopment is to provide new mental health care facilities through the construction of new modern facilities.

It is proposed that this masterplan application will provide the over-arching principles of the future phases of development and the details of the future phases will be subject to further applications of matters specified in conditions.

The proposed redevelopment seeks to provide new hospital accommodation as well as refurbishment of the existing listed buildings (including MacKinnon House). Also proposed is improved access for vehicles, pedestrians and cyclists, new structured landscaped areas and general improvement to the campus environment.

The redevelopment of the site is proposed to take place in several phases:

Phase 1 - New mental health facilities. This includes the erection of a new 185-bed mental health building and brain injury unit which are proposed to cover part of the western side of the site. This is proposed on land that is currently open space and the bowling green.

Phase 2 - Learning Disabilities and Estates. This includes the erection of a new facilities management building at the western end of the site adjacent to Myreside Road and a new learning disabilities facility to the east.

Phase 3 - MacKinnon House refurbishment.

Phase 4 - Integrated rehabilitation. This includes a new integrated rehabilitation building at the centre of the site

Phase 5 - Further expansions, which will occur in the northern part of the site.

The proposed first phase will create 185 new clinical bed spaces which will accept patients currently accommodated in existing facilities elsewhere on the site. This phase will create approximately 15,000 square metres of clinical space.

Having released the buildings currently providing clinical services through the construction of the phase 1 project, the phased redevelopment of the campus would progress in accordance with an agreed masterplan timetable, and will include:

- Demolition of existing facilities extending to 5900 square metres;
- Construction of new estates and facilities building, extending to 2300 square metres;
- Demolition of existing estates facilities, extending to 2300 square metres;
- Construction of further clinical facilities, creating approximately 12,100 square metres gross floorspace;
- Further demolition of redundant clinical facilities of approximately 6800 square metres;

- Refurbishment of the listed MacKinnon House to accommodate support services, approximately 12,500 square metres;
- Construction of further clinical facilities, creating approximately 3000 square metres of gross floorspace;
- Further demolition of redundant clinical facilities of approximately 4000 square metres of gross floorspace;
- Construction in two phases of further additional clinical facilities of approximately 13,000 square metres and 11,600 square metres.

With the exception of the listed buildings and the recently constructed Orchard Clinic and Young People's Unit, the remainder of the hospital buildings on the site are proposed to be demolished. The Kennedy Tower and lecture theatre are owned and operated by Edinburgh University and will not be altered or removed under these proposals.

### **Parking and Access**

Across the site, a total of 450 parking spaces are proposed. The parking areas will be distributed throughout the site and will be located adjacent to the buildings and facilities they serve. Parking will be formally managed and restricted to by means of barrier accesses into car parking areas and traffic regulation orders (in the form of yellow lines) will negate parking outwith designated areas.

In terms of access, the development proposes to retain the existing vehicle access points at the east of the site, where there are two main points of access from Morningside Terrace and Tipperlinn Road. Also proposed is a third access to the west of the site via Myreside Road. This access is proposed to be used for NHS service vehicles and emergency use only. There is no vehicular route proposed to link Myreside Road with Morningside Terrace.

The roads within the development are proposed to be upgraded and will have adjacent footways.

In addition, a separate route for pedestrians and cyclists and open to public use is proposed on the southern part of the site. This route is proposed to connect Morningside Terrace with Myreside Road and will follow an existing unused track.

In terms of public transport, there are regular bus services which run between the centre of Edinburgh and Morningside and serve the site. There is also scope within the proposed development to open up access to bus services on the Myreside Road access.

### **Tipperlinn Bowling Club and Community Gardens**

It is proposed that phase 1 (and in particular the brain injury clinic, which is subject to planning application 13/04232/FUL) will be developed partly on land that is currently occupied by a bowling green which is presently affiliated to the Tipperlinn Bowling Club.

Following detailed discussions, the Tipperlinn Bowling Club have agreed to relocate to Merchiston Bowling Club with a view to sharing the facility.

The existing community gardens are proposed to be removed and replaced in a new landscaped area in the south of the site.

## **Open Space**

The development proposes to improve landscaping across the site by providing spaces for both patient and community use.

The masterplan focuses development on the northern parts of the site thus retaining the existing parkland to the southern edge. It is proposed that the southern edge will be enhanced along the new pedestrian/cycle way in order to provide spaces for recreational and therapeutic uses for both patients and the community, including space for a replacement community garden. The area along the pedestrian/cycle way is perceived as a linear parkland with a range of features such as green gyms, a multi-use games area and new greenhouses.

There are areas within the site associated with the hospital buildings that will be designed to have specific functions for use by patients as a therapeutic resource and each space will be designed separately in response to the clinical needs and requirements of the user group and building it serves.

There are also general aesthetic improvements to the site overall including tree management and scrub removal.

The strategy seeks to maximise the retention of as many trees on site as possible and the existing orchard at the western end of the site is proposed to be retained. In total, there are approximately 573 individual trees across the site. Within the setting of Mackinnon House, there are 2 specimen trees (a Hungarian Oak and a True Service tree) which are of national significance and are proposed to be retained.

The tree survey identified approximately 174 trees that would require to be felled in order to deliver the masterplan. Approximately 40 other trees are proposed to be removed for arboricultural reasons.

The proposed tree planting strategy outlines key structural planting to define routes and spaces, and expand and improve shelter belt planting. As part of the strategy, it is proposed that 475 new trees will be planted throughout the site.

## **SUDS and Drainage**

It is proposed that surface water from the development will be separated from foul water and that surface water will be attenuated to pre-development greenfield run-off flow.

