

Proposed Residential Development at 154 McDonald Road, Edinburgh



Planning Statement on behalf of Kingsford Developments

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1.0 Introduction

- 1.1 This Planning Statement is prepared on behalf of Kingsford Developments in relation to a site at 154 McDonald Road, Edinburgh. The Planning Statement is in support of a planning application and an application for Listed Building Consent (the applications) for alterations to and change of use of 154 McDonald Road to form studio residential accommodation (73 units).
- 1.2 In addition to this Planning Statement, the applications are accompanied by a Design Statement and Building Report Survey and, together with the formal application plans, drawings, application forms and certificates, comprise the overall applications for the site.
- 1.3 The Planning Statement is structured as follows:
- It provides detail on the proposed development (Section 2);
 - It describes the site and the surrounding area (Section 3);
 - It identifies the Development Plan and other material considerations against which the planning application will be judged (Section 4);
 - It appraises the planning application against the policies of the Development Plan and other material considerations (Section 5);
 - It reaches conclusions in relation to the acceptability of the planning and Listed Building Consent applications in the context of the Development Plan and other material considerations (Section 6).

2.0 Proposed Development

- 2.1 The proposed development to which the planning application relates comprises a large 3-storey plus lower-ground level Victorian school-building with frontage to McDonald Road and which will be converted to 73 ‘Urban Key’ studio residential units, with associated accommodation, at ground, first and second floor levels. Parking and other facilities will be located within the lower ground level.
- 2.2 The studios will be provided on each of the three floors, as far as practicable utilising the existing structure (as originally designed and as modified by City of Edinburgh Council (CEC)). The units will be innovatively-designed self-contained studio apartments comprising open plan living, sleeping, changing and kitchen / eating area, with enclosed bathroom area. By utilising the existing high ceiling design of the building, mezzanine floors will be provided to most units, to provide additional useable space above the kitchen / bathroom area.
- 2.3 Communal areas are also proposed which will comprise living / dining / kitchen space at ground floor level, which will be available for use by occupiers of all units within the building; a shared laundry facility at ground / first floor level; gym, storage and garaging areas at lower ground level; and a roof terrace.
- 2.4 Pedestrian access to the building will be provided from the existing access points onto McDonald Road and at the side entrance to the building. Vehicular access will be provided to the communal garage from the side of the building via an enlarged existing entrance at the side.
- 2.5 The lower ground level will be used for parking of cycles, electric mopeds and a small number of electric cars. There will additionally be secured cycle parking externally in the landscaped area facing onto McDonald Road.
- 2.6 A new paved and landscaped open space area will be created with new hard and soft landscaping to the north west of the building, facing onto Broughton Road.
- 2.7 The exterior alterations proposed to the building are:
- photo-voltaic panels to be inserted onto the flat roof parts of the roof;

- a sun room providing access to, and with safety balustrade around, the roof terrace;
- small roof lights to be inserted into the rear slope of the roof to allow the ceiling height of the rooms at third floor level to be raised into the roof space and to create light wells;
- window insertions into the rear elevation; and
- the widening of the existing entrance in the side elevation of the building to allow vehicular access to the basement and removal of one gatepost.

2.8 The building was used by CEC since circa 1971. Works have been carried out to the interior to upgrade the building to meet office standards (building, health and safety etc.) at that time, including filling in archways, creating additional storage, erecting new walls and partitions. This proposal utilises the existing structure of the building.

2.9 Original features will be retained and the proposed internal alterations are:

- removal of existing walls and creation of new internal partitions to create the new studios, including sound and fire proofing;
- new internal mezzanine floors and walls to create bathrooms with sleeping area above to most studios;
- breaking through the ceiling height into the roof space at third floor level to create room height and light wells;
- insertion of thirteen roof lights into the rear facing roof slope, to create light to the units at second floor level;
- insertion of access to roof terrace, including breaking through of roof;
- internal secondary glazing as required and repair / replacement of existing glazing.

- 2.10 The building is vacant and its condition is beginning to severely deteriorate. The Building Structural Report prepared by Gleeds (dated August 2011) and submitted with the applications provides further information¹. The building has deteriorated further during the 22 months since that report was completed.

Urban Key Concept - Evolution

- 2.11 The Urban Key concept aims to create affordable first time buyer and key worker homes in the city centre. The concept has been evolved by Kingsford Developments (<http://www.kingsforddevelopments.co.uk/>) which is part of the Kingsford Group. The group was established over 12 years ago and during this time has been developing high quality property in Edinburgh and has worked with student accommodation providers. It has had first-hand experience of the significant limitations placed on Edinburgh residents and workers to buy their own properties resulting in them being reliant on the rental market. Kingsford Developments believes this is due to financial limitations brought about by the price of property in the City compared to income.
- 2.12 This significant financial gap supports the need for alternative or new forms of accommodation to meet the needs of urban housing. By understanding this housing need, Kingsford Developments has identified a solution – to create a new housing concept for ‘on-market’ affordable housing unsubsidised by the tax payer which allows for city centre living and provides a ‘first rung’ on the property ownership ladder.
- 2.13 Based on the requirements of the identified group within this area of housing need (young, city-centre and key workers, recent graduates, predominantly 1 person households all currently unable to compete on first rung of the property ownership ladder) Kingsford Developments drew on their experience of the student accommodation sector of managed blocks using shared resources and worked with architects from Tokyo known for designing space-efficient

¹ This survey is submitted for demonstrative purposes only. The applicant has no entitlement to rely on this survey and Gleeds owe no duty of care to the Applicant or the Council for the information contained therein.

residential units, to create a new housing concept 'Urban Key' to meet that identified need.

2.14 It achieves this by two guiding principles:

(i) affordability by design and

(ii) affordability by community.

Each is addressed below

(i) Affordability by design

2.15 Affordable city centre accommodation means making better use of smaller spaces. Inspired by the Japanese principles of efficiency in space design, the Urban Key concept emerged by using smarter design concepts, and in particular dual use of space. This has resulted in 1 bed studios of circa 37 sq. m floor area but with a more efficiently designed layout to create up to 30% more living space than the majority of new build two bed 60 sq. m flats. The ambition is that all Urban Key studios can be sold on market for prices below the current CEC affordability threshold.

(ii) Affordability by Community

2.16 The Urban Key concept provides a housing solution that is more than simply accessible to city centre workers in terms of affordability to buy. It is also more affordable to live in compared to traditional city centre housing, therefore, being more accessible to a wider group, by using community buying power and shared resources. Kingsford Developments compared the cost of living in a comparable traditional tenement in which occupiers of each unit would have to pay separately for utilities, internet and digital TV subscription, gym and shared car pool etc. and determined that collective community buying power would result in more affordable living. This could result in the Urban Key concept also enabling a higher proportion of earned income to go towards reducing mortgage debt and building equity for deposits to accelerate the ability to move to the 'second rung' of the property ladder.

