

Development Management Sub Committee

Wednesday 5 December 2018

**Application for Planning Permission 18/03993/FUL
At Parkview, 64 Peffermill Road, Edinburgh
Demolition of existing onsite derelict care home and
erection of 2no. residential flatted blocks, comprising 30
flats, along with associated road, parking court, pedestrian
paths, amenity space and soft landscaping (as amended).**

Item number	4.7
Report number	
Wards	B15 - Southside/Newington

Summary

The principle of housing on the site is acceptable; there are compelling reasons which justify a departure from the development plan in relation to Green Belt policy. The proposed mix, layout, scale, design and access arrangements are acceptable and appropriate in their context. The proposal will provide an appropriate level of amenity to existing and future occupiers and will make a positive contribution to the character of the area. There are no material considerations which outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LDPP, LEN10, LEN11, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LDES01, LDES04, LDES05, LDES06, LDES07, LDES08, LDES09, LTRA02, SPTR03, LTRA04, NSG, NSGESS, NSGD02,

Report

Application for Planning Permission 18/03993/FUL At Parkview, 64 Peffermill Road, Edinburgh Demolition of existing onsite derelict care home and erection of 2no. residential flatted blocks, comprising 30 flats, along with associated road, parking court, pedestrian paths, amenity space and soft landscaping (as amended).

Recommendations

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

Background

2.1 Site description

The site extends to 0.3ha and is located on the south side of Peffermill Road. It comprises the site of a former care home which has been demolished recently. The former building was two storeys high with sloping, mono pitched roofs.

The site is located on a bend on Peffermill Road from which there is a direct vehicular access. There is a bus top directly opposite the site.

There is a low stone wall along the front boundary of the site. Other boundaries comprise red brick walls. There is some vegetation and tree planting along the north (front) and west boundaries.

Directly to the east is a single and two storey property which is in use as a nursing home. There are commercial/ industrial units beyond this further along Peffermill Road.

On the opposite side of Peffermill Road is two storey housing, with the Morgan Playing fields further long Peffermill Road to the east.

To the west are two and a half storey residential blocks; the vehicular access to these runs close to the application site boundary.

Directly to the rear of the site are Peffermill playing fields.

The wider area has a mixture of uses including houses, flats, recreational playing fields and commercial premises.

2.2 Site History

There is no planning history for this site.

Main report

3.1 Description Of The Proposal

The applicant seeks full planning permission for the following:

The demolition of the existing building, and the construction of two residential blocks, providing a total of 30 units. The units will be for 100% mid-market rent, comprising 21 one bedroomed flats and nine two bedroomed flats.

Both blocks will be three storeys in height and will have flat roofs. Proposed materials are dark buff facing brick to walls, with pre cast string course, alu-clad windows (recessed by 215mm) and vertical flat bar railings to windows.

Block one to the east of the site will comprise nine flats; three one bedroomed flats and six two bedroomed flats. Block two will comprise 18 one bedroomed flats and three two bedroomed flats. The majority of flats are dual facing.

Of the 21 one bedroomed flats, eighteen would have a floor area of 54 square metres, and three would have a floor area of 56.4 square metres. Of the nine two bedroomed properties, six would have a floor area of 73.8 square metres, and three would have a floor area of 76.2 square metres.

Associated parking, road and landscaping will be provided as part of the development. A new access in a similar position to the existing access will be provided directly off Peffermill Road.

A total of 11 car parking spaces are proposed in a car parking area to the rear of the site. Of these, two will be disabled parking bays. Two motorcycle parking spaces are proposed. Blocks one and two will have a enclosed brick external bike stores to the rear to provide a total of 26 Sheffield type racks to accommodate 52 bikes.

Bin collection points are located along the west elevation of block one, the east facing wall of block two and next to the western site boundary adjacent to block two.

Communal open space would be provided, giving a total of 724 square metres. The main area of amenity space would be provided to the rear of block one; this would have a total area of 571 square metres.

The wall along the frontage of the site adjacent to Peffermill Road will be retained, and a new vehicular access provided, with three new pedestrian openings. The existing boundary walls to the south, east and west boundaries will be retained.

