

Development Management Sub Committee

Wednesday 27 August 2014

**Application for Planning Permission 14/01797/FUL
At Edinburgh Royal Infirmary, 51 Little France Crescent,
Edinburgh
Landscape and parking proposals on the site of the former
crèche and petrol filling station associated with the re-
provision.**

Item number	6.3
Report number	
Wards	A16 - Liberton/Gilmerton

Summary

The proposed landscaping and public realm works will improve the overall environment of the hospital. The rain garden proposals will add visual interest as well as providing functional water attenuation, while the tree planting and open space is appropriate in providing a setting for the new hospital buildings. The surface water attenuation methods are appropriate, subject to further details. This application therefore is in accordance with the development plan and there are no material considerations which outweigh this conclusion.

Links

Policies and guidance for this application	LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITE12, CITE17, CITE18, CITT5, NSG, NSGD02, NSP,
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Report

Application for Planning Permission 14/01797/FUL At Edinburgh Royal Infirmary, 51 Little France Crescent, Edinburgh Landscape and parking proposals on the site of the former crèche and petrol filling station associated with the re- provision.

Recommendations

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

Background

2.1 Site description

Planning permission in principle was granted on 5 April 2012 for the reprovision of the Royal Hospital for Sick Children (RHSC) and the Department of Clinical Neurosciences (DCN) at Little France (application number 11/02454/PPP). Following the approval of the PPP application, NHS Lothian added the crèche site and former petrol filling station site to the overall site area for the development of the RHSC and DCN. These two areas of ground have been incorporated into the proposals for the hospital buildings to provide an area of public realm, public open space and car parking on the approach to the main entrance of the RHSC. As the crèche and petrol filling station sites are outwith the footprint of the PPP consent, this area is the subject of this separate detailed application.

The site of the crèche and petrol filling station is approximately 1.2 hectares in size. Within the RIE campus, this application site sits in the south west corner. It is bounded to the south by Old Dalkeith Road with residential cottages to the east. To the north is car park B (where the new RHSC and DCN are proposed) and to the west is the University of Edinburgh Research Institute building.

The site also encompasses the existing entrance into the hospital from Old Dalkeith Road and includes areas of existing planting as well as hardstanding.

2.2 Site History

16 December 2009 - a proposal of application notice approved for reprovision of the Royal Hospital for Sick Children and associated expansion of the Royal Infirmary of Edinburgh and public transport variations (application reference: 09/03140/PAN);

13 May 2011 - planning permission granted for a 464 sq m single storey extension to existing University of Edinburgh Chancellor's Building to form a Neurology Clinic (application reference: 11/00799/FUL);

5 April 2012 - planning permission in principle granted for erection of Children's Hospital including department for clinical neurosciences and ancillary facilities (application reference: 11/02454/PPP);

4 June 2012 - permission granted for development of revised access and public transport arrangements, associated car park remodelling, public realm works and landscaping (application reference: 12/00479/FUL);

29 October 2012 - permission granted for the relocation of the existing Vacuum Insulated Enclosure (VIE) and affected car parking area and associated works (application reference: 12/03010/FUL);

6 February 2014 - permission varied for a non-material variation to amend the layout of car parking, carriageways, and footways to the east of the hospital (application reference: 12/00479/VARY)

9 April 2014 - planning permission granted for Approval of Matters Specified in Conditions in relation to Condition 1(i) of application 11/02454/PPP in respect of erection of Children's Hospital including department for clinical neurosciences and ancillary facilities (relating to flood prevention works) (application reference: 14/00078/AMC); and

9 May 2014 - application for approval of matters specified in conditions for a new Royal Hospital for Sick Children, Children's Accident and Emergency Dept, Dept of Clinical Neurosciences, Children and Adult Mental Health Service Unit. Works include heli-pad, energy centre, service yard, disabled, parent and child parking, hard and soft landscaping, internal and external landscaped courtyards. This application is pending decision. (application reference: 14/01796/AMC).

