

Development Management Sub Committee

Wednesday 11 March 2015

Application for Planning Permission in Principle

14/03502/PPP

At Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh

Erection of residential development with associated transport infrastructure, landscaping and open space.

Item number	6.2
Report number	
Wards	A03 - Drum Brae/Gyle

Summary

The proposal to erect residential development at West Craigs has been brought forward in the context of the Second Proposed Local Development Plan, which promotes the site as Housing Proposal Site HSG19. In terms of the adopted Edinburgh City Local Plan the application site lies within the green belt and accordingly it does not support the principle of housing development at this location.

In the context of the Second Proposed Local Development Plan the application proposal is acceptable in principle subject to suitable legal agreements being entered into concerning affordable housing, education facilities and transport infrastructure. A departure from the adopted Local Plan is considered acceptable and it is recommended that planning permission in principle be granted.

Links

[Policies and guidance for this application](#)

LPC, CITE10, CITH1, CITE8, CITE9, CITH7, CITT1, CITT2, NSG, NSDCAH, NSGCGB, LDPP, PHOU1,

Report

Application for Planning Permission in Principle 14/03502/PPP

At Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh Erection of residential development with associated transport infrastructure, landscaping and open space.

Recommendations

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

Background

2.1 Site description

The development site currently comprises West Craigs Farm and associated outbuildings and agricultural land. The site is bound to the east by Maybury Road and to the north by Craigs Road. A single cottage is currently located to the north, within the site. A phone mast is located to the north west. To the south west edge of the site is the West Craigs Industrial Estate; a collection of small industrial units, bound to the north by landscaping, and sitting at a considerably lower level than the site. An existing residential development sits to the south of the site and to the west are open fields.

The site slopes downwards from the north to the south and west, and the northern edge forms a local ridgeline. A water mains runs across the site, from north east to south west.

2.2 Site History

There is no relevant planning application history for this site.

Main report

3.1 Description Of The Proposal

This application seeks planning permission in principle for a residential development of unspecified number of dwellings. The application is accompanied by an indicative master plan.

The indicative master plan and supporting documentation, submitted with the application, are based on a development of up to 250 residential units, with 25% affordable housing units. Subsequent applications for the approval of matters specified in condition would include details of the number of units, design and layout, scale and massing, access, landscaping, open spaces and parking.

Supporting Statement

The following documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Planning Statement;
- Statutory pre-application consultation report;
- Design and Access Statement;
- Environmental Statement;
- Ground investigation report;
- Transport Statement; and
- Sustainability Statement.

3.2 Determining Issues

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) The principle of the proposed development is acceptable;
- b) The landscape impacts and design are acceptable;
- c) The proposal preserves or enhances the historic environment;
- d) The proposal is detrimental to air quality;
- e) The proposal is detrimental to the amenity of neighbouring residents;
- f) The proposal provides sufficient residential amenity for the occupiers of the development;
- g) The proposal raises issues in terms of traffic or road safety;
- h) The proposal will affect local biodiversity;
- i) The proposal raises any flooding and drainage issues;
- j) The proposal is acceptable in respect of education infrastructure and affordable housing;
- k) The proposal meets sustainability criteria;

- l) Any impacts on equalities or human rights are acceptable; and
- m) Comments raised have been addressed.

a) Principle

The application site is located within the Green Belt as identified within the adopted Edinburgh City Local Plan (ECLP). There is a presumption against development in the Green Belt unless necessary for the purposes of agriculture, horticulture, forestry, countryside recreation, or other uses appropriate to the rural character of the area or where a countryside location is essential. The proposed residential development would constitute a non-conforming use within the Green Belt and as such be contrary to police Env 10 of the ECLP and to the non-statutory guideline on 'Development in the Countryside and Green Belt'.

A small portion of the site, at the north west corner, lies within the bounds of the Rural West Edinburgh Local Plan and is designated as Green Belt. It is, however, appropriate to consider the application under the Edinburgh City Local Plan. This does not have an impact on the key policy considerations.

The Strategic Development Plan (SDP) Policy 1A outlines the spatial strategy for the SDP including the identification of 13 Strategic Development Areas. West Edinburgh is identified as a Strategic Development Area and the application site falls within this area.

Paragraph 46 of the SDP confirms that the scale of any additional housing allocations will be determined through Local Development Plans following the preparation of SESplan supplementary guidance taking into account environmental and infrastructure constraints.

Scottish Planning Policy and SDP Policy 7 require a five year effective housing land supply to be maintained. Sites within the identified Strategic Development Areas may be allocated in Local Development Plans or granted planning permission to maintain a five year effective housing land supply, subject to the development being in character with the settlement or local area, the development not undermining green belt objectives and any additional infrastructure required by the development being committed or to be funded by the developer.

A comprehensive assessment of all available greenfield land in West Edinburgh was undertaken to inform the Proposed Local Development Plan (set out within the Revised Environmental Report, March 2013 and Second Revision, June 2014). The housing site assessment criteria fully reflect the criteria included within policy 7 of the SDP concludes that development of this site would be acceptable.

The proposal therefore complies with Policy 7 of the SDP.

There is currently a shortfall in the five year effective land supply. However the Second Proposed Local Development Plan (LDP) identifies further Greenfield housing sites to meet the SDP housing requirements.

The Second Proposed LDP allocates this site as within housing site HSG19. The site was also identified as within housing proposal (HSG19) in the first Proposed LDP (March 2013).

The representation period for the first Proposed Plan ran from 1 May 2013 until 14 June 2013. During this time, representations were received from over 2,200 individuals and organisations, a number of which are directly relevant to this application. Sixty seven representations were received on housing proposal HSG 19 Maybury. Sixty one came from individuals and six from organisations. Two representations were in support of the proposal, two were comments only and 63 were seeking change to the plan. Most of those seeking change are objecting to the principle of development and want the proposal removed from the plan. Having regard to all the representations received, the site is still considered to be an appropriate housing site and remains in the Second Proposed LDP. The application site retains HSG 19: Maybury reference, however the notional site capacity of the housing allocation has been increased from 1,000 - 1,400 units promoted by the first Proposed LDP to 1,700 - 2,000 in the Second Proposed LDP. The site lies within the identified Housing Proposal Site HSG19: Maybury a *'proposal for housing-led development on land to the north and south of Turnhouse Road'*. Policy Hou 1 states that *'Housing development will be supported on sites allocated in this Plan to meet strategic housing requirements (HSG 19 - HSG 37)'* and that the *'proposals must accord with the relevant site briefs and development principles'*.

The Second Proposed LDP was approved at Planning Committee on 19 June 2014. The Planning Committee approved a new Development Plan Scheme (DPS) for the LDP on 19 June 2014.

