

# Development Management Sub Committee

Wednesday 4 November 2015

**Application for Planning Permission 14/04880/FUL  
At Land 196 Metres South Of 49, Burdiehouse Road,  
Edinburgh  
Proposed residential development of 211 new houses and  
flats with associated infrastructure (as amended).**

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| <b>Item number</b>   | 6.1                      |
| <b>Report number</b> |                          |
| <b>Wards</b>         | A16 - Liberton/Gilmerton |

## Summary

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The proposal is contrary to the Edinburgh City Local Plan in terms of the development of a site in the green belt. However, the Second Proposed Local Development Plan allocates this site for housing and provides a site brief for the development of this site. The application has been assessed in terms of its impact on amenity, infrastructure and the landscape and with appropriate mitigation, the development is acceptable. There are no material considerations which outweigh this conclusion.

## Links

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|---|--|
| <a href="#"><u>Policies and guidance for this application</u></a> | LPC, CITD1, CITD2, CITD3, CITD4, CITD5, CITD6, CITD8, CITD10, CITE10, CITE11, CITE15, CITE17, CITE18, CITOS3, CITH2, CITH3, CITH4, CITH7, CITCO2, CITT2, CITT4, CITT5, CITI6, LDPP, PLDP01, PLDP06, PLDP07, PLDP08, PLDP09, PLDP10, PLDP11, PLDP12, PLDP13, PLDP14, OTH, NSGD02, |
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# Report

## **Application for Planning Permission 14/04880/FUL At Land 196 Metres South Of 49, Burdiehouse Road, Edinburgh Proposed residential development of 211 new houses and flats with associated infrastructure (as amended).**

### **Recommendations**

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

### **Background**

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#### **2.1 Site description**

The site extends to approximately 7.4ha and comprises two separate development areas located east of Burdiehouse Road.

Area A is bounded by Burdiehouse Road to the west, the Burdiehouse Valley Park and Burdiehouse Burn to the north, the Burdiehouse Phase 1 development to the north east, and open fields to the south and south east.

Area B is bounded to the west by the Burdiehouse Phase 1 residential development (currently under construction), the Burdiehouse Valley Park and Burdiehouse Burn to the north, an existing residential area to the east and open fields to the south.

In addition, the existing SUDS feature is shown within the red line boundary of the application site, although no development is proposed here.

Whilst the site is predominantly open agricultural landscape (with the exception of the approved adjoining residential development at Burdiehouse Phase 1), there are a number of buildings and other structures located in close proximity, including the category B listed limekilns (HB number: 28159, listed on 14 December 1970) located immediately to the south, a neighbouring residential property (55 Burdiehouse Road) and electricity pylons on the southern edge of the site. Two further houses and the category B listed Burdiehouse Mains Farmhouse and Steading (HB number: 28160, listed on 4 October 1986) are located immediately to the north of the site, and the Murrays residential area is located to the north east. Burdiehouse Burn Valley Park and Local Nature Conservation site containing the Burdiehouse Burn is situated immediately north of the site. The site undulates throughout and falls away to the north towards the Burdiehouse Burn.

The site and surrounding area form part of the Edinburgh Green Belt. In addition, the Burdiehouse Burn Park Local Nature Reserve is located immediately north and north east of the site. This part of the site is also an area of importance for flood management within the Edinburgh City Local Plan.

The site is close to bus stops on Burdiehouse Road which provide services north into the city centre and south to Straiton Retail Park and beyond.

## **2.2 Site History**

### **Introduction**

Planning permission in principle (PPP) was refused (application reference: 10/01185/PPP), however, this decision was overturned at appeal (appeal reference: PPA-230-2047). As a result of that decision, and the requirement to provide an effective supply of land for housing, the parts of the site associated with this application were included in the proposed Local Development Plan.

### **Applications**

22 September 2010 - planning permission in principle was refused for residential development (including affordable housing provision), open space, structure planting (including woodland and scrub) and access junction and road alignment (application number 10/01185/PPP). Reasons for refusal were:

- Inappropriate use on the green belt, contrary to Structure Plan policy Env 10;
- The presumption against the development of greenfield sites;
- The proposal does not adequately protect the green belt's open setting and identity;
- The impact on the open landscape setting of the category B Listed Burdiehouse Limekilns, an important local landscape feature;
- The proposal would lead to coalescence, and
- The loss of prime agricultural land.

10 February 2012 - the above planning permission in principle was granted on appeal (appeal reference: PPA230-2047).

The parameters plan submitted in support of the PPP application indicated that although the total site area was 19.6 hectares, the total development area was only 4 hectares with a capacity of approximately 100 units. This was due to the inclusion of a substantial wedge of planting along Burdiehouse Road, as well as tree planting along the southern and eastern boundaries.

Following the appeal decision, the site was allocated for residential development within the first proposed Local Development Plan, including the areas of land previously proposed to be covered by tree planting as shown in the PPP parameters plan.

29 May 2013 - approval of matters specified in conditions approved for access road (application number: 13/00273/AMC).

12 June 2013 - minded to grant section 42 application to vary condition 1 of 10/01185/PPP to increase the maximum building heights (application number: 13/00673/FUL).

12 June 2013 - minded to grant section 42 application to vary condition 1 of 10/01185/PPP to modify the structural planting (application number: 13/00944/FUL).

12 June 2013 - approval of matters specified in conditions approved for 122 houses and flats (application number: 12/04385/AMC).

17 April 2013 - application for planning permission in principle to develop petrol filling station and electric vehicle charging station, including ancillary shop on adjacent land fronting Burdiehouse Road. Refused at appeal. (application number: 13/01259/PPP).

6 November 2013 - approval of Matters Specified in Condition 2k of Application 10/01185/PPP approved (application number: 13/03048/AMC).

## **Main report**

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### **3.1 Description Of The Proposal**

Full planning permission is sought for the erection of 211 residential units (including 25% on-site affordable provision of 52 units). This involves the development of 86 houses and flats at area A (adjacent to Burdiehouse Road) and 125 units at area B (adjacent to the Murrays).

The residential units comprise 148 houses and 63 flats. The houses comprise two storey terraced, semi-detached and detached units. The flats are located around the main entrance from Burdiehouse Road and are three and four storeys in height. The affordable units comprise mainly of the flats but also include some houses. The breakdown of affordable units is: seven terraced houses with three bedrooms; two semi-detached houses with three bedrooms; 35 flats with two bedrooms and; eight flats with one bedroom.

Materials for the houses are proposed to be reconstituted stone and dry dash render for the external walls and recycled uPVC windows and doors, with concrete tile roofs. The flats are proposed to be finished in render with reconstituted stone panels and a similar grey roof tile.

Access for cars is taken from Burdiehouse Road over the main spinal route through the site. This main route is proposed to be tree-lined and contains a footway for pedestrians, separated from the road by a grass strip. Pedestrian and cycle access is proposed to be taken from Burdiehouse Road, however a separate path through the site can be taken via a footway through the landscape buffer to the south of the site. Due to land ownership issues, there is no through-route to the adjacent Murrays development proposed as part of this application, however, the road has been designed to accommodate buses if this were to happen in the future.

Parking for the flats is located in courtyards to the rear of the units, where there are 81 spaces allocated for the flats and semi-detached units at the western entrance of the site. Cycle and refuse storage is provided for each block. There is 100% cycle parking provision for the flats within secure cycle stores. Parking for the houses is provided at a rate of 1-2 spaces per unit, depending on the size of unit. There are also junction improvements proposed at the entrance of the site from Burdiehouse Road and it is proposed that the Kaimes junction is upgraded to address the cumulative impact of the developments in the wider area.

Open space is proposed in the form of several small courtyards throughout the development, with a large area of open space to the north. There are also areas of landscaping between the proposed flats and Burdiehouse Road.

### Previous Schemes

The development has undergone several minor changes through the course of the assessment, including changes to the layout of some of the units, changes to the design of the flats, changes to the orientation of some units and changes to the SUDS. The general form of the proposed development has remained unaltered.

### Supporting Information

The following documents were submitted in support of the application:

- Drainage Strategy;
- Ecology Report;
- Pre-application Consultation Report;
- Planning Statement;
- Air Quality Assessment;
- Transport Assessment;
- Surface Water Management Plan;
- Mineral Assessment, and
- Tree Survey.

These documents are available to view on the Planning and Building Standards Online Services.