Previous scheme

The first scheme had limited space for motorcycle parking and a pedestrian step access to the front of block two. The revised scheme accommodates the motorcycle parking and provides a ramp for access to block two.

Supporting Statements

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

- Design and Access Statement;
- S1 Sustainability Statement form;
- Drainage Strategy and Flood Risk Assessment; and
- Transport Assessment.

Copies of these documents are available to view on Planning and Building Standards On-line 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 proposal is acceptable in principle;
- b) the proposed scale, design and materials are acceptable;
- c) the proposal is detrimental to the amenity of neighbours and the proposal provides sufficient amenity for the occupiers of the development;
- d) representations raise issues to be addressed;
- e) the proposal affects road safety;
- f) the proposal has impacts on infrastructure;
- g) the proposal meets sustainability criteria; and
- h) the proposal has any equalities or human rights impacts.

a) Principle of development

The site is located within the Edinburgh Green Belt in the Edinburgh Local Development Plan (LDP). Policy Env 10 (Development in the Green Belt and Countryside) states that development will only be permitted where it meets one of the listed criteria and would not detract from landscape quality and/or rural character of the area.

The proposed development would not comply with LDP Policy Env 10 as it would result in new residential development within the Green Belt. However, there are material considerations which would allow a departure from this policy, including the history and previous use of the site. The site was previously developed with a large residential care home, and is part of the built up frontage in various uses along this section of Peffermill Road. The aim of policy Env 10 is to only allow development in the Green Belt where it would not detract from the landscape quality and/or rural character of the area. As this site is located within an existing built up frontage, redeveloping it with an alternative residential use would not detract from the landscape quality or character of the area. There are compelling reasons to allow a departure from policy Env 10 in this instance.

Policy Hou 1 (Housing Development) gives priority to the delivery of housing land supply on sites in the urban area, provided proposals are compatible with other policies of the plan. The proposal would be a suitable site for housing development in principle and would not undermine green belt objectives.

The principle of development is acceptable.

The application is for thirty residential homes and an affordable housing provision requirement of 25% (7) homes is required. The applicant is 21st Century Homes, which is the City of Edinburgh Council affordable housing developer and up to thirty affordable homes for rent will be delivered exceeding the affordable housing requirement. The homes will be built to the Housing for Varying Needs Standards. Notwithstanding this, it is appropriate to ensure that affordable housing is provided in accordance with the Council's policy and guidance. As such, a Memorandum of Understanding is recommended which would ensure that suitable housing is delivered.

The application was submitted prior to the Guidance on Heat Mapping being approved. This Guidance has therefore not been applied to this application.

b) Scale, Design and Materials

Policy Des 1 of the Local Development Plan states that development will be supported where it is demonstrated that it can contribute towards a sense of place. LDP policy Des 4 supports development that will have a positive impact on its surroundings having regard to height, form, scale, materials and positioning.

The positioning and fit of flatted blocks on the site forms a simple and legible layout which connects well particularly with the existing residential block to the west. The proposed layout provides a stronger street frontage than the previous (now demolished) building.

The area of open space provides a central focus to the scheme, with landscape character and amenity space for the residents. A condition requiring full details and implementation of landscaping is proposed.

In terms of height, the development provides three storey flats which will sit within the context of the two and a half storey residential development to the west. The eaves height of the proposal will match the dormer height of this neighbouring block; the development will be 1.4 metres higher than the eaves line in comparison. The area around the site is a mix of one, two and three storey properties; the proposed development in terms of its height would not be out of place within this context.

There are various forms and design of buildings in the vicinity of the site. The design of both blocks is simple and contemporary, and contribute to the character of the area in a positive way. The dark buff toned multi brick would be an appropriate material for this location, and the recessed windows in dark grey aluminium would be acceptable. Full details would be required by condition.

In terms of design, layout and scale the proposal is acceptable.

c) Amenity

Policy Des 5 (Amenity) relates to the amenity of existing and future occupiers of development. It seeks to ensure that amenity is not adversely affected by new development. There are residential neighbours directly on the opposite side of Peffermill Road, and directly to the west. To the east is a care-home.

In terms of privacy, new development is generally located a minimum of 20m from existing residential properties; this provides an acceptable level of privacy between new and existing dwellings. The proposed development would be sufficiently separated from the property on the opposite of Peffermill Road so as not to cause adverse loss of privacy, overshadowing or loss of sunlight to existing property opposite.