2.17 The key components of the Urban Key concept are:

- Shared gym
- Landscaped grounds
- Communal laundry facilities (alleviating the need for washing / drying facilities within the individual apartments)
- Concierge (providing security and block management and management of community facilities)
- Cleaning service
- Shared 'green' car and bike pool
- Shared community internet access and digital TV
- Compact individual kitchens / dining areas in each apartment
- Private dining / living / kitchen areas (which can be exclusively booked as required as a private dining / entertaining space, minimising space requirements within each apartment or used communally when not booked)
- Communal storage rooms (freeing up space within each apartment).

2.18 The Urban Key concept is energy efficient and sustainable. The city centre location will reduce the carbon impact of the typical urban workers' commute to work, and utility bills and usage will be decreased. This is achieved due to community buying power, designed insulation efficiency, the use of renewable sources (solar panels on roof, efficient water heater boilers and communal heating and laundry solutions) and a shared car pool including electric cars and mopeds.

2.19 Whilst the Urban Key concept was initially intended as a new build concept, its core principles are adaptable to conversion of existing buildings. The Urban Key studios are single aspect and the limiting factor in creating opportunities in such accommodation tends to be windows and day lighting. Large Victorian buildings such as old schools have an existing layout which readily lends itself to subdivision

into studios, utilising original layout design, particularly facilitated by the existence of large windows to create sufficient day-lighting and high ceiling heights to allow efficient use of vertical space, without compromising the special features of historic buildings.

- 2.20 These buildings, which are often Listed, are commonly considered to be problematic in terms of reuse, and the Urban Key concept offers the opportunity for the safeguarding and redevelopment of these buildings which would otherwise be neglected and fall into disrepair, with a significant on-going maintenance liability.
- 2.21 No 154 McDonald Road possesses the scale, form, layout and design which readily lends itself to Urban Key concept.

Consultation

- 2.22 Whilst not a statutory requirement, Kingsford Developments has adopted a best-practice approach to consultation and engagement in relation to the current application. Numerous parties were consulted prior to the submission of the applications and details of those meetings are attached in Appendix 3. The resultant applications have been prepared taking into consideration views expressed at the various meetings.
- 2.23 A total of 5 meetings have been held with CEC, at CEC offices. At the first meeting, on 11 April 2013, the overall Urban Key and design concept were introduced. Discussion evolved around:
- the need to protect the Listed Building - walls sub dividing windows was discouraged;
 - ideally bike storage should be internal and, together with community car and bike pool, city car club and potential for bus pass offering, could offset parking requirements;
 - potential policy issues relating to accommodation size, no family units and lack of amenity space;

- the Urban key concept, the reuse of a valuable Listed Building and the close proximity of parks and other open space would be material considerations sufficient to over-ride policy issues.;
- the potential requirement for Section 75 contributions relating to trams, public realm, affordable housing and transport were raised.

2.24 It was initially advised that the application constituted Major Development and the applicant committed to public consultation. Subsequent to the meeting, it was confirmed that the proposal is a Local Development. Nevertheless, Kingsford Developments committed to undertake non-statutory pre-application consultation.

2.25 The second meeting with CEC was held on 10 May 2013, during which generally favourable opinion was expressed. The main issues which the applicant needed to consider further were :

- cycle zones and all local parks should be indicated on plan;
- target minimum units sizes should be 31 sq. m or above;
- parking for motor cycles and scooters should be considered if possible and shown on plan;
- 100% bike storage should be shown on plan;
- private car club and city car club should be promoted;
- the use of bus passes should be encouraged;
- secondary glazing may be required to studios on the Broughton Road frontage due to potential noise nuisance from road and rail traffic;
- good communal facilities would aid justification for smaller studios;
- hard landscaping is acceptable on Broughton Road frontage.

- 2.26 The third meeting was held on 5 June 2013 with Lindsay Glasgow, Asset Planning Manager, Children and Families. The purpose of the meeting was to explain the proposals to Children and Families, and to allow the applicant to understand any issues that may be relevant to the design and operation of the proposed development. Contact details for Broughton Primary School were provided, including the Parents Council.
- 2.27 Children and Families expressed support for the principle of the development, subject to ensuring that the on-going operation requirements of the school were respected and facilitated.
- 2.28 The fourth meeting was held on 20th June with CEC Planning. Support was given to the elimination of proposals which included the sub-division of windows to create individual studios and to the proposed roof lights to the rear slope of the roof. The matters for further consideration related to:
- potential access and future development issues to the rear of the building;
 - parking and bike storage;
 - issues relating to retention of the studios within the definition of affordability.
- 2.29 The final CEC meeting was held on 25 June 2013 with the Senior Project Manager, Land Supply and Affordable Housing Policy in Services for Communities. The Senior Project Manager confirmed that his team *‘would be happy to consider the entire development to be meeting an identified affordable housing need in the city, and would be happy to support the plans in their current form’*. A copy of an email from the Senior Project Manager following this meeting is at Appendix 3.
- 2.30 A pre-application consultation meeting was also held with the Parents’ Council of Broughton Primary School on 12 June 2013.
- 2.31 The main issues expressed related to car parking (congestion at the school at present and car parking lost nearby to development); construction impact; future occupants (overlooking of school playground); and, school garden (contribution sought to improve school grounds). Following suggestions raised by the Parents’

Council, the applicant agreed in principle to P5 and P6 pupil participation in the site's development process, as part of their effective learning programme.

- 2.32 The Assessment in Section 5 below and the Design Statement shows how the proposal has been prepared to address the views and concerns expressed during those meetings.

3.0 Site and Surrounding Area

3.1 The planning application site is located at the junction of McDonald Road and Broughton Road, approximately 1.3 km from the city centre. It extends to a total of 0.18 hectares and comprises a 3 / 4 storey Victorian building which occupies the majority of the footprint of the site (comprising 1,170 sq. m) and a gross internal floor area of 3,402 sq. m.