There are different levels of treatment proposed throughout the site and the drainage strategy shows indicative positions for the proposed surface water pipes, subject to three levels of treatment:

- surface water run-off from the roof areas will undergo one level of treatment;
- surface water run-off from the road areas will undergo two levels of treatment;
- surface water from the service yard area will undergo three levels of treatment.

The levels of treatment include the provision of swales, filter trenches and oil interceptors in appropriate areas.

## **Supporting Information**

The following information was submitted in support of the application:

- 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;
- 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 Services.

## **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 have any impact on the setting of the listed buildings or nearby conservation areas;
- 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 Development Plan Provision

The proposals do not raise issues of a strategic nature and therefore can be assessed in terms of the local plan provision.

The Edinburgh City Local Plan designates the site as being within the Urban Area. There is also an area of designated Open Space within the site.

In terms of the Urban Area designation, the application is for the redevelopment of the existing hospital in order to provide improved clinical facilities. Since there is no change to the use of the site, the proposals comply with the general urban area policies.

With regards to the open space designation, the relevant policy is OS1 (Open Space). Since phase 1 involves the loss of open space in order to accommodate a new acute mental health and brain injury facility, 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 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 of the phase 1 building on the area of existing open space would be the most significant in terms of townscape and visual impact but would only result in an overall negligible magnitude of change when measured from the houses on Balcarres Street/Craighouse Gardens. This is by virtue of the fact that the new buildings would be screened from the existing houses by the mature trees both within the site and along the railway line. Therefore, although this area is most sensitive in terms of its proximity to the site and erection of new buildings on existing open space, no detrimental impacts on townscape or visual quality have been identified.

In addition, the Open Space Audit gives the green space within the current hospital campus 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 and appearance of this open space.

Therefore, taking these issues, mitigation measures and design considerations into account, the 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 criterion. 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.

The majority of current areas of open space on the site are not of great amenity value as public access is limited. In terms of provision, the area in which the proposed development is located does not have a deficiency of large open space that can be used by the public. The creation of a green corridor will enable local public access to this open space and increase open space provision in the area. There is a deficit in terms of play areas in the immediate vicinity of the proposed development, however, it cannot reasonably be expected for the developer to provide a play park within the development. Nevertheless, the developer has indicated that there may be scope for the provision of green gyms and informal play facilities within the southern linear park. Further details will require to be submitted and a condition is recommended in this regard.

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 applicant has 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 applies 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 two 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.

Recreational and therapeutic activity for patients will be key to the Campus strategy. It remains the intention to encourage the community into the grounds and a Public Social Partnership to develop therapeutic green and art spaces will ensure community involvement continues at the hospital site.

In conclusion, 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, criteria (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 proposed development 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, 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

Since this application is made in principle, no detailed design proposals have been submitted with the application. However, there is a general premise that the new buildings will not exceed 2 storeys in height.

While it is recognised that the Environmental Impact Assessment identifies the overall visual impact of the proposal as slight to moderate, the new hospital buildings could be compatible with the scale, pattern and character of the local townscape if they are carefully sited and sensitively designed. The local townscape is characterised by high-quality detached, semi-detached and terraced housing, as well as the George Watson's College buildings and the clubhouse buildings on Myreside. The site currently relates visually to the school buildings in terms of the campus arrangement and varying building heights and styles. The masterplan takes cognisance of the character of the general area by proposing to keep the building heights low and retaining landscaping on the boundaries of the site. This approach will maintain the visual relationship of the site to the school and clubhouse buildings, as well as providing a better relationship with the character of the residential buildings. The overall design and layout of the site 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.

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 proposed masterplan demonstrates an improved clarity of circulation over the existing arrangement. The

retention of mature planting and features such as garden walls would significantly benefit the nature of the campus. A+DS welcomes the inclusion of the shared growing spaces for both public and therapeutic use. In assessing the proposed masterplan against the comments from A+DS, the masterplan seeks to rationalise and improve the open space on the site, particularly in improving accessibility to the orchard and in the provision of a linear park. The circulation for pedestrians and vehicles is complex at present and the masterplan seeks to improve the circulation through the improvement of road layouts and removal of on-street parking. Therefore, the comments made by A+DS have been taken into account in the masterplan.

The design of the individual buildings will come forward with the various future phases of development and will be assessed fully as part of the subsequent applications for matters specified in conditions.

### c) Impact on Listed Buildings and Conservation Areas

The potential for impacts on the setting of the listed buildings within the site has been considered. By virtue of the scale of works and proposed demolitions, it is assessed that the demolition of the existing modern buildings will inevitably alter the setting of the listed buildings. However, these modern buildings are disparate and varying in height and quality and their demolition will enable the comprehensive redevelopment of the entire site which will ultimately promote the context of the listed buildings.

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. Further details of the alterations will come forward with the subsequent applications for future phases, including applications for listed building consent.

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.

The impact of the development on the character and appearance of the various 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 majority of the proposed development is primarily contained within the eastern two-thirds of the site, comprising the replacement of buildings which are no longer appropriate for current hospital needs with modern facilities that are proposed to be single and two-storeys in height. Although there will be some loss of open space in this part of the site, the landscape proposals would create a more appropriate setting for the remaining listed buildings as well as the new buildings, which will benefit the view from the conservation areas. The development of the phase 1 building 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. Therefore, the site will remain as buildings placed in a discreet campus and the overall character of the site will not significantly change.

The individual design elements of the various phases will be assessed in subsequent applications, 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 listed buildings 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.

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.

The City Archaeologist stated that the development site as a whole is regarded as being of archaeological significance in terms of potential prehistoric and medieval to post-medieval settlement, industrial archaeology associated with the Tipperlain Chemical works and the development of the Royal Edinburgh Hospital itself. The proposed development will require extensive excavations in terms of construction, demolition, utilities, roads, landscaping etc and such works will have an impact upon the buried archaeological resource. Accordingly it is recommended that a programme of archaeological works is undertaken prior to development/demolition and a condition is recommended in this regard.

