

# Development Management Sub Committee

Wednesday 18 November 2015

**Application for Planning Permission 14/03632/FUL  
At Land 70 Metres North East Of 10, Suffolk Road, Edinburgh  
Erection of 10 dwelling houses, creation of public park, new  
vehicular and pedestrian access, relocation of existing  
pavilion, alteration to existing boundary wall on East Suffolk  
Road and associated landscaping, drainage and engineering  
works on land at East Suffolk Road, Edinburgh.**

<b>Item number</b>	6.1(b)
<b>Report number</b>	
<b>Wards</b>	A15 - Southside/Newington

## Summary

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The proposals, subject to appropriate conditions and a legal agreement, comply with the provisions of the development plan and non-statutory guidelines. The impact on the special architectural and historic character of the listed building and its setting and the character and appearance of the conservation area are acceptable. Landscape, natural heritage, road safety and neighbouring amenity will not be detrimentally affected.

The loss of part of this existing private open space, formerly used for playing field purposes, is acceptable because of the benefit of providing new public open space and a financial contribution towards improving playing field provision elsewhere.

There are no other material considerations which outweigh this conclusion.

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## Outcome of Previous Committee

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This application was previously considered by Committee on 7 October 2015.

This application has been continued for a hearing to give all parties the opportunity to address the Committee.

## Links

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

LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITE3, CITE6, CITE9, CITE12, CITE16, CITE17, CITOS1, CITOS2, CITOS3, CITH1, CITH3, CITH4, CITT4, CITT5, CITT6, CITT10, NSG, NSGD02, NSLBCA, NSOSS, NSP, OTH, CRPCMP,

# Report

## **Application for Planning Permission 14/03632/FUL At Land 70 Metres North East Of 10, Suffolk Road, Edinburgh Erection of 10 dwelling houses, creation of public park, new vehicular and pedestrian access, relocation of existing pavilion, alteration to existing boundary wall on East Suffolk Road and associated landscaping, drainage and engineering works on land at East Suffolk Road, Edinburgh.**

### **Recommendations**

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

### **Background**

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#### **2.1 Site description**

The application site comprises an area of open grassed land roughly rectangular in shape and extending to some 1.3 hectares (3.2 acres) in area.

It is located at the eastern end of Crawford Road, at its junction with East Suffolk Road, which forms the western boundary of the site. The land is predominantly flat but there is a gentle gradient down to the northern boundary of the site.

The site is bounded to the north by a line of mature trees beyond which is the Edinburgh South Suburban railway line and the Pow Burn. To the east is a triangular stand of mature trees, with the head of a modern residential cul-de-sac development at Cameron March, beyond. To the south are the Iqra Academy Mosque and the converted, former school accommodation buildings, including Buchanan House and Carlyle House surrounding a central grassed quadrangle (East Suffolk Park).

Within Crawford Road, the residential properties are large, stone built, semi-detached pairs of two-storey buildings, with converted roof spaces. A number of these have been converted into flatted properties. On the opposite side of East Suffolk Road, the properties are modern two-storey rendered dwellings.

Within the north western corner of the site stands a pavilion, a 'C' listed building (Ref: 47605, listed on 16 February 2001). The pavilion remains from a former use of the site, and its wider area, as Craigmillar Golf Course; which moved in 1906.

The site has always been in private ownership. It became playing fields for the Moray Home College Halls and then St Margaret's School before the school closed in 2010. There has been no use of the site or the pavilion from that time.

The site is designated in the Edinburgh City Local Plan (ECLP) and the Second Proposed Local Development Plan (LDP) as open space.

This application site is located within the Craigmillar Park Conservation Area.

## 2.2 Site History

The application site previously formed the north western part of a larger site incorporating parts of the former St Margaret's School including the buildings surrounding the East Suffolk Park quadrangle.

The relevant site history is:

In 1990, a draft development brief for a wider site, including the application site, was subject to public consultation. The draft brief envisaged some development of the playing field but this was deleted in the final brief, approved in March 1991. The brief identified the playing field to be retained in recreational use. It was tied to use by St Margaret's School on a 15 year lease from 1977. That lease was further extended, on a temporary basis, until 1995 but thereafter was not renewed.

The playing field site was also the subject of objections to the finalised Central Edinburgh Local Plan in 1994, considered at a public local inquiry in April/May 1995. Of direct relevance the Reporter stated;

*"In my opinion therefore, the objection site should remain as recreational open space. If the use as playing fields is to be terminated, it should nevertheless remain as private open space ancillary to the Moray House Institute, and to the benefit of the adjoining area."*

25 January 2001 - Planning permission was refused for a scheme including the change of use and conversion of existing buildings to 87 dwelling units and the erection of 48 new dwelling units on the playing field area and a block of 20 units on the south west corner of the site (reference 98/00797/FUL).

25 January 2001 - Listed building consent was refused for the conversion of the listed buildings associated with the above planning application (reference 98/00797/LBC).

5 October 2001 - Listed building consent was refused for the demolition of the listed sports pavilion. The reason for refusal being that no evidence had been put forward justifying the demolition of the building (reference 01/02294/LBC).

12 February 2002 - Appeals made against the January 2001 refusals of planning permission and listed building consent were dismissed; however, the appeal, against the October 2001 refusal of listed building consent, was upheld.

5 October 2001 - Planning permission was refused for the change of use of student accommodation to residential accommodation and the erection of new residential villas, townhouses and flats and restoration of the pavilion (reference 01/02283/FUL).

5 October 2001 - Listed building consent was refused for the relocation, approximately eighty metres south of its location, and restoration of the sports pavilion within the site for use as a community facility. The reason for refusal being that the proposed relocation of the pavilion would have an adverse impact on its character and setting (reference 01/02293/LBC).

5 October 2001 - Listed building consent was refused for the relocation and restoration of the sports pavilion within the site for use as a community facility. The reason for refusal being that the relocation of the pavilion would have an adverse impact on its character and setting (reference 01/02520/LBC).