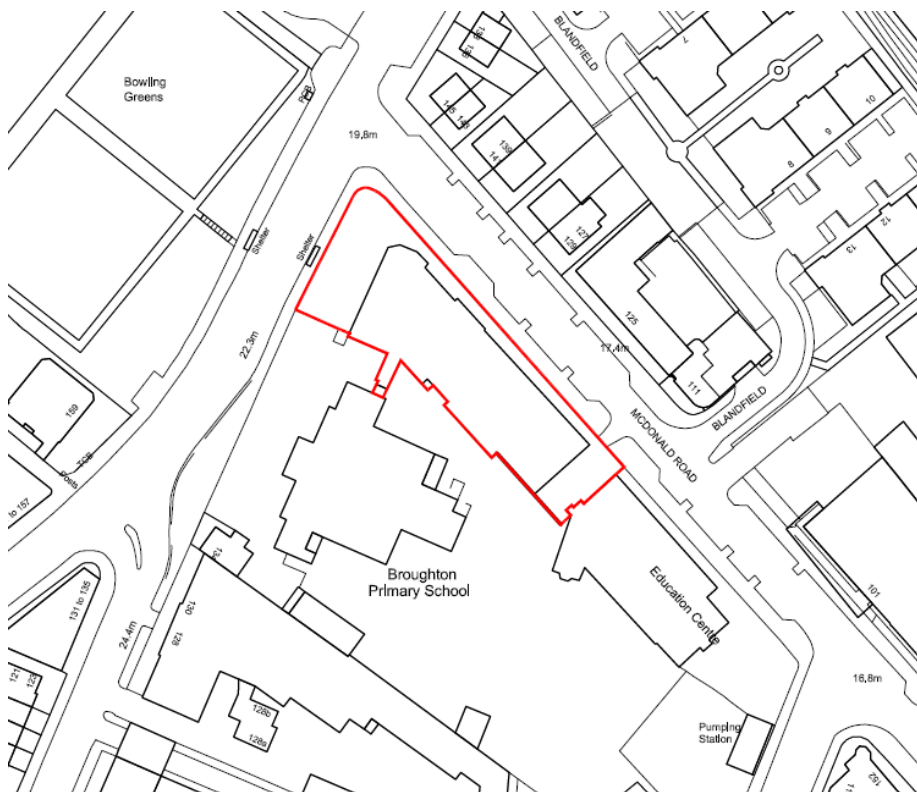


Figure 3.1 – Planning Application Site

3.2 The building was the Broughton Street High School, originally designed and used as a school and last used as offices by the CEC, which carried out alterations to make the building fit for purpose for office use. It is a category B Listed Building, now vacant and its condition is starting to deteriorate. The Building Structural Report, submitted with the applications provides further information.

3.3 There is a small area of hardsurfacing to the immediate north east of the building fronting onto McDonald Road and a larger area to the north west, with some trees, fronting Broughton Street.

- 3.4 The existing Broughton Primary School, including the building and play area, lies to the immediate south of the site. There is one corridor between the two buildings, but this does not provide a connection between the two buildings.
- 3.5 A one and two storey building lies to the immediate south east, which is used as a pre-school nursery.
- 3.6 The character of the area in which the application site is located is mixed, with residential and office / medical uses in the primarily two and three storey buildings immediately opposite the site on McDonald Road; business and residential uses further along McDonald Road to the south east towards Leith Walk, in properties up to six storeys in height; and a bowling green immediately opposite the site on Broughton Road.
- 3.7 McDonald Road, Broughton Road and Leith Walk are bus routes and as such the site is highly accessible, in particular by public transport with a large number of buses using those routes every hour.

4.0 Planning Policy Context

- 4.1 The Town and Country Planning (Scotland) Act 1997 (as amended), requires the planning application to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan comprises the Edinburgh and The Lothians Structure Plan and the Edinburgh City Local Plan (ECLP). The Local Plan is of particular relevance in relation to this scale of planning application.
- 4.2 The former school / office is unallocated within the adopted ECLP.
- 4.3 The building is designated as a Category B Listed Building (extract of Listing attached at Appendix 1). Policy Env4 states that alterations will be permitted, where justified, which will not cause damage to historic structures or diminish its interest and will be in keeping with other parts of the building.
- 4.4 Paragraphs 5.12 – 5.16 at Section 5, and the Design Statement, assess the impact of the development on the integrity of the Listed Building.
- 4.5 Policies Des1 (Design Quality and Context) and Des3 (Development Design) of the Local Plan are relevant. In particular, development is required to be high quality, to create sustainable living environments and to respect the character and appearance of the surrounding areas.
- 4.6 The proposal relates to the change of use of a Listed Building, which is currently in a deteriorating state. The proposal complies with the requirements of these design policies in so far as they refer to existing buildings, as will be demonstrated in Section 5.
- 4.7 DES2 (Co-ordinated Development) is also relevant and the Design Statement illustrates the manner within which the entire ‘education complex’ at this McDonald Road / Broughton Road junction could in future be refurbished or redeveloped should either other building become surplus to CEC’s requirements. This proposal, however, is not dependent upon either of those sites coming forward and the proposed residential and existing education uses can co-exist in a

satisfactory manner should the education uses remain. This is demonstrated below at paragraphs 5.17 – 5.24 and in the Design Statement.

- 4.8 Policy Hou2 (Housing Mix) requires a mix of housing types and sizes ‘*where practical*’, with the intention of creating mixed and inclusive communities. This is assessed in paragraphs 5.6 – 5.11 below.
- 4.9 Policy Hou3 (Private Open Space in Housing Developments) is relevant, which requires a communal provision of open space equivalent to 10 sq. metres per flat. It is acknowledged that there is limited opportunity to provide communal open space at the site but it is considered that there are other considerations which should be taken into account. This is addressed in paragraphs 5.34 – 5.39 below.
- 4.10 Policy HOU4 refers to housing density and states that higher densities are appropriate where good levels of public transport area available, and based on the characteristics of the area. In this case, the site is accessible to the city centre, local shops, places of employment and recreation and to public transport as stated at paragraphs 5.27 and 5.33. The area is one of mixed use, character, density, scale and form as addressed in Section 3 above and in the Design Statement.
- 4.11 Policy HOU5 (Conversion to Residential Use) is particularly relevant and which supports this proposal, subject to:
- satisfactory residential environments being achieved and appropriate open space, amenity and car parking being provided; and
 - housing being compatible with nearby uses.
- 4.12 These criteria are assessed in Section 5 below and in the Design Statement.
- 4.13 Policy HOU7 Affordable Housing states that affordable housing should be provided for in developments exceeding 12 units at a rate of 25%, normally on site for schemes of 20 or more dwellings. At paragraph 6.24, affordable housing is defined as ‘*housing that is available for rent or for sale to meet the needs of people who cannot afford to buy or rent housing generally available on the open market.*’

Affordable housing is important in ensuring that key workers can afford to live in the city...'

- 4.14 The proposed Urban Key housing concept and its particular characteristics are addressed above in Section 2. It is the ambition that all studios will be offered for sale to the market at below current affordability threshold levels, thus complying with the definition of affordability. The conformity with Policy HOU7 is assessed below at paragraphs 5.3 – 5.5 below.
- 4.15 Also relevant are policies TRA4 (Private Parking), TRA5 (Private Cycle Parking) and TRA6 (Design of Car and Cycle Parking) which require appropriate parking provision. Reduced car parking provision can be made in a number of justified circumstances including the accessibility to public transport routes (TRA4(c)), when the characteristics of the use are such that car ownership will be low (TRA4(d)) and if other complementary measures are in place (TRA4(f)).
- 4.16 Paragraphs 5.26 – 5.32 below will demonstrate the extent to which the proposal complies with these policies.
- 4.17 It is considered that should the assessment below demonstrate that the proposal complies with the identified policies of the development plan or if there are other material considerations to justify the development, then permission should be granted.

