

Development Management Sub Committee

Wednesday 25 June 2014

Application for Approval of Matters Specified in Conds 14/00488/AMC

At Site 114 Metres Southwest Of 19, Hutchison Road,
Edinburgh

Approval of Matters Specified in Conditions of 11/01250/PPP
for retail development (Class 1), engineering works,
landscaping, car parking and access.

Item number 4.11

Report number

Wards A09 - Fountainbridge/Craiglockhart

Summary

The principle of retail development has been established by the extant planning permission. The redevelopment of the site will enhance the appearance of the area and an exception to the Council's parking standards has been justified. There are no road safety concerns and residential amenity can be protected by imposing appropriate planning conditions. There are no material considerations that outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITD6, CITE8, CITE9, CITE18, CITH8, CITR4, CITR5, CITT1, CITT4, CITT5, CITT6, CITT13, NSG, NSGD02, NSP, NSMDV,

Report

Recommendations

1.1 It is recommended that this application be Approved subject to the details below.

Background

2.1 Site description

The application site, which measures approximately 1.9 hectares in area and has been vacant for over 10 years, forms part of a wider site previously occupied by the fruit market and supermarket buildings which have been demolished. It is largely covered by self-seeded vegetation. Site access is from West Gorgie Place.

The overall site is bounded by Chesser Avenue to the south west, which sits substantially higher, and Hutchison Road to the south east. Along the north west boundary is, from west to east, a recent 4-storey flatted development, a 6-storey Government Office building and single-storey residential properties. Adjacent to the site along Hutchison Road are small-scale commercial units. To the south, across Hutchison Road are 3-storey flatted properties.

2.2 Site History

6 February 2003 - the Planning Committee approved the Statement of Urban Design Principles for Chesser Avenue, East Side.

26 February 2003 - outline planning permission was granted for a residential development (application reference - 02/00285/OUT). The number of units was not specified.

06 February 2004 - an application for a residential development was withdrawn (application reference - 01/02878/OUT).

15 July 2005 - an application for the erection of a phased residential and commercial development, road infrastructure, landscaping and ancillary works was withdrawn (application reference - 03/02722/FUL).

15 July 2005 - an application for the erection of a residential and commercial development, landscaping ancillary works and road infrastructure was withdrawn (application reference - 03/04689/FUL).

27 October 2005 - outline planning permission was granted for a residential development and associated landscaping, parking and access works (application reference - 04/04031/OUT).

28 April 2008 - an application for the approval of reserved matters (application reference - 04/04031/OUT) relating to design and external appearance was withdrawn (application reference - 08/00782/REM).

18 September 2008 - approval of reserved matters (application reference - 04/04031/OUT) relating to siting, parking and access, walkways and cycle ways, drainage and landscaping, height, waste management and recycling facilities and Transport Assessment (application reference - 07/04940/REM).

23 September 2008 - approval of reserved matters (application reference - 04/04031/OUT) relating to design and external appearance (application reference - 07/05342/REM).

23 September 2008 - approval of reserved matters (application reference - 04/04031/OUT) relating to design and external appearance (application reference - 08/00012/REM).

06 February 2009 - an application was granted for the modification of a deemed planning condition, in respect of outline planning permission (application reference - 04/04031/OUT) to allow applications for the approval of reserved matters to be submitted within five years of the grant outline planning permission (application reference - 08/04167/FUL).

23 March 2011 - minded to approve an application for a four storey care home with ancillary parking and landscaping use class 8 subject to the conclusion of a legal agreement (application reference - 08/03961/FUL).

12 June 2012 - planning permission in principle was granted for a mixed use development comprising residential and retail foodstore (class 1) and associated access and parking (application reference - 11/01250/PPP).

Related applications

10 February 2014 - an application has been submitted for the erection of 3 units including external seating area for retail (class 1), food and drink (class 3) and takeaway (sui generis) use (application reference - 14/00486/FUL). This application, the site of which is to the east of the application site, is also being considered at this Committee meeting.

10 February 2014 - an application has been submitted for a retail unit (Class 1) and associated works (application reference - 14/00487/FUL). This application, which is to the north of the application site, is also being considered at this Committee meeting.

12 February 2014 - an application has been submitted for the approval of matters specified in conditions of 11/01250/PPP for a residential development of 114 flats and houses with associated engineering, landscape, car parking and access (application reference - 14/00546/AMC). This application, which is to the north-east of the application site, is also being considered at this Committee meeting.

Main report

3.1 Description Of The Proposal

Approval is sought for detailed matters relating to planning permission in principle for a retail development. The approved net retail floorspace, 2880 sqm, is to be provided in the form of 4 separate units.

