

Development Management Sub Committee

Wednesday 21 June 2017

Application for Approval of Matters Specified in Conditions 17/01080/AMC

At Granton Harbour, West Harbour Road, Edinburgh
Approval of Matters Specified in Conditions on outline application 01/00802/OUT regarding the erection of a healthcare superhub and six units in Class 1, Class 2 and Class 3 use (as amended).

Item number	4.6
Report number	
Wards	A04 - Forth (Pre May 2017)

Summary

The proposed uses are acceptable at this location. Fundamentally, the proposal does not comply with the aims of the Edinburgh Waterfront as set out in LDP and the Development Principles set out in EW2c. The proposal does not create a perimeter block urban form and it fails to create a high density urban quarter with a design and layout that promotes a reduction in the influence of the car.

The proposed layout is contrary to LDP Policy Tra 4 as it locates the surface car park in front of the building and therefore does not create an active street frontage. It also compromises pedestrian safety because access for service vehicles is taken through the car park.

The proposal is contrary to LDP Policy Des 7 because it does not provide a comprehensive and integrated approach to the layout of the buildings, streets, footpaths, services and surface water management and does not encourage walking and cycling.

The proposal fails to provide a comprehensive development for this part of the masterplan area, prejudicing the implementation of a proposed east - west route and creating uncertainty as to how it relates to future development on neighbouring sites. This is contrary to LDP Policies Des 2 and Del 3.

The level of car parking is in excess of the Council's Parking Standards, without sufficient justification and is contrary to LDP Policy Tra 2.

Links

[Policies and guidance for this application](#)

LDPP, LDEL03, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LEN21, LEN22, LHOU10, LRET06, LTRA02, LTRA03, LTRA04, NSG, NSESBA, NSGD02, NSP,

Report

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Recommendations

1.1 It is recommended that this application be Refused for the reasons below.

Background

2.1 Site description

The site, covering approximately 0.55 hectares, is located to the west of Chestnut Street. It is a vacant area of hardstanding currently surrounded by a palisade fence. The site is relatively flat and rectangular in shape, but the ground slopes away on the northern and western boundaries. A cycle path runs along the wide pavement on Chestnut Street. Access to the site is taken from both the southeast and northeast corners.

To the north is Sealcar Street which provides access to an industrial estate to the west of the site. The industrial estate accommodates a number of large, terraced industrial buildings in various uses. An electricity substation is located just outside of the site boundary in the northwest corner.

Further north is a linear area of vacant land and north of this is a residential flatted development on Hesperus Crossway, which rises up to seven storeys. There are also further areas of vacant land that have planning permission for residential development. To the northeast of the site, a planning application has been submitted for retirement flats (application number: 17/01219/AMC).

To the east of Chestnut Street is a vacant area of land where a planning application for residential use has been submitted (application number: 17/01481/AMC).

To the south of the site are more industrial style buildings comprising car garages and car hire uses.

2.2 Site History

Relevant history to the site:

20 June 2003 - Outline planning permission granted for the Granton Harbour Village, mixed use development comprising residential units, hotel and serviced apartments, shops and retail /services, restaurants /cafes, public houses, general business, leisure facilities and marina. This permission includes a legal agreement to secure contributions towards education and transportation infrastructure, 15% affordable housing, restrictions on future tenancies within Granton Industrial Estate and the long term maintenance and upkeep of the Western Breakwater (application number: 01/00802/OUT).

31 January 2014 - Application approved for matters specified in condition 2 as attached to outline permission 01/00802/OUT: covering siting and height of development; design and configuration of public and open spaces; access, road layouts; footpaths and cycle routes. This was subject to a number of conditions (application number: 13/04320/AMC).

26 August 2016 - Approval of matters specified in condition 2 of outline application 01/00802/OUT covering siting and height of development, design and configuration of public and open spaces, access, road layouts, footpaths and cycle routes (Scheme 5) approved. Condition 4 states that the reserved matters applied for in respect of plots 12, 14, 15, 15A, 16 and 17 i.e. the large retail/leisure centre are not approved (application number: 14/05305/AMC).

2 February 2017 - Approval of matters specified in condition 2 of outline application 01/00802/OUT covering siting and height of development, design and configuration of public and open spaces, access, road layouts, footpaths and cycle routes (Scheme 2) approved. However, the matters applied for in relation to plots 8C, 12,14, 15, 15A, 16, 17, S1, S2 and 35 are not approved (application number: 16/05618/AMC). This is the most up to date masterplan for the Granton Harbour area.