Block one would have windows within 9 metres of the east boundary facing 68-70 Peffermill road (care home). Windows range from between 6-8.2 metres to the site boundary. These would overlook an area of communal ground/ landscaped area. There is a distance of at least 20 metres between the windows in this existing neighbouring property and the proposed new development. Windows in the rear elevation of block 1 (south) would face the playing fields. The development of block one would not result in an unacceptable level of privacy for the existing neighbouring property.

Block two will be approximately six metres from the western site boundary. Some of these windows in the front of this block will lie within the gable of the neighbouring property at 54 to 58 Peffermill Road where a relaxation of the privacy guidance would apply. Other windows in block 2 will overlook the access road and communal gardens to the neighbouring property to the southwest. This would not result in any adverse loss of privacy to the neighbouring property to the west. There would be no loss of privacy from windows facing the playing fields to the south.

In terms of privacy between the two proposed blocks, there would be a distance of approximately 11.5 metres between blocks 1 and 2 within the site. The majority of these are within the gable zones of the two blocks and a relaxation of the privacy distance can be applied; others would look over communal space fronting Peffermill Road.

Other windows within the development would not result in loss of amenity to future occupiers of the development.

In terms of privacy the proposal is acceptable.

The main communal green space comprises 19% of the total site area. The provision of open space on the site is of good amenity value and would achieve good sunlight for a large part of the day. The amount of greenspace proposed broadly meets the requirements of policy Hou 3 (Green space in New Developments) which requires a minimum of 20% of the total site area to be useable greenspace. Some ground floor flats have access to private gardens; occupiers would also have access to the playing fields on the opposite side of Peffermill Road. In terms of green space provision, the proposal is acceptable.

Daylight analysis to existing buildings has been carried out using the 25 degree method. This has identified that there are no adverse impacts on existing properties and daylighting to existing neighbouring property is acceptable.

A sunlight study has been submitted by the applicant which assesses available sunlight. This indicates that the majority of sunlight loss both to the rear of block two and within the gable areas of both neighbouring sites will occur later on in the day around 4pm, the remainder of the day achieving an adequate level of sunlight. An acceptable level of sunlight will be achieved. Most units have dual aspect living areas to enhance the amount of light entering the properties. Where this is not possible on corners, living space is located to allow a good amount of sunlight to the property.

In terms of accommodation provided, all the flats exceed the minimum space standard for accommodation set out within the Edinburgh Urban Design Guidance and are acceptable. Some ground floor flats provide an opportunity conversion to accommodation for wheelchair or other disabled users.

The Edinburgh Urban Design Guidance requires new development over 12 units to provide at least 20% of the units to have a floor area of at least 91 square metres designed for growing families. The development would not include units of three bedrooms or more. The applicant advises that there is a large proportion of detached family houses in the Prestonfield/Peffermill area, and that new developments to include a large number of family social housing are being built close by in Craigmillar. They consider that the central location and good transport links for the Parkview site means it is ideally situated to serve key workers that the tenure is aimed at, and that from previous experience the housing mix proposed at Parkview is the most sought after in the Mid-Market Tenure. Given the above, the proposed development would provide appropriate housing units for this area of the city.

Waste Services has confirmed its agreement to the proposed waster strategy for the development.

The proposed residential development is compatible with the surrounding area and will afford an acceptable level of amenity to both existing and future residents.

d) Letters of Representation

Material Representations – Objection:

- Traffic impact – assessed in 3.3(e) and found Transport had no objections to the proposal. The level of traffic generated will not result in an adverse increase in traffic impact.
- Insufficient parking – assessed in 3.3(e) and found that the level of parking provided is acceptable.

Grange/ Prestonfield Community Council-

The Community Council support the proposal in general but object to the level of parking proposed, the increase in vehicle trips which would be generated, safety concerns with bin collections and request improved infrastructure such as a new pedestrian crossing on Peffermill Road.