## 3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Do the proposals comply with the development plan?

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

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

## 3.3 Assessment

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

- a) the principle of residential development is acceptable;
- b) there are any infrastructure constraints;

- c) the development will have an adverse impact on the landscape;
- d) the scale, design and materials of the proposed development is acceptable;
- e) there is sufficient amenity for existing neighbours and future occupiers;
- f) the proposal will affect local biodiversity or ecology;
- g) the proposal will raise drainage, flooding, ground stability or contamination issues;
- h) the proposal will have any impact on air quality;
- i) the proposal will have any transport, access or road safety implications;
- j) the development will have any adverse impact on any archaeological remains;
- k) the affordable housing proposals are acceptable;
- l) the proposal will meet sustainability criteria;
- m) the proposal will have any equalities or human rights impacts; and
- n) the comments raised by third parties have been addressed.

#### **a) The Principle of the Development**

##### **Scottish Planning Policy (SPP) (2014)**

Scottish Planning Policy (SPP) (2014) accepts there may be appropriate circumstances to justify development in the green belt. It states that where a development plan is out-of-date, a presumption in favour of sustainable development will be a significant material consideration. It also states that where there is a shortfall in the five year effective housing land supply, the development plan will not be considered up-to-date. Effective land supply is the part of the established housing land supply which is free (or expected to be free) of development constraints in the period under consideration and will therefore be available for the contribution of housing.

The methodology for measuring the adequacy of the effective housing land supply is under consideration by SESplan. However it is accepted that there is currently a shortfall in Edinburgh. Accordingly, development plan policies on the supply of housing land are not up-to-date and SPP's presumption in favour of sustainable development is an important material consideration which must be afforded significant weight.

Paragraph 110 of SPP states that the planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a five-year supply of effective housing land at all times;

- enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

The inclusion of Burdiehouse as a housing site in the Second Proposed Local Development Plan accords with the requirements of SPP as it is an effective housing site and will enable the delivery of an allocated site within a five-year period. The merits of the design and layout of the proposal is discussed below, however it is concluded that this site accords with the principles of SPP.

## **Windfall Sites**

In meeting the housing land requirement, the Council is relying on substantial windfall development on top of the base land supply and strategic allocations made in the proposed plan. The SDP assumed around 5,000 windfall completions in Edinburgh up to 2024. The Housing land study, carried out to support the proposed plan, assumes 5,200 completions on windfall sites to 2024. The contribution of windfall sites as well as LDP allocated sites is a necessary part of meeting our housing land requirement. Therefore, granting consent for windfall sites does not negate the requirement to allocate additional sites to meet the land supply.

Further to this, granting planning permission for a windfall site does not automatically make a site part of the effective land supply. The Council is required to maintain a five year supply of effective housing land at all times and currently this is not the case. Therefore, this site is important in meeting the Council's housing land requirement as an allocated LDP site.

## **Strategic Development Plan (SDP/SESplan)**

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

Although this site lies within the South East Edinburgh Strategic Development Area (SDA), it does not mean that all land within the SDA is suitable for housing development in principle. Paragraph 46 of the SDP confirms that the scale of any additional housing allocations will be determined through local development plans (LDPs) following the preparation of SESplan supplementary guidance taking into account environmental and infrastructure constraints. The SDP requires the definition in LDPs of a green belt around Edinburgh for a number of stated purposes. Several areas of significance to the Edinburgh Green Belt lie within the South East Edinburgh SDA, and SDP Policy 1A requires LDPs to take account of such environmental constraints. A comprehensive assessment of all available greenfield land in South East Edinburgh was undertaken to inform the Proposed Local Development Plan (set out within the Revised Environmental Report, March 2013 and Second Revision, June 2014). It forms part of the Strategic Environmental Assessment of the Local Development Plan and provides an assessment of significant negative or positive effects that land use change and development may have on the environment.

This site is categorised as 'East of Burdiehouse Road' in the Housing Site Assessment in the Environmental Report (Revised June 2014). The overall assessment of this site finds that it has potential to accommodate development, subject to additional planting in order to establish a clearly defined new green belt boundary. This is reflected in the layout of the current development proposal.

Scottish Planning Policy (SPP) 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. The housing site assessment criteria (as noted above) reflect the criteria included within policy 7 and concludes that the site is suitable for development. The criteria are further examined below, however, at this stage, it can be concluded that the proposal complies with Policy 7 of the SDP.

There is currently a shortfall in the five year effective land supply. The Second Proposed Local Development Plan (LDP) identifies sites to meet the SDP housing requirements and this site is an important contributor to address this shortfall.

Therefore, the proposal is in accordance with the aims of the Strategic Development Plan.

### **Adopted Edinburgh City Local Plan (ECLP)**

As the site lies within the green belt, policy Env 10 is relevant to the assessment of the proposal. The north western edge of the site is an 'Area of Importance for Flood Management' under Policy ENV17 and a Local Nature Conservation Site under Policy ENV15 is located to the north along the Burdiehouse Burn.

Criterion a) of Env 10 states that development in the green belt will not be permitted except for the purposes of agriculture, woodland and forestry, or for a countryside recreational use that is compatible with an agricultural or natural setting. The proposal for residential development does not conform with the above uses and as such does not comply with criterion a) of Env 10.

Criteria b) and c) apply only to existing buildings and existing non-conforming uses within the green belt and are therefore not relevant in the assessment of this application.

In addition to being contrary to green belt policy, the proposal does not comply with policy Hou 1 (Housing Development). Criterion d) of Hou 1 specifies that housing development will be permitted on other suitable sites within the urban area, if proposals are compatible with other plan policies. This site is not within the urban area and therefore does not comply with Policy Hou 1.

To summarise, the proposal does not comply with Edinburgh City Local Plan policies Env 10 and Hou 1.

## **Second Proposed Local Development Plan (LDP)**

The Second Proposed LDP allocates this site as housing site HSG22. The northern edge of the site remains an 'Area of Importance for Flood Management' under Policy ENV21 and a Local Nature Conservation Site to the north remains under Policy ENV15.

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.

There were 38 representations to this site (proposal HSG22), the majority of which were objecting to the principle of development and requesting that the proposal be removed from the plan. The representations were mainly from individuals with one from the local Community Council. Other representations related to detailed considerations such as drainage, transport and infrastructure constraints. Having regard to all the representations received, the site remains an appropriate housing site and is being progressed through the Second Proposed LDP.

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 and the LDP is now under examination by the Scottish Ministers.

As noted above, the site is identified as a housing proposal in the Second Proposed LDP. The application is therefore in accordance with policy Hou 1a) (Housing Development), which supports development on sites allocated in this Plan to meet strategic housing requirements.

The application proposes 211 dwellings which is within the capacity range stated in the Second Proposed LDP when considered with the already consented scheme (the total numbers would be 333, within the capacity range of 250-350 units on site).

The Second Proposed LDP contains site briefs for each of the new housing allocations. The application broadly complies with the development principles set out in the Brief, including the provision of an active frontage onto Burdiehouse Road and improvements to the woodland.

Therefore, the proposal is in accordance with the provisions of the Second Proposed LDP.

### **Other Material Considerations**

Planning permission in principle (PPP) was sought for this site in 2010 (application reference: 10/01185/PPP). Following the refusal of this application, a subsequent successful planning appeal established the principle of residential development on this site (appeal reference: PPA-230-2047). As a result, the site was allocated for residential development within the first Proposed Local Development Plan, including the areas of land previously proposed to be covered by tree planting as shown in the PPP parameters plan.

Therefore, the principle of developing this site was established through the successful appeal.

## **Policy Conclusion**

In conclusion, the principle of developing this site was established through the previous appeal decision for Planning Permission in Principle (10/01185/PPP and PPA-230-2047) and subsequent applications for matters specified in conditions relating to the Phase 1 part of the site.

However, since this application is for full detailed planning permission and the extent of the development is larger than that of the PPP, it requires to be assessed against the development plan. Although the development is contrary to policy Env10 in the ECLP and is therefore a departure from the adopted Local Plan, Scottish Planning Policy and the Strategic Development Plan require a five year effective land supply to be maintained at all times. 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 21 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) Infrastructure Constraints**

The two main infrastructure issues relating to this site are transport and education.

The Second Proposed Action Programme (Updated May 2015) accompanies the Second Proposed LDP and sets out how the authority proposes to implement the LDP by aligning its delivery with corporate and national investment in infrastructure. The Action Programme sets out actions to help mitigate the impact of strategic and planned growth and to deliver the policies and proposals identified in the Proposed Plan.