Other Material Considerations

- 4.18 A material consideration of significant weight in determining the current planning application is the recently approved Edinburgh Design Guidance, May 2013 and other decisions taken by CEC relating to development proposals in the vicinity of the site.
- 4.19 The Edinburgh Design Guidance is strongly focused towards new build, but its requirements encompass conversion of existing buildings. It reiterates many of the requirements of the policies mentioned above, providing additional detail in some respects.

- 4.20 At page 31, the Guidance refers to housing density and states that increased density is acceptable where there is a clear design rationale and the increased density will not have an adverse impact on the surrounding area. Accessibility to the public transport network is a factor, together with a good range of neighbourhood facilities.
- 4.21 The Guidance identifies this area as being 15-20 in terms of public transport accessibility. It is demonstrated below, and in the Design Statement, that there are some 11 different bus routes and a good range of facilities, amenity and open space within a 5 – 10 minute walk of the site, demonstrating high accessibility.
- 4.22 In relation to housing mix, the Guidance provides more information than the ECLP. It sets a size-guidance for the floor area of different types of units. In this case, it recommends 36 sq. m for studios. Paragraphs 5.40 – 5.41 below demonstrate that whilst the minimum size of any individual unit is no less than 37 sq. m floor area, the unique layout of this proposed development, the innovative design, the vertical use of space in the high room height and the provision of secure communal facilities provides each studio with access to a greater useable floor area and living space.
- 4.23 Also material is the recently issued CEC guidance on Listed Buildings and Conservation Areas 2012, which provides guidance on advice on repair and alteration of Listed Buildings, and stating the importance of protecting the buildings interest.
- 4.24 The Edinburgh Local Development Plan Proposed Plan March 2013 has been published by CEC and available for public representation. Its policies and objectives very much reflect those addressed above. Nevertheless, due to its early stage in its preparation, it is a material consideration of less significant weight.
- 4.25 It is considered, therefore, that subject to compliance with the ECLP and the Edinburgh Design Guidance, permission should be granted. This is assessed below.

5.0 Assessment

- 5.1 This section assesses the proposed development against the provisions of the development plan and all other material considerations.

Proposed Residential Use

- 5.2 The site is unallocated in the development plan and it lies within a mixed-use area. In principle, therefore, its conversion to residential use is acceptable (Policy Hou5).

Affordable Housing

- 5.3 This proposal is for a unique form of studio accommodation, designed specifically to meet the recognised need to accommodate the increase in the number of smaller households, and particularly city and key workers, in the City.
- 5.4 It is intended that the studio accommodation will be offered for sale, on an unsubsidised basis, at or below current affordability threshold levels, and will be aimed towards the young city and key worker group, which is identified as requiring affordable housing. The proposal, therefore, falls within the parameters of affordable housing, as confirmed by CEC Senior Projects Manager (see email dated 25 June 2013 in Appendix 3). Additionally, the shared facilities and design allow for community purchase which will provide accommodation which is cheaper to live in than comparable units in the city, increasing the affordability elements of the proposal.
- 5.5 On this basis, the ambition is that, by the nature of the proposed studios, all will be classed as affordable housing, far exceeding the requirements of Policy HOU7.

Proposed Residential Mix

- 5.6 Only one type of residential unit (of differing layouts and sizes) is proposed in this development due to its unique characteristics. It does not meet the mix requirements of Policy Hou2 and of the Design Guidance. There are, however, other considerations which outweigh the policy and advice.

- 5.7 The application is for a change of use. The existing building does not stand in isolation but lies within an existing area of mixed uses, and mixed housing types and sizes. It is considered that there already exists a mixed, vibrant and inclusive community within this area, to which the proposed development will contribute positively.
- 5.8 Additionally, the Design Statement and Appendix 2 below identify sites which are the subject of applications for development or which have been granted permission. It is clear that a number of new developments could come forward for different types and sizes of housing (from student, to flatted to colony type housing). Taken as a whole, the mixed community exists and will be strengthened and on this basis, as part of the wider neighbourhood, a mix of residential types is being provided.
- 5.9 Furthermore, as this proposal is for an innovative form of housing to meet the affordability needs of city centre and key workers it is not practical to provide a mix of housing types and sizes, within the confines of the Listed Building. Changing the housing concept would impact upon the intention to create accommodation which could be classed as affordable housing. Also, to meet the Guidance advice, 15 family units would be required. Those properties could not be provided with open space, which is a requirement of other policies, and the required alterations to provide such housing could affect the structural integrity of the Listed Building and the viability of the project. Other policies of the development plan would, therefore, be compromised.
- 5.10 Additionally, the provision of a mix of housing types and sizes would detract from the Urban Key concept, which is to provide compact, affordable first rung units for ownership, with communal facilities, for city centre and key workers. It is considered that this form of accommodation would not meet the requirements of 'family housing'.
- 5.11 It is considered, therefore, that the proposal will not conflict with the overall aim of policies and advice which seek a mix of housing types. A mixed community currently exists within this area, and this will be strengthened. There are material

considerations, therefore, which justify the planning application proposal at this location.

Impact on Listed Building

- 5.12 The application building is a Category B Listed Building and the Design Statement accompanying the planning application sets out the design ethos behind the development which focuses on retaining and preserving all special features of the building, utilising the existing floor plan and large windows design.
- 5.13 The proposal involves a minimal change to the external building. The proposed photo-voltaic panels will have minimal visual impact at street level and will not be perceivable from longer distances, as they will be located on the flat roof, set back from its edges. The proposed conservation roof lights will be modest and flush fitting to the rear of the roof and, due to the height of the building, will not be visible from street level. Similarly, the roof access sun room and glass balustrade will not be visible at street level, being on the rear flat roof, will be set back from the roof edges and will be below the ridge height of the adjoining sloping roof.
- 5.14 The existing access, on the south east elevation of the building, will be widened. This alteration will not detract from the integrity of the building as it is a secondary elevation of the building and will be finished with matching materials.
- 5.15 No windows will be subdivided as a result of the new partition walls. The internal design of the proposed studios has been planned such that each window provides light to one studio only, or communal areas. The proposed new windows will match existing and will not affect the integrity of the building.
- 5.16 The building has been altered previously to meet the requirements of the previous CEC office user. Where possible, the original features will be repaired / reinstated. Studio partitioning will follow the existing structural beam pattern as much as possible and the only sub division of each studio space will be the addition of partitions to create additional living space rea at mezzanine level and bathrooms.
- 5.17 The original internal layout of the access, main stairs and corridor routes will be retained and the internal partitioning will not affect the integrity of the listing. The

building is suffering damage at present due to defects to its external fabric, which will be repaired during the course of the alterations to convert the building to its new use. This will be of significant benefit to the future retention and preservation of the building.