- Traffic impact – assessed in 3.3(e) and found that Transport had no objections to the proposal. The level of traffic generated will not result in an adverse increase in traffic impact.
- Insufficient parking – assessed in 3.3(e) and found that the level of parking provided is acceptable.
- Refuse collection/ road safety – assessed in 3.3(f) and found that Waste Services agree to the waste strategy for this proposal.
- Road safety - assessed in 3.3(e) and found that Transport had no objections to the proposal and there are no issues pertaining to road safety relating to this development.

e) Road Safety

A total of eleven parking spaces are proposed for the development. The Transport Assessment submitted with the application states that the previous building/use had a total of ten car parking spaces. It also states that trip generation will be reduced from the previous use by approximately 25 trips per day. In accordance with the current parking standards, the maximum number of car parking spaces for the proposed development is 30 (Zone 2). The standards require a minimum of 60 cycle parking spaces, two electric vehicle charging points and one motorcycle space.

Policy Tra 2 of the LDP allows for lower car parking provision to be considered for this site under parts c) and d) as the site is accessible to public transport stops and is well served by links to cycle/pedestrian routes. The proposal for 11 car parking spaces is acceptable for these reasons. There are existing off street parking spaces in the vicinity and an informative is recommended that the applicant consider provision of a city car club space.

The proposal provides storage for 52 cycles, which although just below the requirements in the standards for 60, is considered acceptable. The provision of two electric vehicle charging points and two motor cycle spaces accords with the standards.

The provision of a new pedestrian crossing in the vicinity of the site for a development of 30 units in this location is not justified or necessary.

In terms of road safety the proposal is acceptable.

f) Impact on Infrastructure

A Drainage Assessment and Flood Risk Assessment have been submitted with the application. These state that the site is not at risk from flooding from fluvial sources, and that there is a small area of medium risk of pluvial within the site. Flood Planning has advised that the site is adjacent to the flood storage reservoir which is designed to fill with water up to a depth of approximately one storey above existing ground level. Typically SEPA guidance is to raise floor levels above the 1:200 + CC flood level plus an allowance of 600mm freeboard on top of this. However, raising floor levels to this elevation would effectively mean that the site would have to be raised significantly/have severe access implications or that it would be effectively sterilised if this was not achievable. Flood Planning considers that as there is an existing Council built flood wall in place that defends the site then development should be allowed to proceed as identified in the application. SEPA raise no objection to the proposals.

Education

Residential development is required to contribute towards the cost of required education infrastructure to ensure that the cumulative impact of development can be mitigated. The site falls within the Sub-Area C-1 of the Castlebrae Education Contribution Zone. 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 9 two bedroom flats is not expected to generate at least one additional pupil. The 21 one bedroomed flats will not generate pupils for the purposes of this calculation. A contribution towards education infrastructure is therefore not required.

Archaeology

The application site lies within an area of archaeological interest. However the site has been significantly impacted upon by the construction of the former care-home and it is considered unlikely that significant in situ remains will have survived. There are no known archaeological implications in relation to this application.

g) Sustainability

The applicant has submitted a sustainability statement in support of the application. The proposal will include low and zero carbon equipment as solar photovoltaic panels will be incorporated. The proposal complies with the requirements of Part A of the Edinburgh Standards for Sustainable Buildings. The requirements of the Edinburgh Design Guidance are met.

h) Equalities and Rights Issues

An Initial Integrated Impact Assessment (IIA) checklist has been completed for this application and has concluded that the development will not require any further assessment in this area. The living accommodation will provide housing for a range of users. The site is accessible for those with mobility issues. The proposal has good access to public transport, green space and local facilities. There are no identified equalities issues.

Conclusion

In conclusion, there are compelling reasons which justify a departure from the development plan in relation to Green Belt policy and the principle of housing on the site is acceptable. The proposed mix, layout, scale, design and access arrangements are acceptable and appropriate in their context. The proposal will provide an appropriate level of amenity to existing and future occupiers and will make a positive contribution to the character of the area. 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

Conditions:-

1. 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.
2. i) Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
3. 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.
4. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.

5. Details of the proposed solar photovoltaic roof panels shall be submitted for consideration and approval prior to the first unit hereby approved being occupied.

Reasons:-

1. In order to enable the Head of Planning to consider this/these matter/s in detail.
2. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
3. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
4. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
5. In order to enable the planning authority to consider this/these matter/s in detail.

