

# Development Management Sub Committee

Wednesday 22 June 2016

## **Application for Planning Permission 15/05434/FUL At 18 Whitehouse Road, Edinburgh, EH4 6NN Proposed demolition of existing dwelling and construction of new care home and associated car parking (as amended).**

<b>Item number</b>	7.3 (a)
<b>Report number</b>	
<b>Wards</b>	A01 - Almond

### **Summary**

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The proposal is acceptable in principle and represents sustainable development as defined by the Edinburgh City Local Plan (ECLP) and Scottish Planning Policy (SPP).

The proposal is acceptable with respect to density, layout, scale and design and it will not have an adverse impact on the character and appearance of the site or the Cramond Conservation Area. No concerns are raised with regard to the proposal's impact on traffic, road safety, parking, flooding, drainage, trees, protected species, archaeology, neighbouring amenity or the amenity of future occupiers. The proposal complies with relevant policies in the Development Plan and associated non-statutory guidance.

The proposal is acceptable. There are no material considerations which outweigh this conclusion.

### **Links**

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**Policies and guidance for  
this application**

CITD1, CITD3, CITD5, CITD6, CITE12, CITE16,  
CITE17, CITE5, CITE6, CITH8, CITT4, CITT5, CITH1,  
CITH4, OTH, NSGD02, NSLBCA, NSP, CRPCRA,

# Report

## **Application for Planning Permission 15/05434/FUL At 18 Whitehouse Road, Edinburgh, EH4 6NN Proposed demolition of existing dwelling and construction of new care home and associated car parking (as amended).**

### **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 site is located to the rear of residential properties fronting Cramond Glebe Road and Cramond Glebe Terrace to the east, to the rear of residential properties fronting Whitehouse Road and School Brae to the south. The River Almond lies to the west. It comprises a large modern two storey detached house set within a large plot. The site is approximately 0.48 hectares in size.

The existing house is not listed and was built around the 1960s/70s. It has a footprint of approximately 213 square metres, which is approximately 4.4% of the total site area. There are several trees, some hedging and vegetation within the site, the majority of which are along or close to its boundaries. The majority of the site outwith the built footprint of the dwelling is grassed. The site slopes down gradually from east to west.

The site is bounded by a combination of stone walls, fencing, hedges, trees and shrub vegetation. The site's western boundary is heavily treed and abuts the steeply sloping treed valley associated with the River Almond further west. The majority of residential properties abutting the site are traditional in style with the exception of two contemporary dwellings along Cramond Glebe Terrace.

Currently vehicular and pedestrian access into the site is provided from a single lane driveway located at the junction of Whitehouse Road and School Brae. There is a secondary, currently disused single lane track linking the site with Cramond Glebe Road.

The surrounding area is predominantly residential with some community and commercial uses in the vicinity. Residential properties generally comprise a mix of one and a half and two storey traditional detached, semi-detached and terraced dwellings, bungalows (some with living accommodation in the attic space), and more modern one and two storey detached, semi-detached and terraced properties. Larger footprint modern developments including three and four storey flatted properties off Cramond Road North and on Cramond Green are also present. The majority of roofs are pitched however a number of more modern developments exhibit flats roofs. Stone, render, tiles and slate represent the predominant building materials within the immediate area, in addition to less frequent instances of brick and timber.

Dwellings in the surrounding area generally benefit from generous plots comprising front and rear gardens. In the immediate vicinity built footprints take up approximately 16% - 38% of the total plot areas.

The site is within walking distance of two bus services on Whitehouse Road which connect to the wider area (including the city centre and Edinburgh Park), a Core Path network along the River Almond, and several cycle routes including two national cycle routes (1 and 76). Cramond Medical Practice is also within walking distance of the site.

The site sits outwith but directly to the east of the Green Belt, an area of protected Open Space, and a Local Nature Conservation Site. These designations are associated with the River Almond valley.

This application site is located within the Cramond Conservation Area.

## 2.2 Site History

- 1 December 2015 - Application for planning permission withdrawn for proposed demolition of existing dwelling and construction of new carehome (61 bed) and associated car parking (application number 15/04016/FUL).
- 2 December 2015 - Application withdrawn for conservation area consent for demolition of dwelling in a Conservation Area (application number 15/03901/CON).

Decision pending for conservation area consent for demolition of dwelling in a conservation area (application number 15/05435/CON).

### Relevant planning history within Cramond

#### **49, 51 Cramond Road North, 2 Cramond Place, Site 34 metres east of 12 Cramond Place:**

23 January 2015 - Planning permission granted for demolition of existing 3 houses and associated garages and erection of 90 bed nursing home (application number 11/01856/FUL).

#### **Land Adjacent To Former 34 Cramond Road North:**

24 June 2011 - Proposal of application notice (PAN) approved for development of vacant site to create cricket and football sports facilities and a care village including:

- International cricket pitch and shared pavilion for Cricket Scotland
- Full size 3G artificial pitch, 5-a-side pitches and shared pavilion for football academy
- Community facilities building (convenience food store, health hub, creche, physio clinic)
- 90 bed care home
- 4 detached blocks of assisted living apartments (64 units in total) (application number 11/01492/PAN).

Application for planning permission in principle minded to grant pending the conclusion of a legal agreement for 'Option 1 - Cricket and Football' - proposed sports facilities (cricket centre and football pitches), sports pavilion and care village (class 8) including ancillary retail (class 1), health hub/sports clinic and creche (class 10). Details brought forward for approval: layout, building footprints, massing and heights (application number 11/01492/PPP).

24 June 2011 - Proposal of application notice (PAN) approved for development of vacant site to create tennis and football sports facilities and a care village including;

- 12 outdoor and 8 indoor tennis courts and shared pavilion for tennis academy
- Full size 3G artificial pitch, 5-a-side pitches and shared pavilion for football academy
- Community facilities building (convenience food store, health hub, creche, physio clinic)
- 90 bed care home
- 4 detached blocks of assisted living apartments (64 units in total)
- (application number 11/01493/PAN).

Application for planning permission in principle minded to grant pending the conclusion of a legal agreement for 'Option 2 - Tennis and Football' - proposed sports facilities (tennis centre and football pitches), sports pavilion and care village (class 8) including ancillary retail (class 1), health hub/sports clinic and creche (class 10). Details brought forward for approval: layout, building footprints, massing and heights (application number 11/01493/PPP).

24 June 2011 - Proposal of application notice (PAN) approved for development of vacant site to create cricket and tennis sports facilities and a care village including:

- International cricket pitch and shared pavilion for Cricket Scotland
- 11 outdoor and 8 indoor tennis courts and shared pavilion for tennis academy
- Community facilities building (convenience food store, health hub, creche, physio clinic)
- 90 bed care home
- 4 detached blocks of assisted living apartments (64 units in total)
- (application number 11/01494/PAN).

Application for planning permission in principle minded to grant pending the conclusion of a legal agreement for 'Option 3 - Tennis and Cricket' - proposed sports facilities (tennis centre and cricket centre), sports pavilion and care village (class 8) including ancillary retail (class 1), health hub/sports clinic and creche (class 10). Details brought forward for approval: layout, building footprints, massing and heights (application number 11/01494/PPP).

## **Main report**

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

The proposal comprises the demolition of the existing dwellinghouse and the erection of a two to four storey care home with associated amenity space, parking and landscaping. Care homes fall under use class 8 (residential institutions).

The footprint of the care home will be approximately 875 square metres, which is approximately 18% of the site area.

The care home will accommodate 50 bedrooms, each floor will contain bedrooms and a range of ancillary accommodation across the floors including diagrams, quiet rooms a cinema and nursing stations. Lift and stair access will be provided to the upper floors.

The proposal comprises the demolition of the existing dwellinghouse and the erection of a two to four storey care home with associated amenity space, parking and landscaping. Care homes fall under use class 8 (residential institutions).

The care home building has a modern design with a flat roof of varying heights. On its east facing elevation the majority of the building is three storeys in height, dropping to two storeys at either end. The west facing elevation rises to four storeys towards its northern section and the existing slope will be cut to accommodate the basement, the majority of which will be subterranean. On the west facing elevation, the northern section of the building will be accessible from ground level due to the change in levels and a relatively limited amount of cut into the ground. The top floor has been set back on all sides and top floor windows on the east facing elevation have been angled to face south east.

The external finish of the care home comprises a combination of render (off white), natural stone panels, zinc cladding, facing brick detailing and glazing with a weathered copper membrane roof. The east facing elevation incorporates vertical sections of natural stone panelling which extend from ground to second floor. The northern section of the east and west facing elevations and the north facing elevation will comprise mainly glazing and stone panelling. The zinc cladding will be restricted mainly to the top floor elevations. Window and door frames will be aluminium and powder coated dark grey.

A communal garden will be provided to the west and north of the site, and paved areas will be provided adjacent to the building. The remainder of the grounds will incorporate landscaping and hardstanding for parking and access. Bin storage will be located to the north eastern corner of the site.

The proposal will result in the loss of approximately ten trees. Thirteen new trees will be planted in mitigation, the majority of which will be positioned within the northern area of the site as part of the communal garden or along the site boundaries. Existing hedging along the access from Whitehouse Road will be retained and shrub planting will be incorporated along the site boundaries. The existing stone wall along the site's northern and eastern boundaries will be retained and the remaining boundaries will be fenced.

Vehicular access will be provided into the site from the existing access point on Whitehouse Road and out of the site onto Cramond Glebe Road in a 'one way' system. Both accesses will have a shared surface arrangement therefore no footpaths will be provided. Pedestrian refuge areas will be provided at intervals along both lanes.