This application seeks planning permission in principle for a residential development of an unspecified number of dwellings. The master plan submitted is for indicative purposes only. In principle the proposed residential development accords with the Second Proposed LDP. Whether the proposal accords with the relevant site briefs and development principles requires full assessment at the detailed application stage.

In conclusion, the application is contrary to policy Env10 in the ECLP and is a departure from the adopted Local Plan. However Scottish Planning Policy and the Strategic Development Plan require a five year effective land supply to be maintained at all times. Subject to a suitable legal agreement relating to infrastructure the proposal meets all of the criterion within SDP policy 7. The Second Proposed LDP allocates additional sites to meet the Council's housing requirement. The site was identified as a housing proposal in the first Proposed LDP and is also included in the Second Proposed LDP. The principle of residential development on this site is therefore supported and complies with proposal HSG 19 and policy Hou1a) in the Second Proposed LDP.

Consideration has been given to whether granting planning permission in advance of adoption of the Local Development Plan would prejudice the emerging plan. In this instance, it is not considered premature to do so because the LDP housing site assessment demonstrates that the proposal accords with SDP policy 7, the cumulative infrastructure requirements have been established and account has been taken of relevant representations submitted to the first Proposed LDP. The need to maintain a five year effective housing land supply is also a consideration.

The proposal is a departure from the Development Plan, however, notification to Scottish Ministers is not required in this instance as the development is not a significant departure from the Development Plan and the Council does not have an interest in the site.

b) Design

The master plan submitted is solely for indicative purposes and is not under consideration at this stage. All detailed matters including design and layout will be considered as part of a detailed application for approval of matters specified in conditions.

c) Historic Environment

The application site is centred upon the historic farm of West Craigs which has medieval origins. The current historic Georgian farm comprises two main elements the farm house and steading. These buildings date from the late 18th/early 19th century. No element of the farm house or steading is listed.

The Council's Archaeology Officer has identified the site as occurring within an area of archaeological and historical significance, and as such must be considered under ECLP policy Env 9.

West Craigs Steading

The Council's Archaeology Officer accepts that the retention of the steading is not practicable, given its poor condition, and advises that if consent is granted a detailed historic building survey is undertaken prior to and during demolition. This should be linked with an appropriate programme of archaeological works.

West Craigs Farmhouse

The Council's Archaeology Officer advises that the loss of the farmhouse is considered to have a significant adverse archaeological impact and as such would be contrary to under ECLP policy Env 9. As such he recommends that the farmhouse is retained. As this application is for planning permission in principle only, the merits of any proposed demolition, or retention, of the farmhouse will be assessed fully as part of a further detailed application for approval of matters specified in conditions.

It should, however, be noted that as the building in question is not listed and has no statutory protection, its demolition constitutes permitted development under Class 70 of the Town and Country Planning (General Permitted Development) Order 1992 (as amended), provided a prior approval process has been undertaken.

Buried Archaeological Remains

The archaeological evidence as detailed in the applicant's supporting Environmental Statement demonstrates that the application site has the potential to contain a wide range of significant buried archaeological remains. It is recommended that a programme of archaeological evaluation is undertaken prior to the submission of a further detailed application.

Conclusion

A condition is recommended to ensure that a programme of archaeological works is undertaken prior to/during construction. As this application is for planning permission in principle the potential impacts of any detailed scheme will be assessed fully as part of a further detailed application for approval of matters specified in conditions.

d) Air Quality

An air quality impact assessment has been submitted which has concluded that there will be no adverse impacts on residential development in this location and the proposed development would not have an adverse impact on the surrounding local environment in regards to local air quality. A consultation response from Environmental Assessment raised no concerns regarding the impact of the proposal on air quality, smell, dust impact, noise or light pollution.

e) Neighbouring Residential Amenity

The proposed residential development will not have a detrimental impact on neighbouring residential amenity and detailed assessment of the potential impacts regarding privacy, daylighting and overshadowing will be assessed at detailed application stage.

f) Amenity of Occupiers

Environmental Assessment do not object to the application subject to the provision of additional noise mitigation information as part of a further detailed application for approval of matters specified in conditions.

The assessment of details in respect of privacy, daylight and sunlight provision and amenity space would be assessed at the detailed application stage.

g) Traffic and Road safety

The application site lies within the Maybury/Barnton Strategic Transport Contribution Zone.

As this application seeks planning permission in principle for a residential development of unspecified numbers the internal layout (including parking) of the roads servicing the development and the precise position of access, both pedestrian and vehicular, will be reserved matters assessed fully as part of a further application for approval of matters specified in conditions, as will the potential impacts on pedestrian and road safety.

The applicant has submitted a Traffic Statement which identifies actions including, but not limited to, a new signalised junction at Maybury Road/Craigs Road and a proposed junction design at Glasgow Road/Turnhouse Road/Maybury Road to include the removal of the right turn off Turnhouse Road.

The proposed removal of right turn off Turnhouse Road at the Glasgow Road/Turnhouse Road/Maybury Road junction is not under consideration as part of this application.

The proposal outlined in the LDP for improving the junction, the removal of Turnhouse Road right turn with traffic diverting through the new development and the Craigs Road junction, has been tested in the applicant's Transport Statement. The Head of Transport has advised that this junction currently operates significantly beyond its capacity and that the proposed removal of the right turn does release a significant amount of capacity. However, it is intended to test alternative designs which retain the Turnhouse Road right turn and that this work is currently ongoing.

The only matters being considered at this stage, relevant to Transport, are whether the proposed signalised junction at Maybury Road/Craigs Road can accommodate this development and the other local sites in the Second Proposed LDP and an assessment of the impact of the development and the other LDP developments on the local road network. The model proposed has been tested under various scenarios up to and including the operation of these signals following the full build out of LDP sites HSG19 and HSG 20. This assessment indicates that the proposed traffic signal junction do operate satisfactorily. The proposal and the accompanying Transport Statement have been considered and the Head of Transport has raised no objections to the application, including the proposed signalised junction at Maybury Road/Craigs Road, subject to the recommended legal agreement.

h) Biodiversity

The application site is not designated as an area of ecological importance, however there are three locally designated sites, Cammo Estate Local Biodiversity Site (LBS), River Almond LBS, and Corstorphine Hill LBS, within 3km of the site. The applicant has submitted an Ecological Assessment (Environmental Statement: section 6) which concludes that the sites are remote from application site and that the proposed development will have no significant effect on designated sites. Furthermore there will be no significant effect on the ecology of the site and its surroundings as a consequence of development as proposed.

A consultation response from Scottish Natural Heritage confirms that they concur with the results and conclusions of the species surveys and advises that no protected species licences will be required.