The proposed units will be single storey, with the exception of one internal mezzanine floor. The units will have a flat roof and will be finished with composite metal cladding and facing brick.

A new vehicular access is to be created off Hutchison Road that will serve both customer parking and service access. Parking will be provided for 255 vehicles. Cycle parking will be provided in front of the retail units. Pedestrian access will be from Chesser Avenue, Hutchison Road and the proposed residential development.

Scheme 1

The following amendments have been made to the original proposals:

- Pedestrian access has been provided from Chesser Avenue;
- Landscaping has been introduced to the car park;
- Structured planting has been introduced to the Chesser Avenue boundary;
- Additional seating areas have been provided; and
- The recycling centre has been omitted.

The following documents have been submitted in support of the application, all of which are available to via the Planning & Building standards online services:

- Design & Access Statement;
- Sustainability Statement;
- Planning Statement;
- Noise Assessment;
- Archaeological Watching Brief;
- Transport Statement; and
- Site Investigation.

3.2 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?

3.3 Assessment

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

- a) the proposals are acceptable in principle;
- b) the scale and design of the proposals is acceptable;
- c) the proposals raise any implications for road or pedestrian safety;
- d) the proposals are acceptable in terms of landscape and biodiversity;
- e) the proposals will adversely affect existing residential amenity;
- f) the proposals meet the Council's requirements in respect of sustainability;
- g) the proposals raise any issues in respect of equalities or human rights;
- h) there are any other material considerations; and
- i) the representations raise issues to be addressed.

a) Principle

Planning permission in principle was granted in 2012 for retail development on the application site. No restrictions were imposed in respect of the type of retail offering (food or non-food sales) or the distribution of floorspace (single or multiple units) and subsequently cannot be controlled at this stage. The granting of that permission, which remains valid, establishes the principle for the proposed development on the site.

b) Scale & Design

The application site and the wider redevelopment site is subject to the Statement of Urban Design Principles approved in 2003. However, that document envisaged the wider site being developed for housing rather than large scale retail development. The current proposals do not therefore adhere to the approved urban design principles.

The proposed retail units are typical of such development - large, metal-clad and box-shaped and set within a large car park. The units do not address the street but are set back within the site to utilise a change in ground levels and help reduce the scale of the units. The introduction of planting and seating areas will assist in breaking up the visual impact of the car park.

The proposed units are of little architectural interest and will not integrate particularly well with the surrounding area in urban design terms. However, it is acknowledged that the application site forms part of a prominent, longstanding gap site, which was previously occupied by large scale functional buildings, and the proposal will represent a welcome visual enhancement of the area.

In summary, the proposal does not accord with the local plan design policies or the Edinburgh Design Guidance but the redevelopment of the site will enhance the appearance of the area.

c) Road & Pedestrian Safety

Parking provision within the proposed car park along with the parking to serve the proposed kiosk units (application 14/00486/FUL) to the east of the site will be 274 spaces. The Council's parking standards stipulate that the maximum provision should be 173 spaces, which is 101 spaces less than the current proposals. However, the supporting transport statement has identified that the combined retail proposals will generate demand for 284 parking spaces, which is marginally greater than the provision proposed. Whilst the parking standards will be considerably exceeded, the car park will sit 1.5 metres below the level of Hutchison Road, which presents a managed solution that minimises the impact upon residential amenity. The proposed parking arrangement is preferable to putting excessive pressure on existing on-street parking in surrounding residential streets. An exception to the Council's parking standards is justified in this instance.

There is a general presumption against large parking areas to the front of new development. However, given the sunken nature of the car park its impact will be minimised and will not dominate the streetscene. An exception is justified in this instance.

The traffic impact of the proposals has previously been assessed as part of the application for permission in principle. A financial contribution towards signal improvements in the local vicinity was secured through that permission.

Cycle access through the site is via the proposed access road off Hutchison Road and a new cycle link that forms part of the proposed residential development to the north-east of the site, thus maintaining access to the existing cycle network to the north-east of the wider site. The existing footway along Hutchison Road, between the proposed access road and Chesser Avenue, is sufficiently wide to accommodate a segregated pedestrian/cycle way and this can be delivered through financial contributions that were secured for cycle infrastructure as part of the planning permission in principle.