Other Relevant History

23 December 2004 - outline planning permission was granted for the development of up to 133,525 square metres of biomedical research uses on a 27 ha site to the south (application reference: 02/04372/OUT);

22 March 2006 - planning permission was deemed to be granted for a public transport link connecting Craigmillar and the RIE on land to the east (application reference: 04/02469/CEC);

26 May 2010 - planning permission granted for the creation of a surface level car park containing 1127 spaces together with access and landscaping on land to the east of the RIE campus designed to accommodate future hospital development on car park B (application reference: 10/00320/FUL); and

23 August 2010 - planning consent was granted for the Niddrie Burn Restoration Project on land to the south and east (application reference: 08/02474/FUL).

Main report

3.1 Description Of The Proposal

Planning permission is sought for new landscaping and parking areas on the site of the former crèche and petrol filling station at the Royal Infirmary of Edinburgh.

The landscaping proposals include a new entrance feature which sets trees within a new area of hard landscaping. There are also wedges of raised beds containing a mix of plants which will act as a rain garden and provide rain water attenuation. Further landscaping includes the provision of an area of open space with grass and trees.

There is also a section of relocated cycleway/footway close to the entrance that links up with the new provision within the AMC application site.

The areas of parking are located close to the entrance of the proposed RHSC and provide parent and child parking and disabled parking only. A new bus lay-by is also proposed on the north west corner of the site.

The main purpose of this application is to:

- Create new public realm incorporating an arrival space for the RHSC & DCN and a space to link the new RHSC & DCN to the existing RIE;
- Provide new parking facilities for disabled users and parent and children;
- Create secure pedestrian routes;
- Enhance the cycle routes and facilities on the site;
- Mitigate flood risk using sustainable drainage techniques, and;
- Maintain and enhance the ecological diversity on the site.

The following documents were submitted in support of the application:

- Ground Investigation Report;
- SUDS proposals;
- Design and Access Statement, and;
- Landscape Management Plan.

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

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 comply in principle with the Development Plan;
- (b) The proposals provide a development of appropriate scale and design;
- (c) The access, parking, and transportation arrangements are acceptable;
- (d) The development is acceptable in terms of flood risk, site contamination, drainage and SUDS;
- (e) The proposal would affect local biodiversity or ecology;
- (f) The proposal is acceptable in terms of the amenity of existing neighbours;
- (g) The proposal would have any equalities or human rights impacts; and
- (h) The comments raised in representations have been addressed.

(a) The Principle of the development

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

Edinburgh City Local Plan

The Edinburgh City Local Plan designates the site as being within the Urban Area. In terms of this designation, the application is for the provision of landscaping works associated with the construction of the new hospital buildings. Since there is no change to the use of the site, the proposals comply with the general urban area policies. Further considerations regarding amenity and access are assessed below.

Proposed Local Development Plan

The Proposed Local Development Plan similarly designates the site as being within the urban area. In addition, the LDP includes the site as being within a special economic area relating to the Edinburgh Bio Quarter. Similar to the Edinburgh City Local Plan, the proposals comply with these land use allocations in the proposed LDP.

The principle of the development is therefore acceptable in terms of the provisions of the development plan.

(b) Scale and Design

There are three distinct areas of new public realm proposed as part of this application. Firstly, there is the area of public realm which forms the approach to the RHSC & DCN from Old Dalkeith Road, along Little France Crescent. This area is proposed to be tree lined and will incorporate pedestrian access links from Old Dalkeith Road. The entrance plaza is designed to direct and focus pedestrian flows along Little France Crescent towards the main RHSC entrance. Desire lines from the bus stops, car parking and existing public paths along Old Dalkeith Road have been incorporated into the public space design. A series of mini rain gardens are designed to assist with drainage and storm water attenuation and provide partial screening of the car parking in views from the hospital access road. These rain gardens are positioned to assist with directing pedestrians towards the RHSC entrance. A discrete entrance will also be provided for the CAMHS unit. This entrance is sunken and recessed to reduce its emphasis. The CAMHS unit will be protected from the main pedestrian circulation by a feature rain garden enclosed by a hedge and incorporating mixed planting to protect the privacy of patients and provide an outlook from the bedrooms.