The potential impacts of any detailed scheme on biodiversity will be assessed fully as part of a further detailed application for approval of matters specified in conditions.

i) Flooding

The applicant has provided a level one Flood Risk Assessment and an Environmental Statement within which section 9 addresses Hydrology, Geology and Hydrogeology. Neither SEPA nor Flood Prevention have raised any objections to the proposal.

Surface water management and SUDS will form part of any detailed design and will be assessed fully as part of a further detailed application for approval of matters specified in conditions.

j) Other Material Considerations

Affordable Housing

The master plan and supporting Design Statement indicates that 25% of the proposed dwellings will be allocated for affordable housing provision. This provision would accord with relevant development plan policy. The exact details of the mix and location of the proposed units would be considered at the detailed application stage and a legal agreement is recommended to ensure the delivery of the relevant affordable housing.

Education

As this application seeks planning permission in principle for a residential development of unspecified numbers it is not appropriate at this juncture to quantify the developer contribution, concerning education facilities, that would be required specific to this proposal.

Subject to a legal agreement securing the appropriate monetary sum towards the educational contribution zone for West Edinburgh, Children and Families has no objections to the proposal in principle. The level of education contributions should be agreed at the detailed application stage in accordance with the guidance on Developer Contributions.

Amenities and services

Concern has been raised by representees that increasing pressure will be placed on local services including shops and leisure facilities. Growing demand for such services may enable operators to plan for expansion. Notwithstanding this extra demand for these types of services would not merit a reason for refusal of this application.

Representations have raised concern about potential overburdening of local medical services. The provision of primary care facilities is currently the responsibility of the Edinburgh Community Health Partnership. From 2015, this is expected to come under the integrated Edinburgh Health and Social Care Partnership. Discussions are taking place between the Council and NHS Lothian on how best to plan for the healthcare facilities required in conjunction with new housing development. As these discussions progress and more detailed information becomes available, this can be incorporated into the Local Development Plan Action Programme through its annual review. It may be appropriate in the future to seek developer contributions towards healthcare facilities. However, there is no justification to do so for this application.

k) Sustainability

The proposals are not at the detailed stage in terms of building design and consequently a sustainability form has not been submitted. Sustainability measures will require further consideration when a detailed application comes forward.

l) Equalities and Human Rights

The potential impacts of any detailed scheme on equalities and human rights will be assessed fully as part of a further application for approval of matters specified in conditions.

m) Public Comments

This application was advertised on 12 September 2014 and 40 letters of objection and no letters of support were received.

Material Representations: Objection

- Proposed junction design at Glasgow Road/Turnhouse Road/Maybury Road, including the 'no right turn' will result in additional local congestion, inconvenience to existing residents of West Craigs, reduced road and pedestrian safety, and a loss of amenity to Craigs Road residents - addressed in section 3.3 g).
- Inappropriate junction design at Craigs Road/Maybury Road - addressed in section 3.3 g).
- Increased traffic and a detrimental impact on local road and pedestrian safety - addressed in section 3.3 g).
- Inadequate education facilities. - addressed in section 3.3 j).
- Currently inadequate local leisure facilities, amenities and services - addressed in section 3.3 j).
- Increased pollution - addressed in section 3.3 d).
- Loss of green belt - addressed in section 3.3 a).
- Inappropriate design, layout, housing type and mix - addressed in section 3.3 b).

Non-Material Representations

- Possible brown field alternative sites.
- Prematurity in advance of the adoption of the Second Proposed LDP.
- Impact on house prices.
- Current increase in non-residents parking at West Craigs Crescent and West Craigs Avenue.
- Extent of neighbour notification.

Community Council

- Negative impacts on local traffic volumes and movements - addressed in section 3.3 g).
- Negative impacts on local infrastructure such as schools, medical services and care homes- addressed in section 3.3 j).

Conclusion

The proposal to erect residential development at West Craigs has been brought forward in the context of the Second Proposed Local Development Plan, which promotes the site as Housing Proposal Site HSG19. In terms of the adopted Edinburgh City Local Plan the application site lies within the green belt and accordingly does not support the principle of housing development at this location.

In the context of the Second Proposed Local Development Plan the application proposal are acceptable in principle subject to suitable legal agreements being entered into concerning affordable housing, education facilities and transport infrastructure. A departure from the adopted Local Plan is considered acceptable and it is recommended that planning permission in principle be granted.

Addendum to Assessment

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

3.4 Conditions/reasons/informatives

Conditions:-

1. Before any work on the site is commenced, details of the undernoted matters shall be submitted to and approved in writing by the Planning Authority; the submissions shall be in the form of a fully detailed layout and shall include detailed plans, sections and elevations of the buildings and all other structures.

Approval of Matters:

- residential unit numbers;
- road layouts, alignment and access arrangements, including amendments to adopted roads and footways;
- design and external appearance of all buildings, open space, urban realm and other structures;
- height, massing and siting;
- boundary treatments (overall site and individual plots);
- car and cycle parking;
- footpaths and cycle routes;
- surface water management plan and Sustainable Urban Drainage Systems (SUDS);
- waste management and recycling facilities;
- full details of sustainability measures in accordance with Edinburgh Standards for Sustainable Building;
- existing and finished ground and floor levels in relation to Ordnance Datum; and
- landscaping:
 - (i) detailed landscaping plan,
 - (ii) a schedule of all plants to comprise species, plant size and proposed number and density,
 - (iii) hard landscaping details,

- (iv) landscape management plan including schedule for implementation and maintenance of planting scheme,
 - (v) details of any water features,
 - (vi) tree protection measures.
2. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building survey, analysis & reporting, publication, public engagement & interpretation) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.
 3. Prior to the commencement of any development, a detailed Noise Impact Assessment, and proposed mitigation measures, shall be submitted to and agreed in writing by the the Council, as planning authority. All mitigation measures to be carried out prior to the occupation of the first dwelling.
 4. The site layout to be submitted as part of the AMC application required under condition 1 above shall include full details of the location and design of the surface water drainage scheme to be installed within the application site and shall be submitted for the approval of the Head of Planning, and for the avoidance of doubt the scheme shall comply with the Scottish Environmental Protection Agency's (SEPA) principles of Sustainable Urban Drainage Systems (SUDS) and contain a surface water management plan.
 5. a) Prior to commencement of any works on site:

With reference to recommendations given in Section 8.4 'Remediation/Mitigation Measures' of the report: 'West Craigs, Maybury: Stage II Ground Investigation: Ironside Farrer (June 2014): 8203'; a detailed schedule of required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.

b) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.