Other recent applications on neighbouring plots:

17 March 2017 - Application submitted for approval of matters specified in conditions of application 01/00802/OUT for the erection of buildings containing 104 retirement flats and ancillary accommodation, formation of road access, underground parking, internal private open space and a public square on Plots 9A and 9B to the northeast of the site (application number: 17/01219/AMC). Not yet determined.

31 March 2017 - Application submitted for approval of matters specified in condition 2 of application 01/00802/OUT for the erection of a 3/7 storey residential development of 302 units with associated roads, car parking and landscaping on plot S1 and S2 (S) to the east of the site (application number: 17/01481/AMC). Not yet determined.

Main report

3.1 Description Of The Proposal

Approval is sought for the erection of a health centre, incorporating GP practice and dentist practice alongside six smaller shop units including a pharmacy and other Class 1 (shops), Class 2 (financial, professional and other services) or Class 3 (food and drink) on Plot 19B of Granton Harbour.

The application seeks to deal with a number of reserved matters set out in the outline planning permission (application number: 01/00802/OUT). These are the siting, design and height of development, including design of all external features and glazing specifications, design and configuration of public and open spaces, external lighting, all external materials and finishes, including their colour; car and cycle parking, access, road layouts and servicing areas; hours of operation and servicing; footpaths and cycle routes; boundary treatments; floor levels including (including the submission of all calculations to support the levels, and including a report on sea levels, with climate change, storm surge and wave action); and hard and soft landscaping details, which shall include layout plans to provide full details of ground preparation.

The applicant is also seeking to meet the requirements of condition 3 of 01/00802/OUT with information submitted in relation to noise impact and site survey (contamination) and also condition 14 relating to sustainable urban drainage for this site.

The proposed building is set back into the site, away from Chestnut Street. The health centre element is a two storey box like building of 1,394 sqm. A parade of smaller single storey units adjoins the health centre running in a linear manner to the north. Six units are proposed, all 83.6 sqm in size, with a pharmacy located adjacent to the health centre with a dispensing hatch linked to the larger building.

The building is to be finished in a grey white powder coated cladding, with brick walling to divide the shop units. The health centre has a large double height glazed element and the shop fronts are also predominately glazed. The window frames are to be grey in colour.

Vehicle access is taken from a central point on Chestnut Street leading directly to a surface car park. Seventy-six spaces are proposed in total, including five disabled and five parent and child spaces. This access is also utilised for servicing/delivery vehicles, with a route running through the car park to the south of the building to a rear service yard. Twelve cycle parking spaces are provided.

A pedestrian/cycle route is proposed from the southeast of the site, with a priority pedestrian and cycle crossing point provided. A planting plan and schedule has been provided, this shows trees and planting mostly on the periphery of the car park.

Scheme 1

The description of development incorrectly stated the proposal was for five units, rather than the six shown in the drawings. This has been altered to reflect the drawings. The elevational treatment for the healthcare centre unit originally proposed wood effect rainscreen cladding and a smaller glazed entrance. The finished floor levels were also slightly lower. These alterations raised no new material considerations and did not require re-notification.

Supporting Statements

The following documents have been submitted in support of the application:

- Design and Planning Statement;
- Noise Impact Assessment;
- Flood Risk Assessment; and
- Simplified Building Energy Model (SBEM) Specification Information.

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

3.2 Determining Issues

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

Do the proposals comply with the development plan?

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

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

3.3 Assessment

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

- a) the principle of development is acceptable on this site;
- b) the design, scale and layout are appropriate to the site;
- c) there are any transport and parking issues;
- d) the proposal will result in an unreasonable loss to neighbouring amenity;
- e) any other material considerations;
- f) any impacts on equalities or human rights are acceptable; and

g) comments raised have been addressed.

a) Principle

Edinburgh Local Development Plan (LDP) Policy Hou 10 Community Facilities sets out that planning permission for housing development will only be granted where there are associated proposals to provide any health and community facilities relative to the impact and scale of development proposed. The intention of this policy is to ensure that new housing development goes hand in hand with the provision of a range of community facilities.

The site is located within the Granton Harbour Area at Granton Waterfront, as identified in the LDP. It is covered by Proposal EW2c for housing led mixed use development. This sets out an estimated total capacity of 1,980 homes, with an estimated 1,634 homes still to be built out across the area.

LDP Policy Del 3 supports proposals which meet a number of requirements, including the provision of a series of mixed use sustainable neighbourhoods that connect with the waterfront and the provision of local retail facilities.