Twenty car parking spaces will be provided including four disabled spaces. One ambulance/patient transport vehicle space will be provided along with spaces for two motorcycles and four bicycles.

The Transportation Statement states that nursing and care staff will be present on site at all times. The working day will comprise two main shifts, between 7.00am and 2.00pm, and then 2.00pm until 10.00pm. There will also be staff working overnight. Administrative and kitchen staff will work a single daytime shift. There will be no resident staff and the maximum number working on site at any one time will be 22 during the day, and five overnight.

The Transportation Statement confirms that visiting hours for residents' relatives will be flexible with the exception of meal times, and peak visiting hours will tend to be between 10.00am and 12.00pm, and between 2.00pm and 4.00pm.

With regard to deliveries and servicing, the Design and Access Statement confirms that they will be limited to food and catering twice a week. One weekly refuse collection will be made and laundry will be undertaken in-house.

The lighting strategy for the site consists of a mix of low (bollards and wall mounted) and higher level (4 metre high post-mounted) elements.

The Sustainability Statement confirms that a Combined Heat and Power (CHP) boiler will be installed in addition to other low carbon equipment relating to heating, ventilation and lighting specifications.

The Drainage Strategy notes that a Sustainable Urban Drainage system (SUDs) will be incorporated.

With regard to waste management it is proposed that the discharge for the site connects to Scottish Water's existing combined sewer network. The Drainage Strategy states that Scottish Water has confirmed that there is sufficient capacity in the wastewater treatment works and local network to service the development.

## **Scheme 1**

Initially the materials for the external walls of the care home building comprised render, reconstituted stone and timber cladding.

## **Supporting Documents**

The following documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Design and Access Statement
- Planning Statement
- Transportation Statement
- Pre-application Consultation Report
- Archaeological Evaluation - Written Scheme of Investigation
- Archaeological Evaluation - Data Structure Report
- Existing Public Utility Review
- Habitat Survey Report and Bat Surveys
- Tree Survey
- Sound Report
- Drainage Strategy

- Sustainability Statement Form
- Lighting Strategy

### **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 permission.

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 proposal is acceptable in principle;
- b) the demolition of the existing house is acceptable;
- c) the proposal is of an appropriate density, layout, scale and design;
- d) the proposal will have an adverse impact on the character or appearance of the conservation area;
- e) the proposal will have an unacceptable adverse impact on protected species and trees;
- f) the proposal will have an adverse impact on traffic, road safety and parking;
- g) the proposal will have an adverse impact on neighbouring amenity;
- h) the proposal will create an acceptable living environment for future occupiers;
- i) the proposal will be acceptable in terms of flooding, drainage and sewage;
- j) the proposal will be acceptable in terms archaeology;
- k) the proposal meets sustainability criteria;



- l) there are relevant material considerations;
- m) any impacts on equalities or human rights are acceptable; and
- n) comments raised have been addressed.

#### a) Principle

The application site is located in the Urban Area as designated by the Edinburgh City Local Plan (ECLP). There are no specific policies which relate to care home developments in the ECLP. However Policy Hou 1 (Housing Development) and Policy Hou 2 (Housing Mix) encourage a mix of housing to meet all needs on suitable sites within the urban area, provided proposals are compatible with other policies in the Plan.

The ECLP states that within the Urban Area, new development should respect the principles of sustainable development and contribute positively to the development of sustainable communities. In addition to allocated sites, the majority of new development is to be directed to the Urban Area.

The ECLP states that sustainable development aims to minimise the impact of human activity on the environment, whilst supporting economic and social progress. The ECLP also states that social inclusion is important to sustainable development. This means seeking to build better, balanced communities and providing everyone with decent homes in safe, attractive and accessible surroundings with convenient access to jobs and services.

The sustainable development principles in the ECLP broadly reflect those set out in Scottish Planning Policy (SPP).

The site comprises a dwelling and associated driveway, parking and garden ground, and as such, is considered to be previously developed land (also referred to as 'brownfield land'). The proposal seeks to maximise the developable area of this large site, which is currently underused.

The site is not located on a protected nature conservation site and there are no designations which would prevent its redevelopment in principle.

The site is accessible to public transport, cycle and walking routes. Cramond Medical Practice is also within walking distance of the site.

The proposal will provide employment within the local area; equivalent to circa 90 full and part time jobs, and will provide residential accommodation for elderly people with care needs.

The proposal is compatible in principle with the predominantly residential nature of the surrounding area. There are no policies within the ECLP which seek to restrict the number of care homes delivered across the city, and there are no policies which seek to restrict the demographics of the area in respect of elderly people.

There are no care homes currently operational within Cramond. However, planning permission was recently granted for a 90 bed care home to the south east of the village on Cramond Road North (application number 11/01856/FUL). This site has recently been cleared for development. As with the majority of development types, the delivery of proposals of this nature is market driven and therefore dependent on there being an identified need and demand.

The proposal is acceptable in principle, subject to compliance with other relevant ECLP policies.

The detail of the proposal is assessed in parts b) to m) of the assessment

#### b) Demolition of Existing House

The site is located within the Cramond Conservation Area and the existing house is not listed. When considering the demolition of an unlisted building in a conservation area it is appropriate to assess the application against ECLP Policy Env 5 (Conservation Areas - Demolition of Buildings) and Scottish Government's Historic Environment Policy 2011 (SHEP).

Policy Env 5 sets out the circumstances against which the demolition of an unlisted building in a conservation area will be considered. Policy Env 5 initially requires an assessment of whether the building proposed for demolition makes a positive contribution to the character of the area. If the proposal does not make a positive contribution, its removal is considered acceptable in principle so long as the replacement building either preserves or enhances the character of the area.

Policy Env 5 indicates that proposals for the total or substantial demolition of a building of merit will only be supported in exceptional circumstances. These circumstances take into account the condition / cost of repairing the building in relation to its importance, the adequacy of efforts to retain the building, the merits of alternative proposals for the site, and whether the public benefits to be derived from allowing demolition outweigh the loss.

The SHEP requires that when assessing the demolition of an unlisted building in a conservation area, local authorities should take into account the importance of the building to the conservation area, and the future proposals for the site. If the building is considered to be of any architectural or historic value a positive attempt should be made to achieve its retention and re-use before any demolition proposals are seriously investigated.

In some instances demolition may be considered appropriate, for instance where the building is of little or no townscape value, or where repair costs are unreasonable, or where the existing form or location makes any re-use extremely difficult.

The existing house is set within a substantial plot with its footprint covering approximately 4.4% of the total site area. The house is situated in the south eastern section of the plot and views to it from public vantage points are limited mainly to glimpses from the two access points and from Cramond Glebe Terrace due to the intervening built form and landscaping. The plot is the largest in the immediate locality. Notwithstanding the house's limited visibility, its contribution to the character of the conservation area the impact of its removal needs to be assessed.

Whilst the footprint size of the house is comparable to the existing detached villas on Cramond Glebe Road, it does not have any special features of merit which would support its retention from an architectural or townscape perspective. It has a relatively modern two storey design and is fairly disjointed in appearance and neither enhances nor detracts from the character and appearance of this part of the conservation area. On this basis its removal would have a neutral impact overall.

Having concluded that the building has no special merit, the requirements of ECLP Policy Env 5 and SHEP are not applicable with regard to the need to consider the condition / cost of repairing the building, the adequacy of efforts to retain the building, the merits of alternative proposals for the site, and whether the public benefits to be derived from allowing demolition outweigh the loss.

The demolition of the existing house complies with ECLP Policy Env 5 and SHEP.

### c) Density, Layout, Scale and Design

#### **Density**

The existing site does not reflect the established density of the surrounding area. The demolition of the existing house presents an opportunity to utilise this large plot more efficiently in terms of its built to open space ratio. The site is in a sustainable location and increasing the density of development in such areas is supported in principle.

A balance is required between supporting greater efficiency in the use of this site and its backland position. The Edinburgh Design Guide states that *'backland development must be designed to ensure that any proposed building is subservient to surrounding buildings and it does not have an adverse impact on spatial character.'*

The proposed care home building cannot reasonably be considered to be subservient to the surrounding buildings, which are generally domestic in scale and nature. There are a number of larger buildings in the wider area, including flatted properties with comparable footprints and scales; however they are not located on backland sites.

The footprint of the care home will take up approximately 18% of the site. While the footprint will be substantially larger than the existing house, the resultant built form to open space ratio will be comparable, if not lower in some cases, than plots within the immediate locality.

The proposal will achieve an appropriate density for the site and its context and will not result in the overdevelopment of the site. The site's backland nature is not sufficient justification to discount the opportunity to achieve an appropriate density for this site.

#### **Layout**

The care home building has a linear footprint which responds to the dimensions of the site and ensures stand-off from all four boundaries. A communal garden will be located to the north and west of the building and existing landscaped boundaries will be enhanced with further planting. Parking and turning along with bin and cycle storage

will be accommodated to the east and south of the building, which corresponds to the position of the two access points.

ECLP Policy Os 3 (Open Space in New Development) requires open space for new development to be appropriate and justified by its scale and needs. The provision of high quality, well located amenity space in relation to care home development is critical due to the limited mobility of its residents. The useable amenity space for this proposal will be consolidated to the north and west, and linked by two level access points at the northern end of the building. The communal garden will be well landscaped to provide interest, and is of a sufficient size for the scale and type of development proposed.