19 April 2002 - An application for listed building consent for; the conversion of five traditional stone built student accommodation buildings, Category 'B' listed, within landscaped grounds to form residential properties, was withdrawn by the applicant (reference 01/02283/LBC).

9 September 2014 - An application for listed building consent for the relocation of the pavilion building was submitted and the report is included on this agenda (reference 14/03633/LBC).

## **Main report**

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### **3.1 Description Of The Proposal**

The application is for the erection of 10 dwelling houses, including a new vehicular and pedestrian access from Crawfurd Road, the formation of a public park, including the relocation of the existing listed pavilion, alterations to the existing boundary wall onto East Suffolk Road, and associated landscaping, drainage and engineering works on the site.

The dwellings are to be five-bedroom, two-storey, semi-detached properties with lower ground floors, comprising garaging and under-building, and attic floor rooms, within the roof space. Overall each property has a footprint of 10.2 metres in width by 13.8 metres in depth and a height of 10.3 metres.

The properties would be faced in stone with wet dash render to the secondary elevations, slated roofs, and timber doors and window frames. It is intended to use timber panelling to the upper floors of some of the properties as a possible means of varying the principle elevation treatments.

Each property has an access drive leading to an integral double garage area.

The proposed vehicular access and pattern of residential development is based on the design concept of the continuation of the gentle curve of Crawfurd Road. This seeks to replicate the historic pattern of semi-detached villas, with five pairs of properties on the northern side of the access.

In order to provide that access, it is proposed to remove a 13 metre long section of the low boundary wall with metal railings above, along the boundary between the site and Crawfurd Road. That work would also entail the loss of a young sycamore tree (Ref 9693 on drawing TS-01 of the Tree Survey report). It is proposed to plant two specimen replacement trees, one on each side of the new access point. It is also proposed to remove a mature sycamore tree (Ref 9698) located centrally along the northern site boundary.

The proposed location of the dwellings necessitates the relocation of the 'C' listed pavilion building, to a position 52.5 metres south, but remaining within the overall site.

The listed building assessment of the proposed relocation of the pavilion is the subject of a listed building consent application (Reference 14/03633/LBC). On the southern side of the access road, it is proposed to form a managed public park open to the local community, including additional tree planting.

The dwellings, together with their associated garden space and the vehicular access, would extend to some 0.76 hectares or 57.3% of the overall site; the remaining 0.57 hectares or 42.7% of the site would be used for the proposed public park.

The proposed park area would include the repositioned pavilion together with footpath access from Crawford Road to the southern boundary of the site. It would be predominantly a grassed area with additional tree planting to enhance the existing tree belts along the southern and eastern boundaries of the site.

The applicant has indicated that the proposed public open space and pavilion would be either gifted to the Council, or some other appropriate public body or community group. Or as an alternative, the applicant has suggested that the owners of the new homes, through a deed of conditions attached to the sale of the property, would take responsibility for the maintenance and upkeep of the open space and building.

### **Supporting Statement**

The applicant has provided supporting statements including: a 'Tree Survey and Arboricultural Constraints' report; Design and Access Statement; which details the intended operation of the property layout; a Consultation Report and a Planning Statement. These are available to view on the Planning and Building Standards Online Services.

### **3.2 Determining Issues**

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Do the proposals harm the character or appearance of the conservation area? If they do, there is a strong presumption against granting of consent.

In considering whether to grant consent, special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. For the purposes of this issue, preserve, in relation to the building, means preserve it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

### 3.3 Assessment

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

- (a) the principle of the proposal is acceptable in this location;
- (b) the works will adversely impact on the special architectural or historic interest of the listed building or its setting;
- (c) the proposals would have any adverse impact on archaeological remains;
- (d) the proposals preserve or enhance the character and appearance of the conservation area;
- (e) the proposed scale, form, design and materials are acceptable;
- (f) the proposals would have any adverse impact on protected trees;
- (g) the proposals would have any adverse impact on biodiversity;
- (h) the proposals affect road safety;
- (i) the proposals will result in an unreasonable loss of neighbouring amenity;
- (j) the proposals provided sufficient amenity for the future occupiers of the development;
- (k) the proposals have any equalities or human rights impacts; and
- (l) comments raised have been addressed.

#### a) The Acceptability of the Proposal in this Location

##### **(i) Loss of Open Space**

The application site comprises a designated area of open space in the ECLP where policies Os 1, 'Open Space Protection', and Os 2, 'Playing Fields Protection' apply. The site is also identified as open space in the second Proposed LDP.

ECLP policies Os 1 and Os 2 set out the circumstances in which development of open space and playing fields will be acceptable.

Redevelopment of the site must comply with policy Os 1 and the local green space standard set out in the 'Open Space Strategy'. The Council's 'Open Space Strategy' sets the standards to be met for open space provision across Edinburgh and is used to assess whether there is an over provision of open space within the immediate area. The local green space standard states that;

*"houses and flats should be within 400 metres walking distance of a significant accessible green space of at least 500 square metres and good quality (for parks and gardens) or fair quality (for other types)."*

With regard to the provisions of policy Os 1(a) the conclusions identified later in this assessment at 3.3(d) are relevant. The proposal represents an appropriate and suitably designed form of development that would preserve the character and appearance of the conservation area at this location. As such there would be no significant impact on the quality or character of the local environment.

Policy Os 1(b) allows for instances where there is a significant over provision of open space serving the immediate area. Such over-provision may be the case where the loss of the open space in question would neither create a deficiency in terms of the standards nor remove an opportunity to address an existing deficiency or need, identified in the strategy. Redevelopment of the site would not in itself lead to a deficiency in local green space in the immediate area as it is both classified as publicly inaccessible and the immediate area is already served by local accessible green space - East Suffolk Park. Aside from a couple of houses on Ventnor Terrace (exactly 400 metres away from the site), there is no existing deficiency in the immediate area. For this reason, the proposal would comply with the provisions of policy Os 1(b).