The underpass that runs below Chesser Avenue is outwith the control of the applicant and the Council and therefore will not be reopened as part of the proposals. The position of the proposed units will obscure access to the underpass but access would still be achievable should that project be pursued. However, in addition, Hutchison Road offers a safer route for cyclists, avoiding the service yard and pedestrians. There is currently no dedicated cycle route to the west of Chesser Avenue and therefore the movement of cyclists via Hutchison Road would not undermine the delivery of a wider route linking to the Water of Leith.

Designing Streets seeks new streets to be distinctive, safe and pleasant, easy to move around, welcoming, adaptable and resource efficient. Whilst the new access road does not form a 'street' in the traditional sense, efforts have been made in conjunction with the proposed kiosks (application 14/00486/FUL) to present an attractive entrance with landscaping, seating areas and the kiosks fronting this road. Pedestrian access across the site is convenient and safe with access for users with mobility issues taken through the heart of the site.

In summary, an exception to the Council's parking standards has been justified; the traffic impact has previously been agreed and provision has been made for cycle infrastructure.

d) Landscape & Biodiversity

Due to the nature of the proposed development, the level of soft landscaping is limited with provision particularly focussed along Chesser Avenue and to the front of Chesser Crescent. This planting will enhance the visual amenity of neighbouring residents and present an attractive edge treatment. The proposals have been revised to include planting throughout the car park to help soften the appearance of such a large area of hardstanding. Where possible, namely in front of the retail units and adjacent to Hutchison Road, seating areas will be provided to help enliven the space.

The design of the retail units presents an opportunity to create swift nesting sites and the provision of swift bricks/boxes should be explored by the applicant. There is no evidence of protected species on the site but the introduction of additional landscaping raises the potential to encourage biodiversity.

In summary, the proposed landscaping will provide an attractive edge treatment, will help enliven the space and raises the potential for biodiversity.

e) Residential Amenity

Activities within the service yard have the potential to disrupt residential amenity by way of noise. However, the provision of acoustic fencing and restricting servicing arrangements to within daytime hours (07.00 - 21.00) will be sufficient to minimise any impact. Noise generated within the car park, including the proposed sub-station, will be contained by the south retaining wall as the car park will sit significantly lower than the properties across Hutchison Road. There is other legislation, namely the Environmental Protection Act, that is better placed to control noise within the premises and therefore planning conditions in respect of this matter are unnecessary. Environmental Assessment raises no objections to the proposals.

Whilst the proposed units will sit to the south of existing residential properties, it has been demonstrated that overshadowing will largely fall on the service yard and will not adversely affect the level of daylight in neighbouring residential properties. Privacy will be unaffected.

No form of access is proposed to the north of application site and new fencing will be installed along that boundary. The security of existing residents will not be compromised by the proposals.

In summary, neighbouring residents will not be adversely affected by overshadowing and will be suitably protected from noise.

f) Sustainability

The applicant has submitted a sustainability statement in support of the application.

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

In summary, the proposals comply with the sustainability requirements of the Edinburgh Design Guidance.

g) Equalities & Human Rights

The layout has been designed to be fully accessible for all users regardless of disability. The site is easily accessible by walking, cycling, car and public transport and do not discriminate on socio-economic grounds.

The proposals will not have an adverse impact in respect of human rights.

In summary, the proposals raise no issues in respect of equalities or human rights.

h) Other Material Considerations

The application site is identified within an area of local archaeological significance. Of particular interest are the potential remains associated with an early 20th Century rail head, a 19th Century road and a cottage with the site having remained relatively free of major development. Given the potential for archaeological remains, it is appropriate to impose a condition requiring a programme of archaeological work in accordance with a written scheme of investigation prior to the commencement of development on the affected area.

i) Representations

Material Issues

Principle

- The retail elements are not consistent with the designated uses in the local plan;
- There is ample retail provision in the surrounding area;
- Potential increase in the number of food retail operators;
- A smaller, more local food store will draw significant trade from local centres;
- No sequential assessment has been undertaken to review opportunities for smaller stores within the catchment area; and
- The proposed change to store layout including an extension will alter the trading characteristics and impact of the proposed development compared to the large food store originally assessed.

These issues have been addressed in section 3.3 a) of the assessment.

Road & Pedestrian Safety

- There is no clearly delineated east-west cycle route through the site;
- The underpass below Chesser Avenue, which could provide a segregated route, is sidelined and at risk of being lost;
- The site is potentially a link in a much longer cycle route;
- The cycle route on site is not direct; is in potential conflict with motor traffic, and is not clearly de-lined;
- The on site cycle route will not link with the established cycleway approaching from Hutchison Crossway;
- The link involves weaving around buildings and using narrow paths leave insufficient room for pedestrians and cyclists to pass each other;
- The Chesser Avenue underpass is an opportunity that can be opened up at minimal cost;
- The proposals do not conform to the principles of 'Designing Streets'.
- The car park represents a complete waste of valuable land that could be used for housing; and
- The proposals will result in increased traffic.