1. In order to enable the Head of Planning Authority to consider this/these matter/s in detail.
2. In order to safeguard the interests of archaeological heritage.
3. In order to protect the amenity of the occupiers of the development.
4. In order to enable the planning authority to consider this / these matter(s) in detail.
5. In order to enable the planning authority to consider this / these matter(s) in detail.

Informatives

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of two years from the date of this consent or from the date of subsequent approval of matters specified in conditions, or three years from the date of planning permission in principle, whichever is the later.
2. Permission shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation to transport infrastructure.
3. Permission should not be issued until the applicant has entered into a suitable legal agreement to ensure that affordable housing is provided in accordance with Council policy.
4. Permission shall not be issued until a suitable legal agreement has been concluded to make a financial contribution to Children and Families to alleviate accommodation pressures in the local catchment area.

Financial impact

4.1 The financial impact has been assessed as follows:

The application is subject to a legal agreement for developer contributions.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

This application was advertised on 12 September 2014 and 40 letters of objection and no letters of support were received. The objections included that of the Corstorphine Community Council.

Material Representations: Objection

- Proposed junction design at Turnhouse Road/Maybury Road, including the 'no right turn' will result in additional local congestion, inconvenience to existing residents of West Craigs, reduced road and pedestrian safety and a loss of amenity to Craigs Road residents.
- Inappropriate junction design at Craigs Road/Maybury Road.
- Increased traffic and a detrimental impact on local road and pedestrian safety.
- Inadequate education facilities.
- Currently inadequate local leisure facilities, amenities and services.
- Increased pollution.
- Loss of green belt.
- Inappropriate design, layout, housing type and mix.

Non-Material Representations

- Possible brown field alternative sites.
- Prematurity in advance of the adoption of the Second Proposed LDP.
- Impact on house prices.
- Current increase in non-residents parking at West Craigs Crescent and West Craigs Avenue.
- Extent of neighbour notification.

Community Council

- Negative impacts on local traffic volumes and movements.
- Negative impacts on local infrastructure such as schools, medical services and care homes.

Background reading/external references

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

**Statutory Development
Plan Provision**

The site is identified in the Edinburgh City Local Plan and the Rural West Edinburgh Local Plan as lying within the Green Belt. Only a small portion of the site, at the north west corner, lies within the bounds of the Rural West Edinburgh Local Plan and as such it is appropriate to consider the application under the Edinburgh City Local Plan. This does not have an impact on the key policy considerations.

The Second Proposed Local Development Plan identifies this site as part of a wider allocation for residential development (Site HSG 19: Maybury).

Date registered 3 September 2014

Drawing numbers/Scheme 01, 02A,
Scheme 2

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Links - Policies

Relevant Policies:**Relevant policies of the Edinburgh City Local Plan.**

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

Policy Hou 1 (Housing Development) supports housing on appropriate sites in the urban area, and on specific sites identified in the Plan.

Policy Env 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological remains of national importance.

Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

Policy Hou 7 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

Policy Tra 1 (Major Travel Generating Development) supports major travel generating development in the Central Area, and sets criteria for assessing major travel generating development elsewhere.

Policy Tra 2 (Planning Conditions and Agreements) requires, where appropriate, transport related conditions and/or planning agreements for major development likely to give rise to additional journeys.

Relevant Non-Statutory Guidelines

Non-statutory guidelines on Developer Contributions and Affordable Housing gives guidance on the situations where developers will be required to provide affordable housing and/or will be required to make financial or other contributions towards the cost of, providing new facilities for schools, transport improvements, the tram project, public realm improvements and open space.

Non-statutory guidelines DEVELOPMENT IN THE COUNTRYSIDE AND GREEN BELT, provide guidance on development in the Green Belt and Countryside in support of relevant local plan policies.

Relevant policies of the Proposed Local Development Plan.

Policy HOU1: Housing Development

Supports in principle housing development on sites allocated in the Plan to meet strategic housing requirement i.e. sites HSG19-37 - clause a) refers;

Table 4: New Housing Proposals

HSG19: Maybury, West Edinburgh - a proposal for housing-led development on land to the north and south of Turnhouse Road. Development required to accord with the Maybury and Cammo site brief.

A site extending to 75 hectare with an estimated capacity of between 1700-2000 houses.

Appendix 1

Application for Planning Permission in Principle 14/03502/PPP

**At Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh
Erection of residential development with associated transport infrastructure, landscaping and open space.**

Consultations

Transport

I have no objections to the application.

I understand that following recent discussions with the developer's agents that the internal layout (including parking) of the roads servicing the development and the precise position of access(es) onto Craigs Road are all now to be reserved matters. Consequentially the only matters being considered at this stage, relevant to Transport, are 1) if the proposed signalised junction access at Maybury Road/Craigs Road can accommodate this development and the other sites in the draft LDP and 2) an assessment of the impact of the development and the other LDP developments on the local road network.

In this regard I can confirm that colleagues from the traffic control team have audited the transport statement (TS) submitted with the applications and, in particular, analysed the traffic models for the signal junctions which were supplied with this TS.

Craigs Rd/Maybury Rd

As stated in the TS (Para 7.5) this model has been tested under various scenarios up to and including the operation of these signals post the full build out of LDP sites HSG19 and HSG 20. This assessment indicates that the proposed traffic signal junction do operate satisfactorily during the weekday morning and evening peak periods (para 7.26). Construction of the new signals does involve some local kerb re-alignment and associated road widening. This can all be accommodated on land either within the public (adopted) road boundary and/or land in the control of the applicant.

Glasgow Rd/Maybury Rd

The traffic generated from this development and the remainder of HSG19 impacts principally on the existing signalised junction at Maybury Rd/Glasgow Rd. The TS does test this junction and confirms that under current conditions the junction operates significantly beyond its capacity (scenarios 1 &2 in tables 7.1 and 7.2). The proposal outlined in the LDP for improving the junction - removal of turn house road right turn with traffic diverting through the new development and the Craig's Rd junction- has been tested in the TS and the 1 TS supplement (dated 9 Dec).

It can be seen the removal Turnhouse Road does release a significant amount of capacity (table 7.4). It is intended to test alternative designs which retain the Turnhouse Road right turn and I can confirm that this work is currently ongoing.

Queensferry Rd/Maybury Rd

The impact of all the full development of HSG19 and 20 on the Barnton signalised junction has been tested in the traffic submission presented in support of application 14/01776/PPP. The proposed amendment to the traffic control system (MOVA) at this junction has been demonstrated to provide a no net detriment solution at this junction.

In addition to the internal layout and access position onto Craigs Road all required transport contributions as per the LDP should be reserved matters. In addition the applicant will require preparing all required road redetermination plans and meeting the council's full cost in respect of advertising the Order. A Quality audit as per Designing Streets will require to be submitted with the AMC application-it is recommended that the scope and terms of this QA are agreed with the council.