- 5.18 The historical interest of this Grade B Listed Building will be retained and its condition improved. The proposal complies with Policy ENV4.

Residential Amenity

- 5.19 A high quality residential environment will be provided for the occupiers of the building, based on the space available within each studio, the quality of the shared communal facilities and resources, the quality of the open space and the good accessibility to local shops and facilities, areas of open space and public transport.
- 5.20 The accommodation will be secure by virtue of the concierge service, CCTV where appropriate, well lit external and communal areas and key-pad controlled access or similar from the front (McDonald Road) and side entrance. There is an existing ramped access and internal lift which will be available for use by occupiers, easing access to the studios.
- 5.21 Schools and residential properties are neighbourly developments as witnessed by the numerous examples of tenement development and urban schools occupying neighbouring sites across the city. Any noise impact which may exist will only occur during the school day and school term times. This is unlikely to coincide with required quiet times of the majority of occupiers. There is a Burden on the current (CEC) and future owners of the area immediately adjoining the rear of the building restricting any new build on that land, thus protecting the amenity of the proposed studios in the future. Secondary glazing can be provided to the studios, as required, and all will be insulated to current standards, restricting noise nuisance.
- 5.22 Due to the separation of the existing building from the houses on the opposite side of McDonald Road, the difference in levels of the existing windows (as illustrated in sectional form in the Design Statement), the cill levels to the studios

being at a high level (at approx. 1.5m), most studios windows being at first floor level or higher compared to the houses opposite and the trees on McDonald Road, there will be no loss of amenity to existing residential units and a reduction in the degree of overlooking compared to the office use of the building.

Impact on the Surrounding Area

- 5.23 This is a significant existing Listed Building which is important in the street scene. The proposed development will safeguard the future of the building, and maintain its role as a dominant feature in the street scene. Minimal external alterations are proposed and the building will be repaired and improved. The proposed new landscaping will further enhance the setting of the building. The proposal, therefore, will have a positive impact as it will protect and improve the special interest of the building and will ensure its retention and maintenance, which is already showing signs of deterioration.
- 5.24 As the proposal is for a conversion with limited new build, there will be no impact on neighbouring properties or the street scene in terms of scale of building, loss of light etc. Overlooking is addressed above.
- 5.25 Whilst there will be studio windows in the rear elevation facing the school play ground, there will be a reduction in the potential for overlooking of school classrooms compared to the permitted office use of the building, due to the juxtaposition of the buildings, the location of windows / cill heights and the reduction in people occupying the building. Whilst some studios will overlook the play area of the school, this commonly occurs in urban schools in Edinburgh. The likely demographic of the occupiers will be younger people, key workers or recent graduates who predominantly will be at work during day time, thus minimising the potential for overlooking. It is considered that there will be a positive impact on the amenity of school users when the building is used as studios compared to that which could occur should the building be re-occupied as an office.

Impact on Pedestrian Safety

- 5.26 This Urban Key housing concept will ensure that pedestrian safety in the locality is not impaired. Secure cycle parking, moped parking, shared private car pool and good pedestrian access will be provided within the site. Occupiers could also be provided with a 1-year bus pass.
- 5.27 As the proposal is for first rung younger people (city centre and key workers and recent graduates who enjoy city centre living and have no need for a car), car ownership is likely to be low, particularly bearing in mind the exceptional accessibility of this site to bus routes, to local shops, the town centres and places of employment.
- 5.28 The city centre lies approximately 1.3 km to the south, a 15 minute walk; major bus routes are within close proximity - Broughton Road adjacent to the site (bus no 36); Leith Walk, 600m from the site (buses 7, 10, 12, 14, 16, 22, 25, 49); and, Pilrig Street, 500m from the site (bus 11). Edinburgh Coach Lines, Service 13, passes the site connecting Leith Walk to Broughton Road along McDonald Road. Additionally, areas of good quality open space are close by, as stated above.
- 5.29 The site lies within a Controlled Parking Zone (N1) and parking zone 3a (CEC Parking Standards for Development Management, 2009). As the residential units proposed are studios which it is intended will comply with the affordability definition, the required parking ratio is between 0 and 0.33 spaces per unit.
- 5.30 In its determination of application 12/03518/FUL, on an adjacent site on McDonald Road, the committee report states *'Whilst the proposals do not meet the Council's current parking standards, Transport's opinion is that this is acceptable due to the fact that the development has good access to public transport and the downward pressure on the number of parking spaces reflects the ethos of proposed developments in north Leith. Car club spaces would mitigate the likely parking pressures'*. That proposed development, granted permission on 3 June 2013, comprised a mixture of 1, 2 and 3 bedroomed units.
- 5.31 It is considered that the parking provision proposed in this current application for the Urban Key housing concept, together with the considerable cycle and moped

parking, and other green transportation incentives, justifies a relaxation of standards.

- 5.32 On this basis, it is considered that vehicular activity will be minimal and will take place without harm to pedestrian activity and the road network.

Quality Development

- 5.33 It is considered that the proposed development will meet the requirements of policies DES1 and DES3 relating to quality development, as addressed above and assessed further below. Reference should also be paid to the submitted Design Statement, which addresses the design-led approach to this proposal.

Open Space

- 5.34 The existing building occupies the majority of the site area, but communal open space is proposed to north west of building within the site and on the roof terrace. The unique housing concept is to serve the housing needs of a particular group – younger, city centre and key workers. The proposed open space in the landscaped areas to the front of the building and the roof terrace will meet the immediate needs of such occupiers.
- 5.35 It is proposed to create a green buffer zone to Broughton Road using the existing semi-mature tree cover and a soft planted green verge to the boundary railings. The remaining area of hard standing will be upgraded as communal open area and by providing small pockets of hard and soft landscaped areas; varied, intimate and sunny communal gardens will be available to residents of the development, within which a variety of activities can take place. Natural stone walls will be used to create the small garden pockets. The roof terrace will also be available to all occupiers surrounded by glass balustrade.
- 5.36 Additionally, private communal internal space will be provided (gym, living / dining areas, sun room) to cater for recreational needs of the occupiers of the building.
- 5.37 As an additional consideration, the site is easily accessible to a range of areas of open space, which are designated as ‘good’ in CEC Open Space Audit 2009 :

- Powder Hall Bowling and Putting Green, opposite the site on Broughton Road;
- Pilrig Park, 650m to the north;
- Redbraes Park, 160m to the north west;
- Pilrig Street Play Area 400m to the north; and
- the Water of Leith within 1.1km, which provides linkages throughout the city.