The proposed layout provides new, good quality, publicly accessible green space greater than 500 square metres in size. In this regard, the application would provide an opportunity to address the small deficiency which exists for those few houses at Ventnor Terrace, provide an appropriate setting to the existing and proposed buildings and maintain an open landscaped character to the area. In accordance with the Craigmillar Park Conservation Character Appraisal, a semi-rural feel to the area would still be maintained. It is therefore considered that the application complies with policy provisions Os 1(b)-(d). The application also complies with policy Des 4(a) in providing an integrated approach to the layout of the buildings and public and private open space.

The ownership and long term maintenance of the public open space and pavilion are critical. The applicant has suggested a number of options as explained in section 3.1. However, it has not been possible to resolve this matter during the period of determining this application. Until such time as suitable arrangements are made for the transfer of ownership and maintenance of the public open space and pavilion, these should remain the responsibility of the applicant. The requirement for the applicant to retain responsibility for and maintain the open space and pavilion until alternative arrangements, agreed by the Planning Authority, are in place will be covered by a legal agreement attached to this application.

The Council's Open Space Audit defines the application site as inaccessible playing fields (PF16). Proposals affecting a playing field are required to be considered against policy Os 2. The site as a playing field was ancillary to the former St Margaret's School. A proposal for the redevelopment of a playing field is required to comply with one of the four criteria set out in the policy. It is considered that in this instance, policy Os 2(c) is most relevant.

In order for the application to comply with this criterion, the developer is required to contribute to the improvement of existing playing field provision elsewhere within the local area.

Following discussion with the developer and **sportscotland**, an appropriate level of financial contribution of £130,000 has been identified that is equivalent to the provision of a grass sports pitch. Those monies should then be allocated towards the improvement of playing field provision at a suitable alternative location.

The site at Kirkbrae Playing Fields (Double Hedges Road) has been identified as a location which could be developed or managed as a multi-pitch venue, and where further investment is required to meet those aims. It is located 1.5 kilometres to the south and, therefore, suitably local to the application site.

It is proposed that, if approved, a legal agreement should be concluded with the developer to secure a financial contribution of £130,000 indexed at the time of payment for use at Kirkbrae Playing Fields, or at an alternative local site agreed by the Council.

The Council has received representations from local residents, supporting the continued designation of the site as open space in the Second Proposed Local Development Plan. At the same time, a representation was made by the developer promoting the site for residential development. These representations are currently being considered at the LDP examination.

Overall, the loss of open space and a playing field the proposal is acceptable in terms of compliance with ECLP policies Os 1 and Os 2.

The nature and area of land proposed for residential development, together with the provision of formal public open space within the whole site, and a financial contribution to improve local playing field provisions, represents an acceptable outcome in this instance.

There is currently no formal means of public access or use of the site. The proposal will provide new public greenspace, addressing an existing deficiency in terms of the open space standards, for some existing residents.

## **(ii) Principle of Housing**

ECLP policy Hou 1 supports housing on suitable sites within the urban area.

Objections have been raised against the development on housing need grounds, on the basis that the Council has identified sufficient other land to accommodate the level of housing needed for the period of the LDP.

However, housing land provision in the LDP is based on the allocation of suitable sites together with a 'wind-fall' provision from appropriate sites within the urban area.

This proposal would contribute to the 'wind-fall' supply of suitable housing sites.

Other relevant policies of the development plan principally include those matters regarding the protection of listed buildings and conservation areas. Those matters are considered in depth in sections 3.3(b) and (d) below. Overall, the conclusion is that the proposals are appropriate in this regard.

Representations have made reference to an appeal determination in 2002. However, its relevance to this proposal is minimal. This proposed residential development is of a materially different form and scale and relates to a very different site area to that previously determined. There have also been intervening changes to development plan policies.

In summary, the principle of housing development on this site accords with ECLP policy Hou 1.

#### b) Impact on Special Architectural or Historic Interest of a Listed Building

A separate listed building consent application has been made for the proposed works for the relocation and alteration of the pavilion building, a category 'C' listed building, from its present location to a new position 52.5 metres to the south in order to accommodate the erection of the residential properties. As part of this process the 1908s extension to the pavilion will be removed.

The pavilion building was listed prior to the assessment and determination of the 2002 public inquiry appeal into the development of the wider East Suffolk Road area. That listing record was updated in 2014, as part of Historic Scotland's sporting buildings thematic study (2012-13).

It was last used in 1995 as part of the wider use of the site as a sports field by St Margaret's School. Given its recent lack of use, it is now in a poor state of repair.

ECLP policy Env 3 permits development that would not be detrimental to the appearance or character of a listed building, or to its setting. Policy Env 4 applies to proposals for the alteration of listed buildings.

The applicant has carefully considered the steps necessary to retain the future of the pavilion within the site and to ensure that it can be suitably restored and reused, albeit in an alternative location. The applicant is of the opinion that there is no viable alternative solution for the future of the pavilion in this current location. This proposal provides for the restoration and retention of the pavilion within the site and the opportunity to bring it back into beneficial use linked to the adjacent public open space. The proposal also provides the opportunity to remove the 1980s extension thereby enhancing the appearance of the building.

The issues pertaining to the special architectural and historic interest of the building, together with that of its setting, are assessed within the listed building application and found to be acceptable.

A Technical Note by IKM Consulting Engineers form part of the applicant's "Conservation Statement and Heritage Impact Assessment". This provides an outline method statement for the relocation of the pavilion. Stage one of the methodology is the assessment of the structure to establish its suitability for lifting. Structural, condition and asbestos surveys will be undertaken which will involve the removal of roof and internal finishes and wall cladding. Temporary strengthening measures will be introduced if needed.

The relocation of the listed building is a critical element of the proposed housing development. Therefore if it is found at stage one of the relocation process, that the pavilion is not suitable for lifting, then the applicant will be required to make good the works already undertaken by completing the refurbishment in situ. This is covered in a condition on the listed building consent. A condition is required on this permission to ensure that development of the houses does not commence until the Council is satisfied that the pavilion can be lifted and the relocation has been undertaken.