Informatives

It should be noted that:

1. A Memorandum of Understanding is required to ensure a minimum of 25% affordable housing is provided.
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 applicant should consider provision of a car club vehicle in support of the Council's LTS Cars1 policy.
6. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport.

7. The development shall be carried out in accordance with the measures identified in the approved Sustainability Statement Form. The applicant should submit a Self Declaration Form to the Head of Planning and Building Standards on completion and prior to occupation unless otherwise agreed.
8. Two parking spaces shall have 7kw (Type 2 sockets) charging point installed and fully operational prior to occupation.

Financial impact

4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

The application has been considered 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

Two letters of objection were received in relation to this application. An assessment of these 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	Edinburgh Local Development Plan
	The site is within the Edinburgh Green Belt. Directly to the south is an a Special Landscape Area, and an Area of Importance for Flood Management.
Date registered	25 July 2018
Drawing numbers/Scheme	1-2,3a,4-10,11a,12-16
	Scheme 2

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Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Env 10 (Development in the Green Belt and Countryside) identifies the types of development that will be permitted in the Green Belt and Countryside.

LDP Policy Env 11 (Special Landscape Areas) establishes a presumption against development that would adversely affect Special Landscape Areas.

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 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 Hou 6 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

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

LDP Policy Des 9 (Urban Edge Development) sets criteria for assessing development on sites at the Green Belt boundary.

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.

Policy TRAN3 states that local plans should include car parking standards that relate the maximum permitted level to accessibility by public transport.

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

Non-statutory guidelines 'The Edinburgh Standards for Streets' sets out principles and guidance whose aim is to achieve a coherent and enhanced public realm.

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 18/03993/FUL At Parkview, 64 Peffermill Road, Edinburgh Demolition of existing onsite derelict care home and erection of 2no. residential flatted blocks, comprising 30 flats, along with associated road, parking court, pedestrian paths, amenity space and soft landscaping (as amended).

Consultations

Archaeology – response dated 1 August 2018

The application site lies within an area of archaeological interest. However the site has been significantly impacted upon by the construction former care-home and it is considered unlikely that significant insitu remains will have survived. Therefore it has been concluded that there are no known archaeological implications regarding this application.

Waste Services – response dated 30 July 2018

Waste and Cleansing Services takes no stance either for or against the proposed development but as a consultee would make the following comments:

Waste and Fleet Services would expect to be the service provider for the collection of waste as this appears to be a residential development. The application form refers to agreeing to CEC waste guidelines but not in detail.

I would assume from the files that this is an area of flatted properties. We would require to see this to ensure waste and recycling requirements have been fully considered.

It is imperative that adequate provision is made for the storage of waste off street, and that cognisance is taken of the need to provide adequate space for the storage of segregated waste streams in line with the Waste (Scotland) Regulations which require the source separation of dry recyclable materials, glass, food, etc.

Adequate provision should also be made for the effective segregation of materials within the building not just at the point of collection. Adequate access must also be provided to allow uplift of waste safely from the collection point taking into consideration the traffic flows at this busy location and I feel we would require to look at the bin storage areas for this development more closely.

In view of these factors the developer must contact Waste Services at the earliest point for advice relating to their options so that all aspects of the waste & recycling service are considered i.e. access for vehicles, health & safety, presentation points for kerbside bins and/or boxes and size of storage areas required in residential gardens for all bins & boxes etc. It would be beneficial to go through the site plans and swept path analysis/vehicle tracking to show how the vehicle will manoeuvre.

Affordable Housing – response dated 15 August 2018

Housing and Regulatory Services has developed a methodology for assessing housing requirements by tenure, which supports an Affordable Housing Policy (AHP) for the city.

The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more. This is consistent with Policy Hou 7 Affordable Housing in the Edinburgh City Local Plan. An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, is provided.

This application is for 30 residential homes and an AHP requirement for 25% (7) homes are required. The applicant is 21st Century Homes, which is the City of Edinburgh Council affordable housing developer and up to 30 affordable homes for rent will be delivered exceeding the affordable housing requirement. The development will consist of flats, along with associated parking. The homes will be built to the Housing for Varying Needs Standards and the latest Design Guidance requirements.