The second area of public realm is in Hospital Square, which will be an area of public realm linking the existing RIE with the new RHSC and DCN. This area is proposed to incorporate pedestrian access from the RIE to the RHSC and DCN via the DCN entrance. The planting for the area has been designed to be robust yet visually attractive and to be reasonably easy to maintain whilst also being appropriate to the local climatic conditions. Due to the nature of this facility, extra care has also been made to ensure that there are no plants with poisonous properties. Away from the building to the central areas within Hospital Square, planting is proposed to consist of linear drifts of grasses and perennials. In the shaded areas to the north of the building in Hospital Square, tolerant species have been selected which will survive in these conditions. In addition, planting is proposed to be used to screen ground floor windows lending privacy to the staff and visitors using these rooms.

Overall, the scale and design of the hard and soft landscaped areas are appropriate for the location and are supported.

(c) Access and Parking Arrangements

Accessible parking and set down/pick up is proposed close to the RHSC entrance and controlled by a barrier access point. Parent and child parking will be provided off Little France Crescent and will be controlled by a barrier access point. Cycle parking is proposed to be provided close to the main entrance and clearly visible from the reception desk.

These arrangements are acceptable and Transport Planning has no objections to the proposals, subject to informatives relating to the submission of applications for road construction consent, the submission of a draft travel plan and the confirmation of relevant traffic orders.

(d) Flood Risk, Drainage, Site Contamination and SUDS

Flood Risk, Drainage and SUDS

According to the Scottish Environment Protection Agency's flood map, the site is potentially vulnerable to flooding. The site is identified as low risk from river flooding, however the southern and eastern most parts of the site are at medium risk and could be affected by river flooding if there were no flood defences. A large proportion of the overall development site is within a medium likelihood of surface water flooding with some small areas highlighted as high risk. This area could currently be flooded if an annual probability of watercourse, tidal or coastal flooding occurs in the range of the 1:1000 - 1:200 storm events. A flood defence scheme is currently proposed along Niddrie Burn and along the back of Little France Mills to address this issue.

Furthermore, the proposed rain gardens will act to collect surface water run-off from the hard paved surfaces within the areas of public realm. The rain gardens act as a basin to gather water by holding it for a short period allowing infiltration into the soil. They are not part of a linked rain trail but work independently, filtering and cleaning the surface run off from the paved areas and allowing the water slowly to percolate into the soil.

With regards to groundwater, the works associated with this application are not expected to have an impact on the groundwater of surrounding areas.

These arrangements are acceptable subject to a condition requiring that surface water drainage details for the proposed landscaping area are supplied once ground investigations relating to the petrol station site are complete.

Site Contamination

The presence of contamination on the former petrol station site indicates that the applicant should take care that the abstraction/management of groundwater levels does not cause the migration of contamination into previously uncontaminated areas. While CEC is the regulator for land contamination, SEPA also provide advice if contaminants are found to be an issue on this site. A condition is therefore recommended seeking details of remediation of the site contamination prior to works commencing on site.

(e) Local Biodiversity and Ecology

Tree planting has been chosen and arranged to frame and focus views across the site, to provide seasonal interest and to enhance the green infrastructure of the main entrance public square. The design incorporates trees along the approach to the building to aid way-finding and orientation. The proposed trees would play an important role in the setting of the new hospital buildings by helping to integrate this new form into the wider surroundings whilst ensuring a high quality environment. Trees have been selected to suit the various areas with fastigate forms being used in close proximity to buildings.

The rain gardens are designed to incorporate a variety of herbaceous grasses and perennial planting and those of longer seasonal value, which will enhance the landscape amenity value for the future, while providing new habitats and visual stimulation for the users of the public space. Rain gardens consist of a shade mix to the north facing borders near to the building and a sun mix planted in linear drifts to the central spaces. These rain gardens are only temporarily wet. They require low levels of maintenance once established and planting within the garden will create dense natural forms. This planting can remain in place to provide structure and seed heads over the colder months and can be left to protect the ground from frost and provide natural fertilisation to the soil.

This approach is acceptable and supported, subject to a condition ensuring the long-term maintenance of the landscaping schemes.

(f) Amenity of Neighbours

The closest neighbours affected by the proposals are at Little France Mills, which lie adjacent to the application site. The properties will benefit in terms of amenity by virtue of the additional landscaping and open space to the west of the properties. A potential short-term loss of amenity may occur as a result of the amended position of the footpath/cycleway while the planting is established, however this will be in the short-term and this is not sufficient justification to amend the proposal.