The proposal complies with ECLP policies Des 1 (Design Quality and Context), Des 3 (Development Design), Des 4 (Layout Design), Des 5 (External Spaces) and Os 3 (Open Space in New Development) and the Edinburgh Design Guidance, with respect to its layout.

### **Scale and Design**

The care home building will be substantially larger in scale than properties in the immediate area. In the wider vicinity, modern flats located on Cramond Green and recently constructed residential properties off Cramond Road North are more comparable in scale and in some cases larger.

The care home building is approximately 61 metres long, and between two and three storeys to the east and two and four storeys to the west. The north and south facing gables are comparable and in some cases lower in scale than surrounding properties.

In order to reduce the visual impact of the building, its height has been dropped at both gables, the upper floors stepped back on the east and west facing elevations and the roof has been designed without a pitch. The upper floor has also been designed to contrast with the lower floors through the use of zinc cladding and contrasting window detailing on the east facing elevation. The west facing elevation rises to four full-height storeys only at the northern end of the building, and the majority of this section will be glazed resulting in a visually lighter structure.

Traditional properties within the immediate area extend to no more than two storeys in height. Whilst their footprints are much smaller, the overall height of some of these buildings with their high ceilings and pitched roofs are not unsubstantial, with some of their ridge heights being comparable with the height of the proposed care home building - particularly its north, south and east facing elevations.

Despite the comparably large scale of the care home building, the plot that it will sit within can comfortably accommodate a building of this size. The building's scale relates well to the size and dimensions of the plot and its varying heights are not incomparable with the surrounding area.

The care home has a contemporary design with a rectangular form and a flat roof. In more recent years, contemporary buildings have been erected in Cramond, including within the new residential development site accessed from Cramond Road North. These contemporary styles present an appropriately contrasting and non-pastiche response to their context.

The key materials proposed for the care home building are render (off white), natural stone panelling and glazing, with brick and zinc detailing. Render, stone and glazing are the predominant materials within the surrounding area. The use of these materials in the majority of the building's design is appropriate. Brick and zinc is evident in the local area in smaller quantities, and is used to break up the building's facades. The use of zinc on the upper floor helps to reduce its visual impact along with its stepped back position. In addition, the positioning of the stone panelled projections in vertical sections on the east facing elevation relate to the rhythm of the traditional terraces within the surrounding area. Aluminium frames for the windows and doors are acceptable.

A condition requiring full details of the materials, including samples, has been added.

The design of the care home is acceptable and complies with ECLP Policy Des 3 (Development Design) and the Edinburgh Design Guidance.

#### d) Impact on Conservation Area

The Cramond Conservation Area Character Appraisal divides the conservation area into four defined areas; 'Cramond Village', 'River Almond Valley', 'Cramond Brig' and 'Cramond Island'.

The site is located within the 'Cramond Village' area, and sits adjacent to the 'River Almond Valley' area to the west. 'Cramond Village' includes the original Cramond village around the estuary, the area surrounding Cramond Kirk and the later residential development along Cramond Glebe Road and a part of Whitehouse Road including School Brae.

The Cramond Conservation Area Character Appraisal identifies a number of townscape components within the 'Cramond Village' area, including several 'intimate lanes' and 'positive frontages'. The access road into the site from Whitehouse Road is identified as an 'intimate lane', and built frontages along parts of Whitehouse Road and Cramond Glebe Road are identified as 'positive frontages'. There are no key views identified into the site from the surrounding area, and the Character Appraisal notes that recent development is set back from the street with high stone walls ensuring the original village character is unspoilt.

When describing the townscape character of 'Cramond Village', the Character Appraisal makes reference to... *'an interplay of Edwardian and Victorian terraces, semi-detached and detached villas, mostly set back from the road with small gardens to the front bounded by hedges and stone walls.* Whilst these properties have a mix of styles, the Character Appraisal concludes that they are generally suburban in appearance and that overall, traditional building materials of sandstone, harl (roughcast render), slate and pantiles are predominant.

The Character Appraisal makes specific reference to the area around Cramond Glebe Road, Whitehouse Road and School Brae, and states that the variety and contrast between the later different housing types and layouts contributes to the visual character of Cramond. The Character Appraisal also notes that buildings are generally two storeys in height moving towards three storeys adjacent to the river.

The Character Appraisal states that any further new development on the ridge of the River Almond valley should be restricted in height and set back from the valley so it is not visible. The Character Appraisal also states that no new development should be permitted within the valley itself on either side of the bank.

ECLP Policy Env 6 (Conservation Areas - Development) states that development within a conservation area should preserve or enhance its special character or appearance. Features of merit including trees and boundary treatment which contribute positively to the area should be preserved, and proposals should demonstrate high standards of design which utilise materials appropriate to the historic environment.

The proposal replaces an existing large dwellinghouse with a two to four storey care home and associated landscaping and infrastructure. The site is previously developed and therefore new development on this site is acceptable in principle. Whilst the use of the site will be intensified, the area to the north, east and south is in active residential use and therefore increased residential activity on the site will not be detrimental to this established character.

The site and its boundaries are generally well landscaped with grass, shrubs and trees. This landscaping enhances the site's secluded and green character. Whilst the built footprint of the care home is larger than the existing house, its linear configuration and central positioning minimises the number of trees to be removed. The majority of the new trees will be positioned to further enhance the site's landscaped boundaries and will thus maintain its green, secluded character.

Clear views into the site from public vantage points are restricted due to intervening landscaping and built form. Even in the winter months only occasional glimpses of the existing dwellinghouse are afforded from Cramond Glebe Road and Cramond Glebe Terrace.

Section 5 of the Design and Access Statement presents a comparative study of one of the clearest views into the site from the junction of Cramond Glebe Road and Cramond Glebe Terrace. This demonstrates that the character and appearance of this part of the conservation area will not be adversely affected by the proposal despite the care home being larger than the existing house.

Significant tree cover on the eastern bank of the River Almond, its steep gradient, and the set back position of the care home means that the development will not be visible from the footpath located down on the eastern bank.

Whilst being heavily restricted due to the tree cover, views to and either side of the site from the western bank already incorporate the existing dwellinghouse and other built form. The proposal will not therefore breach a previously building-free view.

On balance, when taking into account the substantial tree cover and topography of this part of the River Almond valley and the set back position of the care home, the proposal will not have an adverse impact on the existing character and appearance of this part of the conservation area.

The character of the existing access lane from Whitehouse Road is referred to in the Character Appraisal as 'intimate' primarily due to its narrow width, landscaped

boundaries and the restricted views afforded into this secluded site. The width of this lane will remain unchanged as a result of the proposal, and the landscaping along the boundaries will be retained. Low level bollard lighting will be added to improve public safety.

The existing character and appearance of the lane into the site from Whitehouse Road will be retained with the exception of the addition of low level lighting and comparatively greater vehicular usage. Whilst the lighting will alter the character of this lane, its low level nature will reinforce its intimate character in comparison to neighbouring high level street lighting along Whitehouse Road and School Brae. As the movement of vehicles along the lane will be for entry only rather than entry and exit as it is currently used, it is not anticipated that there will be an unacceptable change in the character of the lane in terms of its use.

Whilst the second access point into the site from Cramond Glebe Road is currently gated and unused, it is an established opening and the removal of the gate and formalisation of the road surface will not have a detrimental impact on the character or appearance of the conservation area. It should be noted that in any event, planning permission would not be required to reopen this access.

The proposal will add to the variety and contrast of traditional and more recent development in this part of the Cramond Conservation Area. As demonstrated in section 3.3c) of this assessment, the proposal is of an appropriate design and the materials reflect those established in the surrounding area.

The proposal will preserve the character and appearance of this part of the conservation area. The proposal therefore complies with ECLP Policy ENV 6.

#### e) Protected Species and Trees

The site is adjacent to the River Almond, which is designated as a Site of Importance for Nature Conservation in the ECLP for its biodiversity value. No concerns are raised with regard to the proposal's impact on this designation.

The application is accompanied by a Habitat Survey Report and subsequent surveys. No concerns were raised with regard to badgers or bats. The Habitat Survey Report confirmed that there was no evidence of other protected species, including otter, on the site or in the immediate vicinity.

ECLP Policy Env 12 (Protection of Trees) states that development will not be permitted if likely to have a damaging impact on a tree or trees protected by a Tree Preservation Order. The trees are protected by virtue of their location within a conservation area, however do not benefit from specific preservation orders.

Approximately 10 small and semi-mature trees require to be removed as a result of the proposal. Thirteen 'extra heavy' standard trees will be planted in mitigation within the same general area of the site (north). No concerns have been raised regarding the removal of these trees, and the type and position of the new trees is acceptable. Tree protection measures will be employed for the remaining trees which comprise the creation of root protection areas demarked by protective fencing.

The proposal complies with ECLP policies Env 12 and Env 16 and the associated Edinburgh Design Guidance.

#### f) Traffic, Road Safety and Parking

The application is accompanied by a Transportation Statement which sets out the proposal's potential impact on the transport network. The Transportation Statement includes a review of the existing network including public transport provision, and the likely vehicle trip rates and amount of trips.

The Roads Authority confirms that the trip generation from the development and the resultant impact on the local road network within the Transportation Statement is an accurate assessment. The Roads Authority also raised no concern with regard to the information set out in the Statement regarding public transport provision.

The Applicant's Transport Consultant confirms that Scottish Fire and Rescue Service has been consulted in detail on the proposals, including vehicle tracking diagrams for appliances, and is satisfied with the access and egress arrangements. No concern has been raised by the Roads Authority on this matter.