This site is identified as being within the South East Strategic Development Area. Within this area, there are site-specific actions identified for this application site. In relation to transport, there is a requirement to reconfigure the Kaimes junction to ease congestion for north/south traffic.

The estimated cost for this junction upgrade is approximately £500,000 and this is proposed to be met by the developers for both this application site (HSG 22) and the Broomhills site (HSG21, application reference: 14/04860/FUL).

In relation to Education, there are two options for actions. Option one is the provision of new primary schools at Gilmerton and Broomhills. There is also a need for additional capacity at the catchment secondary schools (Liberton High School or Gracemount High School) although further detailed assessment is required to determine where the additional capacity is best provided. Option two is the provision of extensions onto the existing primary schools (Gracemount, Gilmerton and possible extensions to Liberton and Craigour Park if required due to catchment changes). The contributions levels have not yet been established for option two but the levels of contributions are anticipated to be less than option one.

In terms of contributions, the applicant has confirmed that they are willing to meet the required financial contribution required in the Action Programme for both transport and education. This will mitigate any infrastructure impacts in the wider area and is supported.

### **c) The Impact on the Landscape**

The impact of the proposed development on the landscape requires consideration of its effects on (i) the landscape character and resources and (ii) visual amenity. Landscape impacts describe the effects of the proposals on the physical character and quality of the landscape. Visual impacts describe the effects of the development on visual receptors such as existing local residents, walkers and road users.

In terms of the impact of the development on the landscape character and visual amenity, the site is currently dedicated to agricultural production and has a strong visual connection with the undulating countryside surrounding it and the Pentland Hills beyond. The site benefits from well-established tree groups which serve to create visual separation from adjacent areas as well as promoting a high-quality urban fringe character, particularly when viewed from the south looking northwards. The electrical switching station already has a significant visual impact on much of the surrounding land and is visible by road users along the bypass, as well as the A701 Burdiehouse Road and Frogston Road. People walking in the Pentland Hills or along the Burdiehouse Burn, viewing the site from the south also have their views governed by the large scale electrical infrastructure which runs across the skyline adjacent to the southern boundary of the site.

The current landscape character of the site is a landscape disjointed by electrical and transport infrastructure but which benefits from exceptional views across to the Lothians and the Pentlands Regional Park. The landscape and visual impact of the proposed development requires consideration against this character and within the context of the surrounding suburban context.

While a development of this scale will change the existing landscape character and setting of the city, the site has the landscape capacity for residential accommodation of an appropriate style and density. The visualisations show a development aligned with the contours of the land and structured by layers of tree planting and greenspace. Views across to the Limekilns will be maintained by breaks in development.

Overall, the landscape impact of the development has been assessed. With the existing planting under phase 1 coupled with the proposed landscape mitigation measures as part of the current proposals, the development is acceptable.

#### **d) The Scale, Design and Materials**

In assessing the scale and form of the proposal, policies Des 1 and Des 3 of the ECLP provide a robust framework for assessing design quality. The site is also covered by the Burdiehouse Site Brief within the Second Proposed LDP.

Policy Des 1 states that planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a high quality, sustainable living environment. In terms of assessing this proposal against policy Des 1, the surrounding built environment is a mix of heights, styles and age with varying materials. The proposed mix of unit types and sizes will provide for a range of users and would contribute to the creation of a varied and sustainable place. In addition, the layout of the proposed development would contribute towards the existing quality and character of the immediate and wider environment by having a similar spatial form to surrounding areas of the Murrays and Southhouse and would provide pedestrian permeability through the site towards the new woodland paths to the south.

Policy Des 3 states that developments should have a positive impact on their setting having regard to the positioning of buildings on the site, their height, scale and form, materials and detailing and wider townscape and impact on views. In assessing the development against Des 3, there are several other examples within the locale (particularly along Burdiehouse Road) where the heights of the buildings vary and it is not uncommon throughout the wider area to see a range of building heights in adjacent buildings. Within the streetscape, the existing views to the Limekilns would be maintained. In terms of materials, the developer is proposing to use reconstituted stone and dry dash render for the external walls and recycled uPVC windows and doors, with Marley Modern profile mock bond on the roofs of the houses. For the flats, the external materials are proposed to be render with reconstituted stone panels and a similar tile for the roof. Although these materials will be secured by condition, they are commensurate with the existing Phase 1 site and reflect the materials of the existing established housing areas of Southhouse and Burdiehouse. Therefore, these materials are acceptable.

The Burdiehouse Site Brief requires that an active frontage is provided along Burdiehouse Road, where there is an opportunity to change the character of Burdiehouse Road through street design and creating a residential frontage. The key development principles of the Brief are:

- Vehicular access to be taken from Burdiehouse Road with no vehicular route from Lang Loan;
- Opportunity to change the character of Burdiehouse Road through street design, to enable and improve path connections across Burdiehouse Road, provide street verges and trees and create residential frontage with a reduced speed limit;

- The site layout must enable a bus route to be formed providing a link from The Murrays to Burdiehouse Road, regulated by a bus gate;
- An active frontage must be provided onto Burdiehouse Road, incorporating streetscape enhancements; and
- 30 metre wide tree planting to the southwest of the site to form a new green belt boundary to the west of Burdiehouse Limekilns.

In terms of the assessment of this proposal against the Brief, vehicular accesses are in accordance with the Brief. Although there is a desire to have a bus link connecting the site to the Murrays, the intervening land is not within the control of the applicant and the Council are currently investigating the possibility of acquiring this land. However, the development proposals show that the link is possible and the main spine route through the site has been designed to accommodate buses. In terms of the active frontage, the proposed flats address the street while maintaining an appropriate level of amenity for new residents.

The proposals were presented to the Edinburgh Urban Design Panel prior to the submission of the application. The Panel noted that the proposed design approach of creating a 'gateway' to the site may not create a suitable frontage to Burdiehouse Road and suggested that the siting of the higher development could be more easily accommodated on the northern part of the site. A concern was also raised with respect to the amenity of these flatted units adjacent to the main road. The Panel noted the importance in providing a substantial landscape buffer which it understood formed part of the phase 1 works. Also, the proposal should retain views back to the historic limekilns. The Panel also recommended that an architectural response should be developed which provides character and creates a scenes of place.

In assessing this proposal against the comments made by the Panel, the location of the flats on Burdiehouse Road is in accordance with the Brief contained in the Second Proposed LDP where there is a desire to provide an active frontage and residential frontage. While the Panel's suggestion is a valid approach, the proposal as submitted would create an appropriate urban edge on the approach to the City.

With regards to the limekilns, views from Burdiehouse Road are already obscured and would not be made worse under the current proposals.

In terms of creating a sense of place, the applicant has proposed to provide opportunities for social interaction through the use of small pockets of open space dispersed throughout the site. The substantial landscaping and permeability through the site also provides the development with a sense of place.

Overall, the proposals integrate new homes with the existing townscape and landscape setting, whilst enhancing important approaches to the city through street design.

#### **e) The Amenity of Neighbours and Future Occupiers**

## **Amenity of Neighbours**

The site is separated from the adjacent properties within Burdiehouse Mains Farm Steading by a private road and a landscape buffer. There are no implications on privacy or daylighting and sunlight from the proposed development on the existing properties.

## **Amenity of Future Occupiers**

The mix of unit sizes and house types has a significant impact in ensuring a varied and sustainable community. This mix should respond to the differing needs of residents, immediate site conditions and to citywide objectives. The Edinburgh Design Guidance states that in schemes with 12 units or more, 20% of the total number of homes should be designed for growing families. These types of homes should have three or more bedrooms, have good levels of storage and have direct access to private gardens (for example via patio doors or private external stairs) or safe play areas for children.

This proposal offers almost 66% of properties across the site with three or more bedrooms. These are in the form of terraced, semi-detached and detached houses and are proportioned with at least 81 square metres of internal floor areas, as per the guidance. There is adequate storage within these properties and they benefit from direct access into a garden. In addition, the site has been designed on an urban block basis, where the majority of houses are separated by back gardens of 9 metres. The development will provide a minimum of an 18 metre window to window distance and therefore sufficient privacy is afforded between properties. The properties have also been positioned within the site to ensure that there are no issues with daylighting and sunlight. The properties on the southern and eastern edges of the development have been repositioned to allow for passive surveillance of the wooded areas and provide a greener outlook.