With regards to flooding, there is a separate application (currently under consideration) for the flood defence works at Little France. Issues of surface water have been adequately addressed in the proposals, including appropriate levels of attenuation and landscape features such as rain gardens and there will be no issues of flooding of neighbouring properties from surface water as a result of this development. With regards to groundwater, the movement of groundwater is unpredictable, however there is no expected impact in terms of additional groundwater on residential properties as a result of this development.

(g) Equalities and Human Rights

This application seeks to enhance the public realm around the new hospital buildings by increasing planting and improving the hard and soft landscaped areas. This will provide greater accessibility to open space, which will be of benefit to visitors to the hospital. The proposals also provide barrier-controlled disabled parking spaces close to the entrances of the new buildings. An Equality and Rights Impact Assessment is available to view on the Planning and Building Standards Online Service.

Overall, equalities and human rights issues have been assessed and there are no detrimental impacts as a result of this development.

(h) Representations

The main issues raised by representation are addressed below:

Material Objections

- The impact of the works on the groundwater levels and the potential increase in flooding of adjacent properties (addressed in 3.3 (d) above), and;
- The impact on the privacy of residents as a result of the new public spaces (addressed in 3.3 (f) above).

Overall Conclusion

The proposed landscaping and public realm works are acceptable and will improve the overall environment of the hospital. The rain garden proposals will add visual interest as well as providing functional water attenuation, while the tree planting and open space is appropriate in providing a setting for the new hospital buildings. This application therefore is in accordance with the development plan and there are no material considerations which outweigh this conclusion.

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

3.4 Conditions/reasons/informatives

1. No development shall take place on site until surface water drainage details have been submitted and approved by CEC Flood Prevention. The surface water drainage details shall be supplied once ground investigations relating to the previous petrol station are completed and all surface water drainage shall be installed as per the approved details. For the avoidance of doubt, no water shall be directed to Little France Mills or Old Dalkeith Road.
2. 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.
3. The approved landscaping scheme shall be fully implemented within one year of occupation of the hospital. Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced with others of a size and species similar

to those originally required to be planted, or in accordance with such other scheme as may be submitted to and approved in writing by the Planning Authority.

Reasons:-

1. In the interests of flood prevention.
2. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
3. In order to ensure that the approved landscaping works are properly established on site.

Informatives

It should be noted that:

1. The proposed cycle track and works to Little France Crescent must be open for use by the public in terms of the statutory definition of 'road' and will require to be the subject of applications for road construction consent (RCC). Such application to include extent of adoptable roads, bus stops / stances, footways, footpaths, accesses, cycle tracks, verges and service strips along with details of lighting, drainage, signs and markings, SUDs, materials, structures, layout, design and specification and proposed improvements works as appropriate. Clear identification of adoptable areas should be agreed as early as possible.

2. No development to commence on site until relevant traffic orders have been promoted and implemented for the roads, footways etc. affected by the development, including the stopping up of Little France Crescent to allow for the construction of the new hospital. These are to be progressed under Sections 207 and 208 of the Town and Country Planning (Scotland) Act 1997 as amended and have been consented under separate planning application.

3. 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. A contribution of £2,000 will be required to progress the necessary traffic order. 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.

4. Planning permission should not be granted until the applicant has entered into a suitable legal agreement to:

a. fund the progression of traffic orders including those to re-determine sections of road, introduce waiting and loading restrictions at appropriate locations, introduce taxi ranks, disabled parking and stopping up orders as necessary at no cost to the Council.

Note that any objections to any traffic orders will require to be considered by the Transport and Environment Committee of this Council and therefore no guarantee can be given that orders can be successfully implemented. A contribution of £2,000 per order will be required;

b. provide real time bus infrastructure to serve the development.

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

6. 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.

7. 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.

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:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application is not subject to 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

Following neighbour notification, a total of four letters of objection were received.

Material Objections

- the impact of the works on the groundwater levels and the potential increase in flooding of adjacent properties;
- the impact on the privacy of residents as a result of the new public spaces

There were no letters raising non-material issues.

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

Background reading / external references

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

Statutory Development Plan Provision

The site is within the Urban Area in the Edinburgh City Local Plan where general infrastructure and employment policies apply. It is adjacent to green belt, open space, a local nature reserve and a business development area.

