

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 and Building Standards, Services for Communities
City of Edinburgh Council,
Waverley Court, Business Centre G2
4 East Market Street, Edinburgh, EH8 8BG
22 January, 2016

Dear Ms. King

15/05434/FUL - PROPOSED DEMOLITION OF EXISTING DWELLING AND CONSTRUCTION OF CARE HOME AND ASSOCIATED CAR PARKING, 18 WHITEHOUSE ROAD, EH4 6NN

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

The Community Council opposes the application for the construction of a 50-bedroom care home on this backland site within Cramond Conservation Area. In doing so, the Community Council is reflecting the views of the local community¹, which have been consistently expressed at Community Council meetings, a public exhibition organised by the applicants, and in representations by individuals and organisations to the Community Council. **The revised scale of the proposals does not change the community's objections to the principle of this development within the Conservation Area or to the specific details of the proposed development, as set out in the revised application.**

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

- 1. Inappropriate replacement development within Cramond Conservation Area**
- 2. Matters of concern, but not material planning considerations**
- 3. Location and scale of development**
- 4. Building design and materials**
- 5. Landscaping, open space provision and species conservation**
- 6. Traffic and safety issues**
- 7. Capacity of community medical services**
- 8. Sewerage capacity**
- 9. Light pollution and noise nuisances.**

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

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

1. Inappropriate replacement development within Cramond Conservation Area

¹ Exceptionally, one Community Council member has stated support for this application.

The replacement development, including its location, footprint, massing, height, materials, traffic implications, noise and lighting pollution and effects on surrounding trees, would adversely affect the character and qualities of Cramond Conservation Area. Consequently, consent to the proposals would be contrary to planning policies and guidance for conservation areas in *Scottish Planning Policies (SPP)*, *Scottish Historic Environment Policy (SHEP)*, *PAN 71* and the Council's *Local Development Plan*, *Edinburgh Design Guide* and *Cramond Conservation Character Assessment*.

It should be noted, however, that the Community Council is unlikely to object to a replacement private house of a scale and design that is compatible with character of the Conservation Area. Similarly, the Community Council is not opposed to appropriate care home developments and has supported development of a 74-bed nursing home at Cramond Place, proposed 90-bed nursing home on the former Cramond Campus site and 70 assisted-living flats at Barnton Grove.

2. Matters of Concern, but not Material Planning Considerations

- a. Potentially misleading statements by the applicants** - the Community Council has significant concerns that statements by the applicants' consultants may not accurately reflect the Council's position on the proposals and may be intended to mislead the public; for example –
- pre-application exhibition boards stated ... *Edinburgh Council's Transportation Department has raised no concerns over traffic impacts*
 - the current application form states that, in pre-application discussions with planning staff, ... *RK & EC were supportive of the reduced scale, massing and approach, etc.* Also, the 'Planning Statement' reports that ... *At the meeting with the Council's Planning Officers at the end of October 2015, it was confirmed by the Council that the principle of redeveloping the application site for a new care home development was acceptable and could be supported by current planning policies. The Officers also confirmed that the consultation responses received on the first application indicated that the proposed redevelopment of the site was appropriate in terms of relevant technical, infrastructure, heritage, and environmental considerations.* This latter statement is patently untrue and the Community Council cannot understand how Council staff could give assurances, such as those reported above, prior to fully assessing the proposals and reviewing submissions by the public and statutory consultees.
 - In various locations, the 'Planning Statement' refers to the building being ... *a maximum of two-storeys* (s. 5.2). The application is accompanied by plans and visualisation clearly showing a building of 4-storeys
- b. interior layout is not fit for purpose** - as modern principles of care home design eschews the provision of lengthy bedroom corridors, in favour of smaller groups of rooms around a carers' hub.

3. Location and Scale of Development

The introduction of this commercial, 50-bedroom development on a backland site, and with a gross internal floor area of 2,974m² (locally, homes are around 160-220m²) and a frontage of around 54m, would comprise over-development of the site and this scale of development and intensification of use would adversely affect the residential amenity and special character of Cramond Conservation Area. Hence, it would be contrary to *LDP2* policies *Des 1, Des 3, Des 4, Env 6, Hou 4* and *Hou 7* and guidance in *Cramond Conservation Area Character Appraisal* and *Edinburgh Design Guidance*.