Corstorphine Community Council

As a community council we opposed this development together with the other proposed development at Cammo(GSG20) under Local Development Plan 1 and continue expression of our objections under the revised plan number 2.

Our main concern is the potentially negative impacts on local traffic volumes and movements within the Maybury, Gogarburn and Barnton nexus of junctions particularly with regard to morning and evening rush hours.

There are also other large local housing and commercial developments occurring at the Gyle, Edinburgh Park, Rath and Newbridge all impacting on traffic development. It is also likely at the next roll out of the Local Development Plan under the 5 year review scheme that the go ahead will be given for the 1,300 'Garden City' development at Hermiston with its plan for a sports centre.

There are also concerns that the above will also have negative impacts on other essential elements of the local infrastructure such as schools, medical services, care homes, etc.

Our perception is of a general decrement in the environmental quality of west Edinburgh resultant from low density housing development on former greenfield sites.

Police Scotland

I am writing on behalf of Police Scotland to provide comments on the above planning application.

I would recommend the architects and client consults with Police Scotland and considers Secure by Design accreditation, currently there is limited information to provide comment on.

The site appears to have three vehicle entry points and six pedestrian entry points. It is suspected that as the surrounding areas develop, this will increase connectivity and porosity of the site. The number of recognised routes is substantial and may be used for legitimate reasons by the majority of people, it can, be misused by others.

Without a detailed proposal, it is difficult to determine how easy access will be to boundary or property lines for the proposed homes.

- o When trees and shrubs are being planted in common areas, trees should be crowned above 2.2 /2.4 metres, whilst low level planting is kept below a metre (including any planter). The common areas have to be well maintained to ensure these standards are maintained. This is particularly important with the proposed wooded area, that there are funds to maintain it properly so that it does not become overgrown and offer cover for those intent on misuse of the area.*

- o Location of parking is important as natural surveillance from homes, illumination and ensuring that parking is an integral part of the plan, not relegated to parking courts or along the perimeter of the development.*

- o All properties should have 'private' areas that are not accessible by passing members of the public.*

If further consultation is required on this matter, please contact me. Thank you for your attention to this.

Archaeology

Further to your consultation request I would like to make the following comments and recommendations concerning this application in principal for the erection of a residential development with associated transport infrastructure landscaping and open space.

The site is centred upon the historic farm of West Craigs and is first mentioned in 1506 (S Harris, Place Names of Edinburgh). As outlined in Turley's Environmental Statement (ES) chapter 11 Archaeology, the farm is depicted on all subsequent historic maps of the area. General Roy's 1750's map indicates that the site was slightly larger than today comprising a range of perhaps four separate buildings and associated yards reflecting its medieval origins. The current historic, Georgian farm comprises to main elements the Farm House and Steading. These buildings date from the late 18th/early 19th century and relate to the changes of framing practice brought about by the industrialisation of farming which occurred during this period of Agricultural Improvement.

Accordingly this site has been identified as occurring within an area of archaeological and historical significance. This application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also CEC Edinburgh Rural West Edinburgh Local Plan (2003) policy E30 and LDP policy ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Historic Buildings

West Craigs Steading

Although I regrettable agree with their conclusions that the retention of the steading is not practicable, given its poor condition, the proposed level of archaeological recording (see 12.9.1) is too minimalist and not acceptable. This steading is certainly of local archaeological significance if not possibly regionally important given its history of development from the start of the period of Agricultural Improvement in the L-18th /E-19th century, a period charting Accordingly if consent is granted for this scheme it is essential that a Detailed historic building survey (level 3: internal and external elevations and plans, photographic and written survey and analysis) is undertaken prior to and during its demolition. This will be linked with an appropriate programme of archaeological works as outlined below.

West Craigs Farmhouse

Although unlisted West Craig Farm in my opinion is considered to be an important local survival of a Georgian Farmhouse dating from the period of Agricultural Improvement starting in the late 18th century. Although undoubtedly 'much altered' as Historic Scotland are quoted as saying in the EES since its construction (I would like to know what 200 year old building isn't!) this in my opinion combined does not distract from its local significance. Given the age of this building combined with the historic evidence suggesting that this is the last of a series of farm buildings going back to perhaps the 16th century the significance of its loss is considered more significant than that reported upon within Chapter 12 of Turley's ES.

Accordingly in my opinion the loss of this farmhouse is considered as having a significant adverse archaeological impact and is contra to planning policies E30 and ENV9. As such it is strongly recommended that the current scheme is amended and that this building is retained and reused as a focus for the new development.

However if consent is granted for its demolition it is essential that a Detailed historic building survey (level 3: internal and external elevations and plans, photographic and written survey and analysis) is undertaken prior to and during demolition of both the Steading and Farm House. This will be linked with an appropriate programme of archaeological works as outlined below.

Buried Archaeology

The archaeological evidence as detailed above and within Chapter 11 & 12 of Turley's supporting Environmental Statement demonstrates that the application site has the potential to contain a wide range of significant buried archaeological remains, principally relating to the development of West Craigs Farm from the medieval period but also prehistoric. The proposed development will require significant large scale ground breaking /engineering works which will have a significant affect upon any surviving buried remains and artifacts contained within the topsoil of the surrounding fields. However having assessed this impact I agree in principal with the conclusions of Turley's in that this proposed residential scheme is considered as having a moderate archaeological impact.

Accordingly it is recommended that a programme of archaeological evaluation is undertaken prior to the submission of further AMC or FUL applications. In essence this will require the undertaking of an archaeological evaluation (up to a maximum of 10% of the site) as proposed by Turley's (ES Chapter 11.4.3) but also linked with a

programme of metal detecting. The results of which would allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains prior to development including further metal-detecting prior to/during top-soil stripping.

Archaeological Public Engagement

Further given the potential importance of these remains in terms of the rural history of Edinburgh and in particular the local Craigs/South Gyle area it is considered important that the programme of archaeological works contain a programme of public/community engagement. The scope of this public engagement will be agreed with CECAS and informed by the results of the evaluation works but could include participation in the above mentioned metal detecting survey along with public lectures, viewing points, temporary interpretation boards etc.

It is therefore recommended that if consent is granted that in the following condition be attached to ensure that a programme of archaeological works is undertaken prior to/during construction.

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building survey, analysis & reporting, publication, public engagement & interpretation) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant..

Affordable Housing

1. Introduction

I refer to the consultation request from the Planning Department about this planning application.

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

o The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more.

o This is consistent with Policy Hou 7 Affordable Housing in the Edinburgh City Local Plan.