The impact of the proposal on the listed building is acceptable taking account of the restoration provision, opportunity for a beneficial new use and suitable new location within the existing site. As explained in section 3.3.a), a legal agreement is required to ensure suitable arrangements are made for the ownership and maintenance of the pavilion.

#### c) Impact on Archaeological Remains

This site has been identified as occurring within an area of archaeological and historical significance. ECLP policy Env 9 set out the circumstances when development of such sites would be acceptable.

These state that the aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

The possibility of significant buried archaeological remains, principally prehistoric, cannot be discounted. The proposed development will require significant large scale ground breaking/engineering works which will have a significant effect upon any potential surviving buried remains. However, this impact is likely to be low-moderate.

The iron railings on the western boundary wall, along East Suffolk Road, appear to be Victorian in design. As such they provide a historic link with the sites Victorian Origins as a park and should be preserved within the final scheme.

Accordingly, a condition is proposed that requires a programme of archaeological evaluation to be undertaken prior to development commencing. The results of which would allow for the production of appropriate and more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains.

#### d) Impact on Character and Appearance of the Conservation Area

The Craigmillar Park Conservation Area Character Statement identifies the area as; *one of late Victorian villas and terraces centred on a main arterial road with high traffic flows. Its essential townscape character includes the East Suffolk Road quadrangular former arts and crafts residence halls set in substantial open space which gives a semi-rural feel to the area, further enhanced by its playing field lying adjacent to Newington cemetery.*

*A component of this character is its sheltered rural setting and high quality views into and out of the site. In particular, the field at the north end of the site allows dramatic and uninterrupted views of Arthur's Seat to the north, as well as contributing to the setting of the listed buildings. Newington cemetery, lying just over the north eastern boundary of the Conservation Area, increases the open landscaped feeling in this area.*

ECLP policy Env 6 sets out the circumstances within which development within a conservation area would be acceptable.

Both the form and character of the proposed residential development seek to replicate the historic curved form of the road and the existing dwellings to the west forming Crawford Road. The form, massing and materials seek to replicate the neighbouring traditional villas both in terms of townscape and the existing open appearance.

The limited form of the development and its location, confined to the north eastern part of the site, would also ensure the retention of the principle views out of the site north towards Arthur's Seat.

The proposal would retain the character of the spatial townscape pattern of this part of the Craigmillar Park Conservation Area. The design, form and materials of the residential properties, assessed in detail below at section 3.3(e), would suitably respect the wider appearance of this central part of the conservation area.

The remainder of the site would be formed into a public park with a large amount of new tree planting that would maintain the spatial character of the immediate area. The size and form of the public park provision and additional tree planting would also maintain the open appearance of the existing site, despite the loss of part of the open space.

Within that park setting, the pavilion building would be repositioned to the south of its present position. Given the gentle sloping nature of the site from south to north the new position will be slightly higher and more obvious when viewed from the public road. That repositioning would provide an appropriate and related setting for the pavilion that would positively benefit the function of the building and enhance the wider appearance of this part of the conservation area, including the retention of the views out towards Arthur's Seat.

Overall, given the limited extent of development and its characteristic form and townscape, the proposal represents an appropriate and suitably designed form of development that would preserve the character and appearance of the conservation area at this location.

#### e) Scale, Form and Design (Materials)

ECLP Policy Des 3 identifies those criteria for acceptable forms of development.

The proposal provides a sensitive and modest street frontage respecting the existing Crawford Road building lines. The massing of the buildings is designed to reflect that of the existing properties within Crawford Road.

Contemporary detailing and articulated form is consistent with other nearby developments. The proposed ridge heights respect the neighbouring properties and the design reflects that existing context.

A simple palette of quality traditional materials, detailing and openings are proposed to provide a sense of unity across the scheme which conform to the prevailing properties.

The scale and mass of these semi-detached properties would be further enhanced by the proposed elevation treatments retaining a traditional palette of materials. These comprise slate, timber, stone and traditional wet render.

The precise use of materials has not been finalised and a condition is recommended requiring materials to be approved by the Head of Planning and Building Standards.

Overall, the proposal represents a suitable scale, form and design of development that respects the application site and the prevailing townscape and character of the immediate locality.

The proposed park provides a low key form of use with footpaths and grassed space, incorporating the relocated pavilion and an enhanced level of tree planting along the existing southern and the eastern boundaries. This is an appropriate scale and form for its setting and location.

ECLP policy Env 17 seeks to prevent development on sites that would prejudice flood protection measures.

The application site does not stand within a known area of flooding and its development, subject to appropriate SUDS measures, would not be detrimental in drainage terms.

#### f) Impact on Protected Trees

The density of development reflects the site's role within its wider context and provides additional planting both within the formation of the park and to supplement the existing boundary planting.

It is proposed to remove two trees from within the development area.

There is a young sycamore tree located on the western boundary at the point where the new vehicular access is proposed. Whilst this loss would have a visual impact on the character and appearance of this part of the streetscape the proposed replacement with two specimen trees, one on either side of the new access, would represent a suitable level of mitigation.

The second tree is a mature sycamore located midway along the northern boundary of the site. It has been identified that it has been weakened by storm damage and requires both short term and other longer term remedial work, especially given its proximity to the adjoining railway line. It is therefore suggested that it should be removed.

The proposal includes potential enhancement planting to the existing boundary tree belts and other new planting within the south eastern part of the public park area. That new planting has not been detailed and should be the subject of a suitable condition to agree an appropriate planting scheme including its implementation and future maintenance.

It is proposed to attach suitable conditions to any permission to ensure that all of the trees, to be retained on site, are suitable protected during construction works. It is also proposed that a suitable scheme of replanting is also agreed, carried out and then maintained within the site.

The proposal therefore accords with ECLP policy Env 12 for the protection of trees.

#### g) Impact on Biodiversity

ECLP policy Env 16 seeks to prevent development on those sites that may be the habitat of protected species.

An ecological assessment of the site has been carried out and concludes that there were no notable habitats or species associated with the site.

There was no evidence of badgers using the site but, as a precaution, it is recommended that during construction any open pipes should be closed up at the end of the working day and trenches should be covered or a ramp provided to permit animals that fall in a means of exit. Chemicals and other materials should be stored securely.

