

Development Management Sub Committee

Wednesday 20 June 2018

**Application for Planning Permission 18/01506/FUL
At 7 Canaan Lane, Edinburgh,
Erection of five storey building to replace a disused public
toilet comprising 10 flats.**

Item number	7.2
Report number	
Wards	B10 - Morningside

Summary

The proposal is in accordance with the Edinburgh Local Development Plan, but represents a minor infringement of the Council's non-statutory guidelines in relation to overshadowing and the provision of private open space. The development is acceptable in terms of scale, form and design and will not be detrimental to the character of the surrounding area. There will be a degree of overshadowing of neighbouring garden ground as a result of the proposals. However, on balance, given that the proposal is the desired urban form for the site, the proposals are acceptable.

Links

<u>Policies and guidance for this application</u>	LDPP, LDES01, LDES04, LDES05, LDES06, LDES07, LEN03, LEN12, LEN21, LHOU01, LHOU02, LHOU03, LHOU04, LTRA02, LTRA03, LTRA04, LDES11, LEN06, NSG, NSGD02,
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Report

Application for Planning Permission 18/01506/FUL At 7 Canaan Lane, Edinburgh, Erection of five storey building to replace a disused public toilet comprising 10 flats.

Recommendations

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

Background

2.1 Site description

The application site is a single storey, flat roofed building, dating from the 1960's, and was used until recently as a public convenience. The building is finished in stone clad walls and features block work walls fronting onto Canaan Lane. The site is flat and comprises mostly hard standing around the existing building.

To the west, the site bounds a tenement block blank gable, to the north, garden ground associated with tenements on Steel's Place and Morningside Road, and to the east a two storey residential dwelling. The Canny Man public house, which is category B listed (reference 46297, listed 30 March 1997) is located directly to the south of the site, which forms the boundary of the Morningside Conservation Area.

The surrounding area is mixed residential and commercial in character and lies just outwith the designated Morningside Town Centre.

2.2 Site History

03 August 2017 - Planning permission refused for the erection of new six storey building to replace public toilet comprising 11 flats (as amended) (application reference 17/00184/FUL).

20 November 2017 - Appeal against refusal of 17/00184/FUL dismissed by reporter.

Main report

3.1 Description Of The Proposal

The proposal is to demolish the now disused public toilets and erect a new residential development comprising 10 flats over five storeys. There will be a mix of nine x two bed and one x one bed flats.

The proposed materials are predominantly stone cladding to the front and side elevations and brick to the rear, with the part of the fourth floor finished in a zinc panel system above eaves level. The roof of the building will be finished in zinc standing seam with a glass balustrade where this floor is set back from the main building line.

No car parking provision is proposed on site. Storage for 23 bicycles will be provided within the rear garden area.

Supporting Statement

The applicant has submitted the following information in support of the application:

- Design and Access Statement, including Daylighting Assessment, Noise Survey, Flood Risk Assessment and Surface Water Management Plan and Overshadowing Diagrams.

These are available to view via 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 proposed use is appropriate in the location;
- b) The scale and design are acceptable;
- c) There are any adverse impacts on the setting of listed building or adjacent conservation area;
- d) The development would provide a satisfactory environment for future occupiers;
- e) The proposed use would result in any loss of amenity to neighbouring properties;
- f) Road safety has been addressed;

- g) Any flooding impacts have been addressed;
- h) Any education requirement have been addressed;
- i) Any matters raised in representations have been addressed; and
- j) Equalities and human rights impacts have been addressed.

a) Whether the proposed use is appropriate in this location

The adopted Edinburgh Local Development Plan (LDP) sets out in policy Hou 1 that priority will be given to the delivery of the housing land supply and the relevant infrastructure as detailed in the plan, including on "other suitable sites in the urban area, provided proposals are compatible with other policies in the plan".

The proposed new use is situated in an area of residential uses with other residential properties immediately bounding the site to the north, east and west. The site is located outwith the designated Morningside Town Centre.

The proposal accords with LDP policy Hou 1, subject to compliance with other relevant LDP policies.

b) Scale and design

The proposed five storey development will be broadly consistent with the scale and form of neighbouring tenement properties, and the development will provide a continuation of the existing urban form as seen on Morningside Road. Evidence has been submitted that a tenement building was located on the site for a number of years, and the proposed development is a suitable response given the historic built form of the site. Although it will appear as a later addition to the tenemental form on Morningside Road, and will be read as such, the broad continuation of the roofline will be a "completion" of the currently blank gable end, reflecting the wrap around tenemental form which is an established pattern of the urban form on secondary streets leading from Morningside Road.