2. Affordable Housing Requirement

This application proposal is for up to 250 residential homes and as such the AHP will apply. The applicant has proposed that 25% of the homes on site will be affordable and we welcome this.

The applicant has indicated that the housing element of the proposed development is to include a mix of 2, 3, 4 and 5 bed houses and apartments.

We would welcome early discussions with the developer prior to a detailed planning application being submitted to ensure that the affordable housing element is delivered in accordance with the Council's Affordable Housing Policy.

This department requests that the approved affordable tenures to be provided on site follow the principles of tenure blind construction. They should also provide a representative mix of house types and sizes and be well integrated to provide a mixed sustainable community

3. Summary

Dependent on final site capacity, this proposal will deliver around 62 homes (25% of the site capacity) of approved affordable housing tenures making a contribution to Edinburgh's evidenced affordable housing need and is warmly welcomed by this department.

This department would request that the developer enter into early dialogue with the Council and Registered Social Landlords regarding the most suitable delivery mechanism for the affordable housing requirement.

The developer will be required to enter into a Section 75 legal agreement to secure these affordable homes

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

Flood Prevention

As discussed the applicant has not stated the number of houses which will be present within the development boundary and therefore we cannot request analysis is undertaken to determine detention pond sizing due to various assumptions which will have to be made which will likely mean abortive work is undertaken. With regards to this CEC Flood Prevention has no further comment to make at the PPP stage. The applicant has submitted a Level 1 flood risk assessment which satisfies the proposed development will not be at flood risk.

Can you please add the standard condition to your report to be applied at the full application stage? Suggested wording below:

The applicant will submit full details of the proposed drainage system to the satisfaction of the Head of Planning in advance of approval of the planning application.

In addition to the condition I would suggest the applicant discusses the proposed development with us in advance of submitting detailed information to ensure all

calculations, modelling etc. is undertaken to the standard required. We would welcome a pre-development meeting with the applicant to do this.

SEPA

Thank you for your consultation letter which SEPA received on 11 September 2014.

We have no objection to the proposed application. Notwithstanding this, please note the advice below.

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, which may take account of factors not considered at the planning application stage.

1. Drainage

Foul Drainage

1.1 The applicant is proposing to discharge foul drainage in a separate system arising from the development to the Scottish Water (SW) or Local Authority System. We also note that DIA has been submitted to SW and it has been outlined by Scottish Water has confirmed that there is sufficient stability within the existing infrastructure to accommodate the demands from the development.

Surface Water

1.2 The applicant is proposing to discharge surface water drainage arising from the development to the combined sewerage system, vested by Scottish Water (SW). We note that this will be by a separate system to the foul water discharge; this is to be welcomed and will allow the development in the future to connect to a separate surface water drainage system should this become available. .

1.3 It is SEPA's preference that surface water is returned to the water environment rather than the combined sewer. However, as the applicant has now proposed to discharge to the combined sewer then it is a matter for SW rather than SEPA.

1.4 It should be noted that SW only accepts surface water into a combined system in exceptional circumstances. Removing surface water from the combined sewer is beneficial as it, increases capacity in infrastructure for future development and reduces the risk of pollution events.

1.5 Additional advice for the applicant is detailed below under Section 4. Please note, we have not considered the water quantity aspect of the proposal. Comments from Scottish Water, where appropriate, the Local Authority Roads Department and the Local Authority Flood Prevention Unit should be sought on the SUDS strategy in terms of water quantity/flooding and adoption issues.

2. Potential Co-Location Issues

2.1 We would highlight that there is a Waste Management Licences site which is regulated by SEPA near the proposed development boundary (327901), this has previous been the subject of odour complaints. This potential co-location issue should be fully considered in the determination of the application.

3. Air Quality

3.1 We note that the development is located some distance from local amenities; therefore the number of journeys made by car is likely to increase. Whilst this figure may appear to be insignificant, when considered alongside other developments in Scotland, the cumulative increase in the distance travelled by car could undermine the Scottish Government's commitment to reduce emissions of greenhouse gases. The developer may therefore wish to consider options that would offset carbon emissions - such as the provision of electric charging points that would help to encourage the uptake of low carbon transport.

Detailed advice for the applicant

4. Surface water

4.1 The SUDS treatment train should be followed which uses a logical sequence of facilities in series allowing run-off to pass through several different SUDS before reaching the receiving water body. Well designed this can form part of a wider green network, contribute to the amenity of the site and promote biodiversity.

4.2 Further guidance on the design of SUDS systems and appropriate levels of treatment can be found in CIRIA's C697 manual entitled *The SUDS Manual*. Advice can also be found in the SEPA Guidance Note *Planning advice on sustainable drainage systems (SUDS)*. Please refer to the SUDS section of our website for details of regulatory requirements.

5. Construction Phase, Pollution Prevention

5.1 We note that the supporting material accompanying the application outlines that the construction phase will take due cognisance of any potential environmental effects during the construction phase. We would reiterate that construction works associated with the development of the site must be carried out with due regard to the guidelines on avoidance of pollution. Reference should be made to the relevant Pollution Prevention Guidance (PPG) Notes available on our website at www.sepa.org.uk and to the CIRIA publication C651 "Environmental Good Practice Pocket Book".

5.2 Any waste materials imported to the site during construction must be stored and used only in accordance with a waste management licence or exemption under the Waste Management Licensing (Scotland) Regulations 2011. Similarly, any waste materials removed from the site must be disposed of at a suitably licensed or exempt waste management facility in accordance with these Regulations.

5.3 The applicants and their contractors should also be fully aware of the relevant requirements relating to the transport of controlled waste by registered carriers and the furnishing and keeping of duty of care waste transfer notes.

5.4 We will duly expect the applicant to take all necessary measures are in place to ensure that pollutants typically associated with the construction phase of the project do not cause pollution of the environment, specifically the water environment.

5.5 We would therefore expect the applicant to install temporary drainage facilities, inclusive of good housekeeping arrangements to manage this aspect of the project. This is a legal requirement of the Controlled Activity Regulations.

Regulatory advice for the applicant

6. Regulatory requirements

6.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at www.sepa.org.uk/planning.aspx. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office.

Scottish Natural Heritage

Thank you for consulting us with the above PPP application and EIA on the 10 September 2014.

Position

This proposal, if delivered to appropriate standards and in accordance with submitted design principles and development framework, could provide a well integrated housing expansion to the west of Edinburgh, providing multi-functional green infrastructure with landscape, amenity and recreational benefits, connecting both through the site and beyond. Further detailed advice is provided below and we suggest that the Council closely considers the planning measures that may be necessary to enable successful delivery of the proposal, including the landscape and recreational proposals and all associated natural heritage mitigation.

