

Cramond & Barnton Community Council



Incorporating Cramond, Barnton, Cammo and Quality Street (West)

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Ruth King, Local Developments and Listed Buildings West Team
Planning & Building Standards, Services for Communities
The City of Edinburgh Council
Waverley Court, Business Centre G2
4 East Market Street, Edinburgh, EH8 8BG
22 January, 2016

Dear Ms. King

**15/05435/CON: DEMOLITION OF DWELLING IN CONSERVATION AREA.
18 WHITEHOUSE ROAD, EDINBURGH EH4 6NN**

Cramond and Barnton Community Council appreciates the City Council's agreement to being granted statutory consultee status in respect of this development and seeks refusal of the revised application to demolish the dwelling house at the above address within Cramond Conservation Area to enable development of a 50-bed care home.

In making this submission, the Community Council is reflecting the views of the community¹ that a care home, which is of a substantial scale, on a backland site, of a non-traditional design and potentially generating substantial traffic on already congested roads and with potentially hazardous access, is inappropriate within Cramond Conservation Area. These views have been expressed consistently at Community Council meetings, a public exhibition organised by the applicants, and representations to the Community Council. **The revised scale of the proposals does not change the community's objections to the principle of this development within Cramond Conservation Area.**

The Community Council would not be opposed, in principle, to development of a replacement private dwelling of a scale, materials and other characteristics, which are consistent with the character of neighbouring dwellings in the Conservation Area. Similarly, it is not opposed in principle to care home, or similar, developments out with the Conservation Area. Indeed, a 74-bed nursing home is being developed at Cramond Place (11/01856/FUL), a 90-bed nursing home and 64 assisted-living flats are proposed on the former Cramond Campus site (11/01493/PPP), and 70 assisted-living flats have been completed at the former Barnton Hotel site (12/01941/FUL) – all within a 1km radius of the current proposals.

National and local planning policies and guidance clearly indicate that, as the proposed demolition is sited within a conservation area, the proposal should be assessed within the context of the development proposed to take its place and the implications of that development on the historic, architectural and environmental character and qualities of the Conservation Area.

¹ Exceptionally, one Community Council member has stated support for this application on grounds of economic benefit.

As outlined below, the **Community Council** and members of our community are concerned that demolition of the private single dwelling and its replacement with a commercially-operated, 3- and 4-storey, 50-bedroom care home -

- a. would be contrary to policies relating to development in a conservation area and associated design guidance within **Scottish Planning Policy**, **Scottish Historic Environment Policy (SHEP)**, **PAN 71: Conservation Area Management**, **Edinburgh Local Development Plan** (including LDP2) and the **Edinburgh Design Guidance** and **Cramond Conservation Area Character Appraisal**
- b. represents over-development of the site
- c. would set an inappropriate and unacceptable precedent for larger-scale commercial or accommodation development within Cramond Conservation Area.

Relationship to Planning Policies and Guidance

Scottish Planning Policy – Paragraph 143: Conservation Areas states that *Proposals for development within conservation areas ... should preserve or enhance the character and appearance of the conservation area.* This is echoed in **Scottish Historic Environmental Policy** and **Edinburgh Local Development Plan: Second Proposed Plan – Policy Env5: Conservation Areas – Demolition of Buildings**, which requires that *... Proposals for the demolition of any building within a conservation area, whether listed or not, will not normally be permitted unless a detailed planning application is approved for a replacement building which enhances or preserves the character of the area* Similarly, **Policy Env6: Conservation Areas - Development** states that *... development within a conservation area or affecting its setting will be permitted which ... preserves the special characteristics or appearance of the conservation area and is consistent with the relevant conservation area character appraisal.*

Cramond Conservation Area Character Appraisal refers specifically to the Cramond Glebe Road, Whitehouse Road and School Brae areas, where this proposal is located. It highlights common characteristics which give the Conservation Area its special qualities, including –

- *Variety of suburban cottage style Edwardian and Victorian houses ...*
- *Predominance of traditional building materials and detailing giving a coherence and visual unity to the Conservation Area*
- *Overall, traditional building materials of sandstone, harl, slate and pantile are predominant. Windows are timber sash and case and generally with small panes.*

The *Character Appraisal* notes that some new development *... has failed to take reference from the spatial pattern and surrounding original buildings and materials ... and ... is of a large scale that is out of context with the domestic scale of Cramond.* It states that *... new design should take cognizance of this in order to reinforce the character of the Conservation Area.*

Edinburgh Design Guidance includes statements that, in summary, –

- the density of new development should be appropriate to the neighbourhood
- new development should reflect existing spatial characteristics, building forms and heights, and *... new buildings should sit within the form set by the eaves and ridge of neighbouring buildings*
- backland development should be subservient to surrounding buildings and should be avoided where it would disrupt the spatial character of an area
- design of new buildings should harmonise with *... the scale, size, form, windows and doors and other features by making them a similar size to those of their neighbours.*