The building will be only marginally taller in height than the neighbouring tenement to the west with chimney heights to match. The proposed development will include one additional storey compared to the traditional tenement form, and this will give a modern appearance to the building in the interpretation of the roof. However, the proposed design will effectively replicate the rhythm and uniformity of the adjacent tenement windows, with the marked separation between ground and first floor also reflected from the traditional tenement style. The staggered section of the rear building line (to accommodate stairs) whilst deeper than the adjacent tenement will not dominate the neighbouring property to the east, which is set back a significant distance in the plot from Canaan Lane.

Within the context of Canaan Lane, the adjacent properties are lower in scale than the Morningside road tenements, with two storey buildings bounding the site. However, as the street moves away from Morningside Road there is a mix of 5 storey mid-rise flats, tenements and lower houses interspersed. The addition of a new tenemental form adjacent to the lower rise housing is not uncharacteristic along this street or in the immediate vicinity.

The proposed front building line of the property will also be directly abutting the existing pavement and will match the line of the adjacent shop frontages to the west, and be stepped considerably forward of the adjacent villa to the east. This is an appropriate design solution where tenements are traditionally constructed without front gardens in this part of Morningside. Detailing in the frontage will also be picked up at ground floor level to continue the character of the frontage where this is traditionally of a different style to upper storeys which meets the aims of LDP Policy Des 1.

The external walls to the front and side of the building are to be finished in natural stone to tie in with the predominant building material found in the surrounding area. Zinc cladding is proposed to the top floor level and will be set back from the main frontage, giving the appearance of accommodation in the roofspace. The dark grey colour of the zinc will reflect the slate roof of the adjacent tenement. Windows are proposed to be metal framed to allow for a lightweight contemporary appearance. To the rear elevation of the building it is proposed that the building will be finished in brick to match the colour of the stone. Given that there would be no public views of this elevation, and traditionally ashlar sandstone would only be used on prominent elevations, the proposed materials will provide an appropriate design concept which contributes to a sense of place.

The removal of a number of trees from within the site is compatible with LDP policy Env 12 as the trees do not make a strong positive contribution to the character of the area.

The proposed development complies with Policies Des 1, Des 4 and Des 11 of the LDP as the design concept draws on the general characteristics of the area. The proposed modern development is of an appropriate scale and design taking into account the overall character of the area.

When calculated density, utilising methods from the Edinburgh Design Guidance, the development is significantly higher in units per hectare than existing developments to the east and west. The proposed development has a density of approximately 319 dwellings/hectare, with the neighbouring flatted development to the west only 131 dwellings/hectare plus commercial space at ground floor level. However, the building sits comfortably in the site and will not dominate the streetscene. As detailed below, the development will provide a spacious environment for future occupiers. In these circumstances, it is considered that the increased density at this site is justified and the application complies with LDP policy Hou 4.

c) Setting of adjacent listed building and conservation area

Listed Building

The site is located on the opposite of the side of the street from the Category B listed, Canny Man public house. As the proposed development matches the front building line of the existing tenement buildings on this side of the street the proposal will not have any adverse impact on the setting of, or views from the listed building.

Conservation Area

The site lies directly to the north of the Morningside Conservation Area where the *"northern boundary of the conservation area zig zags between Jordan Lane and Canaan Lane. In this small area there is a small eclectic mix of buildings and periods, ranging over vernacular single storey buildings, to Georgian detached buildings and Victorian tenements"*.

LDP Policy Env 6: Conservation Areas - Development, provides guidance for proposals affecting the setting of a conservation area. The application site is located to the north of the conservation area. The proposed design and scale of the proposals are in keeping with other developments along the edge of the conservation area. There is no adverse impact on the character or appearance of the adjacent conservation area as a result of the development.

d) Environment for future occupiers

The proposed units will provide a satisfactory residential environment in terms of floor space and amenity space. The flats will have a floorspace range of 52 square metres (sqm) to 99 sqm and meet minimum floorspace standards in the Edinburgh Design Guidance. All flats will provide adequate levels of daylight internally and all units are dual aspect.

LDP Policy Hou 3 gives guidance relating to the provision of private garden space in housing developments. A small area of communal garden will be formed at the rear of the flats with an area of private garden to the ground floor flat. Given the height of the proposed development and its orientation, this area will receive little direct sunlight and falls short of the open space standards.