Date registered

9 May 2014

Drawing numbers/Scheme

01-11,

David R. Leslie

Acting Head of Planning and Building Standards

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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 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 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.

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

Appendix 1

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Consultations

Archaeology comment

Further to your consultation request we would like to make the following comments and recommendations concerning this application for landscaping proposals on the site of the former crèche and petrol filling station.

The site lies adjacent to the 18th century Mill and Steading of Little France and as such within an area of archaeological Potential. However it is considered that due to the likely scale of disturbance due to modern construction works across this area, it is unlikely that significant remains would have survived insitu on this site. Accordingly we have concluded that there are no known archaeological implications.

Transport comment

We would ask that the application be continued to allow sufficient time to assess the proposals.

Transport further comment

Further to our memorandum of 6 June 2014, we confirm that we have no objection to the proposed application subject to the following being included as conditions or informatives as appropriate (note that this response also applies to planning application Ref.14/01797/FUL):

- 1. The proposed cycle track and works to Little France Crescent must be open for use by the public in terms of the statutory definition of 'road' and will require to be the subject of applications for road construction consent (RCC). Such application to include extent of adoptable roads, bus stops / stances, footways, footpaths, accesses, cycle tracks, verges and service strips along with details of lighting, drainage, signs and markings, SUDs, materials, structures, layout, design and specification and proposed improvements works as appropriate. Clear identification of adoptable areas should be agreed as early as possible. It is expected that the roads will be submitted for adoption by the Council in due course;*

2. *No development to commence on site until relevant traffic orders have been promoted and implemented for the roads, footways etc. affected by the development, including the stopping up of Little France Crescent to allow for the construction of the new hospital. These are to be progressed under Sections 207 and 208 of the Town and Country Planning (Scotland) Act 1997 as amended and have been consented under separate planning application;*
3. *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. A contribution of £2,000 will be required to progress the necessary traffic order. 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;*
4. *Planning permission should not be granted until the applicant has entered into a suitable legal agreement to:*
 - a. *fund the progression of traffic orders including those to re-determine sections of road, introduce waiting and loading restrictions at appropriate locations, introduce taxi ranks, disabled parking and stopping up orders as necessary at no cost to the Council. Note that any objections to any traffic orders will require to be considered by the Transport and Environment Committee of this Council and therefore no guarantee can be given that orders can be successfully implemented. A contribution of £2,000 per order will be required;*
 - b. *provide real time bus infrastructure to serve the development;*
 - c. *submit a draft travel plan prior to first occupation and a final travel plan within 12 months of that date;*

Note:

1. *Road opening permits will be required for works on existing roads, whether adopted or not;*
2. *Temporary works for the construction phase must be discussed and agreed with the local area roads manager in advance of commencement;*
3. *The closure and stopping up of Little France Crescent as required for the development has been permitted under separate application. The alternative route is to be open as a road to 2 way bus and general traffic before Little France Crescent is stopped up or closed to through traffic and it must be a road under the meaning of the Roads (Scotland) Act 1984;*
4. *The applicant should be aware that new road names may be required for this development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity. Street naming is likely to influence the progression of traffic regulation orders;*

5. *Vertical deflection (e.g. raised tables) will not be permitted on any existing or potential bus route;*
6. *A total of 84 parking spaces for cars is to be provided on the site for disabled, parent and child and emergency use only. General parking is provided throughout the wider site;*
7. *A total of 18 cycle parking spaces is to be provided on the site.*

Environmental Assessment comment

The applicant has advised that the current parking provision on the site is 50. Environmental Assessment welcome the reduction in the total proposed parking number for this development being 40 with a parking management system.

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 depends on how charging technology evolves this includes:

- *Dedicated parking spaces with charging facilities.*
- *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 one electric vehicle charging outlet 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. 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 a charging point at this location.

Environmental Assessment recommends the applicant submits further details for including plans and site drawings which highlight where the EV charging points will be located.

Environmental Assessment are still considering the site investigation information submitted in support of this application. Therefore we will recommend that a contaminated land condition is attached to any consent.

Therefore Environmental Assessment do not object to this application in regards to local air quality subject to the following being included as a condition or legal agreement;

- 1. Prior to the occupation of the approved site, detailed site plans of where the electric vehicle charging outlets and ducting shall be submitted.*
- 2. Prior to the commencement of construction works on site:*

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.