Summary

The application satisfies and exceeds the AHP requirement. A Section 75 is not necessary as the Council will manage the homes.

The Department would be happy to assist with any queries around the affordable housing requirement for this development.

SEPA – response dated 16 August 2018

We have no objection to this planning application, due to the fact that the proposed re-development will result in a decrease in vulnerability of use at the site, which accords with our guidance note [Planning Information Note 4](#). Notwithstanding this, there may be a residual risk of fluvial flooding at the site and we would expect Edinburgh Council to undertake their responsibilities as the Flood Prevention Authority. Please note the advice provided below.

Review of the SEPA Flood Map indicates that the site lies within the 0.5% annual probability (1 in 200-year) flood extent and may therefore be at medium to high flood risk. Although the source of flood risk identified at the site is from surface water solely, it would appear that the fluvial extent takes account of the Braid Burn Flood Prevention Scheme (FPS) and therefore there may also be a residual fluvial flood risk at the site.

The Flood Risk Assessment (FRA) does not provide a full review of flood risk at the site. There is no mention of the FPS and any residual fluvial flood risk. The report also states that there is no historical information pertaining to flooding at the site. However, we hold a record to indicate that the Parkview care home was flooded in April 2000 requiring evacuation of the premises.

The development site lies behind the Braid Burn FPS. We are of the understanding that the FPS has a 200-year standard of protection however there is uncertainty around this and we have not reviewed the hydrology or been provided with as-built design for the scheme. We would also highlight that there is a residual risk with all FPS from exceedance and failure and flooding during such a scenario may be of higher velocities and depths. The pluvial flood maps indicate a medium to high risk of surface water flooding at the site which may be exacerbated by the FPS preventing surface water from draining to the Braid Burn.

Whilst we have no objection to this application as the proposals are for redevelopment which will result in a decrease in vulnerability of the site, we would strongly recommend that further assessment of flood risk at the site is undertaken. This should be used to inform the design of the site, including finished floor levels of the properties, and minimise any residual flood risk from fluvial and surface water flooding.

Surface water management is primarily a matter for the Local Authority to determine and they should satisfy themselves that there is no increase in flood risk to proposed or existing property as a result of development. It is noted within the report that the site is to be landscaped to attenuate surface water up to the 1 in 200-year event on site but not to impact properties by having falls away from buildings. Overland flow routes are to be designed to ensure any surface water flooding exceeding the 1 in 200-year event is directed off site. We would highlight that there should be no increase in flood risk to existing properties.

Caveats & Additional Information for Applicant

The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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. For further information please visit

<http://www.sepa.org.uk/environment/water/flooding/flood-maps/>

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.

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).

Please refer to [SEPA standing advice for planning authorities and developers on development management consultations](#) for other aspects of the development due to the fact that the consultation is below the threshold where we would provide bespoke advice for other aspects.

Regulatory advice for the applicant Regulatory requirements

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 regulatory services team in your local SEPA office at:

Edinburgh Office Silvan House SEPA 3rd Floor 231 Corstorphine Road Edinburgh EH12 7AT

Grange/Prestonfield Community Council – response dated 18 August 2018

Introduction: These comments are submitted on behalf of Grange/Prestonfield Community Council. We support this proposal for 30 flats in two new blocks, consisting of 21 two person flats and 9 one person, in the mid-market rented sector. The developer is 21st Century Homes, a housing arm of CEC and we think this scheme will be a welcome addition to the housing stock in this locality, on the site of the now closed Parkview care home. We note that 11 car parking spaces are to be provided on site including 2 disabled spaces, which we think is broadly consistent with the recent change in CEC parking guidance and the availability of public transport.

However there are two aspects of this application which cause us concern as set out in the following paragraphs.

GPPC Comments:

Transport Assessment: We question the assumption that there will be a net reduction in vehicle trips generated per day compared with when the care home was in operation. It then accommodated up to 42 residents in 6 flats, mostly elderly and some infirm. There may be actual data on daily traffic when the care home was in use to compare with the assumptions in the Traffic Assessment. There is no comparison stated with the current situation of zero trips in and out as the home is closed. The assumption of 53 trips per day when the new development is occupied represents a significant increase in traffic emerging onto Peffermill Road and turning from it, compared with the current situation of zero trips.