The 2016 Open Space Audit identifies that there are pockets of deficiency in access to greenspace in Morningside for both local and large greenspaces. However, there would be no means to remedy this on such a small site or within the surrounding pattern of built form. It is also recognised that there are very good open space opportunities just beyond the standard distance/quality criteria. Equally, there is existing access to play space meeting quality standards. Within the constraints of the site, and given the historic use of the site, failure to provide greater quantities of open space within the site is acceptable.

The proposed flats are of an appropriate size and all are dual aspect. The proposed amenity for the occupiers of the development is of an acceptable level.

Environmental Protection have requested that minimum standards for windows and ventilation be provided to negate the potential noise impact from the existing beer garden of the Canny Man public house. Subject to the inclusion of acoustic glazing to the front elevation of the property the impact from neighbouring uses is acceptable. A condition is recommended which refers to the specifications required. In addition, given the previous use of the site, and potential for contamination, this should also be controlled via condition.

e) Impact on amenity of neighbouring residents

New windows to the east facing gable elevation of the development will be of bathrooms only and these will not result in direct views to neighbouring properties. The rear windows of the development will be located at a distance of between 5.7m and 7.8m and the adjoining tenement garden ground to the north. However, given that there is already mutual overlooking of the gardens from existing flats within these blocks, the impact on privacy will not be significant. Window to window distances match the established dense character of the area and tenemental neighbourhoods.

The proposed development will not cause an unacceptable loss of daylight to the windows of the neighbouring residential properties to the north and east. The design statement submitted has shown that there will be a small reduction in daylight to bedrooms on the rear of 231 Morningside Road but they will maintain an adequate average daylight factor (ADF) retained which meets the requirements of the Edinburgh Design Guidance. Other Morningside Road properties would not be significantly affected as they retain their eastern aspect across the communal gardens. Some impact from the new gable end would be experienced by no 9 Canaan Lane but its southerly aspect would offset this impact.

In terms of overshadowing of neighbouring garden ground, a number of diagrams have been submitted to show the impact of the proposed development at the spring equinox. As the development is located to the south of the adjacent tenement garden ground, it will create a significant degree of overshadowing of this space in excess of levels permitted in guidance.

It was noted in the reporters decision for appeal PPA-230-2211 that "the affected gardens are already shaded by existing mature trees and other tall buildings. They would also be used more in the summer months when the amount of sunlight available will improve on that depicted in the March sunlight diagram. The proposals would also offer other benefits to the Morningside Road properties that would offset the documented loss of direct sunlight. The removal of a vacant deteriorating building, the removal of scrub trees and the creation of a new secure rear boundary would improve the amenity of these rear spaces."

In summary, whilst it is clear that the garden ground of neighbouring properties would be affected by the proposals, it is not considered there would be an adverse effect on amenity overall. The development would therefore comply with LDP policy Des 5 even if it would not meet the overshadowing guidance set out within the Edinburgh Design Guidance.

In terms of noise impact from future occupiers of the development, the application is for a proposed residential use which is compatible with neighbouring residential properties. The development will not raise any significant air quality issues and the proposed internal wood burning stoves do not require planning permission.

f) Road safety and transport issues

The proposal is for a 'car free' development and zero parking provision meets the requirements of LDP policy Tra 2. The site is located within an area of high accessibility with public transport, shops, schools and centres of employment by foot, cycle and public transport.

Private cycle parking within the communal rear garden, involving storage units for each flat will also be provided in accordance with LDP Policy Tra 3.

A contribution of £7,500 is required towards the provision of car club vehicles in the area. This will be secured by an appropriate legal agreement.

g) Impact on Flooding

The application has included adequate Surface Water Flow Plans to show that there will be no adverse impact.

h) Education Requirements

Using the pupil generation rates set out in the Supplementary Guidance, the development of 10 flats is not expected to generate at least one additional pupil. A contribution towards education infrastructure is not required

i) Public Comments

Material representations in objection

- Excessive number of flats and density too high - assessed in section 3.3b);
- Impact on the character of the streetscene along Canaan Lane - assessed in section 3.3b);
- Inappropriate positioning of front building line - assessed in section 3.3b);
- Design does not reflect the roofline of adjacent buildings - assessed in section 3.3b);
- Insufficient parking provision - assessed in section 3.3f);
- Design is overbearing and at least one storey too high compared to neighbouring tenements - assessed in section 3.3b);
- Overshadowing of neighbouring garden ground - assessed in section 3.3e);
- Increase in traffic and road safety issues - assessed in section 3.3f);

- Loss of daylight to neighbouring properties. - assessed in section 3.3e);
- Loss of privacy - assessed in section 3.3e);
- Impact on neighbouring air quality - assessed in section 3.3e);
- Contrary to LDP policies Des 4 and Des 5 - assessed in section 3.3a -g);
- Impact of noise from future occupiers - assessed in section 3.3e);
- Existing excess supply of residential properties in the surrounding area - assessed in section 3.3a); and
- Flooding impacts - assessed in section 3.3g).