#### 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. Due to the presence of mature trees and stone walls, there is minimal visual impact on the amenity of residential properties. 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 Facilities Management (FM) Services building, which is proposed to be situated on the western corner of the site, also comprising the proposed

compound for the phase 1 works. This area is presently overgrown and consists of a number of young to semi-mature trees. To mitigate the impact, the proposed development intends 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.

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.

Two chimneys of between 10 and 11 metres tall are proposed within the phase 1 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. Calculations have been provided 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 the phases of development. Any plant proposed within each phase will be considered by way of a noise impact assessment within each detailed application. An informative is therefore recommended in this regard. Thereafter, each subsequent application for each phase of the development shall include a noise impact assessment which will be required to consider the plant proposed in order to ensure that it will comply with the criteria specified.

In conclusion, the proposals will not have any detrimental affects on the amenity of neighbours. This is by virtue of the low building heights and the retention of the majority of the mature trees on site. Noise impacts and air quality has been assessed and there are no adverse impacts as a result of the development, although further details will be required in the subsequent AMC applications.

#### e) Access, Parking, and Transportation

A transport assessment and travel plan framework were carried out and submitted in support of the application. With regard to the traffic impact, the proposed development represents an intensification of use at the existing site with an additional 136 two-way vehicle trips generated in the AM peak hour and 14 two-way trips in the PM peak hour. While the impact of these trips has been considered in detail for the local road network, no consideration has been given to the potential impact on the A720 / A702 Biggar Road junction (the closest city bypass junction to the site). However by cross referencing the data in the Transport Assessment, it is concluded that the percentage of trips accessing the A720 Edinburgh by-pass will be negligible. 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.

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.

Current parking provision on site is approximately 360 spaces with actual parking levels being up to 470 vehicles taking into account informal and unauthorised parking. Total proposed parking is 450 spaces with stricter parking management and this is acceptable.

There are currently no formal pedestrian or cycle routes through the site. As a result of the proposed development, the site will be opened up further to the general public. As part of the redevelopment of the hospital, the applicant intends to reinstate the right of way to the south of the site as a cycle way and footpath running alongside the railway line. This would provide cycle access to the hospital's facilities as well as creating a formal recreational route and green corridor access from the Union Canal to Morningside, thereby increasing accessibility to the site and its connectivity with its wider surroundings. This proposed east/west cycle and pedestrian route through the site is supported. Further discussion will be required regarding the design and management of the route, particularly if this is to form part of the road network.

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. Further details of car parking will be submitted with subsequent applications and if Committee is minded to grant this application, a suitable informative relating to the provision of EV charging is recommended.

Further details on access, parking and transport will come forward in the detailed planning applications for the subsequent phases, however at this stage, the anticipated impacts are acceptable. In addition, a condition is recommended relating to the submission of a travel plan in order to ensure that green modes of transport are promoted for this site.

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

The development is proposed 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. In this regard, there are two existing public sewers which cross the site; one in the east and one in the west. The majority of the existing hospital development drains into the combined sewers to the east of the site, with the Orchard Clinic in the northwest of the site discharging into the combined sewer that crosses the western site boundary. Under the current proposals, the development at the east of the site would discharge into the sewer to the east and the development at the western end of the site (effectively phase 1) would drain to the west.

Scottish Water has confirmed that it is 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 has 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. This is acceptable in this instance and will be required for each subsequent phase of development.

#### g) Sustainability

As this application has been submitted as a planning permission in principle, details of sustainability will be submitted with individual subsequent applications for the new buildings. However, the applicant has expressed a commitment to achieving a BREEAM rating of 'very good' across the site by implementing a range of sustainable measures including natural ventilation, waste management and pollution monitoring. Other sustainability measures include the use of SUDS and promoting sustainable travel.

This is acceptable at this stage and further details will be submitted with subsequent applications where the applicant will be required to meet the provisions of the Edinburgh Standards for Sustainable Buildings.

## h) Landscape, Ecology and Nature Conservation

With regards to the non-inventory designed landscape setting, there are areas of open space which are considered to be of regional or local importance and the value of these spaces is recognised as making a contribution to the local historic environment and landscape character. The hospital site currently has several areas of woodland (along the boundary to the east of the phase 1 development, as well as on the southern boundary) and areas of parklands to the south that are listed among these non-inventory landscapes. In assessing the development against the impact on the non-inventory designed landscape, the majority of trees in the woodland belt are being retained, and the re-provision of additional trees, will help to enhance this area. The parkland along the southern boundary will also be retained although there may be some loss of trees due to the provision of the linear park. Further details will be required with the submission of subsequent application, however, since the landscaping will be improved in these areas, the overall impact on the non-inventory landscape will be negligible.

With regards to the loss of trees across the site, the majority of woodland and mature trees across the site are proposed to be retained. However, the new developments would necessitate the removal of over 170 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 65 trees/groups of trees and 14 structures as having the potential to support roosts. However, no roost was subsequently identified within any of the trees. The main potential for impacts on bats relates to the two roosts found in Mackinnon House and in the Andrew Duncan Clinic. The structure at the Andrew Duncan Clinic is proposed to be removed and the roost will therefore be lost. Mackinnon House is proposed to be renovated and it is considered possible that the roost entrance and/or the roost cavity itself will be blocked. These are considered significant losses of features of local importance. The main elements of the mitigation strategy are 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;
- 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 entering the buildings. 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;
- Measures to retain and protect roosts - if feasible, the roosting feature and access point in the Mackinnon House roost will be retained; and
- Provision of roosts - new bat roosting opportunities will be created to compensate for the loss of one or both of the roosts. This will be done either by providing built-in

features within the structure replacing the Andrew Duncan Clinic, such as bat bricks, or by providing two bat boxes per lost roost to be located as near as possible to the location of the demolished Andrew Duncan Clinic, preferably on the replacement structure or on Mackinnon House.