In respect of bats the pavilion on site did present an opportunity for bats but a subsequent survey found no evidence of such use.

The proposed public park area, in closer proximity to existing properties, provides a lesser habitat environment. The principle habitat areas are in those areas adjoining the railway line and the Pow Burn to the north which forms a natural connectivity between the application site and other islands of natural habitat, including the neighbouring Newington Cemetery, within this part of the city.

The ecological assessment also identified Japanese Knotweed and Giant Hogweed on site and included a suitable scheme and method statement for the removal of both species from the site.

There are no objections to the proposed development on the grounds of nature conservation and wider biodiversity.

#### h) Road Safety Issues

There are no objections to the proposed development with regard to matters of road safety resulting from the proposed road junction or in terms of the impact of traffic generated by the proposed residential development upon the existing capacity of the local road network, in the immediate vicinity of the application site.

Neighbours have raised concerns regarding the proposed pedestrian access to the south of the site. The plans indicate access between the public park and the immediately neighbouring land to the application site. Those representations advise that the land is private with no right of access at this location.

Council records show that East Suffolk Park is a publically adopted road. However, there are no other roads, either a public or private, within this location. The drive, from East Suffolk Park, serving Carlyle House, Robertson House and Darroch House provides no public access.

Therefore, the developer would need to make the necessary private legal arrangements for such access, as shown on the application plans. That would be a matter beyond the scope of the planning determination of this application.

Whilst such access would have a wider public benefit, in connectivity terms, the public park without this access is acceptable.

#### i) Neighbouring Amenity

The form of the development would present gable-to-gable faces between the semi-detached blocks. The development also continues the existing curved building line of the existing villas on the northern side of Crawford Road and therefore the closest of the new buildings to the existing neighbour at No 25 Crawford Road would also represent a gable-to-gable relationship.

There would be no detrimental levels of overlooking between the properties and the existing neighbours and no detrimental levels of overshadowing.

#### j) Amenity of Future Occupants

The proposed dwellings are each five-bed properties with an internal floor space of 364 square metres and a plot size of 668 square metres, average.

The proposal represents an acceptable level of future amenity for the occupiers of these properties.

#### k) Equalities and Human Rights Impacts

This application has no impact in terms of equalities or human rights.

#### l) Public Comments

### **Material Representations: Objections**

- the proposal is contrary to the Scottish Government appeal findings in 2002 and nothing material has changed is assessed in section 3.3(a).
- loss of designated open space is assessed in section 3.3(a).
- this open space should be retained for sports use is assessed in section 3.3(a).

- there is insufficient open space within the locality is assessed in section 3.3(a).
- the site is regularly used by the local community is assessed in section 3.3(a).
- the proposed planned open space would be too small an area, unsuitable for use as a playing field is assessed in section 3.3(a).
- housing need within this part of the city is accommodated in the new development plan, this housing development is not necessary is assessed in section 3.3(a).
- the existing pavilion building should be restored in its present position, maintaining its character and setting, not moved to allow house building is assessed in section 3.3(b).
- the open space contributes positively to the Craigmillar Conservation Area designation is assessed in section 3.3(d).
- development would interrupt long views towards Arthur's Seat is assessed in section 3.3(d).
- loss of protected trees is assessed in section 3.3(f).
- loss of local biodiversity is assessed in section 3.3(g).
- the existing local roads are in a poor state that would be exacerbated by the additional traffic is assessed in section 3.3(h).

### Conclusion

The proposals, subject to appropriate conditions and a legal agreement, comply with the provisions of the development plan and non-statutory guidelines. The impact on the special architectural and historic character of the listed building and its setting and the character and appearance of the conservation area are acceptable. Landscape, natural heritage, road safety and neighbouring amenity will not be detrimentally affected.

The loss of part of this existing private open space, formerly used for playing field purposes, is acceptable because of the benefit of providing new public open space and a financial contribution towards improving playing field provision elsewhere.

There are no other material considerations which outweigh this conclusion.

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

### **3.4 Conditions/reasons/informatives**

#### **Conditions:-**

1. No new development shall take place on the site prior to the relocation of the category C listed pavilion.

2. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building survey, analysis and reporting, publication) in accordance with a written scheme of investigation which has been submitted to and approved by the Planning Authority, having first been agreed by the City Archaeologist.
3. Prior to the commencement of development on the site a detailed specification, including trade names and samples of those materials, of all the proposed external materials shall be submitted to and approved in writing by the Head of Planning and Building Standards. Thereafter, the development shall be carried out in full accordance with the agreed pallet of materials unless further amendments have been agreed in writing by the Head of Planning and Building Standards.
4. All trees existing on site (except those identified for felling as outlined in the submitted Tree Survey Report produced by Donald Rodger Associates Arboricultural Consultants, dated November 2013) shall be retained and no trees shall have roots cut or be lopped, topped, felled, uprooted or removed, unless otherwise first agreed in writing with the Planning Authority.
5. Before any works start on site, the developer shall submit details and specifications of the protective measures necessary to safeguard the trees on the site during development operations. The developer shall notify the Planning Authority in writing on the completion of such measures and no work on site shall commence until the Planning Authority has confirmed in writing that the measures as implemented are acceptable. The protective measures shall be retained in a sound and upright condition throughout the development operations and no building materials, soil or machinery shall be stored in or adjacent to the protected area, including the operation of machinery.
6. Before any works start on site, a scheme of landscaping indicating the siting, numbers, species and heights (at time of planting) of all trees, shrubs and hedges to be planted, and the extent and profile of any areas of level changes, shall be submitted for approval in writing by the Planning Authority. The scheme as approved shall be implemented within the first planting season following the date of this consent.
7. All planting carried out on site shall be maintained by the developer to the satisfaction of this Planning Authority for a period of 5-years from the date of planting. Within that period any plants, which are dead, damaged, missing, diseased or fail to establish shall be replaced annually.

**Reasons:-**

1. To ensure that relocation of the listed building is undertaken before development of the houses commences.
2. In order to safeguard the interests of archaeological heritage.