In terms of the flats, there are eight single aspect flats. These comprise the one-bedroom flats, however, due to their orientation and size of windows into the living spaces, these flats will receive adequate amounts of sunlight and daylight in accordance with the Edinburgh Design Guidance. The two-bedroom ground floor units benefit from direct access to a small private garden. There is adequate amenity space for the flats in line with the Edinburgh Design Guidance and they benefit from being set within a landscape that has been designed to maximise the amount of amenity afforded to them. Specifically, the flats that front onto Burdiehouse Road have been set back to allow for tree planting and a hedge boundary which provides a private garden space for the ground floor flats. There are additional areas of amenity adjacent to Burdiehouse Road and to the rear of the units.

With regards to the affordable housing, these homes are proposed to be a mixture of flats and houses which would be provided using the principles of tenure blind construction. The homes are proposed to consist of varying house types and sizes and will be made up of one, two and three bedroom homes.

The units meet the minimum space standards as set out in the Edinburgh Design Guidance (52 square metres for one bedroom dwellings, 66 square metres for two bedroom dwellings and 81 square metres for three bedroom dwellings) with the exception of the mid-terraced three bedroom units, however these units represent a minor infringement on these standards of 6 square metres and taking the range and styles of all the properties into account, this is acceptable in this instance.

The planning application is accompanied by an Environmental Noise Report (December 2014), which considers likely effects from road traffic and nearby electricity transmission pylons on residential amenity within the proposed development. The Environmental Noise Report states that the proposed development site has the potential to be impacted by noise from road traffic, mainly on Burdiehouse Road and the City Bypass. The Environmental Noise Report concludes that noise impacts from adjacent electricity pylons would be much less significant than road traffic however cannot be quantified because the high background noise from the Bypass masks other noise sources. The Report recommends a minimum specification of noise insulation within the proposed dwellings to provide a reasonable level of amenity protection within habitable rooms, thereby avoiding sleep disruption and minimising amenity impacts. The development proposes an acceptable level of insulation and this can be secured by a condition of the planning permission. Therefore, in relation to the protection of residential amenity, the proposed development is acceptable.

Overall, the design of the units provides the appropriate amount of amenity for future occupiers and is in accordance with the Edinburgh Design Guidance. Mitigation measures for protection of the units from noise is acceptable and therefore the amenity afforded to new occupiers is acceptable.

#### **f) Local Biodiversity and Ecology**

The site brief contained within the Second Proposed LDP states that the development is expected to deliver enhancements to the Local Nature Reserve, extend woodland along the southern bank of the Burdiehouse Burn and incorporate off-road path links to the Burdiehouse Burn Valley Park. This requirement of the site brief is part of the Council's commitment to deliver the objectives of the Central Scotland Green Network in Edinburgh. As part of these proposals, new woodland planting is proposed along the southern edge of the Burdiehouse Burn. The provision of off-site links to existing paths can be secured via a legal agreement.

It is noted that much of the wider structural landscape proposals required under condition 2(k) of the previous outline planning permission (10/01185/PPP), including retention of existing hedgerows and woodland planting have been implemented and will enhance biodiversity value of the site.

The remainder of habitat on site is of low value and has potential to be enhanced through tree planting and wildflower planting as proposed within open spaces and SUDS.

Therefore, the proposal is acceptable in terms of the impact on biodiversity and ecology.

## **g) Drainage, Flooding, Ground Stability and Contamination**

### **Drainage**

Surface water runoff from the majority of the site developed site is proposed to be discharge by gravity to connect to the existing surface network within the Phase 1 development. This existing network has been sized appropriately to accommodate the discharge from this current proposal. The SUDS basin located in the north-western corner of Phase 1 requires to be upsized to accommodate this development.

Surface water runoff from the cul-de-sac at the north of the site cannot drain to the existing network due to the site topography. Therefore this area will receive both treatment and attenuation within the porous paved road before discharging directly to the Burdiehouse Burn.

Runoff from all roads and driveways are proposed to receive two levels of treatment in accordance with SEPA's requirements for a development of this size. Runoff from the central spine road will receive at-source treatment in filter trenches located within the verges and adopted roads within the development will receive at-source treatment using porous pavements. Runoff from private driveways and roof areas will be treated in a filter trench within the curtilage of the property. The upsized end-of-line SUDS basin will attenuate and treat surface water before discharging into the Burdiehouse Burn at a 1-in-2 year greenfield equivalent.

The foul sewerage drainage from the developed site is proposed to discharge to the existing 750mm diameter combined sewer which runs adjacent to the Burdiehouse Burn.

CEC Flood Prevention has confirmed that these measures are acceptable.

### **Flooding**

There are no watercourses within the site boundary, however the Burdiehouse Burn is located immediately north and north east of the site. A review of the SEPA Flood Map in relation to this proposal indicates that whilst the northern most extent of the red line planning application boundary is partially located within the Burdiehouse Burn flood risk zone, development is not proposed to take place within areas of known flood risk. The surface water from the proposed development would be collected via a gravity system routed towards the existing (to be extended) SUDS facility to the North West. The applicant has prepared an overland flow path figure to demonstrate the overland flows would not put any properties at risk of flooding during an extreme storm event which exceeds the capacity of the drainage network. Therefore the predicted level of flood risk from the proposed development is acceptable and that surface water generated as a result of the proposed development can be appropriately managed onsite. SEPA has advised that it has no objections to the proposals.

In relation to ground water, a Phase 1 Desk Study Report (Geo-environmental Conditions) previously undertaken for planning permission in principle application (10/01185/PPP) noted that as the site is currently agricultural land the theoretical potential for infiltration on the site is high.

However, the report also notes that due to underlying cohesive soils and glacial till, any groundwater movement on the site would be limited. Therefore in the unlikely event of an accidental pollution discharge during the construction of the proposed development, impacts on subsurface hydrogeological resources are likely to be contained onsite rather than migrating to the wider environment.

In the absence of any mitigation measures the Burdiehouse Burn and/or localised groundwater resources could be adversely affected by the proposed development through accidental construction pollution (e.g. oil spillages). However, any potential pollution effects on watercourses or groundwater resources during construction can be fully mitigated through the implementation of appropriate construction environmental mitigation measures and construction management best practice techniques.

Taking these matters into account, the proposed development would not result in any unacceptable impacts on flooding or drainage, and any increase in flood risk is not predicted to occur.

### **Ground Stability**

The Coal Authority commented that the application site falls within the defined Development High Risk Area. The Coal Authority indicated that within the application site and surrounding area there are coal mining features and hazards which need to be considered in relation to the determination of this planning application. As a result of these comments, the applicant undertook a Mineral Assessment and submitted the report in support of the application. The assessment included the drilling of rotary boreholes as part of an intrusive investigation. These boreholes did not identify the presence of unrecorded workings in mineral seams at shallow depth within the area of identified concern on the south western portion of the site. On the basis of the information reviewed and the intrusive investigations undertaken, the mineral stability of the site is satisfactory.

### **Contamination**

With regards to ground condition and contamination, this matter was considered during the previous application for planning permission in principle where site investigation reports were submitted for the site. However, since this is a new application for full planning permission, updated reports are required. In this regard, Environmental Assessment has not raised any objections to the proposals but requires a condition to be attached to the planning permission with regards to the submission of additional updated reports.

### **h) Air Quality**

The planning application was accompanied by an Air Quality Assessment which used a detailed dispersion model to assess the likely emissions to air from the construction and subsequent phases of the proposed development. The Assessment concludes that no exceedences of statutory air quality standards or non-statutory guideline values are predicted to occur during either the construction or operational phases of the proposed development. Once operational, the effect of the proposed development on air quality is considered to be negligible.

Environmental Assessment has no objection on the basis that the development density is in accordance with the limit contained within the Second Proposed Local Development Plan and acknowledges the conclusions of the Air Quality Impact Assessment.

### **i) Transport, Access and Road Safety**

The planning application was accompanied by a Transport Assessment (December 2014). The Assessment considers the traffic generation of the proposed development during its different construction phases and how this would affect receptors which use or are located off the study area road network. The Transport Assessment assumes that the main traffic and transport related environmental effects from the proposed development would be associated with the vehicular movements of dwelling occupiers after the completion of the construction phase. Additional HGV movements would also occur during the construction phase of the proposed development. However due to the temporary nature and relatively low volume of these movements, they not considered to be significant.