Non-material objections

- Insufficient neighbour notification time period for comments- neighbour notification was carried out in accordance with the regulations;
- Drawings not a realistic scale - the proposals are drawn to scale;
- Inaccuracies in design statement - these have been rectified by agent;
- Impact on ability to maintain neighbouring properties - this is a civil issue;
- Proposed flats will be unaffordable - property values not relevant to planning;
- The site should be retained as toilets; and
- Disruption during construction works.

Material representations in support

- Meets housing supply need - assessed in section 3.3a);
- High quality design - assessed in section 3.3b); and
- In keeping with the character of the area - assessed in section 3.3b).

Non-material support comments

- Removes an existing eyesore; and
- Application has addressed DPEA reporter's comments.

j) Equalities

This application has no adverse impact in terms of equalities and human rights. Lift access is provided to upper floors of the building.

Conclusion

The proposal is in accordance with the Development Plan, but represents a minor infringement of the Council's non-statutory guidelines in relation to overshadowing and the provision of private open space. The development is acceptable in terms of scale, form and design and will not be detrimental to the character of the surrounding area. There will be a degree of overshadowing of neighbouring garden ground as a result of the proposals. However, on balance, given that the proposal is the desired urban form for the site, the proposals are acceptable.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. 1) Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
 - c) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
2. Sample/s of the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work commences on site.
3. The windows highlighted in red shown on the proposed elevation drawing (07), (second and third floor), require high performance double glazing, to achieve Rw 41dB, and meet an 'NR15 closed window standard.'
4. Front facing windows overlooking Canaan Lane, (first, second, third, fourth and fifth floors) are to be fitted with high performance trickle vents which achieve Dn,e,w 50 dB.
5. A fully detailed landscape plan, including details of all hard and soft surface and boundary treatments and all planting, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.
6. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.

Reasons:-

1. In order to enable the planning authority to consider this/these matter/s in detail.

2. In order to enable the planning authority to consider this/these matter/s in detail.
3. In order to protect the amenity of the occupiers of the development.
4. In order to protect the amenity of the occupiers of the development.
5. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
6. In order to ensure that the approved landscaping works are properly established on site.

Informatives

It should be noted that:

1. Planning permission should not be issued until the applicant has entered into suitable planning obligations or made payment to contribute the sum of £7,500 towards nearby car club schemes.
2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. The wood burning stoves installed in the development should be approved appliances from the Scottish list of approved appliances, in accordance with changes made to sections 20 and 21 of the Clean Air Act 1993 by section 50 of the Regulatory Reform (Scotland) Act 2014.

Financial impact

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

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

In total 28 representations were received, 23 objecting to the application and five comments in support of the application.

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

Background reading/external references

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

Statutory Development Plan Provision	LDP - Urban Area
Date registered	9 April 2018
Drawing numbers/Scheme	01-03, 04A, 05- 14, Scheme 1

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

Contact: Rachel Webster, Planning Officer
E-mail: rachel.webster@edinburgh.gov.uk Tel: 0131 529 3442

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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

LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

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

LDP Policy Hou 1 (Housing Development) sets criteria for assessing the principle of housing proposals.

LDP Policy Hou 2 (Housing Mix) requires provision of a mix of house types and sizes in new housing developments to meet a range of housing needs.

LDP Policy Hou 3 (Private Green Space in Housing Development) sets out the requirements for the provision of private green space in housing development.

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

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.

LDP Policy Des 11 (Tall Buildings - Skyline and Key Views) sets out criteria for assessing proposals for tall buildings.

LDP Policy Env 6 (Conservation Areas - Development) sets out criteria for assessing development in a conservation area.

Relevant Non-Statutory Guidelines

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

Appendix 1

Application for Planning Permission 18/01506/FUL At 7 Canaan Lane, Edinburgh, Erection of five storey building to replace a disused public toilet comprising 10 flats.

Consultations

Environmental Protection

The planning application is for a new five storey residential building to replace an existing public toilet at 7 Canaan Lane, Edinburgh. The proposed building is located behind an existing 4 storey Victorian period tenement to the west, which fronts onto Morningside Road. The ground floor of that building includes a holistic therapies business and a café located on the corner with Morningside Road. To the east, Canaan lane is residential with a mixture of housing styles and from different periods. To the south, on the other side of the Canaan Lane, the site overlooks the beer garden of a public house which fronts onto Morningside Road. To the east of the beer garden is a pub car park with further residential accommodation of mixed housing styles. The application follows on from 17/00184/FUL which was refused consent.