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.

Informative:

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.

Bridges + Flood Prevention comment

With regards to the letter received from SEPA (dated 10 June 2014 ref: PCS/133482), the subsequent response from Robert Baird Group (dated 17 June ref: 3374/PD/SEPA) and the final response from SEPA (dated 3 July ref: PCS/134164) in relation to these two planning applications the Flood Prevention Unit have the following comments:

- 1. We are satisfied with the design approach for this application and with the responses provided by Robert Baird Group in their letter of 17 June. We have no further issues with regards to the surface water or flood risk sections of SEPA's first letter dated 10 June.*

2. *With regards to the issue raised by SEPA concerning the dewatering of the site during construction we await the response by the Dunne Group, as detailed within Robert Baird Group's letter. It is our opinion that SEPA has a valid concern and we would welcome inclusion with discussions regarding the proposals around dewatering and the potential increase in flood risk downstream. A condition of planning can be attached requesting that the methodology surrounding the dewatering of the excavation, be supplied and agreed between the developer, SEPA and City of Edinburgh Council's Flood Prevention Unit, prior to the works being undertaken.*
3. *We have no objection to a condition being placed on application 14/01797/FUL that surface water drainage details for the proposed landscaping area be supplied once ground investigations, of the previous petrol station, are completed. This however must be approved by SEPA and this Unit prior to work starting on site.*
4. *Attention to details, such as drop kerbs, should be observed during detailed design. This will ensure that surface water flowpaths are not directed towards the hospital compromising its drainage system and potentially increasing its risk to flooding.*
5. *The legal agreements referred in the "Suds Proposal", Robert Baird Group, May 2014 document has been received and reviewed by this Unit. We have no further comment.*

SEPA comment

We advise the City of Edinburgh Council (CEC) that there are matters relating to the water environment which must be clarified, confirmed or agreed prior to these applications being determined by CEC in its role as Flood Prevention Authority under the terms of the Flood Risk Management (Scotland) Act 2009. Please see Sections 1.4, 1.5, 1.6, 1.7, 1.10 and 2.1 below.

In addition, there are matters which must be resolved prior to these applications being determined in order to avoid difficulties or delays in authorising the proposed development under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR): please see 2.1, 3.1, 3.2 and 3.3 below.

In respect of the basement provision I draw your attention to sections 1.8, 1.9 & 1.10 below wherein we discuss the concerns we have previously raised about the inclusion of this basement element of the design and the risks associated with failure of the tanking, should the basement contain infrastructure essential to the continued operation of the facility. At minimum the basement design and operation should be considered in respect of resilience to flooding although we recognise this is a matter for the site operator.

Finally, we advise CEC as lead regulator for land contamination to address any possible contamination of the former petrol station area prior to determination. Please see Section 2.2.

Advice for the planning authority

1. Flood Risk

1.1 This proposal is to construct a new Royal Hospital for Sick Children and Department for Clinical Neurosciences on the existing car park to the west of the Royal Infirmary of Edinburgh at Little France, NGR NT 290 704. The Niddrie and Burdiehouse Burns previously crossed the proposed development site. These watercourses, however, were diverted in a single channel around the current footprint of the Royal Infirmary prior to its construction. A flood bund was extended around the site to provide protection up to the order of about a 1% AEP (1:100) flood event.

1.2 SEPA has commented previously on Phases 1 and 2 of the proposed flood defences on the Burdiehouse Burn to raise the standard of flood protection of the development site up to a 0.1% AEP (1:1,000) flood level. We are providing advice now on the potential risk of flooding on site from surface water and groundwater.

1.3 We are concerned that there is a current risk of surface water flooding on the development site. Rain falling on the car park, currently located on the application site, drains towards the main entrance of the Edinburgh Royal Infirmary. Measures are required to prevent surface water flooding to the new Royal Hospital for Sick Children and Department for Clinical Neurosciences and to address the current risk to the existing hospital buildings on the site

1.4 It is proposed to use Sustainable Urban Drainage Systems (SUDS) to treat and attenuate surface water runoff from the site and restrict the discharge from the site to greenfield rates. The SUDS will provide attenuation for up to the 0.5% AEP (1:200) storm, including a 30% allowance for climate change, and the design will be on the basis of the site being 100% impermeable. It is not clear from the documents supporting these applications, however, what is meant by greenfield rates. The most frequent use of this phrase in terms of discharge rates is usually the two year return period rate of runoff from an undeveloped site, however in some cases it can be variable. In Section 3.0 of the SUDS proposal document, the maximum discharge rate from the site is stated as 12.2 ls-1 . The final discharge rate, however, must be agreed between the flood prevention authority (CEC) and the applicant.