These issues have been addressed in section 3.3 c) of the assessment.

Residential Amenity

- Concern over the height of the retail units and the impact upon daylight in neighbouring properties;
- Concern over the overall security of residential units to the north of the site;
- Increased noise associated with retail deliveries and the substation to the rear; and
- The positioning of engineering plant will impact upon neighbours.

These issues have been addressed in section 3.3 e) of the assessment.

Conclusion

In conclusion, the principle of retail development has been established by the extant Planning Permission in Principle. The redevelopment of the site will enhance the appearance of the area and an exception to the Council's parking standards has been justified. There are no road safety concerns and residential amenity can be protected by imposing appropriate planning conditions. There are no material considerations that outweigh this conclusion.

It is recommended that the Committee approves this application subject to conditions in respect of archaeology, materials and deliveries/collections.

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

3.4 Conditions/reasons/informatives

1. No development shall take place until the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.
2. Hours of deliveries and collections, including waste collections shall be restricted to 07.00 - 21.00 hours, Monday to Saturday only. No vehicular access, for the purposes of deliveries and collections, shall be permitted to the service yard outwith these times.
3. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Head of Planning before work is commenced on site; Note: samples of the materials may be required.

Reasons:-

1. In order to safeguard the interests of archaeological heritage.
2. In order to safeguard the amenity of neighbouring residents and other occupiers.
3. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.

Informatives

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of two years from the date of this consent or from the date of subsequent approval of matters specified in conditions, or three years from the date of planning permission in principle, whichever is the later.

2. 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.

3. As soon as practicable upon the completion 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.

4. The incorporation of swift nesting sites/swift bricks into the scheme is recommended.

5. This consent is for planning permission only. A separate application(s) for advertisement consent will be required in respect of the proposed signage.

6. The design and installation of any plant, machinery or equipment shall be such that any associated noise complies with NR25 when measured within any nearby living apartment, and no structure borne vibration is perceptible within any nearby living apartment.

7. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for Road Construction Consent.

Financial impact

4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

Risk, Policy, compliance and governance impact

5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

The application was advertised on 21 February 2014. There have been 5 letters of representation received; 3 of which object to the proposals and 2 offer general comments. The following material points have been raised:

- Principle of development;
- Road & pedestrian safety; and
- Residential amenity.

Hutchison Chesser Community Council has offered no comments on the proposals.

Background reading / external references

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

David R. Leslie

Statutory Development

Plan Provision

The application site is identified in the Edinburgh City Local Plan as part of a housing proposal (HSG 2 - Chesser Avenue).

Date registered

14 February 2014

Drawing numbers/Scheme

01a-02a,05b,06a,07a,08-09, 10a, 12a, 13, 14a, 15, 16a, 17-20,

Scheme 2

Acting Head of Planning and Building Standards

Contact: Andrew Trigger, Planning Officer

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Links - Policies

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 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological remains of national importance.

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

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

Policy Ret 4 (Local Centres) sets criteria for assessing proposals in or on the edge of local centres.

Policy Ret 5 (Out of Centre Retail Development) identifies the circumstances in which out-of-centre retail development will be permitted.

Policy Tra 1 (Major Travel Generating Development) supports major travel generating development in the Central Area, and sets criteria for assessing major travel generating development elsewhere.

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

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

Policy Tra 6 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Policy Tra 13 (Cycle and Footpath Network) prevents development which would prevent implementation of, prejudice or obstruct the current or potential cycle and footpath network.

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.

Non-statutory guidelines on 'PARKING STANDARDS' set the requirements for parking provision in developments.

Non-statutory guidelines on 'MOVEMENT AND DEVELOPMENT' establish design criteria for road and parking layouts.

Appendix 1

Consultations

Transport Planning

There is a significant overprovision of parking contrary to the Council's approved parking guidelines (ref informative 1 below). However in accordance our guidelines the applicants' have included in their supporting transport information a parking statement. This parking statement includes a justification for the higher provision based on daily accumulation totals relating to an edge of centre development. It is considered this designation is appropriate and, in accordance with the need to balance the development needs and the requirement to minimise overspill parking on surrounding residential, I have no objections to the development.