Bats may continue to forage and commute across the site during operation of the new or upgraded 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 is unlikely to 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 was 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 masterplan 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 open space 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. Although there are no issues raised with the principle of this development, further assessments will be carried out as the subsequent applications for approval of matters specified in conditions are submitted.

#### j) Representations

The letters of objection raised the following material issues:

- damage to trees in the orchard, addressed in 2.3(h)
- loss of glasshouses and adjacent horticultural land, addressed in 2.3(d)
- loss of the bowling club, addressed in 2.3(a)
- flooding issues, addressed in 2.3(f)
- damage to badgers' habitat, addressed in 2.3(h)
- traffic impacts, addressed in 2.3(e)
- loss of privacy to adjoining school addressed in 2.3(d)

The comments in support of the application supported the redevelopment and retention of the hospital use on site.

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(h) 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

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 proposed development offers the opportunity to sensitively modernise the existing key built assets including improving the setting of the listed buildings, upgrade facilities on the site, increase and improve access for all users, and include new areas of well-designed buildings, car parking and gardens/courtyards sitting within and surrounded by a high-quality landscape setting, consistent with the non-Inventory

designed landscape setting. No adverse amenity impacts will arise as a result of the development with regards to neighbours, flooding, noise and air quality.

### 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. No work shall commence on each phase of the site until details of the undernoted matters have been submitted to and approved in writing by the Planning Authority; the submissions shall be in the form of a detailed layout of that phase (including landscaping and car parking) and shall include detailed plans, sections and elevations of the buildings and all other structures.

Approval of Matters:

- design and external appearance of all buildings, open space, urban realm and other structures;
- height, massing and siting;
- boundary treatments (overall site and individual plots);
- car and cycle parking;
- road layouts, alignment and access arrangements, including any amendments to adopted roads and footways;
- footpaths and cycle routes;
- surface water management plan and SUDS;
- waste management and recycling facilities;
- noise attenuation measures;
- full details of sustainability measures in accordance with Edinburgh Standards for Sustainable Building;
- existing and finished site and floor levels in relation to Ordnance Datum;
- external lighting, including footpath and street lighting, arrangements for the development;
- landscaping, which shall include:
  - (i) detailed landscaping plan,
  - (ii) a schedule of all plants/trees to comprise species, size, proposed number and density,
  - (iii) inclusion of hard landscaping details,
  - (iv) landscape management plan including schedule for implementation and maintenance of planting scheme,
  - (v) details of any water features,
  - (vi) tree protection measures.

2. The details of the matters specified in condition 1 pursuant to this permission shall be substantially in accordance with the Environmental Statement prepared by Hub and Montagu Evans dated 9 October 2013 accompanying this planning application.

3. Prior to the commencement of any development on site, a detailed plan outlining the final design and location of the footpath/cycleway along the southern boundary of

the site, including finishing materials, street furniture and soft landscaping 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 phasing plan.

4. Each application for approval of matters specified in condition 1 shall be accompanied by a phasing plan for the development of the site. The phasing plan shall include the delivery of the linear park and cycleway/footway, MUGA, greenhouses and grow space and shall identify the car parking, individual blocks with associated landscaping, open space, and surface water management plan to come forward as part of the development and show how these matters relate to the wider development.

5. Prior to the commencement of any development, a detailed plan outlining the final design of all hard and soft landscaping within that phase 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 phasing plan.

6. 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, public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Head of Planning.

7. 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.

8. A draft travel plan shall be submitted for approval to the Head of Planning prior to first occupation of the first phase of development and a final travel plan shall be submitted within 12 months of that date and implemented thereafter.

9. 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.

**Reasons:-**

1. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
2. To ensure that an appropriate form and quality of development is achieved for the site.
3. In order to enable the Head of Planning Authority to consider this matter in detail and to ensure the appropriate timescale for the delivery of this access.
4. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
5. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
6. In order to safeguard the interests of archaeological heritage.
7. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
8. To allow the Head of Planning to consider this matter in detail and to ensure sustainable means of transport to/from the site.
9. In the interests of natural heritage.

## **Informatives**

It should be noted that:

1. 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.

These proposals may involve the discharge of trade effluent to the public sewer and may be subject to control as defined in Part II of the Trade Effluent Control and Charging Scheme. No substance may be discharged to the public sewerage system that is likely to interfere with the free flow of its content, have detriment to treatment / disposal of their contents, or be prejudicial to health.

2. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Transport if he wishes the bays to be enforced under this legislation. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2002 regulations or British Standard 8300:2009

3. 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).

4. Prior to occupation of the development, noise from all plant (including air source heat pump system) should comply with NR25 within the nearest residential property (with windows partially open for ventilation purposes).

5. If combined heat and power (CHP) plant with chimney flue which meets the calculation requirements stipulated in the Clean Air Act 1993 is proposed within any future detailed planning applications for the site then a chimney height calculation should be carried out. Any calculation results should be included within future detailed application layouts with the calculation details provided to the Council in support of the associated application. Details of calculation procedure and requirements can be found within the Clean Air Act 1993 and associated supporting guidance.

6. All applications for matters specified in conditions shall be accompanied by a noise assessment which will examine noise arising from plant and other machinery relating to the buildings in that phase.

7. a) Application for the approval of matters specified in conditions shall be made before the expiration of 3 years from the date of the grant of planning permission in principle, unless an earlier application for such approval has been refused or an appeal against such refusal has been dismissed, in which case application for the approval of all outstanding matters specified in conditions must be made within 6 months of the date of such refusal or dismissal.

b) The approved development shall be commenced not later than the expiration of 3 years from the date of grant of planning permission in principle or 2 years from the final approval of matters specified in conditions, whichever is later.