Background

This is a strategically important site in terms of city expansion westwards, and one which will help set a precedent in design terms for the rest of the larger Maybury LDP allocation. This locally sensitive landscape requires a good approach to layout and design of housing and green infrastructure, with consideration of how the development edge, including the green infrastructure, might expand and connect to existing and future adjacent development. Although the Local Development Plan (LDP) is not yet finalised, we support the key issues and development principles that are set out for this allocation in the LDP.

Appraisal

It is noted that the PPP approval is for the principle of use and access arrangements only, with all other matters including layout, scale and landscape, for subsequent approval. The illustrative nature of the masterplan and proposed layouts is highlighted within the document.

The EIA assessment has been completed based on the design submitted and associated design principles and development parameters. It should be noted that any major changes from this may form a new application and require further EIA assessment.

Our advice is based on the assessment and design principles in this application, with recommendations on key aspects to be taken forward as the basis for any subsequent application.

Landscape and Visual, and Green Infrastructure

The proposal has built on the development principles contained within the LDP, producing a more detailed set of design principles and development framework for the site.

These principles, including the design approach for the site's green infrastructure, if successfully delivered to appropriate standards, could lead to multiple benefits for both people and nature and we therefore recommend that the key principles and framework for the site are taken forward and developed in more detail, namely:

- o *the various green networks and open space, including linear park and smaller green spaces, detention basins, 30m woodland edge and general tree planting through the site.*
- o *the design principles centred around active frontages onto the various open spaces, as well as future extension of the proposals and park to the west.*
- o *the various footpaths and cycleways to permeate through the site.*
- o *continued consideration of how this proposal, future proposals, and green infrastructure will connect and be permeable through future development phases of the wider Maybury allocation.*

The framework accords well with the Designing Street policy document, with permeability and good connectivity, especially for cycling and walking. The green infrastructure as proposed is clearly expressed in terms of its layout and intended function, and is well integrated with the overall design layout and connections. These areas will provide a positive environment for walking and cycling through the site, linking to areas beyond.

However, we recommend that consideration is given to any CAA requirements for this area. The submitted proposals do not seem to have considered CAA landscaping restrictions which might be in place, for example, by proposing fruit bearing trees to encourage birds and species rich detention basin habitats. We therefore recommend consultation with CAA to inform final design of SUDs basins and choice of tree and shrub species throughout the site and woodland edge.

We also recommend that further clarity on the content and long term financing of maintenance and management of the openspaces is important for the successful development of landscaping here, particularly in respect of connectivity with the wider LDP site.

With reference to the Landscape and Visual chapter of the EIA, the use of the term SPA is used throughout the landscape sections and assessment. It is assumed that this is an error, and that SLA (Special Landscape Area) is meant instead, as SPA is a nature conservation designation which does not make sense in this context.

Ecology

We are satisfied with the results and conclusions of the species surveys and advise that no protected species licences will be required.

Edinburgh Airport

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the conditions detailed below:

Height Limitation on Buildings and Structures

No building or structure of the development hereby permitted shall exceed 9m.

Reason: Development exceeding this height would penetrate the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger aircraft movements and the safe operation of the aerodrome. See Advice Note 1 'Safeguarding an Overview' for further information.

Height Limitation on Trees & Shrubs - Application Site

No existing individual trees, shrubs or stands of trees and shrubs on the application site and no trees and shrubs planted on the application site as part of the approved landscaping scheme shall be permitted to grow above a height of 9 metres.

Reason: If trees or shrubs exceed this height they will penetrate the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger the movements of aircraft and the safe operation of the aerodrome.

Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority. The submitted plan shall include details of:

- monitoring of any standing water within the site temporary or permanent*
- sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>).*
- management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached.*
- reinstatement of grass areas*
- maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow*
- which waste materials can be brought on to the site/what if any exceptions e.g. green waste*
- monitoring of waste imports (although this may be covered by the site licence)*
- physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste*
- signs deterring people from feeding the birds.*

The Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Planning Authority.

Reason: It is necessary to manage the development in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Edinburgh Airport.

Submission of SUDS Details

Development shall not commence until details of the Sustainable Urban Drainage Schemes (SUDS) have been submitted to and approved in writing by the Planning Authority. Details must comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS). The submitted Plan shall include details of:

- Attenuation times*
- Profiles & dimensions of water bodies*
- Details of marginal planting*

No subsequent alterations to the approved SUDS scheme are to take place unless first submitted to and approved in writing by the Planning Authority. The scheme shall be implemented as approved.

Reason: To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)' (available at <http://www.aoa.org.uk/operations-safety/>).

We would also make the following observations:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues'.

Lighting

The development is close to the aerodrome and the approach to the runway. We draw attention to the need to carefully design lighting proposals. This is further explained in Advice Note 2, 'Lighting near Aerodromes' (available at <http://www.aoa.org.uk/operations-safety/>). Please note that the Air Navigation Order 2005, Article 135 grants the Civil Aviation Authority power to serve notice to extinguish or screen lighting which may endanger aircraft.

We, therefore, have no aerodrome safeguarding objection to this proposal, provided that the above conditions are applied to any planning permission.

As the application is for planning permission in principle, it is important that Edinburgh Airport is consulted on all reserved matters relating to siting and design, external appearance (including lighting) and landscaping.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Edinburgh Airport, or not to attach conditions which Edinburgh Airport has advised, it shall notify Edinburgh Airport, the Civil Aviation Authority and the Scottish Ministers as specified in the Safeguarding of Aerodromes Direction 2003.

Environmental Services

The application site is currently an open space to the west of Maybury Road bounded to the north by Craigs Road, to the south-west by West Craigs Industrial Estate and to the south by housing in West Craigs Crescent. There is an existing house and steading and some cottages within the development area. To the east of Maybury Road there is further housing in East Craigs Rigg that is within 100 m of the application site.

Local Air Quality

Environmental Assessment raised concerns regarding the potential impacts this development may have on local air quality. Traffic generated by the development will add to existing high traffic flows on Maybury Road, Glasgow Road and Queensferry Road. There is also a composting facility located approximately 350 m north-west of the application site which is a potential source of dust and odour emissions. It's noted that there are one hundred existing residential properties along stretches of these roads within 1 km of the site. The applicant has therefore submitted a supporting air quality impact assessment which has considered the potential impacts from construction activities at the application site, the impacts of emissions of traffic generated by the proposed development once operational and the cumulative impact of emissions of traffic generated by the proposed development and other planned development in the local area that is likely to impact on traffic flow on the same routes. The air quality impact assessment has been carried out based on 250 residential units being developed within the application site.