The Transport Assessment makes much of the convenience of the eastbound bus stop from the city for residents of the new flats, but to use it they will have to cross this busy road and in the future there could be more children trying to cross the road. This is a situation which the previous use of the site as a care home did not really have to take into account when walking and cycle access did not need to be facilitated. Furthermore the entrance to the popular Morgan Playing Fields is nearby on the north side of the road which residents of the flats should be able to access safely and easily.

We agree with the Transport Assessment that there are good cycle and pedestrian routes nearby but getting to them can be very difficult. This stretch of Peffermill Road is 30mph and from observation a lot of westbound traffic does not observe this limit. We hope that this development will generate increased pedestrian and cycle traffic and disagree with the Transport Assessment that "there is no requirement for any additional infrastructure". A CEC development should surely be an exemplar of safe sustainable travel and in this respect we think this scheme falls well short. We suggest that there should be as a minimum an island refuge or preferably a light controlled pedestrian crossing very close to this development which would also aid existing nearby residents.

Refuse Strategy: We have no comments on the number or location of bin stores for waste and recycling except in so far as they relate to the following comments about the arrangements for collection. The residents of 30 flats will generate a lot of refuse and recycling material. It is intended that collection vehicles will stop on Peffermill Road in 3 roadside places to which the bins will be wheeled and collection vehicles will not enter the site. This will add to the hazards for people trying to cross the road and could be potentially dangerous as westbound vehicles on Peffermill Road will suddenly come onto a stationary truck and its operatives from a bend in the road. We urge that the refuse collection arrangements be reviewed

Summary: While we support this scheme in principle, we also strongly urge that the Transport Assessment and Refuse Strategy be reconsidered and therefore object to these aspects of the proposals as submitted.

Flood Planning – response dated 12 September 2018

This site is adjacent to the flood storage reservoir which is designed to fill with water up to a depth of approximately one storey above existing ground level. Typically SEPA guidance is to raise floor levels above the 1:200 + CC flood level plus an allowance of 600mm freeboard on top of this. I would note that the Braid Burn FPS has a climate change allowance of 12% and that the current CEC requirements are 30% climate change allowance.

Raising floor levels to this elevation would effectively mean that the site would have to be raised significantly/have severe access implications or that it would be effectively sterilised if this was not achievable.

In this instance Flood Prevention are of the view that as there is an existing Council build flood wall in place that defends the site then development should be allowed to proceed as identified in the application. This is however ultimately the decision of Planning.

SEPA have not objected and therefore we will not encounter the same issues that we have of objections in principle for sites along the Water of Leith.

Police Scotland – response dated 10 October 2018

I write on behalf of Police Scotland regarding the above planning application.

We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.

Transport – response dated 7 November 2018

No objections to the application subject to the following being included as conditions or informatives as appropriate:

1. The proposed access on Peffermill Road to Close 2 is by steps. Whilst the proposed level access from the rear of the building may meet the requirements of building standards, it does not necessarily meet the additional requirements of the Equality Act 2010. The applicant should consider whether reasonable provision for wheel chairs etc. can be made, i.e. provide a suitable ramped access;
2. The applicant will be required to provide 2 electric vehicle charging outlets including dedicated parking spaces;
3. The proposed 2 motorcycle parking spaces are considered acceptable. However, the proposed layout of these spaces is not considered sufficient to enable users to safely enter and exit the spaces. The applicant should be required to amend the layout to ensure safe entry and exit;
4. The applicant should consider provision of a car club vehicle in support of the Council's LTS Cars1 policy. A contribution of £7,000 (£1,500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;
5. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
6. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future;

Notes:

No reasoned justification has been provided for the proposed car parking provision, as required in the Council's parking standards. However, the proposed 11 spaces, including 2 disabled, are considered to be acceptable.

The proposed 52 cycle parking spaces are considered acceptable.

Education – response dated 12 November 2018

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.

21 of the 30 flats proposed only have one bedroom and have therefore been excluded from this assessment. Using the pupil generation rates set out in the Supplementary Guidance, the development of 9 two bedroom flats is not expected to generate at least one additional pupil. A contribution towards education infrastructure is therefore not required.