The Transport Assessment concludes that the site is well situated in relation to the existing transport network. The site would be accessed from Burdiehouse Road using an existing junction that has sufficient capacity to accommodate the proposed development, and a series of footpaths, footways and cycle links are located within walking distance. In addition, the site is located adjacent to an existing bus route corridor which provides frequent and regular access to a number of destinations across Midlothian and Edinburgh. The Transport Assessment uses recognised modelling techniques to predict that once the proposed development is occupied a total of 58 vehicular trips (two-way) would occur during the weekday AM peak hour and 50 during the weekday PM peak hour. The Transport Assessment demonstrates that the peak number of vehicle movements associated with the proposed development would not affect the peak hour flows and therefore would not adversely impact on the capacity of the local road network.

In terms of the cumulative impact with other development in the area, the signal-controlled junction at Kaimes Crossroads is over capacity at present, however a modification to the approach lane markings and a revision to the staging of the traffic signals (which will be achieved through developer contributions) will enable the junction to operate within capacity in the future in order to accommodate both committed development traffic and traffic associated with the proposed development. With the implementation of MOVA control (proposed as part of wider transport improvement measures) the impact of the development can be further offset.

As such, the traffic impacts of the proposed development can be mitigated and are acceptable.

In terms of access for pedestrians and cyclists, the site is well situated in relation to the existing transport network. A series of footpaths, footways and usable cycle links exist in the surrounding area offering connections with the wider network, including links to the Burdiehouse Burn. The Second Proposed LDP requires an off-site multi-user path connection to link with paths in Midlothian via Straiton Pond. This link currently exists from Lang Loan via an existing track leading into the site and through to the Burdiehouse Burn and beyond.

## **j) Archaeology**

The site was identified as occurring within an area of archaeological potential in pre-application discussions and as a result the site was subject to an archaeological evaluation undertaken by AOC Archaeology in October 2014 (AOC report 22904). The results identified that no significant remains had survived in situ (due in part to modern deep ploughing) across the area. Accordingly it has been concluded that there are no further archaeological requirements in regards to this particular development.

## **k) Affordable Housing**

A minimum of 25% of the homes on site are required to be of approved affordable housing tenures and in this case, this totals 52 units. The applicant has stated their willingness to meet this obligation.

The location of the affordable housing is proposed to be at the entrance to the site on Burdiehouse Road. This location allows for easy access to several frequently operating bus routes and amenities on Burdiehouse Road and is supported.

Overall, the proposal is supported as it will provide tenure-blind affordable housing that meets a range of different affordable housing needs. This will be secured via a suitable legal agreement.

## **l) Sustainability**

A Sustainability Statement was submitted in support of the application.

| <b>Essential Criteria</b>        | <b>Available</b> | <b>Achieved</b> |
|----------------------------------|------------------|-----------------|
| Section 1: Energy Needs          | 20               | 20              |
| Section 2: Water conservation    | 10               | 10              |
| Section 3: Surface water run off | 10               | 10              |
| Section 4: Recycling             | 10               | 10              |
| Section 5: Materials             | 30               | 30              |
| <b>Total points</b>              | <b>80</b>        | <b>80</b>       |

In addition to the essential criteria, the applicant has provided a commitment to further sustainability measures as set out in the desirable elements sections, including the use of sustainable timber and low/zero carbon technologies.

The sustainability measures are therefore acceptable.

## **m) Equalities and Human Rights**

The application has been assessed for any potential impacts on equalities and human rights. The proposal would lead to the loss of the existing open area, though it would provide new housing, including 25% affordable and the potential for a new bus link, which could aid in improving the standard of life.

In relation to equalities, the design statement indicates that development will be fully accessible to disabled people and that the houses will be designed to accommodate changes in lifestyle and mobility that can be anticipated over the lifetime of their occupants.

## **n) Representations**

The letters of objection raised the following material issues:

- Contrary to policy and premature (addressed in 3.3(a) above);
- Cumulative impact of the developments in the area (addressed in 3.3(a) above);
- The site is remote from amenities (addressed in 3.3(a) above);
- Visual Impact (addressed in 3.3(b) above);
- Views to the Limekilns restricted (addressed in 3.3(b) above);
- Number of units proposed is too high (addressed in 3.3(c) above);
- Flats inappropriate (addressed in 3.3(d) above);
- Poor design (addressed in 3.3(d) above);
- Water run-off and flood risk (addressed in 3.3(f) above);
- Impacts on traffic flow and air quality (addressed in 3.3(g) above);
- Distances to amenities are too great to encourage cycling or walking (addressed in 3.3(g) above);
- Poor facilities for cyclists (addressed in 3.3(g) above), and
- Paths and connections should be made to surrounding areas (addressed in 3.3(g) above).

## **Community Council Comments**

Gilmerton and the Inch Community Council commented on the height of the flats and the importance of this arterial route, and the dispersion of the affordable housing.

The neighbouring Liberton and District Community Council commented on the principle of the development, the height of the flats, the lack of bus link and traffic impacts.

These issues are examined throughout the assessment section.

## **Overall Conclusion**

The proposal is contrary to the Edinburgh City Local Plan in terms of the development of a site in the green belt. However, the Second Proposed Local Development Plan allocates this site for housing and provides a site brief for the development of this site. The application has been assessed in terms of its impact on amenity, infrastructure and the landscape and with appropriate mitigation, the development is acceptable. There are no material considerations which outweigh this conclusion.

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

## **3.4 Conditions/reasons/informatives**

### **Conditions:-**

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

- a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
- b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
2. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
3. Prior to the occupation of the first unit of the development, the following noise protection measures as defined in the Airshed 'Environmental Noise Assessment' report (AS 0440 Burdiehouse Phase 2 Rev04), dated 17 December 2014 shall be carried out in full and complete:
- Glazing units with a minimum insulation value of 9.1/20/13.1mm double glazing should be installed for the following facades. Block A & B Elevations facing A701, Block B South facing with a trickle vent capable of a minimum sound reduction index of 39 dB Dne.
4. The approved landscaping scheme shall be fully implemented within one year of occupation of the first residential unit. Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme as may be submitted to and approved in writing by the Planning Authority.

**Reasons:-**

1. In order to ensure that the site is suitable for redevelopment.
2. In order to enable the Head of Planning to consider this/these matter/s in detail.
3. In the interests of amenity and to afford the properties adequate protection from noise.
4. In order to ensure appropriate planting is established on site in the interests of amenity and setting of the development.

## Informatives

It should be noted that:

1. Consent 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; and
  - Transport for appropriate transport infrastructure.

The legal agreement will also make provision for affordable housing on the site.

The legal agreement should be concluded within 6 months of the date of this notice. If not concluded within that 6 month period, a report will be put to committee with a likely recommendation that the application be refused.

2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. All mobile plant introduced onto the site shall comply with the emission limits for off road vehicles as specified by EC Directive 97/68/EC. All mobile plant shall be maintained to prevent or minimise the release of dark smoke from vehicle exhausts. Details of vehicle maintenance shall be recorded.
6. The developer shall ensure that risk of dust annoyance from the operations is assessed throughout the working day, taking account of wind speed, direction, and surface moisture levels. The developer shall ensure that the level of dust suppression implemented on site is adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.

## Financial impact

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### 4.1 The financial impact has been assessed as follows:

The developer has agreed to meet all required infrastructure contributions as part of a Section 75 legal agreement.

## **Risk, Policy, compliance and governance impact**

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

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

## **Sustainability impact**

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### **7.1 The sustainability impact has been assessed as follows:**

This application meets the sustainability requirements of the Edinburgh Design Guidance.

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

A Proposal of Application Notice was submitted and registered on 24 January 2014. Copies of the Notice were also issued to:

- Gilmerton and Inch Community Council.

Councillors:

- Norma Austin Hart;
- Bill Cook;
- Nick Cook; and
- Keith Robson.

Members of Scottish Parliament:

- Kenny MacAskill MSP;
- Cameron Buchanan;
- Sarah Boyack;
- Gavin Brown;
- Kezia Dugdale;
- Neil Findlay;
- Alison Johnstone; and
- Margo MacDonald.

Schools:

- Burdiehouse Primary School;
- St Catherine's Roman Catholic Primary School;
- Gracemount High School; and
- Holyrood RC High School.

#### Other Organisations:

- Liberton and Gilmerton Neighbourhood Partnership;
- South Edinburgh Partnership; and
- Burdiehouse Burn Valley Park Steering Group.

#### Residents:

- Owl Hall, 49a Burdiehouse Road;
- 49 Burdiehouse Road;
- 51 Burdiehouse Road;
- 53 Burdiehouse Road; and
- 55 Burdiehouse Road.

Community consultation events were held throughout March and April 2014. Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online Service.