Local Authorities undertake air quality monitoring in order to meet its duties under Part IV of the Environment Act. This includes measurements of Nitrogen Dioxide (NO₂) at various locations across the city using diffusion tubes including some of which are within 2 km of the development site. The NO₂ diffusion tube measurements from across Edinburgh show high concentrations exceeding the 40 $\mu\text{g}/\text{m}^3$ annual mean objective are present next to busy roads, particularly within street canyons. In the vicinity of the proposed development site, exceedences have been recorded on the Glasgow Road and at the Barnton junction. Annual mean concentrations at other locations around the Barnton junction are below the objective level. The applicant predicts that concentrations of NO₂ within the application site closest to Maybury Road would be lower than at the nearest monitoring site at 158 Glasgow Road and at the Barnton junction due to the lower traffic flow along the A902 than along the A90 or A8 and the greater distance of the application site from the junctions of the A902 with the A90 and A8.

The air quality impact assessment shows that the annual mean objective for NO₂ is likely to be met at all receptor locations. However, the annual mean objective for Particulate Matter (PM₁₀) may not be met at two receptors near the Maybury junction. The applicant states that the traffic from the proposed development makes no perceptible difference to concentrations of PM₁₀ at these locations and will not significantly affect whether or not the objective is achieved.

If consented the operational phase of the development will cause increases in local traffic at a level which will give rise to imperceptible increases in concentrations of PM₁₀ and NO₂ at roadside locations on affected roads. The significance of these changes has been deemed negligible, even at roadside properties on the Glasgow Road and at the junction of Maybury Road with Queensferry Road where existing concentrations of PM₁₀ and NO₂ may be close to the relevant annual mean objectives. Therefore the proposed development on its own will not have an adverse impact on local air quality.

Cumulative Impacts

In addition to the proposed development at West Craigs, there is provision in the Local Development Plan for further 1450 - 1750 residential properties at Maybury and 500-700 new residential properties at Cammo.

In addition to this "Special Economic Development Areas" have been identified north of the Glasgow Road at the Royal Bank at Gogarburn and at the Royal Highland Centre. Although each planning application must be considered on its own merits, within the confines imposed by national, regional and local policies in circumstances such as this it presents difficulties when developments are permitted sequentially, with each individually having only a relatively low polluting potential, but which cumulatively result in a significant worsening of air quality.

All of these potential developments will cumulatively generate additional traffic on the local network leading to an increased risk that the air quality objectives for PM10 and NO2 will not be met in the immediate vicinity of the junctions of Maybury Road with Queensferry Road and the Glasgow Road. The potential cumulative impact of already committed development plus the residential development at Cammo has been modelled by the applicant and the output of the model states that the annual mean objective for NO2 is likely to be met at all the receptor locations allowing for the cumulative effects of committed development and the proposed development at Cammo as well as this proposed development.

However, it also highlights that the annual mean objective for PM10 may not be met at all the receptors once the committed development and the development at Cammo are operational with or without the additional traffic associated with the proposed development. The assessment shows that the objectives may not be met at two receptors that are particularly close to Maybury Road and two receptors that are particularly close to Glasgow Road. This proposed development on its own does not make a significant difference to whether the PM10 objective is met at these locations however the cumulative impacts as described above if fully developed out will have a 'slight adverse' impact at a number of receptor locations.

Composting

The existing composting site north-west of the application site is located approximately 350m from the boundary of the application site. In 2012 the site handled 32,259 tonnes of household and commercial waste. The site is regulated by Scottish Environment Protection Agency (SEPA) and is required to control emissions of dust and odour.

It should be noted that Environmental Health Officers have received odour complaints from existing residential properties which are located approximately 500m of the composting site boundary. Complaints are referred onto SEPA as they are the regulator.

This separation distance between composting operations and the proposed residential properties is greater than the minimum of 250m that is outlined in Environment Agency Position Statement on Composting (Environment Agency, 2009) in relation to the permitting of new composting operations. This separation distance is also recommended in the Scottish Planning Policy (and draft reviewed SPP) in regards to outdoor composting facilities and residential developments. Therefore in accordance with the guidelines the separation between the composting facility and the application site should be sufficient to protect future residents in relation to any adverse health effects that might arise as a result of bio-aerosol emissions.

The separation between the composting site and the application site should also be sufficient to protect future residents from odour nuisance during normal operation of the site, although a failure in the management of odour emissions from the site combined with a north-westerly wind could lead to odour nuisance arising.

Contaminated Land

Environmental Assessment has assessed the report entitled: Stage II Ground Investigation: Ironside Farrer: June 2014: 8203.

With reference to the findings of the investigation and Summary of Risk Assessment (Section 8.3) it is accepted that potential risks to the development arising from land contaminants can be considered to be of LOW to MEDIUM classification. It is noted that potentially localised risks from hydrocarbon based contamination are identified in the vicinity of the tank area and made ground associated with the farm steading area. It is considered that the hydrocarbon contamination identified in the tank area will require further delineation as part of a formal remediation strategy. Furthermore, the assessment concludes that 'remediation works will be driven by the finalised earthworks scheme'. Therefore, Environmental Assessment can recommend the following condition to ensure any potential risks from land contaminants are appropriately remediated and the land in question can be determined to have been made suitable for the proposed use:

a) *Prior to commencement of any works on site:*

With reference to recommendations given in Section 8.4 'Remediation/Mitigation Measures' of the report: 'West Craigs, Maybury: Stage II Ground Investigation: Ironside Farrer (June 2014): 8203'; a detailed schedule of required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.

b) *Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.*

Noise

Environmental Assessment raised concerns regarding the potential noise impacts from the A902. Details of mitigation will be required during the detailed stage. This must be submitted in the form of a noise impact assessment which details exactly what mitigation measures are required. The site is outside the noise contours for the airport therefore we will not require this aspect to be further investigated.

Therefore Environmental Assessment offers no objection to this application subject to the following conditions;

Conditions

1. *Prior to the commencement of construction works on site:*

(a) *A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*

(b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning

Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.

2. The development shall not commence until a scheme for protecting the residential properties hereby approved from noise from the A902 has been submitted to and approved in writing by the Head of Planning; all works which form part of the approved scheme shall be completed to the satisfaction of the Head of Planning before any part of the development is occupied.

Informative

The scheme will be designed in accordance with BS8233:2014 'Guidance on sound insulation and noise reduction for buildings - Code of Practice' to attain the following internal noise levels:

Bedrooms - 30dB LAeq, T and 45dB LAfmax
Living Rooms - 35 dB LAeq, D

T - Night-time 8 hours between 2300 - 0700
D - Daytime 16 hours between 0700 - 2300

Location Plan



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