The Roads Authority raises no concerns regarding the entrance and exit of refuse vehicles.

The entry and exit driveways are proposed as shared surfaces. The sharing of space between pedestrians, cyclists and vehicles is encouraged by Designing Streets and the Council's Street Design Guidance. These documents promote shared surfaces, which encourage motorists to recognise the space as being different, drive more slowly, and respond directly to the behaviour of other users (including other motorists). The access lanes have sufficient widths (minimum of 4 metres) to allow space for vehicles to pass pedestrians and cyclists, and pedestrian refuge areas will be provided at intervals along both lanes.

Current Council parking standards for a care home development in this area (Zone 4) require a between 20 and 35 parking spaces. The developer is proposing to provide 20 parking spaces including four disabled spaces. One ambulance/patient transport vehicle space will also be provided along with spaces for two motorcycles and four bicycles. The Roads Authority raises no objections to this level of provision and the provision complies with the Council's Parking Standards.

The Roads Authority does not object to the proposal subject to the inclusion of relevant conditions, informatives and the creation of a suitably worded legal agreement for contributions including:

- £5,000 for the improvement of public transport infrastructure (bus shelters), to accommodate movement needs associated with the development in the vicinity
- £2,000 to progress a suitable traffic order to introduce waiting and loading restrictions on Whitehouse Road, Cramond Glebe Road and School Brae as necessary, in particular, to ensure adequate visibility is afforded to drivers exiting onto Cramond Glebe Road



The Roads Authority confirms that without the introduction of waiting and loading restrictions particularly on Cramond Glebe Road, the proposed exit will be unsafe due to limited visibility. As there is no guarantee that the promotion of the traffic order will be successful, the Roads Authority confirms that a suspensive condition should be attached to the permission. This condition has been added accordingly.

The Cramond and Barnton Community Council objects to the proposal on several grounds, including various traffic and safety issues. The Roads Authority was reconsulted on the matters raised in the Community Council's response, and did not raise any concerns.

The proposal complies with ECLP policies Tra 4 and Tra 5, and the Council's non-statutory guidance on Parking Standards.

#### g) Neighbouring Amenity

The Edinburgh Design Guidance states that the pattern of development in an area will help to define appropriate distances between buildings and consequentially privacy distances. The Guidance also set out matters relating to sunlight, daylight and outlook.

The care home will be approximately 14 metres from the eastern boundary of the site with a short windowless projection at approximately 9.6 metres from that boundary, approximately 26 metres from the northern boundary of the site, and approximately 11 metres from the southern boundary of the site. The closest window-to-window distance from the care home to a neighbouring residential property will be approximately 18 metres at 4 Cramond Glebe Terrace.

The privacy distances achieved for this development are characteristic of the surrounding area and in some cases greater. The window-to-window distances are acceptable and will avoid adverse impacts on the privacy experienced by neighbouring properties.

The care home will be set back a sufficient distance from the site's boundaries to avoid any adverse impacts on daylight, sunlight and outlook relative to neighbouring residential properties.

The site has an established residential use and the proposed change to a care home will both maintain and intensify this use type. The lighting consists mainly of low level bollard and wall mounted types, and higher level post mounted lighting in the car park which will be automatically switched off following shift changes and outwith visiting times for public access.

Environmental Assessment has assessed the proposal against its potential impacts with regard to noise, disturbance, odour, air quality, soil pollution and light pollution, and raises no objections.

Environmental Assessment recommends conditions including one to restrict timings for deliveries and collections. This condition has been added accordingly.

The proposal will not have an unacceptable adverse impact on neighbouring amenity.

The proposal complies with ECLP Policy Des 3 (Development Design) and Policy Hou 8 (Inappropriate Uses in Residential Areas), and the associated Edinburgh Design Guidance.

#### h) Living Environment for Future Occupiers

The proposal comprises 50 bedrooms with en-suites and ancillary facilities, communal areas, a cinema room and hair and therapy spaces. Useable outdoor amenity space is provided to the north and west of the building.

All the bedrooms have windows providing natural light. From a planning perspective there are no minimum floor areas set out for bedrooms in care home uses such as this. The adequacy of the room sizes would be assessed under a separate regime set by the Care Quality Commission.

An assessment of the quantity and quality of the open space provided is particularly relevant given the value of accessible space to residents who are likely to have a range of mobility difficulties. Excluding paths and ancillary landscaping the proposal will provide direct access to approximately 998 square metres of useable shared amenity space comprising garden and paved areas. The majority of this outdoor space will be north and west facing.

The quantity and quality of the outdoor space is acceptable, and the standard of living provided internally is acceptable from a planning perspective.

Environmental Assessment raises no objections with regard to the impact on the amenity of future residents. Conditions have been recommended relating to acoustic glazing to mitigate against noise from aircraft and ceiling insulation to mitigate against noise relating to the roof top plant equipment.

The proposal complies with ECLP policies Des 3 (Development Design) and Des 5 (External Spaces), and the associated Edinburgh Design Guidance.

#### i) Flooding, Drainage and Sewage

Flood Prevention has assessed the proposal in relation to drainage and flood risk and raises no objections. Similarly, SEPA raises no objections.

No concerns are raised with regard to the proposal's impact on water quality or soil erosion.

With regard to waste management, it is proposed that the discharge for the site connects to Scottish Water's existing combined sewer network. The Drainage Strategy states that Scottish Water has confirmed that there is sufficient capacity in the wastewater treatment works and local network to service the development.

The proposal complies with ECLP Policy Env 17 (Flood Prevention).

#### j) Archaeology

The site lies across the southern entrance to the Roman Fort at Cramond. Although predominantly outwith the main fort itself, the outer ditches are thought to be on or close to the site's northern boundary, and the site does occur within the area known to contain evidence of the fort's associated extra-mural settlement, temporary camps and southern Roman Road. Based on the historical and archaeological evidence, the site has been identified as occurring within an area of archaeological significance.

No objections are raised with regard to archaeology subject to a condition requiring a programme of archaeological work (excavation, analysis & reporting, publication, public engagement) in accord with a written scheme of investigation to be submitted prior to the commencement of development. This condition has been added accordingly.

The proposal complies with ECLP Policy Env 9 (Development of Sites of Archaeological Significance).

#### k) Sustainability

The site comprises a number of measures to enhance energy efficiency, including the use of a Combined Heat and Power (CHP) boiler and low carbon equipment relating to heating, ventilation and lighting specifications. In addition, a Sustainable Urban Drainage system (SUDs) will be incorporated.

The site is within an urban location, well located with respect to public transport and well connected by foot and cycleways to the wider area.

The proposal represents sustainable development.

#### l) Other Material Considerations

Representations have raised concern about potential overburdening of local medical services.

It is the requirement of NHS Lothian to provide or expand existing health care facilities where needed. The applicant confirms that the care home will be run by registered nursing staff who will be on-site at all times. When GPs are required, the applicant has stated that these do not come solely from the local catchment area, but also the catchment area of where the patient has come from. The applicant states that due to this arrangement, the impact of the proposal on Cramond Medical Practice will be kept to a minimum.

#### m) Equalities and Human Rights

The building has been purposely designed for the elderly including those with mobility difficulties, where access will be required for wheelchair users. Lift access is provided between floors. Externally, level access from entrance and exit points is provided, and four disabled parking spaces are also provided.

The proposal does not raise concerns with regard to equalities and human rights.

#### n) Public Comments

The application has received 475 objections including from Cramond Action Group, Cramond Association, Cramond Heritage Trust, Cockburn Association, an MSP and an MP.

55 representations have been received in support of the proposal including one from the Council's Health and Social Care Department, and one petition in support. The petition contains 338 signatures.

The objections raised have been summarised below:

### **Material Representations: Objections**

- Use is inappropriate in residential area - this has been addressed in section 3.3a) of the assessment
- Cramond should be kept free of development - this has been addressed in section 3.3a) of the assessment
- Unsustainable location - this has been addressed in section 3.3a) of the assessment
- Demolition of existing dwelling unacceptable - this has been addressed in section 3.3b) of the assessment
- Detrimental to character of conservation area - this has been addressed in section 3.3d) of the assessment
- Inconsistent with spatial character of area - this has been addressed in section 3.3c) of the assessment
- Scale, massing and design of building inappropriate - this has been addressed in section 3.3c) of the assessment
- Materials inappropriate - this has been addressed in section 3.3c) of the assessment
- Insufficient amenity space provided - this has been addressed in section 3.3h) of the assessment
- Impact on road and pedestrian safety and congestion - this has been addressed in section 3.3f) of the assessment
- Increase in parking on surrounding streets - this has been addressed in section 3.3f) of the assessment
- Access to site unsuitable - this has been addressed in section 3.3f) of the assessment
- Insufficient parking provided - this has been addressed in section 3.3f) of the assessment
- Inadequate access for pedestrians, cyclists and wheelchair users - this has been addressed in section 3.3f) of the assessment
- Noise and disruption - this has been addressed in section 3.3g) of the assessment
- Loss of privacy, outlook and light - this has been addressed in section 3.3g) of the assessment
- Lack of public transport - this has been addressed in section 3.3a), 3.3f) and 3.3k) of the assessment
- Lack of amenities in wider area including medical facilities - this has been addressed in section 3.3a) and 3.3l) of the assessment
- Light pollution - this has been addressed in section 3.3g) of the assessment
- Air pollution - this has been addressed in section 3.3g) of the assessment
- Odours - this has been addressed in section 3.3g) of the assessment

- Care home residents will be adversely by noise from aeroplanes - this has been addressed in section 3.3h) of the assessment
- Detrimental impact on archaeology - this has been addressed in section 3.3j) of the assessment
- Detrimental impact on trees - this has been addressed in section 3.3e) of the assessment
- Detrimental impact on sewage system - this has been addressed in section 3.3i) of the assessment
- Potential detrimental impact on water quality of River Almond - this has been addressed in section 3.3j) of the assessment
- Detrimental impact on protected species - this has been addressed in section 3.3e) of the assessment
- Flood risk and soil erosion - this has been addressed in section 3.3i) of the assessment

Several representations cited inaccuracies in the supporting documentation. This issue was raised with the Agent and an opportunity was provided to review the documentation in order to make revisions as required. As a result, the Design and Access Statement, Transportation Statement and Archaeological Evaluation - Written Scheme of Investigation were revised to account for an error in the reference to the number of bedrooms proposed. The revised documents are available to view on the Planning and Building Standards Online Services.