A pre-application report on the proposals was presented to the Committee on 12 March 2014 (application reference: 14/00316/PAN). The Committee noted the information at this stage and requested further information on:

- (a) The access on to the duel carriageway at Burdiehouse Road;
- (b) The impact on the Kaimes junction, and
- (c) The possibility of an alternative access at Langloan or the roundabout below the Bypass.

The proposals were submitted to the Urban Design Panel on 28 May 2014. Full details of the response can be found in the Consultations section.

## **8.2 Publicity summary of representations and Community Council comments**

The application was advertised on 13 February 2015 and five letters of objection were received. These included comments from a local resident, the Gilmerton and Inch Community Council, the neighbouring community council (Liberton and District) and the cycling body, Spokes. Following the submission of amended plans for the flats, neighbours were re-notified and a further letter of representation was submitted.

A full assessment of the representations can be found in the main report in the Assessment section.

## **Background reading/external references**

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- 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**

**Strategic Development Plan (June 2013)**

Policy 1A outlines the spatial strategy for the SDP including the identification of 13 Strategic Development Areas of which South East Edinburgh is identified as a Strategic Development Area.

Policy 7 require a five years effective housing land supply to be maintained.

**Scottish Planning Policy**

SPP requires a supply of effective land for at least five years to be maintained at all times.

**Finalised SDP Supplementary Guidance**

The Finalised SDP sets out housing land requirements for each of the six Council areas as required by SDP policy 5.

**Edinburgh City Local Plan**

The site is within the Edinburgh Green Belt.

**Second Proposed Local Development Plan**

The site is identified as housing allocation HSG 22.

**Date registered**

19 December 2014

**Drawing numbers/Scheme**

01-26, 27B, 28-31, 32B,

## **David R. Leslie**

Acting Head of Planning and Building Standards

Contact: Lesley Carus, Senior Planning Officer

E-mail:lesley.carus@edinburgh.gov.uk Tel:0131 529 3770

## **Links - Policies**

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### **Relevant Policies:**

#### **Relevant policies of the Edinburgh City Local Plan.**

Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effective development of adjacent land or the wider area.

Policy Des 3 (Development Design) sets criteria for assessing development design.

Policy Des 4 (Layout Design) sets criteria for assessing layout design.

Policy Des 5 (External Spaces) sets criteria for assessing landscape design and external space elements of development.

Policy Des 6 (Sustainable Design & Construction) sets criteria for assessing the sustainable design and construction elements of development.

Policy Des 8 (Urban Edge Development) sets criteria for assessing development on sites at the Green Belt boundary.

Policy Des 10 (Tall Buildings) sets out criteria for assessing proposals for tall buildings.

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

Policy Env 11 (Landscape Quality) establishes a presumption against development which would adversely affect important landscapes and landscape features.

Policy Env 15 (Sites of Local Importance) identifies the circumstances in which development likely to affect Sites of Local Importance will be permitted.

Policy Env 17 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Policy Env 18 (Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Policy Os 3 (Open Space in New Development) sets out requirements for the provision of open space in new development.

Policy Hou 2 (Housing Mix) requires the provision of a mix of house types and sizes in new housing developments.

Policy Hou 3 (Private Open Space) sets out the requirements for the provision of private open space in housing development.

Policy Hou 4 (Density) sets out the factors to be taken into account in assessing density levels in new development.

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

Policy Com2 (School Contributions) sets the requirements for school contributions associated with new housing development.

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.

Policy Tra 4 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in supplementary planning guidance, and sets criteria for assessing lower provision.

Policy Tra 5 (Private Cycle Parking) requires cycle parking provision in accordance with levels set out in supplementary guidance.

Policy Inf 6 (Water & Drainage) sets a presumption against development where the water supply and sewerage is inadequate.

### **Relevant policies of the Proposed Local Development Plan.**

Second Proposed LDP Policy Del 1 (Developer Contributions) identifies the circumstances in which developer contributions will be required.

Second Proposed LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

Second Proposed LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

Second Proposed LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

Second Proposed LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

Second Proposed LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

Second Proposed LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

Second Proposed LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

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

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

### **Other Relevant policy guidance**

**Non-Statutory guidelines** Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings and landscape, in Edinburgh.

# Appendix 1

## **Application for Planning Permission 14/04880/FUL At Land 196 Metres South Of 49, Burdiehouse Road, Edinburgh Proposed residential development of 211 new houses and flats with associated infrastructure (as amended).**

### **Consultations**

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#### **The Coal Authority. update 30.09.15**

*Thank you for your consultation letter of 30 September 2015 seeking the views of The Coal Authority on the additional information submitted in support of the above planning application.*

*The Coal Authority is a non-departmental public body sponsored by the Department of Energy and Climate Change. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.*

#### *The Coal Authority Response: Material Consideration*

*The application site falls within the defined Development High Risk Area. The Coal Authority information indicates that within the application site and surrounding area there are coal mining features and hazards which need to be considered in relation to the determination of this planning application.*

*Whilst it has been noted that the majority of the application site falls outside the defined Development High Risk Area, the eastern part of the site is likely to be affected by historic unrecorded underground coal mining at shallow depth. In accordance with the Overall Site Layout Plan (Drawing Reference: 13069 (PL) 001B, dated 12.11.14/KGR) built development will be taking place within this part of the site.*

*In addition to the above, our records indicate that the southern part of the site (grid cords: 327837-667312) is within the influencing distance of limestone workings at shallow depth. However we do not hold any further information on these limestone workings and as such cannot advise definitively whether those workings will cause any instability issues within this part of the site.*

*The Coal Authority previously objected to this planning application in a letter to the LPA dated 30 December 2014. The objection was raised on the grounds that a Coal Mining Risk Assessment had not been submitted as part of the application.*

*The Coal Authority is therefore pleased to note the submitted Mineral Assessment Summary Report (April 2015, prepared by David R Murray and Associates). The Report confirms; that based upon a review of available geological information and mine plan information, and contrary to our records, the only area of potential risk was in the extreme south-western edge of the site. As a consequence, the Report goes on to confirm that rotary boreholes were drilled in this location to identify the presence of any unrecorded working in mineral seams.*

*On the basis that the boreholes were advanced to our sufficient depth to fully understand any coal mining legacy features that could present a risk to ground stability, and that no voiding or broken ground was encountered identifying coal workings, The Coal Authority is satisfied, that from the information presented, the risks to the development posed by coal mining features would be very low.*

*Whilst it is appreciated that the boreholes were not drilled in the eastern part of the site, initially of which was thought could be affected by historic unrecorded underground coal mining at shallow depth, this area has since been discounted from the defined Development High Risk Area. The Coal Authority therefore concurs with the conclusions made within the Mineral Assessment Summary Report, that the mineral stability of the site is considered to be satisfactory.*

*The Coal Authority Recommendation to the LPA*

*The Coal Authority considers that the content and conclusions of the Mineral Assessment Summary Report (April 2015, prepared by David R Murray and Associates) are sufficient for the purposes of the planning system in demonstrating that the application site is safe and stable for the proposed development. The Coal Authority therefore withdraws its objection to the proposed development. However, further more detailed considerations of ground conditions and/or foundation design may be required as part of any subsequent application for a building warrant.*

### **The Coal Authority. Date 06.01.15**

*Proposed residential development of 210 new house and flats with associated infrastructure; Land 196 metres South of 49, Burdiehouse Road, Edinburgh*

*Thank you for your consultation letter of 23 December 2014 seeking the views of The Coal Authority on the above planning application.*

*The Coal Authority is a non-departmental public body sponsored by the Department of Energy and Climate Change. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.*

*The Coal Authority Response: Fundamental Concern*

*I have reviewed the proposals and confirm that the application site falls within the defined Development High Risk Area.*

*The Coal Authority information indicates that within the application site and surrounding area there are coal mining features and hazards which need to be considered in relation to the determination of this planning application.*

*Whilst it has been noted that the majority of the application site falls outside the defined Development High Risk Area, the eastern part of the site is likely to be affected by historic unrecorded underground coal mining at shallow depth. In accordance with the Overall Site Layout Plan (Drawing Reference: 13069 (PL) 001B, dated 12.11.14/KGR) built development will be taking place within this part of the site.*

*In addition to the above, our records indicate that the southern part of the site (grid cords: 327837-667312) is within the influencing distance of limestone workings at shallow depth. However we do not hold any further information on these limestone workings and as such cannot advise definitively whether those workings will cause any instability issues within this part of the site.*

*The Coal Authority objects to this planning application, as the required Coal Mining Risk Assessment Report, or equivalent, has not been submitted as part of the application.*