The most recent masterplan drawing (application number 16/05618/AMC) shows indicative plans for units consisting of 250 sqm retail use, 500 sqm leisure use and 500 sqm health use on this plot. Such uses are acceptable in principle at this location, in line with the outline permission (application number: 01/00802/OUT) and subsequent approved masterplans.

No information has been provided to support the size of the proposed healthcare element. The plans show that the internal layout is indicative and that the first floor dental treatment facility is only an option shown for illustrative purposes. The applicant states that there is occupier interest.

The LDP Action Programme (December 2016) contains a healthcare action to provide a new practice to mitigate the impact of new residential development in Granton Waterfront. An option being explored is to co-locate this with a new waterfront primary school.

Edinburgh Health and Social Care Partnership (EHSCP) is responsible for the planning and development of GP practices in Edinburgh and notes that there has not been any pre-application consultation with the applicant on this proposal. Its strategic plan includes the need for a new practice to provide for approximately 10,000 people (as per the LDP Action Programme). However, the planning application submitted would be insufficient to meet their requirements. It is also noted that it is unusual for private GP practices to come forward without support from NHS Lothian and the EHSCP, but not unfeasible.

It is unfortunate that there has not been a joined up approach with the Council and partners to consider a strategic approach to delivering healthcare facilities in this part of the city. Nonetheless, this would not be a reason for refusal and the proposed uses are acceptable in principle.

The proposed health centre is a Class 2 (financial, professional and other services) use. If given approval, the 1,394 sqm unit could be changed into a Class 1 (shops) use under permitted development rights. Condition 19 of the outline planning permission restricts the gross floor area of each retail unit to 250 sqm, with the exception of one larger retail unit restricted to a maximum of 1,500 sqm. If such a change took place, then this would account for the one larger unit permitted under the terms of this condition.

b) Design, Scale and Layout

LDP Policies Des 1 - Des 8 set a requirement for proposals to be based on an overall design concept which draws on the positive characteristics of the surrounding area with the need for a high quality of design which is appropriate in terms of height, scale and form, layout, and materials.

The LDP also sets out the aims of the long term strategies for the Edinburgh Waterfront. This includes transforming the waterfront into one of the city's landmark features, attract high quality developments and create distinctive high density urban quarters and build exemplar sustainable communities with a reduction in the influence of the car in design and layout.

Design and Scale:

The design of the building is utilitarian in its form and execution with an emphasis on function and limited detailing. The single storey parade of shop units are similar to those found in other parts of the city and benefits from large glazed shop fronts with brick detailing. The buildings are lacking in any architectural merit without any consideration for the emerging masterplan or recent developments.

The Edinburgh Design Guidance indicates that materials should normally harmonise with those used on surrounding buildings. The wider area is characterised by a number of different building types, both in terms of the current industrial ones and the existing and proposed residential developments. There is no overarching design code for the area. The proposed cladding is dull and industrial in appearance and does not enhance the overall design. The design and materials create large expanses of uninteresting elevations which are visible from existing properties and will create unattractive edges to the adjoining masterplan area.

As a proposed two storey building (with single storey elements) in an area where higher rise residential development exists, the building height will not impact on adjacent existing buildings. A mixed-use development with residential use on the upper floors could provide a more efficient and appropriate design solution for the site. The design of the building as proposed is unacceptable at this location as it fails to have regard to the emerging masterplan and will compromise the development of adjoining land. The design is not of a high quality and it does not aid in creating a high density urban quarter as set out in the LDP aims of the Edinburgh Waterfront.

Layout:

LDP Policy Tra 4 Design of Off-Street Car and Cycle Parking sets out that where off-street parking is acceptable, a number of design considerations will be taken. This includes that surface car parks should not be located in front of the building where the building would otherwise create an active frontage onto a street and main entrances should be located as close as practical to the main site entrance. Structural planting should be provided to minimise the visual impact and the design of car parking should not compromise pedestrian safety.

The proposed primary elevation of the building is set back by approximately 40 metres from Chestnut Street, one of the main routes through the wider Granton Harbour area. A large surface car park is proposed between the street and the building. This does not comply with Policy Tra 4 and no attempt has been made to provide any active frontage or interaction with the street. The extensive car park will create a negative impact on the townscape of the area and compromises co-ordinated development.