3. In order to enable the Head of Planning and Building Standards to consider these matters in detail so as to protect important elements of the existing character and amenity of the site and safeguard the character of the conservation area.
4. In the interests of visual amenity; to ensure that all trees to be retained are satisfactorily protected before and during construction works.
5. In order to ensure that no damage is caused to the existing trees during (demolition and) development operations.
6. In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
7. In the interests of visual amenity and effective landscape management; to ensure that adequate measures are put in place to protect the landscaping and planting in the long term.

### **Informatives**

It should be noted that:

1. A legal agreement is required to:
  - (i) obtain a financial contribution of £130,000 indexed at point of payment for use in contributing to the improvement of sports pitch provision elsewhere within the local area. The exact location is to be agreed with the Planning Authority; and
  - (ii) ensure that the applicant retains responsibility for the ownership and maintenance of the public open space and pavilion until suitable alternative arrangements as agreed with the Planning Authority are secured.
2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
3. 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.
4. 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.
5. This consent grants planning permission only. It does not constitute listed building consent for works to the listed pavilion building.

6. As a precaution to prevent injury to badgers it is recommend that during construction works on the site that: any open pipes should be closed up at the end of the working day; trenches should be covered or a ramp provided to permit animals that fall in a means of exit; and that chemicals and materials should also be securely stored on site.
7. A suitable scheme and method statement for the removal of both Japanese Knotweed ('Reynoutria Japonica') and Giant Hogweed ('Heracleum Mantegazzianum') from the application site should be finalised and the works carried out in full prior to the commencement of development on the site.
8. All accesses must be open for use by the public in terms of the statutory definition of 'road' and are required to be the subject of applications for road construction consent.
9. Any on-road spaces within the site cannot be allocated to an individual property, nor can they be the subject of sale or rent. The spaces will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street parking spaces, whether the road has been adopted or not. The developer will be expected to make this clear to prospective residents and tenants.

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

The proposal requires a financial contribution from the developer of £130,000, the equivalent of the provision of a grass sports pitch, to the Council to provide improvements of a suitable, alternative, local site as a multi-pitch venue; such as the site at Kirkbrae Playing Fields (Double Hedges Road) or to an alternative agreed local site.

## **Risk, Policy, compliance and governance impact**

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

## **Equalities impact**

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### **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**

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### **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**

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### **8.1 Pre-Application Process**

There is no pre-application process history.

### **8.2 Publicity summary of representations and Community Council comments**

The application was advertised on 19 September 2014 and attracted 92 letters of representation, from 66 properties, all of which raise an objection to the proposal.

These included comments from; Ian Murray MP, the Grange/Prestonfield Community Council, Craigmillar Park Association, East Suffolk Park Proprietors Association, the Blasket Association and Preston Street School Parent Council.

#### **Material Representations in Objection**

- the proposal is contrary to the Scottish Government appeal findings in 2002 and nothing material has changed;
- loss of designated open space;
- this open space should be retained for sports use;
- there is insufficient open space within the locality;
- the site is regularly used by the local community;
- the proposed planned open space would be too small an area, unsuitable for use as a playing field;
- housing need within this part of the city is accommodated in the new development plan, this housing development is not necessary;
- the existing pavilion building should be restored in its present position, maintaining its character and setting, not moved to allow house building;
- the open space contributes positively to the Craigmillar Conservation Area designation;
- development would interrupt long views towards Arthur's Seat;
- loss of protected trees;
- loss of local biodiversity; and
- the existing local roads are in a poor state that would be exacerbated by the additional traffic.

#### **Non-Material Representations in Objection**

- there are ongoing discussions between the local MP and sporting organisations with regard to the future use of the site;
- the applicants' original proposal was for 48 houses, if allowed there would be a subsequent amendment for such numbers;
- the southern boundary of the application includes land outwith the applicants' ownership that should not be included in the application; and
- the proposal includes a means of access between the site and the land to the south, there is no right of access to what is private land.

## Community Council Comments

Grange/Prestonfield Community Council objected to the proposal. They commented on the grounds of: loss of designated open space; recent LDP report to Committee identified 'no justification to remove the open space designation from these sites'; makes only an insignificant contribution to housing land requirement; historic open space use of site protected by policy and Open Space Strategy; and precedent for refusal based on Reporters Decision. Their representation is reproduced in full in the consultations section of the report.

A full assessment of the material 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](#)
- [Edinburgh City Local Plan and Rural West Edinburgh Local Plan](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development  
Plan Provision**

Planning Policy **Scottish Planning Policy 2014**  
Maximising the Benefits of Green Infrastructure

**Edinburgh City Local Plan** - Urban Area, a designated Conservation Area and an area of designated open space.

**Date registered** 9 September 2014

**Drawing numbers/Scheme** 01-08,  
Scheme 1

**David R. Leslie**

Acting Head of Planning and Building Standards

Contact: John Maciver, Senior Planning Officer

E-mail:john.maciver@edinburgh.gov.uk Tel:0131 529 3918

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

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

Policy Env 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 16 (Species) sets out species protection requirements for new development.

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

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

Policy OS 2 (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 Hou 1 (Housing Development) supports housing on appropriate sites in the urban area, and on specific sites identified in the Plan.

Policy Hou 3 (Private Open Space) sets out the requirements for the provision of private open space in housing development.

Policy Hou 4 (Density) sets out the factors to be taken into account in assessing density levels 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.

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 10 (Rail Halts) safeguards identified sites for rail halts.

## **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** 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

The Open Space Strategy and the audit and action plans which support it are used to interpret local plan policies on the loss of open space and the provision or improvement of open space through new development.

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

### **Other Relevant policy guidance**

The Craigmillar Park Conservation Area Character Appraisal emphasises the predominance of high quality stone-built Victorian architecture of limited height which provides homogeneity through building lines, heights, massing and the use of traditional materials, and the predominant residential use.