5.38 Whilst the open space provision does not meet the guidance set out in Hou3, it is considered that sufficient space is available to meet the needs of the target purchasers, and the aims of policy relating to open space will not be compromised. The explanatory text to policy HOU3 (paragraphs 6.14) states that the policy '*applies to mainstream, family housing, whether flatted or not. It does not apply to housing built for occupation by particular groups such as students or the elderly*'. The proposal is for a particular group, small households and key workers, for whom the provision of communal open space is not a key issue and who will not require such space standards as occupiers of mainstream family housing.

5.39 There are material considerations, therefore which outweigh the specific requirements of Hou3.

Size of Accommodation

5.40 The proposed development is targeted at a specific needs group – those small households (principally 1 and possibly 2 person) requiring affordable housing, and particularly city and key workers. High quality residential accommodation will be provided, meeting these identified needs within the city centre to complement other development being provided within the immediate area which will create a mixed, vibrant area.

5.41 The proposed studios would utilise space creatively. The proposal is for a new and innovative housing type, which is not addressed in the Guidance, based on shared use of communal facilities (storage, laundry and private dining / living rooms),

provided externally to each individual unit but internally to the building complex. The amount of actual living area would be greater than comparable traditional accommodation. As the Guidance envisages all facilities being provided for *within* each unit, the accommodation available to each unit exceeds that stated in the Guidance.

6.0 Conclusion

- 6.1 Planning permission is sought by Kingsford Developments for the conversion of an existing Listed Building to 73 studio residential units, and associated development. The site is located within an area of mixed-use and is near to a key public transport corridor providing excellent links to the City Centre and beyond, and is in close proximity to existing open space and other neighbourhood facilities.
- 6.2 The Urban Key concept is unique and provides a new form of accommodation to address affordability issue for city and key workers. It is the ambition of the Urban Key concept to provide on-market affordable housing with no tax payer subsidy.
- 6.3 Importantly, the proposed development will ensure the retention of and preservation of a significant Listed Building and will be developed sensitively to the buildings special features.
- 6.4 The proposal enhances the residential mix within the wider area and provides for a high quality form of development. The existing building was last used as CEC offices and the change of use to residential will reduce the impact of the development on amenity and traffic generation in this locality.
- 6.5 It is considered that the proposal is acceptable in terms of the relevant policies within the adopted Edinburgh City Local Plan, other guidance and other material considerations and planning and Listed Building Consent should be granted.

Appendix 1 – Extract of Listing of 154 McDonald Road

BROUGHTON ROAD AND 154 MCDONALD ROAD, BROUGHTON SCHOOLS WITH JANITOR'S HOUSE AND PLAYSHELTER, BOUNDARY WALLS, GATEPIERS AND RAILINGS (Ref:30041)

This building is in the **Edinburgh, City Of Council** and the **Edinburgh Burgh**. It is a category **B** building and was listed on **10/03/1999**.

Group Items: N/A, Group Cat: N/A, Map Ref: NT.

Description

Robert Wilson, 1897, McDonald Road extension (McDonald Road block), John A Carfrae, 1903. 2-storey and attic, 11-bay, monumental Queen Anne school. Squared and snecked sandstone ashlar with red sandstone ashlar at ground and margins. Base course, round-arched keystone windows at ground, cill band at 1st floor, cornice course above 1st floor, cill band at attic; 3-bay projecting gable to centre with Venetian window to gablehead; flanking gablehead bays set-back with 2-storey gablehead bay projecting to outer right. NE PRINCIPAL BLOCK: NE (PRINCIPAL) ELEVATION: windows to 9 centre bays at ground, regular fenestration above, 2 segmental dormerheads to left and right, Venetian window to centre; architraved windows to outer bays at ground with architraved entrances with fanlights, stone-mullioned tripartites to both floors above, motifs to gablehead; stone-mullioned tripartites at ground and 1st floors, segmental pediment to 1st floor. Windows at ground and 1st floors to side elevations of projecting centre bays. SE MCDONALD ROAD BLOCK: NE (BROUGHTON ROAD) ELEVATION: connected to principal block by modern link. 7-bay, round-arched keystone windows at ground, stone-mullioned bipartites to right at 1st floor, windows to remaining bays, segmental arched tall stone-mullioned bipartites with motifs to centre in 2nd, 4th and 6th bays at 2nd floor. SE (MCDONALD ROAD) ELEVATION: 2-storey with attic and basement, 20-bay (17 bays to McDonald Road, 3 bays to canted corner). 2-leaf timber panelled door in corniced and architraved entrance in bay 14 with window directly above with cornice and pediment, date panel to centre (1903), small window to left of entrance with windows in 3 bays to right, smaller to outer right, windows to remaining keystone round-arched bays; stone-mullioned bipartites to left and to alternate bays to 1st floor, windows to remaining bays; stone-mullioned bipartite to bay 12 with flanking windows; stone-mullioned tripartite to bay 14 with windows to bays remaining, smaller window to outer right. Regular fenestration above with smaller windows; segmental-headed dormers with decorative panels to tympani in bays 3 and 9, paired gablehead between bays 5 and 7, corbelled stripped pilasters flank blank panel linking gableheads at centre. Ridge ogee cupola above. Regular fenestration to left and right in canted corner bays, stone-mullioned bipartite to segmental headed dormer with decorative panel to tympanum to centre above with flanking stone-mullioned bipartites, bracketed broken pediment with keystone over carved panel, 'Broughton Higher Grade School' to centre at 1st floor. Timber sash and case windows with multi-pane glazing, grey slates, ridge and wall head stacks with terracotta cans, cast-iron railings. INTERIOR: not seen 1998. JANITOR'S HOUSE AND PLAYSHELTER: 2-storey, single bay gable headed janitor's house to right of principal elevation adjoining East Claremont Street; stone mullioned tripartites at each floor, entrance set back to left. 2-storey, 5-bay play shelter to rear with windows at 1st floor. BOUNDARY WALLS AND RAILINGS: low coped, stepped ashlar walls, square plan pedestaled gatepiers with cornice and ball finial to principal elevation. Square plan gatepiers with cornice to McDonald Road elevation.

Notes

Substantial example of Edinburgh Board School design in Queen Anne style, sited prominently at junction of several roads.

References

Gifford, McWilliam and Walker, EDINBURGH, (1988), p645.