LDP Policy Des 7 Layout Design states, amongst other matters, that permission will be granted where the layout will encourage walking and cycling. The proposal primarily caters for car users, with pedestrians left to traverse a large car park with only one notable pedestrian and cycle route through the site. The width of the pedestrian/cycle route is inadequate and fails to meet minimum dimensions contained within the guidance. Policy Des 7 also requires a comprehensive and integrated approach to the layout of the site including the buildings, streets, footpaths, services and SUDS features.

The applicant has stated that the proposed layout is required for specific needs of the operator, but limited information has been provided. It is also stated that the proposed layout is needed to ensure that people (potentially infirm or with mobility issues) have easy access to the main entrance. Although in some instances this may be the case, no attempt has been made to illustrate other possible solutions. The applicant has not submitted detailed information explaining the rationale for the proposed building's position within the site and how this has been developed through the design process.

The applicant points to the most recently approved masterplan (planning application 17/01080/AMC) that shows a building with some car parking to the front and that this application merely moves the building further back into the site. However, the masterplan drawing is annotated to say that the proposed buildings on Plot 19B are indicative, not part of that application and would be subject to a detailed planning submission. Consequently, little weight can be given to this. Some limited car parking at the front may have been an acceptable solution if carefully designed to promote sustainable transport.

It has also been pointed out that an earlier approved masterplan from 2014 approved Hesperus Square with parking in front of the proposed building in close vicinity of the site (application number 13/04320/AMC). This showed eleven car parking spaces set around an area of greenspace. The spaces were away from Hesperus Crossway and orientated towards Plot 9A. This situation is similar to that which exists within the high quality spaces within the New Town and city centre. This cannot be used as a comparison to a large 76 space car park in front of a building as proposed in this application.

The proposed car parking fails to provide adequate landscaping with only nine trees and other shrubs relegated to the edges of the site. Only a beech hedge is proposed along the Chestnut Street boundary. This is insufficient for the size of car parking proposed. No information is provided on surface water management measures.

Servicing is to the rear of the building, with access to the service yard taken through the car park from the vehicular site entrance. This arrangement would compromise pedestrian safety contrary to LDP Policy Tra 4.

The pedestrian/cycle route through the site is from the south. This crosses the access to the service yard. Furthermore, it is not clear how pedestrians arriving from the existing and planned development to the north would easily access the proposed healthcare building and associated units. It has not been shown how the proposal will meet the aims of the Edinburgh Waterfront as set out in the LDP to create an exemplar sustainable community that provides a reduction in the influence of the car in the design and layout. The pedestrian access is contrary to LDP Policy Tra 4 as it is inconvenient and does not promote safety.

Co-ordinated development:

The current masterplan shows a proposed road (Ross Kestrel Road) running through the southern part of the application site and linking into a large circus (roundabout) surrounded by proposed housing. This proposed route will provide a pedestrian link between proposed housing in the western part of Granton Harbour to the proposed local centre in the south east. This application proposes car parking and access to the service yard on the route of the proposed Ross Kestrel Road.

A context masterplan has been provided to show that when/if Ross Kestrel Road is built, it will result in the loss of some of the proposed car parking in the future (which as discussed below would be acceptable in terms of numbers). This application does not accord with the current masterplan and may prejudice the delivery of a proposed road and pedestrian link.

The proposal leaves a road to the north of the site (Sealcar Street) running into the back of the proposed houses with no identifiable use. It also fails to demonstrate how the service yard and rear of the healthcare building will relate to the proposed housing and road and footpath network to the west. The context plan shows the service yard close to proposed residential units, raising potential future noise issues which will require to be mitigated. Overall, the layout of the site in terms of siting of the building, servicing and access arrangements do not represent a well-considered proposal compatible with the wider area.

The proposal is contrary to LDP Policy Des 2 Co-ordinated development as it compromises the effective development of adjacent land and limits the comprehensive regeneration of the area by not providing a design that creates well defined and cohesive streets and spaces. The layout, comprising a building located in a car park and service yard, represents a low density placeless solution which is not aligned with the regeneration supported by the LDP. The proposal is therefore also contrary to LDP Policy Del 3 Edinburgh Waterfront as it fails to provide a comprehensively designed proposal which maximises the development potential of the area. It is also contrary to the Granton Harbour (EW 2c) Development Principles by failing to provide a perimeter block urban form and the proposed design and layout is inappropriate to the site in terms of place-making.