### **Material Representations: Support**

- Principle of care home supported
- Existing house does not complement character of conservation area
- Large garden is suitable for development
- Architecture in keeping with area
- Circa 90 jobs will be created
- Local employment encouraged which will minimise travel
- Impact on adjacent properties is negligible
- Limited visibility of site from roads and surrounding area
- Enhanced and accessible amenity space will contribute to local community
- Existing local amenities will support proposal (i.e. public transport, medical centre)
- Traffic impact will be negligible
- High standard of accommodation provided
- Ecology will not be adversely affected

### **Non-Material Representations**

- Proposal will create a precedent
- Proposal will enhance bank balance of shareholders
- There are more appropriate sites available
- Proposal will devalue surrounding properties
- Loss of view
- Disruption from construction process
- Not taken account of residents views as part of the community consultation undertaken by the Applicant

- Revisions to the proposal are minimal
- Interior layout not fit for purpose
- Residential development would be more appropriate
- Residents will oppose Traffic Regulation Order
- Structural stability of building could be an issue
- Proposal will adversely impact demographic of population in Cramond
- Proposal meets social need
- Shortage of care homes
- Oversupply of care homes

## **Community Council**

Cramond and Barnton Community Council requested to be a statutory consultee therefore their response is set out in the consultation section of this report. The comments raised have been addressed within the relevant sections of the assessment.

## **Conclusion**

The proposal is acceptable in principle and represents sustainable development as defined by the Edinburgh City Local Plan (ECLP) and Scottish Planning Policy (SPP).

The proposal is acceptable with respect to density, layout, scale and design and it will not have an adverse impact on the character and appearance of the site or the Cramond Conservation Area. No concerns are raised with regard to the proposal's impact on traffic, road safety, parking, flooding, drainage, trees, protected species, archaeology, neighbouring amenity or the amenity of future occupiers. The proposal complies with relevant policies in the Development Plan and associated non-statutory guidance.

The proposal is acceptable. 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. The occupation of the development hereby approved shall not commence until the waiting and loading restrictions on Whitehouse Road, Cramond Glebe Road and School Brae (as necessary), which are required to be progressed through a suitable traffic order, have been implemented in full.
2. No demolition or development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation,

analysis & reporting, publication, public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

3. The landscaping scheme as approved shall be implemented within the first planting season following the completion of the development hereby approved.
4. All planting carried out on site shall be maintained by the developer to the satisfaction of this Planning Authority. Any plants, which are dead, damaged, missing, diseased or fail to establish shall be replaced annually.
5. The trees to be retained on the site shall be protected during the construction period by the erection of fencing, in accordance with clause 2 of BS 5837:2012 "Trees in relation to design, demolition and construction".
6. Full details of the boundary treatment(s) shall be submitted to and approved by the Planning Authority prior to the commencement of the development on site.
7. All trees existing on site at the date of this report except those identified for removal shall be retained and no trees shall have roots cut or be lopped, topped, felled, uprooted or removed, unless otherwise agreed in writing with the Planning Authority.
8. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
9. All bedroom windows of the development shall be glazed to provide a minimum sound reduction index value of 35dB (e.g. glazing consisting of 10mm and 6mm thick panes of normal float glass separated by a 20mm wide cavity).
10. Deliveries and collections, including waste collections, shall be restricted to between the hours of 07:00 and 19:00, Monday to Saturday.
11. The bedroom(s) directly below the roof top plant equipment shall have a suspended ceiling construction comprised of two layers of 15mm thick plasterboard with 100mm thick mineral fibre slabs, having a density of at least 100kg/m<sup>3</sup>, laid on top of it.

**Reasons:-**

1. To ensure adequate visibility is afforded to drivers.
2. In order to safeguard the interests of archaeological heritage.

3. In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
4. 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.
5. In order to safeguard trees.
6. In order to enable the Planning Authority to consider this/these matter/s in detail.
7. In the interests of visual amenity; to ensure that all trees to be retained are satisfactorily protected before and during construction works.
8. In order to enable the Head of Planning to consider this/these matter/s in detail.
9. In order to protect the amenity of the occupiers of the development.
10. In order to safeguard the amenity of neighbouring residents and other occupiers.
11. In order to protect the amenity of the occupiers of the development.

### **Informatives**

It should be noted that:

1. Prior to the issue of consent the applicant shall enter into a suitably worded legal agreement with the Council to contribute the sum of £5,000 for the improvement of public transport infrastructure (bus shelters) to accommodate movement needs associated with the development in the vicinity.
2. Prior to the issue of consent the applicant shall enter into a suitably worded legal agreement with the Council to contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions on Whitehouse Road, Cramond Glebe Road and School Brae as necessary (in particular, to ensure adequate visibility is afforded to drivers exiting onto Cramond Glebe Road).
3. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
4. 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.



5. 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.
6. The applicant should submit a draft Travel Plan prior to first occupation and a final Travel Plan within 12 months of that date. The Travel Plan should explore financial contributions to transport promotion measures, including contributions to, or provision of, public transport season tickets and the provision of a public and sustainable transport information pack.
7. A monitor capable of receiving an internet connection to display Public Transport Real Time information should be displayed in the reception area of the care home.
8. Refuse facilities should be within 30 metres of an area which can be accessed by a refuse removal vehicle.
9. The provision, layout and location of cycle parking should be to the Councils standards in accordance with Cycle Friendly Design Guide and to the satisfaction of the Head of Transport.
10. 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. If relevant, 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.
11. The applicant should contact the Council's Public Transport section, Graham Atkins, Tel 0131 469 3783, email [graham.atkins@edinburgh.gov.uk](mailto:graham.atkins@edinburgh.gov.uk) before commencing work on site to ensure the proposed works do not have an impact on the operation of the bus stops.
12. Electric vehicle charging outlets should be considered for this development which includes dedicated parking spaces with charging facilities ducting and infrastructure to allow electric vehicles to be readily accommodated in the future.
13. In addition to the advertising costs associated with the progression of a suitable order to introduce waiting and loading restrictions on Whitehouse Road, Cramond Glebe Road and School Brae as necessary, the applicant will be required to provide suitable consultation drawings to allow the Council to initiate the statutory traffic order process with respect to these waiting and loading restrictions.

14. Clearance of vegetation/trees has the potential to disturb nesting birds; therefore clearance should be carried out outside the bird nesting season March - August (inclusive). Should it be necessary to clear ground during the bird nesting season the land should be surveyed by a suitably qualified ecologist and declared clear of nesting birds before vegetation clearance starts.

## **Financial impact**

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

The application is subject to a legal agreement for developer contributions.

## **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**

Pre-application discussions took place on this application.

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

The application has received 475 objections including from Cramond Action Group, Cramond Association, Cramond Heritage Trust, Cockburn Association, an MSP and an MP.

55 representations have been received in support of the proposal including one from the Council's Health and Social Care Department, and one petition in support. The petition contains 338 signatures.

Cramond and Barnton Community Council requested to be a statutory consultee therefore their response is set out in the consultation section of this report.

## **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**

The site is located within the Cramond Conservation Area. The site sits outwith but directly to the east of the Green Belt, an area of protected Open Space, and a Local Nature Conservation Site.

### **Date registered**

3 December 2015

### **Drawing numbers/Scheme**

01,02A,03,04B,05,06,07A-09A,10,11,12A,13,14,15A,18-20,

Scheme 2

## **John Bury**

Head of Planning & Transport  
PLACE  
City of Edinburgh Council

Contact: Ruth King, Planning officer  
E-mail:ruth.king@edinburgh.gov.uk Tel:0131 529 6475

## **Links - Policies**

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### **Relevant Policies:**

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

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

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

Policy Env 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 Env 5 (Conservation Areas – Demolition of Buildings) sets out criteria for assessing proposals involving demolition of buildings in conservation areas.

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

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

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

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

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

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

### **Other Relevant policy guidance**

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

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

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

The Cramond Conservation Area Character Appraisal emphasises the enclosed, compact and informal spatial structure, the vernacular style of many of the buildings, the predominance of traditional building materials, and the prevalence of residential uses.