4. Building Design and Materials

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

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

5. Landscaping, Open Space Provision and Species Conservation

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

- a. the visualisations in the *Design and Access Statement* (e.g. 'Drawing 5. Proposed Design') show an extent and scale of tree cover and screening, which is unlikely to be achievable given the landscaping proposals shown on other plans and would cast excessive shade on west- and north-facing rooms and garden grounds
- b. revised siting of the 4 storey-building towards the western boundary of the site will increase its visibility on the skyline, when viewed across the River Almond from the popular John Muir Way and Dalmeny path network – especially in winter, when there is no vegetation on trees on the site boundary
- c. ready access to comfortable, attractive greenspace is essential for the physical and mental well-being of elderly residents. The plans show relatively small garden areas to the north and west sides of the proposed development, which will be overshadowed by the 3-/4-story care home to the south and east and mature trees to the west and north – all having major shading effects and potentially creating a frost pocket in winter and damp environment over much of the year
- d. the tree protection areas appear inadequate given the size and likely extent of root systems of existing trees. In particular, the access road in front of the building will require to support heavy vehicles during construction and thereafter and construction of this road is likely to adversely affect the few existing trees along this frontage, which provide essential, but partial visual screening
- d. a bat survey during the main activity period (i.e. summer) will be essential to ascertain the presence of bats in the existing building and comply with EU/UK regulations. It is unacceptable to state in the *Habitat Survey Report* that ... *It is considered that the main building does not have features suitable for supporting bat roosts; such as gaps beneath roof-tiles and within soffits*, without undertaking a bat survey in accordance with BCT and CIEEM guidelines.

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

6. Traffic and Safety Issues

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

- i. understated levels of use of Whitehouse Road and Cramond Glebe Road – despite statements to the contrary, Whitehouse Road is a well used traffic route. Also, while it is true that Cramond Glebe Road is a local access road, it provides essential access for residents and to Cramond car park (150+ spaces; frequent peak period turn-over), Cramond Inn (approx. 45 spaces), Cramond Kirk Halls (approx. 60 spaces; 2,000+ bookings/year), Cramond Kirk (no dedicated parking for services, weddings or funerals), Cramond Nursery (100+ children; morning/afternoon sessions) and Cramond Medical Practice (approx. 12 spaces) – all of which generate overflow parking pressures at peak times
- ii. bus services – Section 4 refers to six '41' buses/hour in each direction. In reality, the '41' terminus is close to the proposed site and there are only 4 buses/hour at peak periods arriving at/leaving Cramond. Early morning/late evening services at weekends are half-hourly and do not commence early enough on Sundays to serve the stated morning shift times. In addition, travel time from Cramond to Princes Street is stated as 10 minutes, as opposed to the 33 to 49 minute travel time to Hanover Street shown in Lothian Buses' timetable. These long travel times will deter bus use, as driving times can be 10 to 20 minutes and most staff will not live near the '41' route. Also, Lothian Buses have indicated that continuance of the '41' service to this part of Cramond is not guaranteed, due to the low density of residents
- iii. traffic generation predictions - Section 5 indicates that the first staff day shift starts at 07.00 and the second shift finishes at 22.00, when night staff take over. However, the *Trip Generation* tables (5.1, 5.2) and *Accumulation of Vehicles* diagram (7.1) do not show these arrivals or departures. Staff arriving/leaving at these early morning/late evening times will mostly use private vehicles, with inevitable noise disturbance to neighbouring residents.

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

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

- i. drivers approaching the care home from the east (e.g. Cramond Road North) have a very restricted view of the entrance, which is set back and obscured by neighbouring properties and often by parked cars. Drivers, especially HGV drivers, will effectively have to make a U-turn in Whitehouse Road and drive directly across the Whitehouse Road/School Brae junction
- ii. the entrance requires drivers and cyclists to cross the Whitehouse Road/School Brae junction at the point where residents and River Almond Walkway users' vehicles and cyclists are emerging from, or entering, School Brae and pedestrians are crossing the junction, including adults and children from the adjacent Nursery and Cramond Primary School. These conflicting pedestrian and traffic movements will pose significant safety hazards
- iii. the exit to Cramond Glebe Road uses a narrow lane (approx. 3.5m wide) with stone walls at the exit point, resulting in an absence of visibility splays. Hence, the front of vehicles will be across the footway before drivers see any approaching pedestrians, cyclists or elderly people intending to access the care home. This footway is used by visitors to Cramond, who will be unaware of the need to exercise caution.
- iv. parked cars on Cramond Glebe Road, between the care home exit and junction with Whitehouse Road, will further obscure exiting drivers' views of approaching traffic and Cramond Glebe Road users' views of cars coming out of the care home
- v. parked cars restrict the above-mentioned section of road to one-way traffic, with resultant congestion - often backing up onto Whitehouse Road or Cramond Road North. This congestion is compounded by high flows of traffic at weekends and public holidays to Cramond Car Park, Boat Club, Harbour, Kirk and Kirk Halls, resulting in conflicts and grievances, which will be exacerbated by a further 112+ vehicle movements per day
- vi. while there is limited off-street parking for everyday needs, additional on-street parking will be generated during care home events (e.g. parties, summer fairs, open days). This will exacerbate parking pressures from residents, patients at Cramond Medical Practice and clients of the two Children's Nurseries, which are a current cause of congestion, nuisance and safety hazards.

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

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

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

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

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

7. Capacity of Medical Services

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

8. Sewerage Capacity

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

9. Light and Noise Pollution

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

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

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

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

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

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

Yours sincerely,

Andrew Mather

Chair, Cramond & Barnton Community Council