# Appendix 1

## **Application for Planning Permission 14/03632/FUL At Land 70 Metres North East Of 10, Suffolk Road, Edinburgh Erection of 10 dwelling houses, creation of public park, new vehicular and pedestrian access, relocation of existing pavilion, alteration to existing boundary wall on East Suffolk Road and associated landscaping, drainage and engineering works on land at East Suffolk Road, Edinburgh.**

### **Consultations**

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#### **Grange - Prestonfield Community Council**

*This application is for ten dwelling houses in five semi-detached blocks together with associated works on the former St. Margaret's School playing field in East Suffolk Road, within the Craigmillar Park Conservation Area. It was considered at a recent meeting of this Community Council, when it was decided to object to the application, for the following reasons.*

*a) The site is designated as Open Space on both the existing development plan, that is the Edinburgh City Local Plan, and the emerging development plan (Second Proposed Plan or LDP2).*

*b) As recently as 12 June this year, this and other small sites designated as Open Space, on which representations had been made last year on LDP1 to change their designation, were considered by the Planning Committee. In reporting on these sites to this meeting, page 413 of Agenda Item 5.1 on LDP Part 2 includes the statement "There is no justification to remove the open space designation from these sites".*

*c) The housing land requirement stipulated by Scottish Ministers through the Strategic Development Plan (Sesplan) and statutory Supplementary Guidance is fulfilled in LDP2 without the tiny contribution which housing on this Open Space would make.*

*d) The long history of this field being used as a playing field and for sporting activities started in about 1895 when it was part of the nine hole golf course and football pitch of the Craigmillar Park Golf Club, continued through its use as a sports field by the Moray House Institute of Education and its predecessor, and finally by periodic leasing by St. Margaret's School as a playing field until the school closed in 2010. Since then there have been strenuous efforts to re-establish use of the field for junior sports and currently many people use it recreationally showing that there is a need for all of it to be retained as Open Space and as a valuable "green lung" within the urban area. This use also supports the Open Space and Playing Fields Policies of both ECLP and LDP2, buttressed by the 2009 Open Space Audit and 2010 Open Space Strategy, in which this field is identified as playing field (PF16).*

e) *The last application to use this field for housing was refused by CEC, which was upheld on Appeal by the Reporters Decision Letter of 12 February 2002. We think that this present application should also be rejected as since then there has been no material change affecting this decision.*

*For the reasons set out above we object to this application and ask that it be refused.*

### **sportscotland - original consultation**

*sportscotland note that the proposed development is on the site of the playing field at Crawford Road and Suffolk Road which includes a pavilion.*

*They refer to Scottish Planning Policy (SPP) paragraph 226; which states that outdoor sports facilities should be safeguarded from development except where:*

- the proposed development is ancillary to the principal use of the site as an outdoor sports facility,*
- the proposed development involves a minor part of the outdoor sports facility and would not affect its use and potential for sport and training,*
- the outdoor sports facility which would be lost would be replaced by either a new facility of comparable or greater benefit for sport and in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area, or*
- the relevant strategy and in consultation with **sportscotland** show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site could be developed without detriment to the overall quality of provision.*

*The first two points do not apply since the proposal is for redevelopment of the whole site. City of Edinburgh Council's playing pitch strategy does not demonstrate that there is a clear excess of playing fields to meet current and anticipated future demand. Accordingly, some form of compensation is required to accord with the third bullet point above.*

*It is understand that no form of compensation has been included as part of this proposal. **Sportscotland** would therefore ask that this is response is treated as a holding response pending further details being submitted regarding potential compensation. In the absence of an appropriate level of compensation then **sportscotland's** position is likely to be objection.*

### **sportscotland - revised consultation**

*The applicant has suggested that the site should not be classed as a sports pitch. The Development Management Regulations 2013 make clear that **sportscotland** is a statutory consultee where development is likely to "...prevent the use of land, **which was last used** as a sports facility, from being used again for that purpose." [emphasis added] The fact that the site has not been used in recent years, as a sports pitch, is not material to this consultation requirement. **Sportscotland** applies Scottish Planning Policy (SPP) to land last used as a sports pitch.*

*There is a clear rationale for this approach - pitches are limited resources which benefit from protection under national planning policy, and if pitches which are not currently in active use did not benefit from such protection, then there would arguably be an incentive for landowners to discourage use - a position which would clearly be inconsistent with national policy.*

*SPP, in protecting pitches, make no differentiation between whether a pitch is classed as 'private' or 'publicly accessible.' This issue (i.e. that compensation is required where a pitch is classed as private) has been previously confirmed at appeal (see Directorate for Planning and Environmental Appeals (DPEA) appeal at Firs Park, Falkirk, (Ref P/PPA/240/246)).*

*The requirement for compensation where land was last used a sports pitch (or other outdoor sports facility) comes from SPP paragraph 226. Compensation delivered or requested in connection with the loss of other types of open space does not set any precedent for compensation associated with pitch loss, nor does it override the provisions of SPP paragraph 226.*

*On the basis of the above observations, **sportscotland** maintains that the development of this site would prevent the use of land, which was last used as a sports facility, from being used again for that purpose. On that basis, **sportscotland** considers that compensation should be provided in line with SPP paragraph 226 (as per bullet point 3, since the other bullet points do not apply).*

*For information, we have sought to review the planning history of this site. Information available online (Council and DPEA websites) is limited due to the date of previous planning applications, however, from a combination of these sites and **sportscotland's** own records it is understood that:*

- A 1998 planning application was submitted for development of this site by Miller Homes (Ref A 00797 98) - **sportscotland's** recommended level of compensation at that time was £120,000 towards upgrading pitches and a changing pavilion at Inch Park. This was accepted by the applicant and **sportscotland** withdrew their initial objection; however the appeal was ultimately dismissed.*

- A 2001 planning application (Ref 01/02283/FUL) was submitted by Miller Homes for redevelopment of this site. It is understood that an appeal was submitted against non-determination of this application, but that the appeal was subsequently withdrawn. It is understood that in relation to that application, Miller Homes was willing to contribute £120,000 toward the upgrading of playing fields at Inch Park and also to provide 2 tennis courts on site.*