8. The Environmental Statement has been taken into consideration in the making of this decision as required under Regulation 3 of the Environmental Impact Assessment (Scotland) Regulations 1999.

9. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.

10. As soon as practicable upon the completion of each phase of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.

**Statutory Development  
Plan Provision**

The site is zoned in the adopted local plan as being within the Urban Area. There is also an open space designation on the site.

**Date registered**

10 October 2013

**Drawing numbers/Scheme** 01-04, 05A-07A,

**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 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

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 OS2 (Playing Fields Protections) sets criteria for assessing the loss of playing fields.

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

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

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

### **Relevant Non-Statutory Guidelines**

**Non-Statutory guidelines** Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings and landscape, in Edinburgh.

**The Morningside Conservation Area Character Appraisal** emphasises that the architectural character of the conservation area is largely composed of Victorian and Edwardian villas and terraces which form boundaries to extensive blocks of private open space. The villa streets are complemented by the profusion of mature trees, extensive garden settings, stone boundary walls and spacious roads. The villas which are in variety of architectural styles are unified by the use of local building materials.

**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.

**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

# Appendix 1

## Consultations

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### 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.*

*Any demolition or refurbishment works must not be carried out on the development site that may endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures. The demolition of buildings or other structures near to operational railway infrastructure must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from Network Rail's Asset Protection Engineer before development can commence.*

*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 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.*

*o Reference should be made to the Secure By Design Hospitals document for further guidance on building shapes and natural surveillance recommendations. With this in mind, consideration should be given to the lack of natural surveillance of the proposed greenhouse site fronted by new structural tree planting.*

### **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. The proposed development is informed by a site-wide masterplan.*

#### *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.*

#### **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 Lotbian 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 Morningisde 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.

## **Archaeology comment**

*The nationally significant Royal Edinburgh Hospital was constructed as Edinburgh's first purposely designed hospital for the mentally ill in 1813 following public subscription. The original Georgian Hospital was replaced in 1842 by the current listed Mackinnon House which forms still forms the centre of the present day hospital complex. The accompanying Environmental Statement provides a detailed history of both the development of the site. In summary the site is of considerable archaeological and historic significance with the potential for medieval occupation (medieval village of Tipperlain, Old Myrside Cottage), early industrial archaeology associated with the 1770's Tipperlain Chemical Works and the Hospital itself both in terms of the extant range of hospital buildings (both listed and unlisted) and possible buried remains associated with the original Georgian Hospital.*

*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 Policies ENV3, ENV4 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

### *Buried Archaeology*

*As stated the development site as a whole is regarded as being of archaeological significance in terms of potential prehistoric and medieval to post-medieval settlement, Industrial archaeology associated with the Tipperlain Chemical works and the development of the Royal Edinburgh Hospital itself. The proposed development will require extensive excavations in terms of construction, demolition, utilities, roads, landscaping etc and such works will have an impact upon the buried archaeological resource.*

*In general I concur with the broad conclusion stated within the Cultural Heritage and Archaeological section (9) of SKM's Environmental Statement that the developments indicated within the Masterplan will have in general low-moderate impacts. However in specific areas namely regarding the sites associated with Old Myrside Cottage and Tipperlain Chemical works I disagree with their conclusions at this stage that development within these areas will have no impact as in the first instance the cottage site is possibly much more significant than alluded to i.e. dating back to 16th century and in the latter the site has not been evaluated to determine if any remains survive in what would considered to be a regionally important industrial archaeological site.*

*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 whole area including the sites associated with modern development dismissed within the report as having negligible impact because they underlie current buildings. A suite of mitigation measures will need to be required with an initial phase of archaeological evaluation and monitoring during demolition. 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 retention and reuse of the sites significant buildings is to welcomed. The Environment Statement does state that their will be wide range of direct impacts upon the various hospital and associated buildings range from demolition to internal alterations. In principal I concur with the general principals of retention and demolition and with the requirement that detailed archaeological historic building recording will be undertaken, with the final specifications to be agreed with this office prior works commencing on each building.*

*That said the proposals will seek to demolish a range of 20th century buildings. Although I concur with the SKM's conclusions that in off themselves these structures are not of intrinsic significance, in my opinion they do however as a group 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 a basic level 1 photographic and written historic building survey is undertaken of these buildings prior to their demolition.*

### *Archaeological Public Engagement*

*Further given the potential importance of the archaeological remains in terms of the history of Royal Edinburgh Hospital and earlier industrial and medieval occupation, it is essential that this programme of archaeological works contain a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards). The scope of which will be agreed with CECAS.*

*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, public engagement) 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.*

### **Environmental Assessment comment**

*The planning permission in principle application proposes a masterplan vision for the modernisation of the Royal Edinburgh Hospital campus. 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.*

## *Air Quality*

*Environmental Assessment had concerns regarding the potential impacts this development may have on local air quality. This was due to the increase in numbers of car parking spaces and the introduction of several large combined heat and power (CHP) units with chimneys. In an attempt to decrease such impacts, Environmental Assessment encouraged 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. Environmental Assessment also advised the applicant that all CHP units must comply with the Clean Air Act 1993 and that this section will not support the use of biomass.*

*Transport Planning has advised that the current parking provision on the site is 360 however in reality, the actual car parking numbers can be up to 470. The total proposed parking number for this development is 450 with strict parking management. Transport Planning have also supported the proposed east-west cycle and pedestrian route through the site and Environmental Assessment also support this measure.*

*It is highlighted in Edinburgh's Local Transport Strategy 2014-2019 that the Council seeks to support increased use of low emission vehicles and support the extension of the network of EV charging points.*