Environmental Protection – response dated 19 November 2018

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable).

The applicant proposes 11 car parking space. The Edinburgh Design Standards will require that at least 2 of these spaces have electric vehicle charging points installed. The charging outlets shall be capable of providing a 7kw charge via a type two socket.

Environmental Protection offer no objection subject to the following conditions;

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.

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. Two parking spaces shall have 7kw (Type 2 sockets) charging point installed and fully operational prior to occupation.

Environmental Protection additional - response dated 21 November 2018

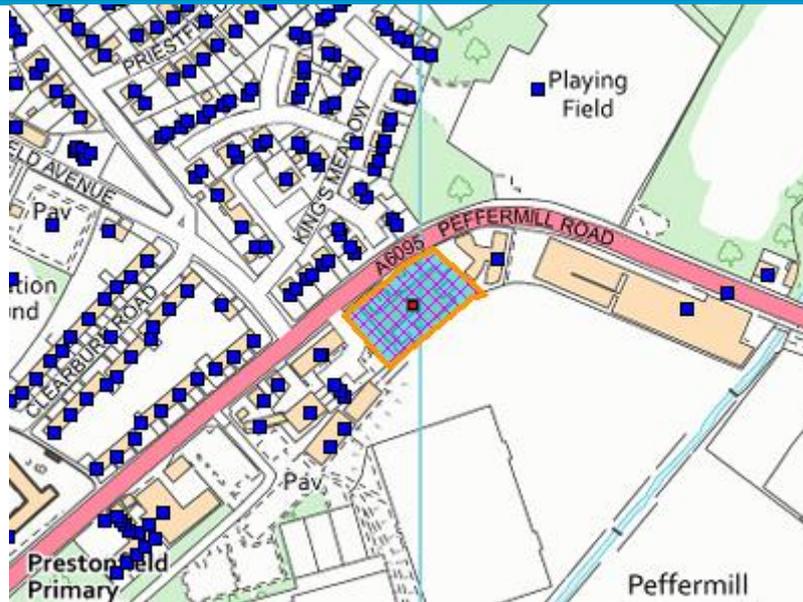
I refer to the *Report on Site Investigation at Parkview Housing, 64 Peffermill Road, Edinburgh* dated March 2018 that was produced for Will Rudd Davidson by Aitken Laboratories Ltd under reference number; L517 and supplied in support of the subject proposal.

The report is not considered to provide a sufficiently comprehensive risk assessment in accordance with current guidance such as PAN 33 and BS: 10175:2011: Investigation of Potentially Contaminated Sites to enable the Local Authority to determine the land to be suitable for proposed use. Therefore, a standard planning condition to address land contamination should be attached to any prospective planning approval.

The following comments raise the major issues of concern that should warrant detailed attention before Environmental Protection would consider the risk assessment presented within the Report on Site Investigation in the context of a planning condition in any further detail. It should be noted that these comments are preliminary and based upon the information supplied or is absent from the Report on Ground Investigation:

- 1) There is no preliminary risk assessment and conceptual model available based upon an appropriately detailed preliminary site investigation (desk study) in line with BS10175:2011.
- 2) Consequently, there is no basis or rationale for the site investigation. There is no information available to enable understanding of the site investigation design, sampling and analytical strategy and data coverage. The investigation coverage has not been quantified in any level of detail and it is not possible to determine whether the investigation is appropriately targeted toward identification of historical potential sources of contamination and any associated pollutant linkages in line with BS10175:2011.
- 3) The Site investigation appears to have been undertaken pre-demolition/pre-hardstanding clearance. The potential data gaps and uncertainty inherent within the data coverage and risk assessments caused by accessibility constraints to ground surface beneath hardstanding should be evaluated and addressed by subsequent data collection where information gaps will undermine the level of confidence that can be gauged in the risk assessments presented. The preliminary investigation should identify areas of the site that should be further targeted by investigation points further to removal of hardstanding to address information gaps.
- 4) The full extent of gas/groundwater monitoring data should be supplied according to a defensible frequency/duration of monitoring based upon applicable guidance. The report mentions further gas monitoring will be undertaken There is currently no groundwater sampling/analysis to support the current interpretation of risk to the water environment.

Location Plan



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