# Appendix 1

## **Application for Planning Permission 15/05434/FUL At 18 Whitehouse Road, Edinburgh, EH4 6NN Proposed demolition of existing dwelling and construction of new care home and associated car parking (as amended).**

### **Consultations**

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#### Roads Authority

*I have no objection to the proposed application subject to the following being included as conditions or informatives as appropriate:*

1. *Consent should not be issued until the applicant has entered into a suitable legal agreement to:*
  - a. *Contribute the sum of £5,000 for the improvement of public transport infrastructure (bus shelters), (to accommodate movement needs associated with the development in the vicinity - in accordance with LTS policies LU1-LU4, PT3 and the approved transport contributions report);*
  - b. *Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions on Whitehouse Road, Cramond Glebe Road and School Brae as necessary (in particular, to ensure adequate visibility is afforded to drivers exiting onto Cramond Glebe Road- see note iv below);*
  - c. *Submit a draft Travel Plan prior to first occupation and a final Travel Plan within 12 months of that date. The Travel Plan to include financial contribution to transport promotion measures, including contributions to, or provision of, public transport season tickets and the provision of a public and sustainable transport information pack. Reason - To encourage more sustainable travel modes in line with the Local Transport Strategy policy LU 3;*
  - d. *A monitor capable of receiving an internet connection to display Public Transport Real Time information should be displayed in the reception area of the care home. (Reason to advise staff and visitors of public transport);*
2. *The proposed exit on Cramond Glebe Road to be widened within the constraints of ownership;*
3. *Refuse facilities should be within 30 metres of an area which can be accessed by a refuse removal vehicle;*
4. *The provision, layout, location and number of cycle parking should be to the Councils standards in accordance with Cycle Friendly Design Guide and to the satisfaction of the Head of Transport;*
5. *The developer must submit a maintenance schedule for any SUDS infrastructure for the approval of Head of Planning;*
6. *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.

Notes:

- i. Current Council parking standards for a care home development in this area (Zone 4) require a between 20 and 35 parking spaces. The developer is proposing to provide 20 parking spaces which is acceptable;
- ii. The applicant should contact the Council's Public Transport section, Graham Atkins, Tel 0131 469 3783, email [graham.atkins@edinburgh.gov.uk](mailto:graham.atkins@edinburgh.gov.uk) before commencing work on site to ensure the proposed works do not have an impact on the operation of the bus stops;
- iii. Electric vehicle charging outlets should be considered for this development which includes dedicated parking spaces with charging facilities ducting and infrastructure to allow electric vehicles to be readily accommodated in the future;
- iv. In addition to the advertising costs as noted the applicant will be required to provide suitable consultation drawings to allow the Council to initiate the statutory traffic order process with respect to these waiting and loading restrictions. A suspensive condition is requested as there is no guarantee that the promotion of this order will be successful. It is considered that without it this exit is unsafe (appropriate visibility splay not provided);
- v. The application was submitted with a comprehensive Transport Statement (Andrew Carrie, Traffic and Transportation Ltd, August 2015). This TS has been examined and the trip generation from the development and impact on the local road network demonstrated within it is considered valid. The walking section of the document, however, only considers the facilities on the existing road network once pedestrians have left the site. It is noted that the long driveway entry and exit are narrow and proposed as shared surfaces. As this is not a proposed road for adoption this is not a matter for consideration by Transport. However I would suggest that Building Control are consulted on this layout as it would appear that pedestrians- particularly mobility and visibility impaired ones- will have no safe refuge from vehicles using the drive;
- vi. It is noted that the fire service has confirmed that the proposed development layout is acceptable.

### Archaeology

*I would like to make the following comments and recommendations concerning the above linked planning applications for the proposed demolition of existing dwelling and construction of a new care-home and associated car-parking.*

*The site lies across the southern entrance to the Roman fort at Cramond, constructed c.140AD as part of the Antonine Wall border system and which was extensively re-occupied during the Severan invasion of Scotland in the early 3rd century AD. Although predominantly out with the main fort itself, the outer ditches thought to on or close to the sites northern boundary, the site does occur within the area known to contain evidence for the fort's associated extra-mural settlement, temporary camps, southern Roman Road leading into the fort and also Anglian (7-10th century) and medieval occupation.*

*The site was identified at the pre-application/PAN stage as being high archaeological significance. Accordingly and in line Policy ENV 9 an archaeological evaluation was required to be undertaken to determine the significance of any surviving remains. This work was undertaken by ARCHUS in May 2015. The results have demonstrated that the application site lies outwith the Roman Fort's main defences but within an area containing associated features such as pits/post-holes and possible field-boundary of both Roman and post-Roman date. Pre-historic artefacts were also recovered along with an isolated fragment of human remains. The human bone was not related to a grave cut and its original origin and date is currently unknown, though a Roman date cannot be ruled out..*

*Based on the historical and archaeological evidence the site has been identified as occurring within an area of archaeological significance. Accordingly this application must be considered under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh City Local Plan (2010) policy ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

*An assessment of the results of evaluation undertaken by ARCHUS in 2015 has led to the conclusion that the demolition of the current property and new care-home will have a significant archaeological impact. However although significant, the nature and scale of the deposits encountered indicate that in my opinion such would overall be seen as moderate. As such it is recommended that a detailed programme of archaeological excavation is undertaken in order to fully record and excavate all significant archaeological deposits which may be affected by these proposals.*

*Furthermore, given the potential importance of these remains it is essential that the excavations contain a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards) the scope of which will be agreed with CECAS.*

*It is recommended that the following condition is attached to both the FUL & CON applications if consent is granted, to ensure that this programme of archaeological works is undertaken.*

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

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

## SEPA

*Thank you for your consultation letter which SEPA received on 07 December 2015.*



*We responded to planning application 15/04016/FUL for the same site on the 5 October 2015 (our ref: PCS/142572). We note that the proposal has been revised with a reduced scale.*

*The changes to the development do not impact on our previous comments which we have therefore repeated in this response (see Section 1 and 2 below).*

*We have no objection to this planning application. Please note the advice provided below.*

*Advice for the planning authority - the same as for 15/04016/FUL (our ref: PCS/142572)*

## *1. Flood risk*

*1.1 SEPA were previously consulted on a pre-application enquiry for development at this site. We provided comments that there would unlikely be an objection as the site was outwith the 0.5% annual probability (1:200-year) flood extent and we hold no further information to indicate a risk at this site. Further to these previous comments, the section information provided with the consultation indicates a significant level difference between the western boundary of the site and the River Almond. We have no objection to the proposals on flood risk grounds.*

*1.2 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland.*

*1.3 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.*

*1.4 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 City of 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 in line with the phases of this legislation.*

## *2. Surface water drainage*

*2.1 It is proposed to discharge surface water from the development to the combined sewer. Our preference would be to treat surface water by sustainable drainage systems (SUDS) and discharge to the water environment. SUDS help to protect water quality, reduce potential for flood risk and release capacity in the public sewerage network. Discharges to combined sewers should be avoided to free up capacity for waste water discharges.*

2.2 *Scottish Water should be consulted to ensure that they are willing to accept the surface water from the proposed development into the combined sewer. Scottish Water only accepts surface water into a combined system in exceptional circumstances. We would expect Scottish Water and the applicant to ensure that all reasonable efforts are made to remove surface water from the combined sewer.*

2.3 *We encourage surface water runoff from all developments to be treated by sustainable drainage systems (SUDS) in line with Scottish Planning Policy (Consultative Draft Paragraph 160), PAN 61 Planning and Sustainable Urban Drainage Systems and PAN 79 Water and Drainage. Further guidance on SUDS can be found in the SUDS section of our website and in CIRIA's C697 manual entitled The SUDS Manual. Advice can also be found in the SEPA Guidance Note Planning advice on sustainable drainage systems (SUDS).*

2.4 *Comments from Scottish Water, where appropriate, the Local Authority Roads Department and the Local Authority Flood Prevention Unit should be sought in terms of water quantity/flooding and adoption issues.*

*Regulatory advice for the applicant*

### *3. Regulatory requirements*

3.1 *Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office (tel: Edinburgh & West Lothian 0131 449 7296 / Borders 01896 754797 / Falkirk 01786 452595).*

### Environmental Assessment

*The applicant proposes the demolition of an existing dwelling at 18 Whitehouse Road, to be replaced with a care home. The site is accessed via a driveway to the south and another to the east (joining Cramond Glebe North). Bordering to the south, east and north are existing dwellings with the river Almond to the west.*

*Environmental Assessment has concerns over the introduction of a noise sensitive property in this location given its proximity to the flight path of Edinburgh Airport. In addition to inward aircraft noise intrusion, this proposal has the potential to generate operational noise which could negatively affect the amenity of the neighbouring dwellings; both of these aspects have been considered and assessed in noise impact assessments submitted by the agent. These assessments conclude that:*

- o an upgraded glazing specification will be required to attenuate aircraft noise to acceptable levels within the bedrooms of the care home*
- o a specific ceiling construction will be required to protect the amenity of the top floor bedrooms of the care home from plant noise*
- o noise associated with servicing vehicles will not be loud enough to negatively affect the amenity of the neighbouring dwellings during daytime operation.*

*Conditions regarding each of these points are recommended.*

*This proposal includes a kitchen which will provide hot food for residents. Due to the proximity of the neighbouring residential dwellings Environmental Assessment has concerns over the potential for kitchen odours to affect amenity. The agent has submitted information regarding the performance specification of the kitchen extract fan and flue which meet Environmental Assessment's minimum standards and addresses these concerns. The proposal also includes a combined heat and power plant. Environmental Assessment has considered the capacity of the system in relation to the Clean Air Act 1993; the power output being below the level which would require a chimney height calculation to be submitted by the developer.*

*Environmental Assessment has no objections to this proposal, subject to the following conditions:*

- 1. All bedroom windows of the development shall be glazed to provide a minimum sound reduction index value of 35dB (e.g. glazing consisting of 10mm and 6mm thick panes of normal float glass separated by a 20mm wide cavity).*
- 2. Deliveries and collections, including waste collections, shall be restricted to between the hours of 07:00 and 19:00, Monday to Saturday.*
- 3. The bedroom(s) directly below the roof top plant equipment shall have a suspended ceiling construction comprised of two layers of 15mm thick plasterboard with 100mm thick mineral fibre slabs, having a density of at least 100kg/m<sup>3</sup>, laid on top of it.*

#### Flood Prevention

No objections.