*The Coal Authority Recommendation to the LPA*

*In accordance with the agreed risk-based approach to development management in Development High Risk Areas, the applicant should be informed that they need to submit a Coal Mining Risk Assessment Report as part of this application.*

*Without such an assessment of any risks to the development proposal posed by past coal mining activity, based on up-to-date coal mining information, The Coal Authority does not consider that the LPA has sufficient information to determine this planning application and therefore objects to this proposal.*

*The Coal Authority would be very pleased to receive for further consultation and comment any subsequent Coal Mining Risk Assessment Report which is submitted in support of this planning application.*

## **ARCHAEOLOGY CONSULTATION. Date 08.01.15**

*Further to your consultation request I would like to make the following comments and recommendations concerning this application for residential development of 210 new house and flats with associated infrastructure.*

*The site was identified as occurring within an area of archaeological potential in pre-app discussions as a result the site was subject to a archaeological evaluation undertaken by AOC Archaeology in October 2014 (AOC report 22904). The results identified that no significant remains had survived in situ (due in part to modern deep ploughing) across the area. Accordingly it has been concluded that there are no further archaeological requirements in regards to this particular application.*

## **RSPB Scotland date 14.01.15**

*Thank you for consulting RSPB Scotland in regard to the above planning application. The applicant, Barratt East Scotland, seeks permission to build 210 new houses and flats and associated infrastructure on land near Burdiehouse Road, Edinburgh.*

*We have studied the application and associated documents, including the ecological assessment, and can confirm that RSPB Scotland does not object to this application. We have the following observations to make on aspects of the proposal.*

*We recognise that achieving the aims of providing the infrastructure, setting and facilities required by a modern housing development might not always be conducive to the best conservation interests. The developer should, nevertheless, aim to maximise any existing or potential biodiversity features of the site to benefit wildlife and enhance the quality of life of residents.*

*We agree that the site, as it stands, has low biodiversity interest and supports few habitats or species of significant conservation interest. An exception to this is the Burdiehouse Burn (see below). Every opportunity should, however, be taken to retain and create features that are beneficial to wildlife within the broader development.*

*On this basis, all trees, shrubs and other plants, including wildflower meadows, should be of native species. Areas of heavily manicured lawns should be kept to a minimum and only where required for recreational, access and security purposes. Other grassland areas should comprise wildflower meadows with scattered plantings of native trees and shrubs. Paths can be created through these and maintained by mowing, rather than having whole areas kept short. Interpretation may be required to explain why these areas are maintained as such for nature conservation interests and are not just neglected on economic grounds. Fertiliser should not be applied to any wildflower areas and care taken to avoid enriched runoff or seepage from adjacent grassed areas.*

*Page 2*

*The SuDS pond should have as wide a buffer as possible from hard development and its broad margins should be allowed, and encouraged where necessary, to develop naturally. RSPB guidance on the creation and management of such features for biodiversity interest and community enhancement may be referred to at:*

*[http://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)*

*The integrity of the Burdiehouse Burn and a wide, undeveloped buffer between it and the residential development should be maintained for ecological and flood-management reasons.*

*The applicant has identified the area along the southern bank of the Burdiehouse Burn as a potential flood area. On this basis, the applicant wishes to keep it free of trees (Planning Statement, Table 5.4). The applicant should be required to justify this approach, as flood plains naturally support some trees, such as willow and alder, which help with flood alleviation and soil stability and retention. Either way, the flood plain area should be as wide as possible, and developed and maintained by creating waterbodies (such as marshy areas and shallow ponds which may be ephemeral or permanent) to enhance biodiversity and slow down water flow and release during flooding events.*

*We note the proposal to create a 50 metre wide belt of trees to form a new "landscape boundary" on the southern edge of the site. This should comprise native species only (and not include sycamore, which is a non-native invasive), and should not be so densely planted as to shade out ground flora.*

*We would wish to see the provision of nestboxes for swifts and house sparrows within the development. These should be incorporated in/onto the new buildings. This relatively cheap and easy procedure can deliver significant benefits to these, respectively, amber- and red-listed species. Nestboxes for other bird species and nursery and hibernation boxes for bats should also be erected at appropriate locations around the site.*

*The provision of allotments within the development, particularly for those residents living in flats, should be considered. Given that the demand for allotments in Edinburgh is very high, with long waiting lists (4-7 years), appropriate areas should be dedicated to this usage at Burdiehouse Allotments will improve the residents' quality of life and wellbeing as well as having potential benefits for biodiversity. Reference should be made in this regard to the CEC allotment strategy:*

### **Flood Prevention. Date 03.02.15**

*The application should include a flood risk assessment and a surface water management plan.*

#### *Flood Risk Assessment*

- 1. The flood risk assessment should show that the development is not at risk of flooding in a 1:200yr (0.5% AEP) flood from a watercourse. An allowance should be made for climate change.*
- 2. Land raising to protect the development will not generally be acceptable within functional flood plains.*

#### *Surface Water Management Plan*

*The surface water management plan should deal with flood risk from surface water, ensuring that flood risk elsewhere is not made worse by runoff from the development. The main elements of the surface water management plan should be analysed up to the 1:200yr (0.5%AEP) event with an allowance for climate change and include as follows:*

##### *Discharge Point*

- 1. Discharge point(s) for the drainage system must be identified, and the approval in principle from the owner, or Scottish Water in the case of a sewer, for the discharge to that point must be demonstrated.*
- 2. If the drainage system discharges to a watercourse, directly or indirectly, it must be served by SUDS in accordance with the SUDS manual and SUDS for roads where applicable. The treatment methods must be approved by SEPA. Maximum discharge rates should not exceed 4.5l/s/ha or the 2yr greenfield rate, whichever is the lower. Attenuation volume must be designed for the full capacity of the drainage system.*

##### *Flow Paths*

- 1. Surface water should be dealt with by analysing the existing and proposed flow paths and depths for surface water runoff. This should include runoff from outwith the site, from unpaved areas within the site, and from paved areas in events which exceed the capacity of the drainage system.*
- 2. New buildings in the development must not be at risk of flooding as a result of these flow paths and depths*
- 3. Where runoff from the site could increase flood risk elsewhere, the increased runoff from paved surfaces, relative to greenfield runoff, (up to the 1;200yr plus climate change event) should be attenuated on site.*

4. *If the development alters existing flow paths in a way which increases flood risk to existing property, additional attenuation or other measures may be required.*

#### *SUDS Maintenance*

1. *Details of the organisation taking on the responsibility of the proposed SUDS (including underground attenuation tanks), the size of SUDS retention ponds along with GIS co-ordinates is required.*

*It is recognised that small, restricted sites may require some relaxation in respect of attenuation volumes on site.*

*Information should be supplied in a report detailing proposed mitigation measures with supporting and appropriate drawings and calculations. Print outs solely from InfoWorks / MicroDrainage is not considered as a sufficient report.*

*Drainage issues cannot be left as a condition on an FUL or AMC application, since it can have significant impacts on finished floor levels, property locations, location of paths and other hard landscaping aspects. This information is required prior to this department's determination.*

### **Liberton & District Community Council. Date 12.01.15**

#### *Why Liberton & District Community Council is commenting*

*Whilst the application lies outside the Liberton & District Community Council (L&DCC) area but prior to the formation of Gilmerton Inch Community Council, L&DCC commented on and objected to the development of this area.*

#### **COMMENTS**

*The planning application site is in three parts and for the purpose of these comments will be referred to as the eastern area, western area and the northern area. The eastern and western areas are proposed to be developed for housing while the northern area is proposed to provide a SUDS facility.*

#### *Development Plan Status*

*The proposed housing areas whilst included as part of a proposed housing site in the emerging Local Development Plan Version 2 remain as parts of the City of Edinburgh Adopted Local Plan. The proposal for the housing is therefore premature pending consideration by the Scottish Government and subsequent Adoption of the emerging Local Development Plan Version 2 (LDP2).*

#### *The Proposal*

*The western area was included in the area of the planning application approved following an appeal against refusal of planning permission some time ago.*

*However, in approving the application, the Reporter recognised the importance of the site and its role in relation to the edge of the City of Edinburgh, and required the area be part of a larger area of structural tree planting surrounding the site. L&DCC is aware that City of Edinburgh Council approved an application seeking permission to delete the western area from the structural planting area but, in the light of the current proposals for Broomhills, this should be reviewed and reversed.*