*On the basis of the above it can confirm that **sportscotland's** position is objection to this proposal in the absence of suitable compensation. The site previously accommodated a full sized grass hockey pitch, and on this basis we suggest that a figure in the region of £130,000 would be appropriate (the cost of providing a basic grass pitch at 2015 prices is on average £130,000). To confirm, **sportscotland** does not consider that £50,000 is sufficient compensation to vary this position.*

*We discussed possible projects to which compensation could be directed. Having spoken to colleagues it understand that there are a number of projects which may benefit from funding; these are listed below but would require further examination with the Council:*

- Inch Park playing fields (approximately 1 mile from the site) - grass playing field pitch upgrades*
- Double Hedges playing field (approximately 1 mile from the site) - grass playing fields pitch upgrades*
- Liberton High School (1.5 miles from the site) - we understand there are plans for a 3G synthetic grass pitch at this school.*

*There are also plans for upgrading an existing synthetic grass pitch to a water-based hockey pitch at Meggetland, and an ongoing project to deliver 3G synthetic pitches at Hunters Hall Park, although these are more distant from the site (around 3 miles and 5 miles respectively). I would also comment that whilst I confirmed I would respond today, a colleague is having strategic meetings with the Council today and tomorrow, and if any further projects are highlighted in these meetings then I can forward on these details.*

*In summary, **sportscotland** maintains its position whereby we are minded to object in the absence of appropriate compensation, and it is suggested that this would comprise pitch upgrades in the area to the value of around £130,000. You made reference to delivery mechanisms - if a project is identified then one option would be a Section 69 Agreement - happy to discuss if this would be of assistance.*

## **Transport**

*Has no objection to the application subject to the following being included, either as conditions or informatives, as appropriate:*

- 1. All accesses must be open for use by the public in terms of the statutory definition of 'road' and are required to be the subject of applications for road construction consent.*
- 2. The Council's Priority Parking scheme in this area goes live on 3 November 2014. The Council is implementing part of the scheme with additional spaces to be implemented if required. The proposed development would therefore be included as part of the Priority Parking scheme;*
- 3. The applicant must be informed that any on-road spaces within the site cannot be allocated to an individual property, nor can they be the subject of sale or rent. The spaces will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street parking spaces, whether the road has been adopted or not. The developer will be expected to make this clear to prospective residents and tenants;*
- 4. The applicant should provide a swept-path diagram to demonstrate that a vehicle can enter and exit the turning head in forward gear, in the interests of road safety; and*
- 5. Local connectivity should be provided through the proposed parkland connecting with East Suffolk Road. The location, layout and specification to be to the satisfaction of the Director of Services for Communities.*

Note:

1. Access to any car parking area is to be by dropped kerb (i.e. not bell mouth);
2. A length of 2 metres nearest the road should be paved in a solid material to prevent deleterious material (e.g. loose chippings) being carried on to the road;
3. Any gate or gates must open inwards onto the property;
4. Any hard standing outside should be porous, to comply with 'Guidance for Householders' published in December 2012;
5. The applicant should be informed that prior to carrying out any works to form a footway crossing a Minor Roadworks consent must be applied for and secured; and
6. The works to form a footway crossing must be carried out in accordance with "Development Roads - Guidelines and Specification".

See pages 5, 15 & 16 of

[www.edinburgh.gov.uk/downloads/file/9579/householder\\_guidance\\_2012](http://www.edinburgh.gov.uk/downloads/file/9579/householder_guidance_2012)

## Archaeology Officer

Makes the following comments and recommendations concerning this application.

The site is currently a small public park bounded to the north by a Victorian railway line. Historic map evidence indicates that the site has remained relatively undeveloped since at least the 18th century with General Roy's 1750s map suggesting that the site was open pasture leading up to the Pow burn currently located across the northern side of the railway line. The site was formed with the creation of Suffolk Road during the 1870s. The C-listed Clubhouse occupying the NW corner of the site was designed by Alexander Lorne Campbell in 1895 as the clubhouse for Craigmillar Park Golf Club. The Golf club left the site in 1907, though the building remained in use as a sports facility until 1995.

Accordingly, this site has been identified as occurring within an area of archaeological and historical 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 CEC Edinburgh Local Plan (2010) policies ENV2 and 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.

## Historic Buildings

The proposed scheme seeks to demolish this relatively rare Victorian clubhouse and rebuild it on site on a new location in the SW corner. Such proposals must be considered as having a significant impact on this historic building. Accordingly, if consent is granted for this scheme it is essential that a detailed historic building survey (level 3: internal and external elevations and plans, photographic and written survey and analysis) is undertaken prior to and during its demolition. In addition prior to this work starting the applicant must submit a conservation/mitigation plan which will detail how the building will be taken down, stored, rebuilt and conserved.

In addition to the above historic club house the iron railings on the sites western boundary wall along East Suffolk Road would appear to be Victorian in design. As such they provide an historic link with the sites Victorian Origins as a park and should therefore be preserved within the final scheme.

### **Buried Archaeology**

*Due to the lack archaeological field work in the area the site has an unknown archaeological potential. However, as the site has by and large remained undeveloped since at least the mid-18th century the possibility of significant buried archaeological remains principally prehistoric cannot be discounted. The proposed development will require significant large scale ground breaking/engineering works which will have a significant effect upon any potential surviving buried remains. However, having assessed this impact it is considered such an impact is likely to be low-moderate.*

*Accordingly, it is recommended that a programme of archaeological evaluation is undertaken prior to development commencing. In essence this will require the undertaking of an initial phase of archaeological evaluation (up to a maximum of 10% of the site). The results of which would allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains.*

*It is therefore recommended that if consent is granted that in the following condition be attached to ensure that a programme of archaeological works is undertaken prior to/during construction.*

#### **Condition:**

*'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building survey, analysis and 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.*

### **Network Rail**

*Thank you for consulting Network Rail regarding the above development. After examining the proposal Network Rail considers that it will have no impact on railway infrastructure and therefore have no comments/objections to this application.*