#### Cramond and Barnton Community Council

*Cramond and Barnton Community Council appreciates the City Council's agreement to being granted statutory consultee status in respect of this development.*

*The Community Council opposes the application for the construction of a 50-bedroom care home on this backland site within Cramond Conservation Area. In doing so, the Community Council is reflecting the views of the local community, which have been consistently expressed at Community Council meetings, a public exhibition organised by the applicants, and in representations by individuals and organisations to the Community Council. The revised scale of the proposals does not change the community's objections to the principle of this development within the Conservation Area or to the specific details of the proposed development, as set out in the revised application.*

*In summary, the Community Council seeks refusal of the application for the following reasons -*

- 1. Inappropriate replacement development within Cramond Conservation Area*
- 2. Matters of concern, but not material planning considerations*
- 3. Location and scale of development*
- 4. Building design and materials*
- 5. Landscaping, open space provision and species conservation*
- 6. Traffic and safety issues*

7. Capacity of community medical services
8. Sewerage capacity
9. Light pollution and noise nuisances.

*These grounds for seeking refusal of the application are discussed in more detail overleaf.*

*This submission should be read in conjunction with the Community Council's objections to application 15/05435/CON for conservation area consent to permit demolition of the dwelling house to enable the care home development. It is not intended to repeat verbatim the case made in this parallel submission and many of the reasons for objection are similar to those set out below.*

#### *1. Inappropriate replacement development within Cramond Conservation Area*

*The replacement development, including its location, footprint, massing, height, materials, traffic implications, noise and lighting pollution and effects on surrounding trees, would adversely affect the character and qualities of Cramond Conservation Area. Consequently, consent to the proposals would be contrary to planning policies and guidance for conservation areas in Scottish Planning Policies (SPP), Scottish Historic Environment Policy (SHEP), PAN 71 and the Council's Local Development Plan, Edinburgh Design Guide and Cramond Conservation Character Assessment. It should be noted, however, that the Community Council is unlikely to object to a replacement private house of a scale and design that is compatible with character of the Conservation Area. Similarly, the Community Council is not opposed to appropriate care home developments and has supported development of a 74-bed nursing home at Cramond Place, proposed 90-bed nursing home on the former Cramond Campus site and 70 assisted-living flats at Barnton Grove.*

#### *2. Matters of Concern, but not Material Planning Considerations*

- a. *Potentially misleading statements by the applicants - the Community Council has significant concerns that statements by the applicants' consultants may not accurately reflect the Council's position on the proposals and may be intended to mislead the public; for example -*
  - o *pre-application exhibition boards stated ... Edinburgh Council's Transportation Department has raised no concerns over traffic impacts ....*
  - o *the current application form states that, in pre-application discussions with planning staff, ... RK & EC were supportive of the reduced scale, massing and approach, etc.. Also, the 'Planning Statement' reports that ... At the meeting with the Council's Planning Officers at the end of October 2015, it was confirmed by the Council that the principle of redeveloping the application site for a new care home development was acceptable and could be supported by current planning policies..... The Officers also confirmed that the consultation responses received on the first application indicated that the proposed redevelopment of the site was appropriate in terms of relevant technical, infrastructure, heritage, and environmental considerations. This latter statement is patently untrue and the Community Council cannot understand how Council staff could give assurances, such as those reported above, prior to fully assessing the proposals and reviewing submissions by the public and statutory consultees.*

*o In various locations, the 'Planning Statement' refers to the building being ... a maximum of two-storeys (s. 5.2). The application is accompanied by plans and visualisation clearly showing a building of 4-storeys*

*b. interior layout is not fit for purpose - as modern principles of care home design eschew the provision of lengthy bedroom corridors, in favour of smaller groups of rooms around a carers' hub.*

### *3. Location and Scale of Development*

*The introduction of this commercial, 50-bedroom development on a backland site, and with a gross internal floor area of 2,974m<sup>2</sup> (locally, homes are around 160-220m<sup>2</sup>) and a frontage of around 54m, would comprise over-development of the site and this scale of development and intensification of use would adversely affect the residential amenity and special character of Cramond Conservation Area. Hence, it would be contrary to LDP2 policies Des 1, Des 3, Des 4, Env 6, Hou 4 and Hou 7 and guidance in Cramond Conservation Area Character Appraisal and Edinburgh Design Guidance.*

### *4. Building Design and Materials*

*Cramond Conservation Area Character Appraisal highlights key characteristics of the Conservation Area, including the variety of suburban, cottage-style, Edwardian and Victorian houses and predominance of traditional building materials creating a coherent visual unity (e.g. sandstone, harl, slate or pantile roofs, domestic fenestration). Edinburgh Design Guidance states that backland development should be subservient to surrounding buildings, avoid disrupting the spatial character of the area, design features (e.g. scale, size, windows, doors) should harmonise with, and be of a similar scale to, existing buildings, and buildings should sit within the form set by the eaves and ridge of neighbouring buildings.*

*The massing, form, scale, fenestration, materials (i.e. reconstituted stone, timber cladding, copper-coloured membrane roof) and fourth floor with flat roof at the height of adjacent roof ridges, are clearly contrary to the guidance and policies in SPP, SHEP and LDP2 - especially LDP2 policies Des 1, Des 3, Des 4, Env 5 and Env 6.*

### *5. Landscaping, Open Space Provision and Species Conservation*

*The landscaping, open space and conservation proposals are unacceptable, as -*

*a. the visualisations in the Design and Access Statement (e.g. 'Drawing 5. Proposed Design') show an extent and scale of tree cover and screening, which is unlikely to be achievable given the landscaping proposals shown on other plans and would cast excessive shade on west- and north-facing rooms and garden grounds*

*b. revised siting of the 4 storey-building towards the western boundary of the site will increase its visibility on the skyline, when viewed across the River Almond from the popular John Muir Way and Dalmeny path network - especially in winter, when there is no vegetation on trees on the site boundary*

c. *ready access to comfortable, attractive greenspace is essential for the physical and mental well-being of elderly residents. The plans show relatively small garden areas to the north and west sides of the proposed development, which will be overshadowed by the 3-/4-story care home to the south and east and mature trees to the west and north - all having major shading effects and potentially creating a frost pocket in winter and damp environment over much of the year*

d. *the tree protection areas appear inadequate given the size and likely extent of root systems of existing trees. In particular, the access road in front of the building will require to support heavy vehicles during construction and thereafter and construction of this road is likely to adversely affect the few existing trees along this frontage, which provide essential, but partial visual screening*

d. *a bat survey during the main activity period (i.e. summer) will be essential to ascertain the presence of bats in the existing building and comply with EU/UK regulations. It is unacceptable to state in the Habitat Survey Report that ... It is considered that the main building does not have features suitable for supporting bat roosts; such as gaps beneath roof-tiles and within soffits, without undertaking a bat survey in accordance with BCT and CIEEM guidelines.*

*As a consequence of the above assessments, the Community Council contends that this proposal is contrary to LDP2 policies Des 5(a), Env 6 and Env 16*

## 6. Traffic and Safety Issues

a. *Misleading or inaccurate statements in Transportation Statement, including -*

i. *understated levels of use of Whitehouse Road and Cramond Glebe Road - despite statements to the contrary, Whitehouse Road is a well used traffic route. Also, while it is true that Cramond Glebe Road is a local access road, it provides essential access for residents and to Cramond car park (150+ spaces; frequent peak period turn-over), Cramond Inn (approx. 45 spaces), Cramond Kirk Halls (approx. 60 spaces; 2,000+ bookings/year), Cramond Kirk (no dedicated parking for services, weddings or funerals), Cramond Nursery (100+ children; morning/afternoon sessions) and Cramond Medical Practice (approx. 12 spaces) - all of which generate overflow parking pressures at peak times*

ii. *bus services - Section 4 refers to six '41' buses/hour in each direction. In reality, the '41' terminus is close to the proposed site and there are only 4 buses/hour at peak periods arriving at/leaving Cramond. Early morning/late evening services at weekends are half-hourly and do not commence early enough on Sundays to serve the stated morning shift times. In addition, travel time from Cramond to Princes Street is stated as 10 minutes, as opposed to the 33 to 49 minute travel time to Hanover Street shown in Lothian Buses' timetable. These long travel times will deter bus use, as driving times can be 10 to 20 minutes and most staff will not live near the '41' route. Also, Lothian Buses have indicated that continuance of the '41' service to this part of Cramond is not guaranteed, due to the low density of residents*

iii. *traffic generation predictions - Section 5 indicates that the first staff day shift starts at 07.00 and the second shift finishes at 22.00, when night staff take over. However, the Trip Generation tables (5.1, 5.2) and Accumulation of Vehicles diagram (7.1) do not show these arrivals or departures. Staff arriving/leaving at these early*

morning/late evening times will mostly use private vehicles, with inevitable noise disturbance to neighbouring residents.