1.5 It is proposed that surface water will be conveyed to an attenuation system which will comprise of three storage areas under paving construction and a further storage tank under a raised grass area south west of the building. There is reference to green roofs and rain-gardens possibly contributing to a comprehensive set of measures to deal with surface water runoff.

1.6 It is proposed that there will be a secondary drainage system provided at the areas of ponding to ensure that and floodwaters are drained directly to the outfall manhole via an independent pipe network to the SUDS system. There are statements in the SUDS proposal document that this pipe network is sized to ensure the capacity of the total site area and it would protect the building and surrounding area from flooding should the design storm be exceeded or there is a failure of the main SUDS system.

1.7 The basis of a maintenance plan is detailed in Section 4.0 of the SUDS proposal document. There will be daily inspections which will include the clearing of any debris that might impact on the efficiency of the drainage system. There is also a recommendation for a three monthly maintenance regime of the SUDS system and equipment carried out in accordance with manufacturer's recommendations. There is also a proposal to keep a number of replacement parts on site so that repairs may be made quickly.

1.8 The information submitted to us includes details on the borehole investigations. We expressed concern in earlier consultations about the proposal to include a basement in the building design.

1.9 The basement will be located in what was previously the course of the two watercourses which were diverted into the man made channel that now goes around the perimeter of the site of the Edinburgh Royal Infirmary. Elevation drawings of the building indicate that the basement floor level will be 47.5 mAOD. The borehole investigations show that the basement will extend down into the water table with some of the groundwater levels appearing to be approximately 1.0 to 2.0 metres above this level during the period of the tests.

1.10 The basement will need to be tanked so that water cannot penetrate the walls and floors of the construction. We would advise that consideration is given in the building design and equipment for a failure of the impermeable membrane to ensure the continued functioning of the hospital if such a problem is experienced. During construction there will be a requirement to lower groundwater levels to enable construction. Proposals to dewater will need to take into consideration water quality and the flows within the receiving watercourse. Discharges to the watercourse when natural flows are high could potentially increase the risk of flooding downstream. Consideration should be given to how to manage this process in order to minimise this risk of flooding to existing properties.

2. Groundwater

2.1 The construction method statement with planning application 14/01796/AMC identifies the requirement for a CAR licence in order to dewater the basement excavation. An assessment of the potential impacts of this process will be carried out as part of the CAR licence determination process. There are no immediately apparent, significant barriers to licensing a temporary dewatering abstraction at this location. At Section 1.10, above, we have advised of the need for proposals to dewater to be developed and agreed to take into account water quality and flows in the receiving watercourse. While these proposals are being developed and agreed account should also be taken of any implications for a CAR licence.

2.2 The presence of contamination on the former petrol station site (planning application 14/01797/FUL) indicates that the applicant should take care that the abstraction/management of groundwater levels does not cause the migration of contamination into previously uncontaminated areas. CEC is the lead regulator for land contamination but we will provide any assistance we can if contaminants are found to be an issue on this site. We consider it advisable for the applicant and CEC to address this issue prior to planning application 14/01797/FUL being determined.

3. Sustainable Urban Drainage Systems (SUDS)

3.1 Confirmation is required from the applicant that the SUDS scheme proposed meets the technical standards set out in CIRIA 697 and will comply with the terms of General Binding Rules (GBR) 10 and 11 of CAR in advance of this application being determined.

3.2 Currently the flow chart provided in drawing RBG-MZ-00-SC-770-001_02 does not appear to identify run-off from the south west area of the site receiving any SUDS treatment prior to discharge via an attenuation tank.

3.3 Confirmation that the larger scale SUDS scheme for the site has been sized so that it can accommodate all development proposed by both applications is needed. Greater clarity in the drawings illustrating SUDS proposals would be beneficial in providing a comprehensive overview of what areas are being treated by which SUDS measures.