*The City of Edinburgh Parking Standards for Development Management also now encourages the use of EVs. It states that the Council is likely to introduce a requirement for EV charging infrastructure which is dependent upon how charging technology evolves and includes:*

- o Dedicated parking spaces with charging facilities.*
- o Ducting and infrastructure to allow electric vehicles to be readily accommodated in the future.*

*Developers should now consider the potential for EV charging as they develop their proposals. Based on currently available technology Environmental Assessment recommends that at least two electric vehicle charging outlets should be of the following standard:*

*70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. They must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.*

*It should be noted that support is available to developers to adopt EV's through the Energy Saving Trust's Sustainable Transport Advice Service and Interest Free Low Carbon Loans.*

*Grants are also available for the installation of EV charge points for workplaces, with 100% funding currently available for installations up to £10,000. More information can be found at:*

*<http://www.energysavingtrust.org.uk/scotland/Organisations/Transport/Electric-vehicles/Electric-Vehicle-Charge-Point-Funding>*

*The Scottish Government and Local Authorities are working to decrease their fuel-based vehicles, replacing them with electric vehicles. Scottish Government funding has*

*enabled the purchase of around 270 vehicles for the public sector fleet including many Lothian based NHS Scotland vehicles which would make good use of charging points at this location.*

*The applicant has committed to installing EV charging points and has provided details of where they will be located for the phase 1 development. Environmental Assessment still require the applicant to submit further details for further phases of the development including plans and site drawings which highlight where the EV charging points will be located. An informative is recommended below to that effect.*

*Two chimneys in the region of 10 and 11 metres tall are proposed within the phase 1 development stage 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. 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. 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 recommended in this regard.*

## *Noise*

### *Noise from Development Affecting Surrounding Noise Sensitive Receptors*

*A noise impact assessment has been provided in support of the application 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.*

*Plant in the form of a combined heat and power (CHP) and other fixed ventilation plant are proposed within the phases of development. The application advises that any plant proposed within each phase will be considered by way of a noise impact assessment within each detailed application. An informative is recommended below for guidance and should be utilised as criteria for singular and cumulative plant noise levels when used at each phase of the development which includes plant. Thereafter, it is recommended that each Approval of Matters in Conditions (AMC) application for each phase of the development includes a noise impact assessment which considers the plant proposed ensuring that it will comply with the criteria specified within the informative.*

*Additional road traffic noise increases from the whole proposal have been found to be negligible and therefore have been scoped out at this stage of the masterplanning.*

*The agent has confirmed that deliveries to the hospital are likely to occur via the Myreside Road entrance to the west of the site. It is the opinion this section that this should be encouraged as reducing larger vehicular use of the eastern Tipperlinn Road entrance will reduce delivery vehicle related noise impacts from affecting the greater populated streets to the east of the development site.*

*Emergency vehicle use, including sirens, could increase should this application be consented. Supporting information advises that it is standard policy for the Scottish Ambulance Service to only use sirens in emergency and when the public highway is obstructed during blue light calls. The use of sirens by the Police and other emergency vehicles is controlled under Regulation 99 of the Road Vehicles (Construction and Use) Regulations 1986. This permits the use of sirens only when necessary when responding to an urgent incident or to warn other road users of the presence of the vehicle. Therefore, supporting information advises that drivers are fully aware that sirens must be used with restraint, particularly at night so as not to cause nuisance to surrounding residents. In addition, the agent has confirmed that blue light services are not a common feature of mental health hospital provision and so unlikely to increase due to the consenting of this application. Therefore, if there was to be an increase in siren noise from this development, it is unlikely to significantly increase to the point that a noticeable detriment to residential amenity will occur. Environmental Assessment is of the opinion that siren noise is best managed by the applicant to ensure that the surrounding residential properties are not affected by the use of emergency vehicles. However, it is recommended that if it becomes clear that any future phase of the development will include a significant increase in emergency vehicle use then this should be considered within the noise impact assessment provided in support of that phase. Whilst siren noise is best managed by the applicant, some mitigation may still be possible to reduce noise impacts from siren use (e.g. ensure the vehicles enter and exit via the Myreside Road entrance where possible). Therefore, as per the noise impacts from plant, siren noise should also be considered within the noise impact assessments provided in support of each phased application.*

*Construction and associated noise is likely to occur over a number of years until the completion of the project. Therefore construction noise has been considered within the assessment with mitigation proposed to control noise. The supporting information advises that a construction noise strategy will be drawn up in conjunction with NHS Health Technical Memorandum "08-01 - Acoustics" to control associated noise.*

#### *Noise from Development Affecting Hospital Operations*

*In terms of protecting the existing and proposed hospital operations from noise associated with the development, the site is surrounded by and includes a number of noise sources (e.g. railway traffic, road traffic, rugby stadium (sports facilities), existing and proposed fixed plant and school noise). The noise impact assessment advises that each detailed application will consider these sources in relation to criteria stipulated within NHS Health Technical Memorandum "08-01 - Acoustics". The technical memorandum indicates that noise affecting NHS operations requires to be controlled and therefore it is considered appropriate to allow the NHS to address these issues internally.*

#### *Kitchen Odours*

*The agent has confirmed that a production kitchen is proposed within the development and will be introduced within future phases of the masterplan. Environmental Assessment has highlighted to the agent that kitchen odours will require to be considered to ensure odours are suitably ventilated to an exhaust point away from any surrounding odour sensitive premises. The agent has acknowledged this issue and will consider it at the appropriate application phase and stage.*

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

#### *Site Contamination Condition*

*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 Informative*

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

#### *Electric Vehicle Charging Point Informative*

*Prior to the occupation of future phases of the development, detailed site plans of where the electric vehicle charging outlets and ducting shall be submitted for written approval by the Head of Planning and Building Standards.*