Informatives

- 1) The calculated maximum parking for a development of this size/sqm as per the Council's 2009 Parking Standards is 173. The developers have requested 274 spaces for their operational purposes- ref appendix B of the applicants' Transport Statement.*
- 2) All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent.*
- 3) The applicant requires tom be advised that there are a number of minor issues with regards to the roads layout. These can be resolved at the Road Construction Consent stage.*

Environmental Assessment

Environmental Assessment raised concerns and recommended conditions in response to application 11/01250/PPP. Relevant to this application are the conditions regarding noise, air quality and contaminated land. In this regard, a noise impact assessment has been submitted by the applicant, a site investigation has also taken place, however, the findings of this report are not yet known.

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

Conditions

- 1. The design, installation and operation of any plant, machinery or equipment shall be such that any associated noise complies with NR25 when measured within any nearby living apartment, and no structure borne vibration is perceptible within any nearby living apartment.*

2. *All music and vocals, amplified or otherwise, shall be so controlled as to be inaudible within any neighbouring premises.*
3. *The sound insulation properties or sound transmission characteristics of the structures and finishes shall be such that no impact or airborne noise from the normal operations within the application premises is audible in any neighbouring living apartment.*
4. *Deliveries and collections, including waste collections, to be restricted to between the hours of 07:00 and 21:00, Monday to Saturday.*

Archaeology

As discussed in relation to the 2011 consented application (11/01250/PPP) the site until c.1900 remained relatively undeveloped farmland, bisected by a country road leading to Gorgie Farm to the north and containing the site of a small 19th century rural building (farmer labourers cottage). The northern half of the site becomes developed at the turn of the 20th century with the construction of a railhead, with the southern half of the site remaining relatively open until the interwar years when small scale industry moves in as part of the industrial/commercial expansion of Edinburgh.

Accordingly the site has been identified as occurring within an area of local archaeological significance. This application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh City Local Plan (2010) policy 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.

To date no archaeology work has been undertaken to investigate and record the archaeological sites identified in my earlier report (e.g. the c.1900 railhead, the 19th century road and cottage). Accordingly it is recommended that the original condition is attached to this AMC application (see below) in order that the required programme of archaeological excavations is carried out prior to/during development.

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

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

SEPA

We have no objection to these planning applications providing that the two AMC applications (14/00488/AMC and 14/00546/AMC) follow the principles of the agreed Flood Risk and Proposed Drainage Strategy (dated 22 March 2011) which accompanied the consented planning application 11/01250/PPP. If the applications do not follow the same principles then please re-consult us.

For applications 14/00486/FUL and 14/00487/FUL, we acknowledge that these are additional applications which could increase the overall drainage capacity of the site, however as it appears that the drainage is to be taken to Scottish Water sewers we offer no objection to these two applications.

Comments from Scottish Water should be sought where the SUDS proposals would be adopted by them. We encourage the design of SUDS to Sewers for Scotland Second Edition standards and the adoption of SUDS features by Scottish Water as we are of the view that this leads to best standards and maintenance.

Police Scotland

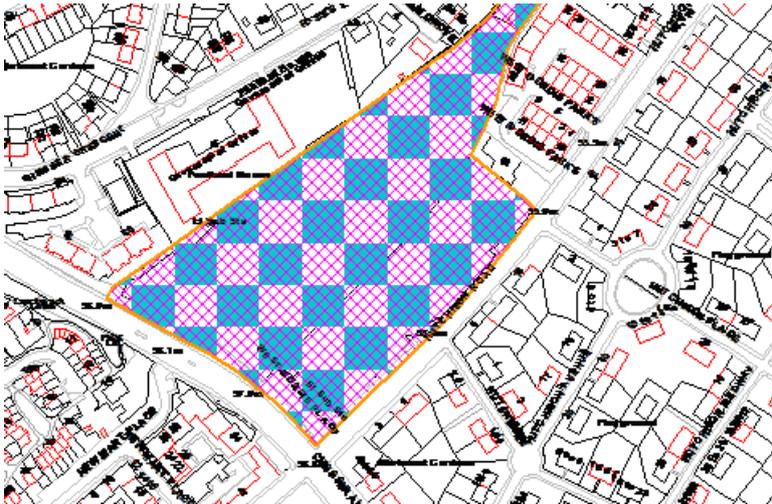
I am writing on behalf of Police Scotland to provide comments on the above planning applications.

Observations and comments

Levels of recorded crime for the area where the planning application is being made can be made available on request.

- *Reference should be made to the New Homes Secured By Design document for guidance on standards and layouts - both Section 01: Layout & Design and Section 02: Physical Security*
- *Consideration should be given by the architects and client to applying for a Secured By Design award.*

Location Plan



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