In summary, the general design of the building is lacking in design merit with a functional approach taken with a desired end user. It contributes little to placemaking in this part of the city. The layout of the development does not comply with LDP Policy Tra 4 as it results in a dominant surface car parking in front of the proposed building, providing no active frontage to Chestnut Street and does not provide safe and convenient movement for pedestrians. The proposal does not provide a comprehensive and integrated approach to the layout of the site and does not encourage walking and cycling, contrary to LDP Policy Des 7. The proposal fails to deliver co-ordinated development and prejudices the comprehensive regeneration of the wider area, contrary to LDP Policies Des 2, Del 3 and the development principles set out in EW2c.

c) Transport Matters

The access from Chestnut Street is acceptable.

The current parking standards for these land uses in this location allow for between 44 and 51 spaces. The 76 proposed spaces represent a 50% overprovision. It is noted that at a future point the proposed introduction of Ross Kestrel Road would result in the loss of some spaces, but the phasing of development is not clear. It is also not clear how the delivery of this road could be secured, if approval was given for this proposal.

There is no indication of the number of end users/patients. If designed for the residents of Granton Harbour (existing and future) then it would be expected that most users would be within walking distance. No potential identification of the wider area that the development would serve has been provided to justify the parking levels. EHSCP has commented that the practice is insufficient in size to meet the requirements for a new healthcare practice to provide for the Granton Waterfront, which in turn questions the excessive level of car parking proposed. No further transport information has been submitted.

Environmental Protection encourages car parking numbers to be kept to a minimum to limit any potential air quality issues through the wider Granton Harbour area. It recommends that electric vehicle charging points should be provided. The layout plan shows ducts for car charging points in two locations.

Bus stops are located next to the site on Chestnut Street and on Hesperus Crossway. Further stops lie close to the south of the site on Waterfront Avenue. There are a number of Lothian Bus Services (numbers 24 and 47) that provide links to and throughout the city. Further buses are also available from Granton Square (numbers 16, 19 and 32). Accordingly there are other alternatives to the car serving the area.

There is also a tram safeguard along West Harbour Road and Waterfront Avenue, with a tram stop at Granton Square also indicatively identified. This would improve accessibility to the area and site if the route is progressed at this location.

Twelve cycle spaces have been provided across two different locations. It is not currently clear what the design specification is, but this could be covered by a condition. Secure, undercover parking is required for staff (a minimum of seven spaces) but this has not been provided in the proposed development.

The proposed level of car parking is contrary to LDP Policy Tra 2 Private Car Parking and the Council's Non-statutory Parking Standards for Development Management. It also fails to comply with LDP Policy Tra 3 Private Cycle Parking as the level of cycle parking does not comply with the standards set in Council guidance.

d) Amenity

The principle of retail, health and leisure uses has been established on the site, although the land use location within the masterplan area are not fixed.

Currently the development is mostly surrounded by industrial uses, though there is proposed residential development to the west and east. Existing residential development is to the north.

Generally the proposed development will have limited impact on adjacent uses. Though there will be some negative impact on visual amenity as existing and potentially future residential development that will overlook a car park and service yard. Environmental Protection has raised some concern regarding the potential impact on the proposed residential development to the west from the proposed service/delivery yard associated with this application.

A follow up response from the applicant's noise consultant has indicated that future residential phases could be designed to consider potential noise implications or alternatively a close-boarded acoustic barrier would be recommended to mitigate any potential noise issues. As the application is not recommended for approval, this matter has not been progressed further. A condition relating to noise impact could be utilised if committee were minded to approve the application. However, it should be noted that without this level of detail it is not possible to assess if the acoustic mitigation would compromise the appropriate development of adjoining land.

e) Other Material Considerations

Archaeology:

There are no significant archaeological impacts associated with the application.

Contaminated land:

Condition 3 of the outline application requires a conceptual model and site investigation/remedial works to be submitted. A conceptual model has been submitted and Environmental Protection are still considering the information.

As the condition is not a reserved matter itself, this could be discharged for the site once Environmental Protection has assessed its acceptability.

Flooding and Drainage:

The applicant has provided a Flood Risk Assessment (FRA) for a number of plots within the Granton Harbour Area. This covers the application site (Plot 19B). However, it has not been submitted in the appropriate manner with the relevant self-certification checks. Accordingly, Flood Prevention has not assessed the information.

This issue would need further consideration if committee were minded to approve the planning application. The FRA does conclude that there should be a minimum finished floor level of 4.85m AOD with a freeboard of 600mm. The finished floor levels show a level of 6.05 AOD. The report does note that higher levels may be required to provide effective surface water drainage measures or achieve mitigation from other sources of flood risk.

No information has been provided on surface water management. Condition 6, which applies to the outline permission, still requires details of surface water disposal arrangements to be submitted.