Due to the close proximity of the site to the beer garden, there were concerns that noise from customers in the beer garden would significantly affect the amenity of residents living in the new accommodation. Therefore, a Noise Impact Assessment (NIA) was provided by the agent. Although the desired standard of inaudibility through an open window could not be achieved, it was decided to accept the reduced standard of inaudibility through a closed window with upgraded acoustic ventilators (trickle vents). The justification being that there are existing residential properties that also overlook the beer garden and only the property on the ground floor has a bedroom to the front. The new building will also reduce traffic and other extraneous noise for some of the existing tenement building's rear facing rooms.

The only front facing windows that are predicted to meet the NR15 criterion with standard open trickle vents are the ground floor windows.

The NIA did not identify any plant noise from the public house or other adjacent commercial premises.

The development will also have wood burning stoves in each apartment living room. Under the Clean Air Act 1993, The City of Edinburgh Council's area is a smoke control area, therefore it is not permitted to emit smoke from a chimney unless an authorised fuel is being burned or an 'exempt appliance' is being used. The agent has advised that only DEFRA approved wood burning appliances are to be installed. Therefore, an informative is included overleaf.

Environmental Protection has no objections to the planning application subject to the following conditions:

Conditions

- 1) i) Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
- 2) In elevation drawing no. L(PL)014D: The windows highlighted in red, (second and third floor), are to be installed with high performance double glazing, 10/16/8.8 to achieve Rw 41dB, and meet an 'NR15 closed window standard.'
- 3) High performance acoustic ventilators which achieve Dn,e,w 50 dB are to be installed in, or above each window overlooking Canaan Lane on the first, second, third, fourth and fifth floor; as noted in elevation drawing no. L(PL)014D.

Informative

The wood burning stoves installed in the development should be approved appliances from the Scottish list of approved appliances, in accordance with changes made to sections 20 and 21 of the Clean Air Act 1993 by section 50 of the Regulatory Reform (Scotland) Act 2014.

Waste Services

No objection.

Flood Planning

No objection.

Roads Authority

No response.

Children and Families

The Council's Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery' states that no contribution towards education infrastructure is required from developments that are not expected to generate at least one additional primary school pupil.

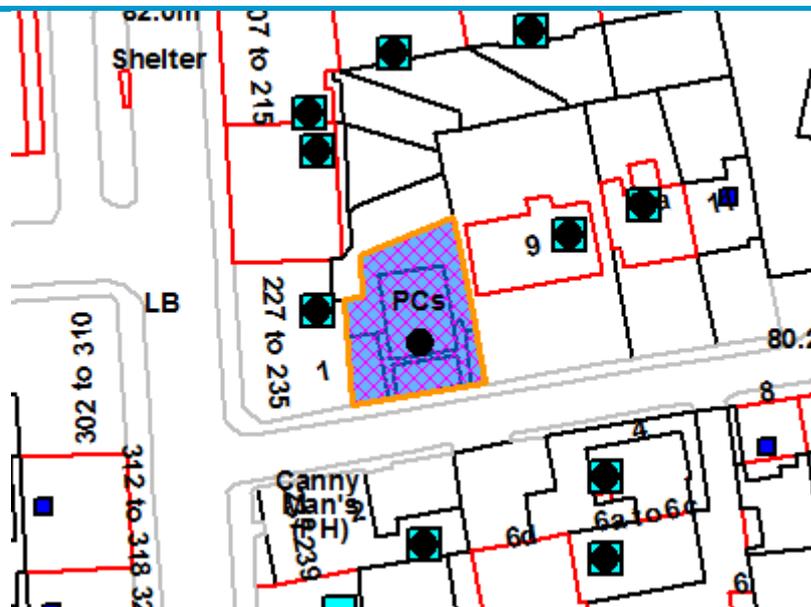
Using the pupil generation rates set out in the Supplementary Guidance, the development of 10 flats is not expected to generate at least one additional pupil. A contribution towards education infrastructure is therefore not required.

Archaeology

Further to your consultation request I would like to make the following comments and recommendations concerning this application for the erection of a five storey building to replace a disused public toilet comprising 10 flats.

The site has been identified as occurring within an area of archaeological potential. However, it is considered that the potential for significant archaeological remains being disturbed by this development is minimal. Therefore, it has been concluded that there are no significant archaeological implications regarding this application.

Location Plan



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