*The electric vehicle charge points required should be installed in accordance with Transport Scotland's 'Switched On Scotland: A Roadmap to Widespread Adoption of Plug-in Vehicles' (2013). In particular the charge points should include a 70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. The DC charge should be delivered via both JEVS G105 and 62196-3 sockets and the AC supply by a 62196-2 socket. The outlet must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.*

#### *Combined Heat and Power and Chimney Height Calculation Informative*

*If combined heat and power (CHP) plant with chimney flue which meets the calculation requirements stipulated in the Clean Air Act 1993 is proposed within any future detailed planning applications for the site then a chimney height calculation should be carried out. Any calculation results should be included within future detailed application layouts with the calculation details provided to the Council in support of the associated application. Details of calculation procedure and requirements can be found within the Clean Air Act 1993 and associated supporting guidance.*

#### *Addendum*

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

*NB. However, should all the above condition 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.*

## **Scottish Natural Heritage comment**

### *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.*

### **Scottish Water comment**

*Scottish Water has no objection to this planning application. Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections.*

*Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk).*

*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 may have capacity to service this proposed development.*

*Edinburgh Wastewater Treatment Works - may have limited capacity to serve this new demand. The Developer should discuss their development 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.*

*Scottish Water is funded to provide capacity at Water and Waste water Treatment Works for domestic demand. Funding will be allocated to carry out work at treatment works to provide growth in line with the Local Authority priorities. Developers should discuss delivery timescales directly with us. Developers should discuss delivery timescales directly with us.*

*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 may 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.*

*Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be*

*adequately serviced from the available pressure may require private pumping arrangements installed, subject to compliance with the current water byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.*

*An appropriate water storage system Water storage equivalent to 24 hours usage is recommended for commercial premises. Details of such storage installations must be forwarded can be discussed to Scottish Water's Customers Connections department at the above address.*

*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.*

*There may be contaminated land issues relevant to the development of this site. The developer must ensure that satisfactory precautionary measures are taken to protect public water and sewer pipes from any possible contamination. The developer may have to submit a full soil investigation report to Scottish Water. Customer Connections will be able to provide advice on this subject on request.*

## **Transport**

*We have no objections to the application subject to the following being included as conditions or informatives as appropriate:*

- 1. A draft travel plan to be submitted to the Council prior to first occupation of the first phase of development and a final travel plan to be submitted within 12 months of that date;*
- 2. The proposed signalised access on Myreside Road is not approved at this stage.*

*Note:*

- 1. The proposed signalised junction on Myreside Road has been discussed with the applicant but Transport considers a priority junction is more appropriate, given the anticipated very low levels of traffic. Further discussion will be required in due course as the development phases are implemented if the signalised junction is to be pursued. The applicant should note that the signalised junction is not approved under this application. The applicant should note that if a signalised junction is agreed in the future, this will be implemented at no cost to the Council;*
- 2. Current parking provision on site is approximately 360No. spaces with actual parking levels being up to 470No. vehicles, including informal and unauthorised parking. Total proposed parking is 450No. spaces with stricter parking management;*

3. *The proposed east - west cycle and pedestrian route through the site is supported. Further discussion will be required regarding the design and management of the route, particularly if this is to form part of the 'road' network;*
4. *All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Transport if he wishes the bays to be enforced under this legislation. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2002 regulations or British Standard 8300:2009 as approved by the Head of Transport;*
5. *It is noted that, although this site will see an increase in trips, there is no net increase in trips anticipated on the network as a whole.*

### **Bridges + Flood Prevention comment**

*We refer to the above application and would make the following comments regarding the requirements for an application with respect to flood risk.*

1. *The proposal for drainage include provision for SUDS attenuation to store a 1:200 event runoff. The rest of the system will also need to be designed to take this runoff.*
2. *The buildings are to be kept above the adjacent ground level. This will require attention to detail with the lond connected buildings proposed.*
3. *The outfall location for surface water does not appear to have been agreed. Given the noted lack of capacity in combined sewers, we would strongly recommend that the option to connect to the surface water sewer is chosen. The decision would however have to be made by Scottish Water.*

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

*The development of the site 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, and representatives of the planning authority in June 2013 to provide comments to inform the developing proposals. Amended drawings were then submitted to NDAP (A+DS with Health Facilities Scotland) for review in October 2013. The commentary from that assessment which relates to the masterplan proposals, as submitted to the Local Authority, is given below to assist in the consideration of the above application.*

#### **1.0 Assessment of Masterplan**

*The site has a strong landscape identity with rich and varied open spaces that present a unique opportunity to create a distinctive and special place for patients, staff, visitors and surrounding communities. The orchard and growing areas are valuable resources and these therapeutic amenities require careful integration with new proposals.*

*The proposed masterplan demonstrates considerably improved clarity of circulation, over the existing arrangement, and a strong landscape concept. The retention of*

*mature planting and features such as garden walls will significantly benefit the nature of the campus providing continuity during the change. The grounds to south of the site, in particular, could be fantastic if the qualities of spaces indicated in the presentation made in June and the client's aspirations for integration of patient and public use are achieved. We welcome the inclusion of the shared growing space (for both public and therapeutic use) at the heart of the site landscape, and note that the intended location is currently undeveloped allowing relocation of current activity without interruption. We recommend that this space is made available as soon as possible to allow seasonal transfer of growing activity.*

*The clarity of the arrival sequence to the east of the site is welcomed. The provision of a public/pedestrian space facing Mackinnon House, with open views to the southern parkland, has the potential to transform the initial impression of the site and provide a sense of welcome and orientation. We encourage the team to ensure that the nature of this space, and the clarity of public and private faces and spaces for the intended Learning Disabilities Unit, is retained into the detailed development of this area.*