Sustainability:

A Sustainability Form has not been submitted with the application as per normal procedures. It is not a reserved matter on the application and if submitted as a standalone application would not be considered a major application. However, it is expected that Part A of the form should be provided to indicate how Section 6 (energy) of the 2010 Building Regulations can be met. A Simplified Building Energy Model (SBEM) has been provided to demonstrate this.

f) Equalities and Human Rights

The application has been assessed in terms of equalities and human rights. The proposal will develop a vacant area of land for healthcare uses and other services, but causes potential issues with pedestrian/cycle access. The application raises no overriding concerns in relation to equalities and human rights.

g) Public Comments

No public comments received.

Conclusion

The proposed uses are acceptable at this location. Fundamentally, the proposal does not comply with the aims of the Edinburgh Waterfront as set out in LDP and the Development Principles set out in EW2c. The proposal does not create a perimeter block urban form and it fails to create a high density urban quarter with a design and layout that promotes a reduction in the influence of the car.

The proposed layout is contrary to LDP Policy Tra 4 as it locates the surface car park in front of the building and therefore does not create an active street frontage. It also compromises pedestrian safety because access for service vehicles is taken through the car park.

The proposal is contrary to LDP Policy Des 7 because it does not provide a comprehensive and integrated approach to the layout of the buildings, streets, footpaths, services and surface water management and does not encourage walking and cycling.

The proposal fails to provide a comprehensive development for this part of the masterplan area, prejudicing the implementation of a proposed east - west route and creating uncertainty as to how it relates to future development on neighbouring sites. This is contrary to LDP Policies Des 2 and Del 3.

The level of car parking is in excess of the Council's Parking Standards, without sufficient justification and is contrary to LDP Policy Tra 2.

It is recommended that this application be Refused for the reasons below.

3.4 Conditions/reasons/informatives

Reason for Refusal:-

1. The proposal is contrary to Edinburgh Local Development Plan Policies Des 2 Co-ordinated Development and Del 3 Edinburgh Waterfront as the proposed layout compromises the regeneration and development potential of the wider area. The proposal conflicts with the current masterplan by prejudicing the implementation of a proposed road and creating uncertainty as to how it relates to future development on neighbouring sites.
2. The proposal is contrary to Edinburgh Local Development Plan Policy Tra 4 Design of Off-Street Car and Cycle Parking because it locates the surface car park to the front of the proposed building, failing to create active frontage onto the street and compromises pedestrian safety by providing inappropriate access for service vehicles. It does not accord with the principles of Granton Harbour Development Principles (EW 2c) which states that proposals are expected to complete the approved street layout and perimeter block urban form. It also fails to meet the aims of the LDP for the Edinburgh Waterfront that states that this area should build exemplar sustainable communities with a reduction in the influence of the car in design and layout.

3. The proposal is contrary to Edinburgh Local Development Plan Policy Des 7 Layout Design as the layout does not provide a comprehensive and integrated approach to the layout of buildings, streets, footpaths, services and SUDs features and does not promote safe and convenient access and movement in and around the site
4. The proposal is contrary to Edinburgh Local Development Plan Policy Tra 2 Private Car Parking, as the proposed parking exceeds the non-statutory Parking Standards without sufficient justification and does not encourage sustainable non-car modes. It also fails to meet the aims of the LDP for the Edinburgh Waterfront that states that this area should build exemplar sustainable communities with a reduction in the influence of the car in design and layout.

Financial impact

4.1 The financial impact has been assessed as follows:

There is an existing legal agreement in place - no contributions are required.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

A Simplified Building Energy Model Specification has been submitted, but no Sustainability Form.

Consultation and engagement

8.1 Pre-Application Process

There is no pre-application process history.

8.2 Publicity summary of representations and Community Council comments

No representations have been received.

Background reading/external references

- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

The site is located within the Urban Area as shown on the Local Development Plan proposals map. The land is identified as being within Edinburgh Waterfront. Proposal EW 2c (Granton Harbour) states that the area is for a housing-led mixed use development. It sets out a number of Development Principles. These include that proposals will be expected to:

- Complete the approved street layout and perimeter block urban form.
- Provide a housing mix that is appropriate in terms of place-making and would maximise completions within this urban regeneration proposal within the plan period.

Date registered 10 March 2017

Drawing numbers/Scheme 01,02A,03A,04A,05,06,

Scheme 2

David R. Leslie
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Kenneth Bowes, Planning Officer
E-mail:kenneth.bowes@edinburgh.gov.uk Tel:0131 529 6724

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Del 3 (Edinburgh Waterfront) sets criteria for assessing development in Granton Waterfront and Leith Waterfront.

LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

LDP Policy Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

LDP Policy Hou 10 (Community Facilities) requires housing developments to provide the necessary provision of health and other community facilities and protects against valuable health or community facilities.

LDP Policy Ret 6 (Out-of-Centre Development) identifies the circumstances in which out-of-centre retail development will be permitted.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

LDP Policy Tra 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Relevant Non-Statutory Guidelines

NSESBA - **Non-statutory guidelines** Part A of 'The Edinburgh Standards for Sustainable Building' requires new development in Edinburgh to reduce their carbon emissions in line with the current Building Regulations

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

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

Appendix 1

Application for Approval of Matters Specified in Conditions 17/01080/AMC

**At Granton Harbour, West Harbour Road, Edinburgh
Approval of Matters Specified in Conditions on outline application 01/00802/OUT regarding the erection of a healthcare superhub and six units in Class 1, Class 2 and Class 3 use (as amended).**

Consultations

Archaeology response - dated 20 March 2017

The site lies at the centre of the 19th century Granton Harbour a site identified as being of archaeological significance. Although there is further archaeological work to be undertaken in regards to the development of 01/00802/OUT, it is considered unlikely that significant archaeological remains will occur in situ on this site. Therefore it is concluded that there are no significant archaeological impacts upon this scheme.

Edinburgh Health and Social Care Partnership response - dated 30 March 2017

- *EHSCP is responsible for the planning and development of GP practices in Edinburgh, and we have not had any consultation or interaction with the applicant in this case*
- *Our strategic plan includes the need for a new GP practice in the Granton Waterfront area, and currently our plan is that a new practice will require to provide GP services for c10,000 people*
- *The plan indicates the potential to co-locate with the proposed new CEC primary school in Granton*
- *The timescale for provision of the physical premises is currently identified as 2020/1*
- *The plans for the actual GP surgery the applicant has submitted are insufficient size to meet our requirement*
- *Contractual arrangements for GPs mean that you can't just set up as a GP independently, unless you are providing a private GP service of which I think there is only 1 in Edinburgh. The majority of our 73 GP practices are independent contractors, who contract with the Primary Care Contracting Organisation (PCCO) part of NHS Lothian & the rest are directly managed by us. Setting up a new surgery requires significant revenue support from NHSL/EHSCP as the money to fund a surgery with GPs /other staff is directly linked to patient numbers & it is usually several years before they are financially viable. Therefore, if the applicant built a GP surgery he would not be able to use it to set up GP services unless it had been contractually agreed with NHSL/EHSCP well in advance & had been through all our governance processes etc*
- *If there is an opportunity for a developer to provide premises of an appropriate size, it would be potentially of interest should the opportunity to co-locate with the new school not be attainable, however, any approach at this stage would be purely exploratory.*

Environmental Protection - dated 18 April 2017

We are currently assessing the submitted ground investigation report and noise impact assessment that have been submitted as part of this AMC application. Please advise if there are any other areas you required us to assess. Environmental Protection do have issues with the submitted noise impact and are not convinced that the proposed service yard would not adversely impact the proposed residential properties to the west of this development site. For example the source noise levels used from a historic measurement have been taken at a 50m distance from the source noise. The modelled number of service vehicles is low. The applicant has proposed a 1.8m timber fence however this is not an acoustic barrier.

Environmental Protection have raised concerns regarding the potential impacts this larger master planned development may have on local air quality. This was due to the increase in numbers of car parking spaces. Environmental Protection encouraged the applicant to keep parking numbers to a minimum and make provisions for electric vehicle (EV) charging throughout the development. Environmental Protection also advised the applicant that all CHP/energy plant units must comply with the Clean Air Act 1993 and that Environmental Protection will not support the use of biomass.

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

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

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

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

70 or 50kW (64 Amp) DC with 43kW (100 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.

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

Grants are also available for the installation of EV charge points for workplaces, with funding currently available for installations. More information can be found at <http://www.energysavingtrust.org.uk/scotland/Organisations/Transport/Electric-vehicles/Electric-Vehicle-Charge-Point-Funding>

The Scottish Government and Local Authorities are working to decrease their fuel-based vehicles, replacing them with electric vehicles. Scottish Government funding has enabled the purchase of hundreds of vehicles for the public sector fleet including many Lothian based NHS Scotland vehicles which would make good use of a charging point at this 'superhub' location.