iv. deliveries and refuse collection - statements that The only deliveries ... will be food and catering twice a week ...and... one refuse pick-up from the site weekly .. are apparent gross understatements and ignore postal, parcel, pharmacy, florist, maintenance equipment and other deliveries. Also, compliance with recycling policies will require more than one refuse collection per week (e.g. general wastes, clinical wastes, recycling collections) and additional traffic will be generated by tradesmen and taxis.

b. Potentially hazardous access and egress arrangements - traffic and pedestrian safety hazards and issues are numerous, for example -

i. drivers approaching the care home from the east (e.g. Cramond Road North) have a very restricted view of the entrance, which is set back and obscured by neighbouring properties and often by parked cars. Drivers, especially HGV drivers, will effectively have to make a U-turn in Whitehouse Road and drive directly across the Whitehouse Road/School Brae junction

ii. the entrance requires drivers and cyclists to cross the Whitehouse Road/School Brae junction at the point where residents and River Almond Walkway users' vehicles and cyclists are emerging from, or entering, School Brae and pedestrians are crossing the junction, including adults and children from the adjacent Nursery and Cramond Primary School. These conflicting pedestrian and traffic movements will pose significant safety hazards

iii. the exit to Cramond Glebe Road uses a narrow lane (approx. 3.5m wide) with stone walls at the exit point, resulting in an absence of visibility splays. Hence, the front of vehicles will be across the footway before drivers see any approaching pedestrians, cyclists or elderly people intending to access the care home. This footway is used by visitors to Cramond, who will be unaware of the need to exercise caution.

iv. parked cars on Cramond Glebe Road, between the care home exit and junction with Whitehouse Road, will further obscure exiting drivers' views of approaching traffic and Cramond Glebe Road users' views of cars coming out of the care home

v. parked cars restrict the above-mentioned section of road to one-way traffic, with resultant congestion - often backing up onto Whitehouse Road or Cramond Road North. This congestion is compounded by high flows of traffic at weekends and public holidays to Cramond Car Park, Boat Club, Harbour, Kirk and Kirk Halls, resulting in conflicts and grievances, which will be exacerbated by a further 112+ vehicle movements per day

vi. while there is limited off-street parking for everyday needs, additional on-street parking will be generated during care home events (e.g. parties, summer fairs, open days). This will exacerbate parking pressures from residents, patients at Cramond Medical Practice and clients of the two Children's Nurseries, which are a current cause of congestion, nuisance and safety hazards.

*It is noted that the Council's Transport Development Control Manager has recommended a suspensive condition requiring approval of a statutory TRO to restrict waiting and loading on sections of Cramond Glebe Road, without which the traffic exit from the proposed Care Home would be unsafe. Local residents, many of whom have no alternative parking, have indicated that they will strongly oppose any such Order*

*c. Pedestrian Access and Safety - Designing Streets states that priority should be given to pedestrians' and cyclists' safety and design should be inclusive. LDP2 policy Des 7: Layout Design states that ... safe and convenient access and movement in and around development will be promoted, having regard especially to the needs of people with limited mobility and special needs. Many residents will fall into these categories and separate footways will be essential for residents and visitors with mobility, sight or hearing impairments. Also, a footway along the exit lane will be required to enable residents' access to Cramond Medical Practice, Cramond Kirk/Kirk Halls (programmes for the elderly) and Cramond Village and Harbour.*

*However, the current proposals do include footways along the internal access/egress road and, if this road is to meet width requirements for emergency and refuse vehicles, there will be insufficient width for footways, especially for wheelchairs users. Consequently, the lack of safe and adequate width footways is likely to deter active travel*

*d. Emergency Vehicle Operations - It is assumed that the emergency services have approved the traffic arrangements. The emergency vehicle 'Swept Path Analysis' does not cover the access and egress points and it is unlikely that there would be sufficient turning space for a fire appliance (plus snorkel/ladders) exiting the site onto Cramond Glebe Road*

*Taking account of the above traffic and safety issues, the Community Council contends that the proposals are contrary to guidance in Designing Streets, other national policies and LDP2 policies Des 7, Hou 7 and Tra 2.*

#### *7. Capacity of Medical Services*

*Cramond Medical Practice is the only medical practice in the vicinity of the proposed care home. It is operating at capacity and is/will be coming under further pressures for services for the elderly from the assisted-living and care home developments at Barnton and Cramond Place. Cramond's ageing demographic will further exacerbate pressures on local medical services.*

#### *8. Sewerage Capacity*

*The 'Drainage Strategy' plan shows the intention to connect all drainage flows into the combined sewer, which links to the trunk sewer along the River Almond. This sewer operates above capacity at periods of peak flow, resulting in occasional effluent discharges onto the River Almond Walkway in Cramond Village and into the River Almond. Additional drainage loading from this proposal will exacerbate this already unacceptable situation. LDP2 policy RS 6 applies.*

#### *9. Light and Noise Pollution*



*The existing dwelling generates little or no external lighting pollution or noise nuisance. In contrast, the proposed 50-bed care home will -*

- a. require lighting of access and egress roads, parking areas, entrance area and utility areas. Also, there may be façade lighting and some rooms may generate external light*
- b. generate vehicular traffic day and night (e.g. night-time emergency medical and fire responses), with resultant noise nuisances.*

*Resultant lighting pollution and noise nuisances will adversely affect the amenity of the 16 or so houses immediately adjacent to/overlooking the development and its access and egress roads, and the wider neighbourhood. Such impacts are inappropriate to a backland site in a primarily residential area - especially within a conservation area - and, as such, are contrary to national policies (e.g. SPP, SHEP) and LDP2 policies Des 5, Env 6, Env 22, and Hou 7.*

#### *10. Recommendation for Site Visit and Request for Hearing by Committee*

*Understandably, the applicants have presented their proposals in the most favourable light. However, the Community Council has identified inaccuracies, deficiencies and distortions in their proposals and reports. To enable elected members to get a fair and balanced view of the proposals and understand the constraints and character of the site, we suggest that a site visit is required, so that members can take a considered and informed judgement of the potential impacts of the proposals.*

*Representatives of the Community Council will be pleased to discuss the above reasons for seeking refusal of this application. In particular, the Community Council requests the opportunity to present the community's views at a hearing by the Development Management Sub-Committee.*

#### **Additional Comments**

##### *Bat Surveys:*

*We note that the bat surveys have been undertaken in May and did not show bat activity within the buildings. However, bat roosting potential in the buildings has been shown in these and previous reports. We would draw your attention to the following advice on SNH's website (<http://www.snh.gov.uk/about-scotlands-nature/wildlife-and-you/bats/advice/>) ... For small-scale developments, i.e. those affecting individual houses or small groups of associated buildings, a minimum of three activity (emergence/re-entry) surveys and a thorough inspection of building(s) both inside and out is required. The activity surveys should be undertaken at dusk or dawn and comprise at least one dawn visit. They should be spread over several weeks during the bats' main period of activity, ideally with visits in June, July and August. The objective of these surveys is to: identify the species of bat present; locate their access point(s); provide an estimate of numbers; and determine the status of the roost (e.g. maternity, transition, male roost etc). If a survey has been conducted during the winter and has reported suitable habitat for/evidence of bats a summer survey will be necessary before planning approval can be granted. (key points highlighted in bold).*

*While Community Council members do not purport to be experts in bat surveys, the above advice would suggest that timings of the bat surveys in May are on the margins*

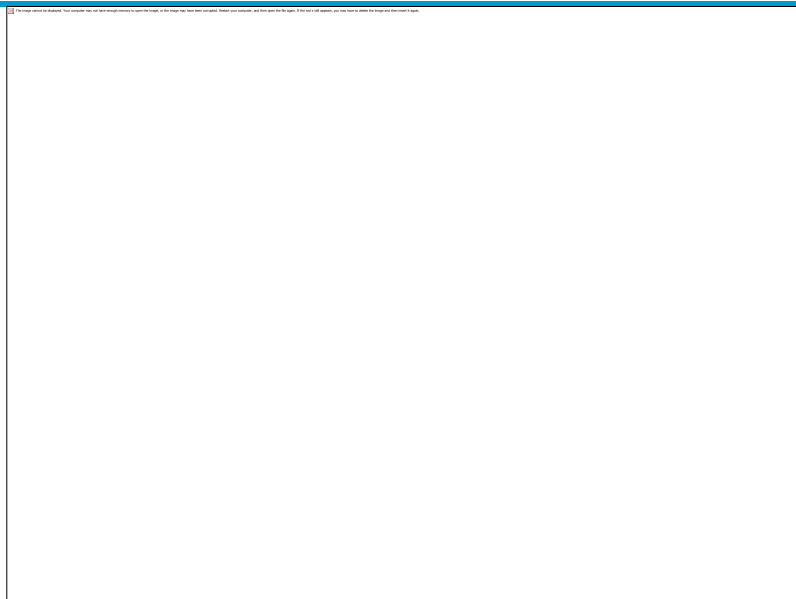
*of the bat activity season. We would suggest, therefore, that a further series of bat surveys be required during over the summer during the main bat activity season.*

#### **Swept Path Analysis**

*In assessing the Swept Path analyses drawings for both emergency vehicles and refuse collection vehicles, we note that the path of these vehicles is in immediate vicinity to the boundaries of the adjacent properties. This is likely to affect the landscaping proposals alongside the entrance driveway, allows for no margin of error before damage is made to the boundaries and would not seem to allow for any protuberances from the vehicles (e.g. mirrors) or cambers on the internal or public roads - especially at the exit onto Cramond Glebe Road.*

## **Location Plan**

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