3.4 As well as allowing greater certainty about the likelihood of proposals for SUDS meeting CAR requirements, provision of the information identified at 3.1 to 3.3 would also help enable CEC as the Flood Prevention Authority to be confident that this development was not increasing flood risk, on or offsite, prior to determination.

SEPA further comment

We are writing to you with regard to a letter sent to you and SEPA from Philip Davis of The Robert Bird Group on 17 June 2014 (their reference 3374/PD/SEPA) which was sent in response to our letter to you of 10 June 2014 (our reference PCS/133482) in response to the above planning applications.

The letter and accompanying drawing (RBG-MZ-00-PL-770-003) address the concerns we raised in our letter of 10 June 2014, with the exception of proposals for dewatering the site of the basement (please see point 1.4). We believe, however, there is a solution to this issue which we hope will be acceptable to City of Edinburgh Council (CEC) and the applicants (please see point 1.5). In addition, we would like to be consulted on the maintenance plan when it has been prepared (please see point 1.3) and we are concerned that issues relating to de-watering should be resolved after planning permission is granted (please see point 2.1).

The contents of this current letter are divided into the three areas of SEPA's interests on which we wrote on the 10 June 2014: Flood Risk; Groundwater; Sustainable Urban Drainage Systems (SUDS). Where appropriate the relevant numbering from our letter of 10 June 2014 and the letter from Philip Davis is included, in bold, to highlight how our concerns have been addressed.

Advice for the planning authority

1. **Flood Risk**

1.1 *In the letter from the Robert Bird Group there is confirmation that the proposed greenfield surface water runoff rate is 4.5 ls-1ha which has been agreed with the flood prevention authority.*

SEPA is satisfied that this will ensure that there should be no increase in surface water runoff rates discharging from the site following the completion of the new Royal Hospital for Sick Children. 1.4.

1.2 The Robert Bird Group has provided a drawing (drawing number RBG-MZ-00-PL-770-003) which provides further detail on the different elements that will form the SUDS treatment of surface water. SEPA is satisfied that the secondary drainage system will provide additional resilience to the hospital site in terms of dealing with surface water issues. 1.5 & 1.6.

1.3 The Robert Bird Group confirms that a maintenance plan will be put in place to ensure that the drainage system should operate efficiently. 1.7. We would like to be consulted on this maintenance plan when it has been prepared.

1.4 In the letter of 17 June 2014, the Robert Bird Group provides further detail on the construction of the proposed basement of the Royal Hospital for Sick Children. Measures include finished ground levels that will slope away from the access point. SEPA still has concerns, however, regarding the management of water during the dewatering stages of the basement construction. The discharge of pumped groundwater to the nearby Niddrie Burn has the potential to increase flows in the watercourse and increase the risk of flooding downstream of the discharge point. This issue will not be addressed through a CAR licence and, therefore, we recommend that this detail is considered before determining planning application 14/01796/AMC. 1.10.

1.5 In order for conditions to be discharged in relation to drainage and preventing increased flood risk, prior to work beginning on site, the applicants should submit for approval by CEC's flood prevention officer a management plan for the discharge of water to the Niddrie Burn that will ensure no increase in flood risk.

Caveats & Additional Information

1.6 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

1.7 The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice inline with the phases of this legislation and can be downloaded from www.sepa.org.uk/planning/flood_risk.aspx.

2. Groundwater

2.1 There is confirmation in the letter from the Robert Bird Group that de-watering of the site will be carried out by the Dunne Group which will be in contact with SEPA "to discuss the proposals prior to submission". The dewatering will be regulated under the Water Environment (Controlled Activities) Regulations 2011 (CAR). As noted in our response of 10 June 2014 (section 2.2) we advise that proposals for dewatering are

agreed "prior to planning application 14/0179/FUL being determined". We stress this point to prevent the possibility of requirements for the CAR licence being incompatible with the terms of the planning permission. Section 2.

3. Sustainable Urban Drainage Systems (SUDS)

3.1 The information that had been provided by Philip Davis in his letter and accompanying drawing address all concerns set out under this section of our response of 10 June 2014. 3.1, 3.2 & 3.4, 3.3. We have no further comment to make on these points.

Location Plan



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