The applicant should commit to installing EV charging points and provide details of where they will be located.

If class 3 uses are being proposed the termination points of the kitchen extracts will need to be carefully considered in relation to the proposed and existing neighbouring uses.

Roads Authority Issues - dated 19 May 2017

The application should be refused.

Reasons:

Whilst the proposed use, medical and retail, is considered acceptable, the proposed layout, parking and access arrangements are considered unacceptable.

1. *The proposed layout is considered to be contrary to policy Tra 4 Design of Off-Street Car and Cycle Parking (LDP p.128) which states:*

a) *"surface car parks should not be located in front of buildings where the building would otherwise create an active frontage onto a public space or street, and main entrances to buildings should be located as close as practical to the main site entrance";*

a) *the design of surface car parking or entrances to car parking in buildings should not compromise pedestrian safety and should assist their safe movement to and from parked cars, for example, by the provision of marked walkways";*

The proposed layout locates the car park on the street frontage and access to the main entrance is not considered to promote safety and is inconvenient;

2. *Parking provision is considered contrary to policy Tra 2 Private Car Parking (LDP p.127) which states "Planning permission will be granted for development where proposed car parking provision complies with and does not exceed the parking levels set out in Council guidance." (LDP p.127).*

Current Council parking standards for development in this area (Zone 5c) permit the following between 44 and 51 spaces as follows:

Medical centre:

o *45 staff - 1 per 3 staff = 15 spaces*

o *17 consulting rooms - 1.5 per room = 25.5 spaces*

Retail, 501.6m²:

o *First 500m² - between 1 per 150m² and 1 per 50m² = 3.3 to 10 spaces*

o *Over 500m² - between 1 per 60m² and 1 per 35m² = 0*

The development proposes to provide 76 car parking spaces, a 50% overprovision compared to the maximum permitted 51 spaces. This is not considered to be acceptable;

3. Cycle parking provision for medical staff is considered to be contrary to policy Tra 3 Private Cycle Parking (LDP p.128) which states that "Planning permission will be granted for development where proposed cycle parking and storage provision complies with the standards set out in Council guidance."

Current Council parking standards require staff cycle parking to be secure and undercover. No such provision (7 spaces) appears to have been made.

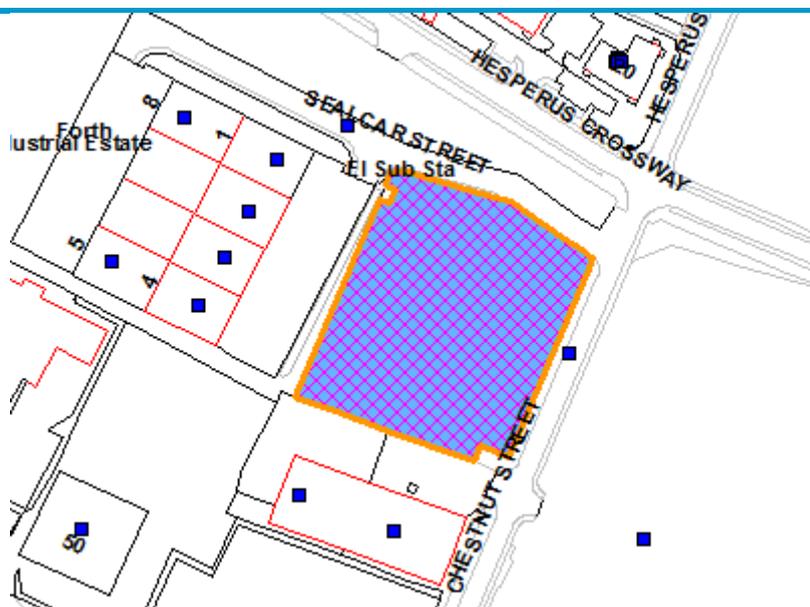
It is also unclear as to whether the cycle parking stands located to the front of the building for customers meet the requirements of design and specification.

Waste Services response- dated 22 March 2017

As this is a commercial development, the Council will not be the provider of waste management services to this property. Architects should however note the requirement for trade waste producers to comply with legislation, in particular the Waste (Scotland) Regulations which require the segregation of defined waste types to allow their recycling. This means there would need to be storage space off street for segregated waste streams arising from commercial activities. Depending on the size and use of the property it may also be that they are required to segregate other streams such as fluorescent lamps, batteries and electrical equipment as well.

It would be the responsibility of any third party commercial organisations using the site to source their own trade waste uplifts.

Location Plan



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