Appendix 2 – Planning History within Locality

Development	Site	Decision Made Date	Decision Issued Date
Redevelopment of the site and erection of buildings for mixed use development including student residential accommodation and associated facilities, retail (class 1) units and food and drink (class 3) units, cycle parking areas and associated alterations to access and landscaping (as amended)	Shrubhill House 7 Shrub Place Edinburgh EH7 4PD	09 Apr 2008	09 Apr 2008
Residential development of 6 maisonettes and 13 flats with associated car parking and landscaping.	Land 42 Metres North Of 117 Bellevue Road Edinburgh	21 Feb 2013	Minded to grant pending legal agreement
Erection of building for student residential accommodation and motorist centre for the sale of fitting of tyres, exhausts, brakes and other fast fit motorist repairs, including the carrying out of Ministry of Transport tests at part ground floor level and associated alterations to access and car parking (as amended).	4 - 6 McDonald Road Edinburgh EH7 4LU	14 May 2007	14 May 2007
Residential development of 86 flats, with associated private underground and courtyard parking, landscaping and re configuration of existing perimeter parking and footpaths	Site 35 Metres Southwest Of 132 McDonald Road Edinburgh	07 Oct 2010	Minded to grant pending legal agreement
Proposed residential development of flats and colony housing.	Site 35 Metres Southwest Of 132 McDonald Road Edinburgh	03 Jun 2013	03 Jun 2013

Appendix 3 – Pre-Application Consultation

The following pre-application meetings have taken place, to inform the preparation of the proposals. Details file note of those meetings follow below.

Organisation	Principal Representative	Date
City of Edinburgh Council Planning	Linda Hamilton, Principal Planning Officer	11/04/2013
City of Edinburgh Council Planning	Stephen Dickson, Senior Planning Officer (Listed Buildings)	10/05/2013
City of Edinburgh Council Children & Families	Lindsay Glasgow, Asset Planning Manager, Children & Families	05/06/2013
Broughton Primary School Parents Council	Gareth Overton, Lindsay Law	12/06/2013
City of Edinburgh Council Planning & Transport	Stephen Dickson, Senior Planning Officer (Listed Buildings); Andy Bogle, Transport	20/06/2013
City of Edinburgh Council Services for Communities	Iain MacPhail, Senior Project Manager, Land Supply and Affordable Housing Policy Services for Communities	25/06/2013

Minutes

Project	54 McDonald Road, Edinburgh		
Project No.	1328		
Date	11.04.2013 @ 3.30pm	Page	1 of 2
Location	City of Edinburgh Council Offices		
Purpose	Pre- Planning Application Meeting		

Present:	Representing	
Alex Watts	Kingsford Estates (Client)	AW
James Ferguson	Staran Architects (Architect)	JF
Iain Shillady	Staran Architects (Architect)	IS
Linda Hamilton	Edinburgh Planning Department	LH
David Givan	Edinburgh Planning Department	DG
Jackie McInnes	Edinburgh Planning Department	JM

Action

1.00 Introductions

1.01 Concept overview by AW

- Affordability through design and community - Urban Key
- Self contained 35sqm studios
- 74no. proposed units
- Shared resources - large dining spaces, laundry, gym etc
- Use of community buying power for services such as internet
- Allow first time buyers to get a foot on the housing ladder

2.00 Design

2.01 Design Concept by AW

- Efficient design to make the most of living space
- High ceilings allow use of mezzanine levels
- Each unit will have high levels of natural lighting
- Use of smart furniture and storage solutions
- Good use of existing listed building

- 3.00 Transport
- 3.01 Transport strategy by AW
- Potential for each purchaser of a unit to be given a free years bus pass
 - Bicycle racks/ lock ups to be provided
 - Residents 'car club' allowing a choice of vehicles

4.00 Initial Planning Responses

4.01 Planners Comments

- Walls splitting windows not encouraged. To be designed out
- Existing council survey may not be accurate. Staran to check
- Bicycle storage to be internal
- Bin storage to be reviewed in detail
- Overlooking of playground may need review
- Close proximity to kerb on main front elevation may need review
- Lack of amenity space
- If gym is provided, then to be residents only
- Bus pass offering could offset against lack of car parking
- Doesn't meet requirements of housing mix but given concept may not be an issue
- No family units supplied
- Noise of school may come up with Environmental Health
- May need to compromise on unit numbers
- Comfortable with the proposal in this location
- Discussion with Building Standards advised at an early stage
- May require some accessible units
- Potentially a very good use of a Listed Building
- At present the building is a liability with a leaking roof etc.

5.00 Planning Application

5.01 Process required for a full application

- Classed as a Major Development
- Proposal of Application Notice (PAN) required
- Processing agreement with planning required
- Public consultation event required to engage with public
- Engagement with community council required

6.00 Section 75 Contributions

6.01 Potential contributions highlighted

- Tram contributions
- Public realm contributions
- Affordable housing contributions
- Transport contributions

Distribution:- Those present

Minutes

Project	154 McDonald Road, Edinburgh		
Project No.	1328		
Date	10.05.2013 @ 2.00pm	Page	1 of 2
Location	City of Edinburgh Council Offices		
Purpose	Pre- Planning Application Meeting		

Present:	Representing	
Stephen Dickson	Edinburgh Planning Department	SD
Paul Scott	Scott Hobbs Planning Ltd (Planning Consultant)	PS
James Ferguson	Staran Architects (Architect)	JF
Iain Shillady	Staran Architects (Architect)	IS
		Action

1.00 Introductions & Concept Overview by PS

2.00 Conceptual Plan

- Plan welcomed as a useful overview of the character of the area in the vicinity of the site, and the emerging proposals (as identified on the Plan). This should be included as part of the Design Statement.
- The Plan should indicate cycle zones to support the application, and should ensure that all local parks were identified (SD referred to Redbraes Park to be added).

3.00 Site Plan and Floor Plans

- The indicative plans for the wider school site were discussed, and SD reacted favourably. The perimeter block approach maintained a lot of space to the rear, around the school, and the future change of use of the school itself would benefit from this. SD suggested that the 'link building' be removed to differentiate the schemes and restore the existing buildings. PS/JF explained that this was to remain to facilitate the operation of the school building, but could be considered longer term.
- Staran confirmed that the units would be 30-35 sqm each, including mezzanines. SD would prefer to see 31 sqm as a minimum.
- The removal of any subdivision of individual windows was welcomed by SD.
- The use of Motor Cycles and scooters should also be encouraged.
- There should be an emphasis on Internal Bicycle Storage, utilising the large basement areas if possible (Staran advised that not all this area had yet been surveyed due to access issues).