The backland location in the Cramond Conservation Area and scale, design and materials of the proposed 50-bedroom care home, which is intended to replace a single dwelling, are contrary to the above-mentioned policies, character appraisal and guidance. In particular, -

- a. **location and access** – the backland site requires access along narrow access and egress lanes overlooked by around 11 houses. The consultants' estimated 112 vehicle movements per day contrasts with very limited traffic flows from the existing dwelling and are inconsistent with maintaining the qualities of this quiet, low density Conservation Area and the amenity of neighbouring properties

- b. **scale and over-development of the site** – typically, adjacent properties are 2-storey with an internal floor area of under 200m². and parking for around 2 cars accessed from the adjacent road frontage. The proposed development has a gross floor area of around 3,000m² (i.e. over 15 times the floor area of adjacent homes), parking for 21 vehicles (including ambulance) and an internal road approx. 180m long. Consequently, the site and the scale and massing of this development is inappropriate within a backland site in this residential part of Cramond Conservation Area
- c. **height and roof type** – typically, neighbouring houses are one- or two- two-storey in height (ground to eaves) with gable or hipped roofs, whereas this is a 3-storey plus basement building with a flat roof. The proposed height and form is contrary to advice in *Edinburgh Design Guidance* and out-of-scale with surrounding buildings.
- d. **materials and design details** – whereas buildings in the Conservation Area predominantly comprise sandstone or harl walls, slate or pantile roofs, and domestic scale fenestration, the proposed design comprises extensive rendered façade, timber cladding, reconstituted stone, high and non-traditional fenestration and a copper-coloured membrane roof. These features and materials are contrary to established conservation area policy and design guidance and will detract from the qualities of the Cramond Conservation Area
- e. **landscaping issues** – the site and adjacent gardens contain many mature trees which contribute to the landscape values and amenity of Cramond Conservation Area. While a tree protection zone is shown on the ‘Tree Proposals’ plan, this would appear to be insufficient to guarantee the protection of the root systems of larger trees during construction and the proposed sealed access/egress roads and parking areas are likely to have detrimental effects on the trees on the eastern and southern perimeters of the site
- f. **European protected species** – while potential bat roosting trees have been identified in the ‘Habitat Survey Report’, a bat survey has not been undertaken to identify whether bats may be roosting within the property for which demolition consent is being sought. This will be required in order to satisfy EU/UK regulations and national and local planning policies
- g. **noise nuisance** – noise from moving vehicles (est. 112 vehicle movements over 14+ hour day), waiting vehicles (e.g. taxis), vehicle doors being opened/closed and residents’ conversations in near vicinity of adjacent homes will transform this quiet backland site into a source of noise nuisance to neighbouring properties contrary to conservation area values
- h. **lighting pollution** – the access and egress roads, parking areas and exterior reception area will require extensive and substantial levels of lighting during dusk and darkness to enable safe use by elderly and less-sighted residents and visitors. Interior lighting of some rooms may be evident from outside the building and there may be façade lighting. Hence, the development will introduce levels of lighting over extensive areas that are alien to domestic backland plots in Cramond Conservation Area and light pollution will detract from the amenity of surrounding and more distant properties.

Issues of Precedent

There are no larger-scale commercial or accommodation developments in Cramond Conservation Area. Members of the community are concerned that consent for the demolition of this single dwelling and its replacement with a commercially-operated care home could set a precedent for larger-scale commercial or other development in Cramond Conservation Area (e.g. tourist accommodation, high-density flatted accommodation), to the detriment of the special character and qualities of the Conservation Area and amenity of Cramond’s residents and visitors.

It should be noted that while the consultants’ ‘Design and Access Statement’ (section 3) shows photos and refers to modern 3-/4-storey high flatted developments in the Cramond area, these are sited outwith the Conservation Area and not within a backland site, such as the current proposal.

Other Issues in Respect of the Care Home Proposals

This submission, on behalf of the communities of Cramond and Barnton, has focused on specific planning considerations relating to application 15/05435/CON. Further issues relating to the care home proposals, including key concerns over amenity, traffic generation and pedestrian safety will be covered in the Community Council’s separate submission on application 15/05434/FUL.

Request for Hearing by the Development Management Sub-Committee

Given the controversial nature of the above proposals and their potential impacts on Cramond Conservation Area and its residents and visitors, Cramond and Barnton Community Council –

- a. requests an opportunity to present the community's views to the Development Sub-Committee
- b. recommends that a site visit be arranged to acquaint members with the particular characteristics of the site and Conservation Area and key issues relating to the proposals.

Representatives of the Community Council will be pleased to provide further information or to clarify any matters relating to the proposals discussed in this submission.

Yours sincerely

Andrew Mather, Chair, Cramond & Barnton Community Council