*In general we consider the masterplan to be a good response to the site. There are, however, a few areas we would wish to see further developed either within the masterplan or as part of current (Phase 1) and subsequent detailed submissions:*

*a) We note that the transport assessment states a requirement for 450 parking places, but we could identify only 416 on the plan. We recommend that the client and council satisfy themselves that sufficient parking is provided in proximity to each facility and ensure that the valuable public spaces and landscape areas described in the plan are not eroded by increased parking demands; any significant increase in the number of spaces needed may be best managed by using the topography of the site to stack parking locally to facilities. Further, that the proposed parking management plan will ensure traffic is not generated by drivers visiting multiple car parks to find a space, potentially resulting in staff and visitors parking remotely from their destination.*

*b) The visual impact of the FM facility and yard should be minimised, and planned to ensure that noise and disturbance from vehicles is screened from the adjacent mental health facility and the orchard - ideally by bringing occupied areas of the FM building (offices/kitchen etc.) closer to the orchard to provide an active frontage and passive observation and ensure any areas visible from the site arrival point are attractive/active frontages. As the first building encountered on entering the site from the west, the materials and architectural expression of this built element must be positive (eg a friendly 'gatehouse' rather than resembling an industrial shed) to set a positive impression of the facility and not deter access. We understand detailed proposals for the FM facilities are in development, but these were not submitted and are therefore not assessed in this response.*

*c) As stated previously, the shared landscape along the south of the site is considered a very positive asset. The three-dimensional nature and aspect of the routes around the Phase 1 development, which connect the individual facilities and main garden areas to the orchard and west entrance, should be developed further to ensure a pleasant route for patients/visitors/staff arriving by foot/cycle/public transport from the west and to encourage progression from one area of landscape to the other (a separate response will be provided in relation to Phase 1 proposals).*

*d) Maintaining prominence of Mackinnon House within the campus is welcomed, and the client team should ensure this significant building retains some areas for use*

by patients and potentially public (not become a 'staff only' zone) with the ground floor and court providing opportunities for social uses, learning resources, and events.

e) The northern route is described as predominantly a vehicular axis, although it is likely to be used by many pedestrians, both those accessing the northern buildings and people coming from their cars. The nature of this axis, and also the north-south connections to the parkland, should be explored further in terms of the pedestrian experience. We understand that concerns over safety have resulted in a separation of pedestrian and vehicle routes. However, the current design does not appear to allow for pedestrian desire lines, meaning many pedestrians may use parts of the roads as routes. Therefore, given the physical restrictions on route locations and widths and the intended reduction in car traffic volume, we consider that further development of this aspect using 'designing streets' as a model for a pedestrian friendly environment for all or parts of the routes would be beneficial.

f) The masterplan should be brought into three dimensions to understand the topography and the impact of this on routes, on visibility of buildings and opportunities for visual connections to the wider landscape, both from the public realm and from facilities and this communicated through sketches taken from eye level. Further, where changes in level will be needed the plan should consider how these will be handled as be a positive part of the useable landscape, considering the risks, both physical and visual, posed by unexpected drops. This greater understanding of the masterplan in three dimensions might also inform the proximity between, and design of, the additional buildings.

## 2.0 Phased Implementation

The first phase of development is located to the west of the site, with all vehicular access, and a high portion of pedestrian access from the east. We recommend that a series of site-wide phasing plans be drawn up to demonstrate how pedestrian and vehicular access will be provided and maintained through subsequent work phases. In this good routes for patients/staff from public transport routes to the east and west, and easy and attractive connections to the usable landscape, should be demonstrated for all occupied facilities. Consideration should be given to providing shuttle buses from Morningside to assist accessibility both during development phases and afterwards.

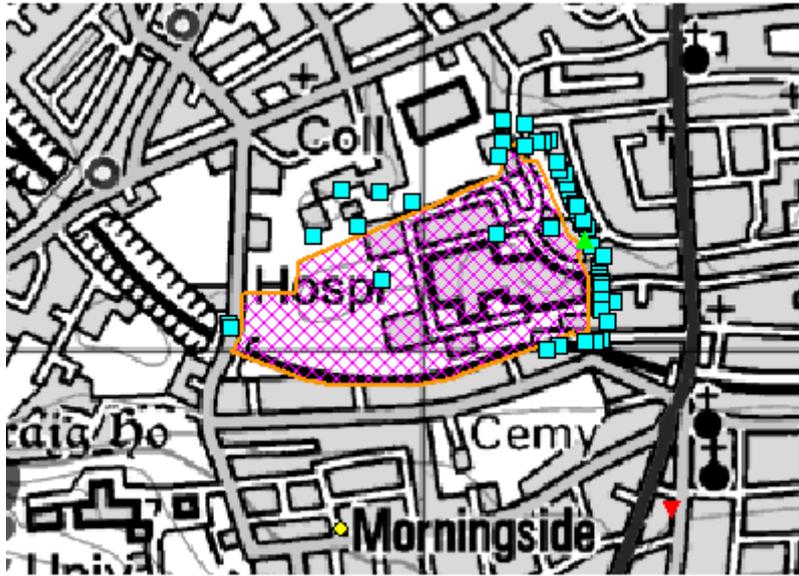
### NOTES ON USE AND LIMITATIONS TO ABOVE ASSESSMENT:

If extracts of the report are used in publicity, or in other manners, A+DS & HFS reserve the right to publish or otherwise circulate the whole report.

Any Design Assessment carried out by Health Facilities Scotland and/or Architecture and Design Scotland shall not in any way diminish the responsibility of the designer to comply with all relevant Statutory Regulations or guidance that has been made mandatory by the Scottish Government.

## Location Plan

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