- Private Car club initiative will be supported, but will require to be promoted in addition to the City Car Club, not instead of.
- A review of internal parking is required.
- Review of City Car Club spaces on site and in the immediate vicinity required.
- The use free yearly bus passes will be encouraged.
- Environmental Services need to be consulted with regard to nuisance noise from road and rail
 - SD suggested the use of secondary glazing may be stipulated on Broughton Road
 - Contact Andrew Campbell for Pre-Application discussions.
- Good Communal Facilities will aid justification for smaller studio sizes. The creation of a hard landscaped open space to the Broughton Road frontage was discussed and agreed as an appropriate solution, subject to detailed design.
- The units within the existing stair well need to be reviewed as they are potentially too small

Distribution:- Those present, Alex Watts



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File Note

Date : 20 June, 2012

Subject : **154 McDonald Road, Meeting CEC**

Present: James Ferguson, Staran Architects (JF)
Sheila Hobbs, Scott Hobbs Planning (SH)
Stephen Dickson, CEC Planning (SD)
Andy Bogle, CEC Transport (AB)

1. Revised plans tabled and reference made to:
 - a. no sub-division of windows – acceptable, cross sections required
 - b. minimum unit sizes of 35 sq m - accepted by SD as communal areas outweighs size / single aspect nature of units;
 - c. conservation rooflights – rear roof – accepted
 - d. concierge – SD requested (and preferred) concierge living in for 24 hour service
2. Issues raised :
 - a. SD - Site boundary to rear hard on rear wall – concern re building regulations, access and future demands for new build close to windows. JF confirmed building regulations can be met. SH referred to easement around building. Position to be clarified with Solicitor
 - b. Bike storage – SD confirmed requirement for 100% internal. Need to demonstrate that it can be achieved. JF confirmed.
 - c. Parking – AB expressed standard for 1 space per unit, and site outside CPA (SH subsequently confirmed, CPZ N1 and parking zone 3a so standard between 0-0.4 per unit). Concern expressed relating to number of spaces and space available for turning. SH referred to the lack of parking available for office use at present. AB suggested that concierge should control bike provision and bus pass / ticket provision.
 - d. SD requested information on the means of securing the units as affordable over the longer term. SH referred to programmed meeting with CEC on 25 June 2013 to discuss this issue and that further information would be provided.

Kingsford Developments

Meeting with Broughton Primary School Parents Council

12 June 2013

Minute

Attendees: Parents Council Representatives including Gareth Overton and Lindsay Law
Kingsford Developments Representatives – Alex Watts (Director), Paul Scott
(Scott Hobbs Planning), Iain Shillady (Staran Architects).

1. PS thanked the PC representatives for attending, and GO in particular for arranging the meeting. PS explained that Kingsford were the preferred bidder for the former school then education centre building fronting McDonald Road, following the Council's decision to dispose of the building as surplus to its requirements. PS stated that Kingsford were not party of the initial decision to dispose of the school, but were a preferred bidder for the site following the Council's decision to sell.
2. PS explained that it was Kingsford's intention to submit applications for planning permission and listed building consent before the end of June for the change of use and alterations to the existing building. AW explained that Kingsford had entered into a missive to buy the building subject to securing planning permission, but could not buy the building at any time prior to receiving permission.
3. AW explained the Urban Key concept as delivering affordable housing through innovative design. Between 68 and 74 studio apartments would be developed, each of between 30 and 35 sqm, and with communal living facilities including a dining room, catering kitchen, car pool and shared services including broadband and utilities. The studios were likely to sell in the £100,000-£110,000 range.
4. IS tabled the latest floor plans and site layout plan, and explained how the building would work.
5. Feedback from the PC members was as follows:
6. Car parking – the school was already very congested, and car parking was lost following the sale of the former school car park on Bellevue Road for development. AW explained that no car parking was being provided, and given the controlled parking zone around the site, the studios were unlikely to appeal to car owners. The demographic was younger people, either key workers, or recent graduates, who enjoyed city centre living and had no need for a car.
7. Construction impact – concerns were raised about the potential health and safety risks associated with doing works to the exterior of the building, on the playground side. AW explained that there was an allowance in the missive for a construction period, and PS offered to send this to GO. The construction area would be fenced off and secured.
8. Future occupants – concerns were raised about how to avoid the studios providing the opportunity to overlook the school playground. PS explained that the building could be re-occupied at any time, without the need for planning permission, for office purposes,

with no control over the nature of the occupants. AW confirmed that the studios would be sold or rented and there would be a concierge facility on site. The occupants were likely to be at work during school hours. Noise from the playground would be managed through secondary glazing where necessary.

9. School garden – the PC members queried the potential for investment in the school garden, and AW confirmed that there would be a payment, as part of the missive, of £4-5,000 towards improvements to the school garden.
10. The PC members stated that they would outline the plans to the meeting of the full Parents' Council which was taking place after this meeting. PS provided contact details for any follow up questions, and all agreed to have a further discussion once the planning application was submitted, which PS stated would be before the end of June.

From: Iain MacPhail <Iain.MacPhail@edinburgh.gov.uk>
Date: 25 June 2013 11:58:23 BST
To: Alex Watts <alex.watts@kingsfordstates.co.uk>, Paul Scott <ps@scotthobbsplanning.com>
Subject: McDonald Road & Affordable Housing Policy

Alex, Paul

It was good to meet you today, many thanks for coming into the office to discuss the Affordable Housing Policy outcomes for your proposed development.

All 100% of these homes could be considered to be meeting the city's affordable housing requirements provided they are made available as low cost homes to buyers at approved affordable housing levels. In order to assist with you performing a meaningful construction and development appraisal, the Council takes the view that we would honour the approved affordable housing levels as they are today (June 2013) or the levels they are at the time the completed homes are made available for sale, whichever is the higher figure.

It is highly encouraging, from our point of view, that these homes will meet a crucial part of the city's identified affordable housing need, and in such an efficient manner in that they will not require any public subsidy in order to be built or distributed.

For the statutory requirement of 25% affordable housing we would require that buyers commit to the property being their sole and primary residence (in order to satisfy ourselves that the entire development will not become a buy-to-let opportunity). The Council has worked with Barratt, Taylor Wimpey, McCarthy & Stone and others to develop a process for that, which is quick and efficient to run for your sales and marketing team.

I am happy to provide the following link, as it provides evidence that the Council's direct experience in recent months has been that there is a considerable need for 1 bedroomed properties in the city, and that this need is not being met. This development will contribute to meeting that need, and will not exhaust that need at all.

In summary, our team would be happy to consider the entire development to be meeting an identified affordable housing need in the city, and would be happy to support the plans in their current form when a formal consultation request comes our way in due course.

Kind regards

Iain

Iain MacPhail | [Senior Project Manager](#) | [Land Supply & Affordable Housing Policy](#) | The City of Edinburgh Council | Services for Communities | Strategy & Investment | Business Centre C:3, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG | Tel 0131 529 7804 | Fax 0131 529 7502 | iain.macphail@edinburgh.gov.uk |

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