*An additional reason for refusal should be because the development of flatted properties on the western part of the site is totally inappropriate to existing townscape and will result in an unacceptable permanent edge to the City of Edinburgh on the eastern edge of the A701.*

*The proposals for the eastern part of the site fails to deliver the desired section of the bus route linking Burdiehouse Road and Lasswade Road via The Murrays housing estate.*

### *Traffic*

*There are concerns about the number of houses to be served by the single access from the currently permitted housing and the additional housing proposed. Right turning traffic exiting the sites is likely to be a source of danger to southbound traffic on the A701. Traffic which opts to make the same manoeuvre using the roundabout north of the bypass (A720) will add to the congestion experienced by southbound traffic at the roundabout. Northbound traffic will generate additional congestion at the Kames Crossroads, a junction acknowledged to be currently at capacity. Pedestrian access to the bus network will be extremely poor from the eastern part.*

### *Conclusions*

*This proposal should be refused planning permission as it is premature pending the Adoption of LDP2, because of the inappropriate nature of development proposed on the western edge of the site and for the failure to comply with the development plan site brief.*

### *Comments on the concept of flatted development on Burdiehouse Road*

*Should this and the Broomhills proposal, which also proposes flatted development along the western edge of Burdiehouse Road, be approved, the cumulative effect of the proposed developments together with recent new development on Burdiehouse Road will be "tenement alley". The proposals in 14/04880/FUL will, in conjunction with Broomhills and ongoing new development will turn the A701 entry into City of Edinburgh an architectural nightmare destroying views of the City over the existing townscape.*

*The entry into City of Edinburgh along all routes should be a memorable event and any development should enhance the experience for visitors to and commuters into the City alike. The current proposals are mundane in the extreme and not worthy of a City which prides itself in the quality of its townscapes. If in the event that the site must be developed after the due consideration of the LDP2, any entry feature should reflect the existing lower level developments and could reflect the current housing at Burdiehouse village.*

## **Gilmerton + Inch Community Council - response dated 21/04/2015**

*We have read over the submission from Liberton & District CC and to be honest they have captured most of our thoughts (and more!)*

*Gilmerton & Inch CC do not like the fact that, should this proposal go ahead, a huge part of Burdiehouse Road is going to be lined with flats of a considerable height. This is one of the main arterial roads into the City of Edinburgh and should therefore receive special consideration as to how it looks aesthetically.*

*We also have reservations as to why it appears that the affordable housing on the site are placed together and not mixed between the rest of the housing.*

Assessment Date 27/04/15

### **TOWN AND COUNTRY PLANNING ACT 1997**

*Proposed residential development of 210 new house and flats with associated infrastructure on land 196m south of 49 Burdiehouse Road (14/04880/FUL).*

*The proposed development site lies between the A701 Burdiehouse Road to the west, Lang Loan to the south, existing residential development to the east (the Murrays), and the Burdiehouse Burn to the north. Electricity pylons are located on the southern edge of the site. The proposal is for 210 residential units with associated infrastructure of landscaping, open space provision, ancillary infrastructure including connections to an existing SUDS facility and access infrastructure.*

*Environmental Assessment has raised concerns regarding this development including the impacts the development may have on local air quality, contaminated land and noise impacts from neighbouring local roads and electricity pylons. The applicant has addressed these areas and where appropriate has submitted supporting documents.*

*The planning application is accompanied by an Air Quality Assessment which has used a detailed dispersion model to assess the likely emissions to air from the construction and subsequent phases of the proposed development. The Assessment concludes that no exceedences of statutory air quality standards or non-statutory guideline values are predicted to occur during either the construction or operational phases of the proposed development. Once operational, the effect of the proposed development on air quality is considered to be negligible. Environmental Assessment would offer no objection if the development density is in accordance with the maximum proposed in the Local Development Plan and taking the conclusions of the Air Quality Impact Assessment. Informatives shall be recommend in regards to construction phase impacts.*

*The Environmental Noise Report states that the proposed development site has the potential to be impacted by noise from road traffic, mainly on the A701 and A720. The Environmental Noise Report concludes that noise impacts from adjacent electricity pylons would be "much less significant" than road traffic however cannot be quantified because the high background noise from the A720 masks other noise sources. The Report recommends a minimum specification of noise insulation within the proposed dwellings to provide a reasonable level of amenity protection within habitable rooms, thereby avoiding sleep disruption and minimising amenity impacts.*

*Environmental Assessment recommends conditions are attached to ensure the appropriate mitigation measures are carried out.*

*Due to the historic land use Environmental Assessment recommend that a condition is attached to ensure that contaminated land is addressed.*

*Therefore on balance Environmental Assessment offers no objection to this application subject to the following 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 following noise protection measures to the proposed residential development, as defined in the Airshed 'Environmental Noise Assessment' report (AS 0440 Burdiehouse Phase 2 Rev04), dated 17 December 2014:*

*o Glazing units with a minimum insulation value of 9.1/20/13.1mm double glazing should be installed for the following facades. Block A & B Elevations facing A701, Block B South facing with a trickle vent capable of a minimum sound reduction index of 39 dB Dne*

*shall be carried out in full and completed prior to the development being occupied.*

#### *Informative*

*1. All mobile plant introduced onto the site shall comply with the emission limits for off road vehicles as specified by EC Directive 97/68/EC. All mobile plant shall be maintained to prevent or minimise the release of dark smoke from vehicle exhausts. Details of vehicle maintenance shall be recorded.*

*2. The developer shall ensure that risk of dust annoyance from the operations is assessed throughout the working day, taking account of wind speed, direction, and surface moisture levels. The developer shall ensure that the level of dust suppression implemented on site is adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.*

3. *Internal un-surfaced temporary roadways shall be sprayed with water at regular intervals as conditions require. The frequency of road spraying shall be recorded as part of documented site management procedures.*
4. *Surfaced roads and the public road during all ground works shall be kept clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping shall be recorded as part of documented site management procedures.*
5. *All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.*
6. *Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.*
7. *This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.*
8. *No bonfires shall be permitted.*

### **SEPA Response 14.10.15**

*We have no objection to this planning application. Please note the advice provided below.*

*Advice for the planning authority*

#### *1. Flood Risk*

*1.1 We have no objection to the proposed development on flood risk grounds. Notwithstanding this we expect Edinburgh Council to undertake its responsibilities as the Flood Prevention Authority.*

*1.2 Review of the SEPA Flood Map indicates that part of the site lies within the 0.5% annual probability (1 in 200-year) flood extent and as such is potentially at medium to high risk of flooding from the Burdiehouse Burn. It is noted, however, that the area shown to be at risk has been allocated as open land and properties are to be located on higher ground to the south.*

*Continued....*

*-2-*

*1.3 A Drainage Strategy has been provided which includes a Flood Risk Assessment (Halcrow, 2010) carried out in support of the application for development between the two parcels of land in the current proposals. The Flood Risk Assessment (FRA) indicates that the predicted 0.5% annual probability, including a 20% allowance for climate change, flood level at the site is approximately 116.83mAOD. Given that the lowest finished floor level for the development is 119.45mAOD, we are satisfied that the proposed properties are outwith the flood extent of the Burdiehouse Burn and we have no objection to the development. Drainage of the site is to be via the existing SUDS pond which will be extended to accommodate the additional water.*

*The pond is shown to be outwith the 0.5% annual probability flood extent and post-development rates are to be limited to greenfield rates, which should be agreed with Edinburgh Council as Flood Prevention Authority.*

*2. Surface Water Drainage and Sustainable Urban Drainage Systems (SUDS)*

*2.1 The details for surface water and SUDS provided in support of this application indicate that the site will meet the requirements of CIRIA 697 and, therefore, these proposals are acceptable.*

*3. Air Quality and Greenhouse Gas Emissions*

*3.1 An air quality modelling assessment has been undertaken and the findings are reported. We note and welcome the decision to use ADMS Roads to assess the impact of traffic on local air quality. The modelling assessment has shown that the completed development is likely to have a negligible impact on local air quality.*

*3.2 “The Climate Change (Scotland) Act 2009 sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set in secondary legislation” . Road transport emissions account for 72.4% of all transport emissions of greenhouse gases and cars account for over half road emissions . The cumulative increase in the distance travelled by car could undermine efforts to reduce emissions of greenhouse gases. Section 5 of the Scottish Government’s Climate Delivery Plan describes the issue in detail. The applicant may wish, therefore, 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.*

*Continued....*

*-3-*

*Detailed advice for the applicant*

*4. Flood Risk*

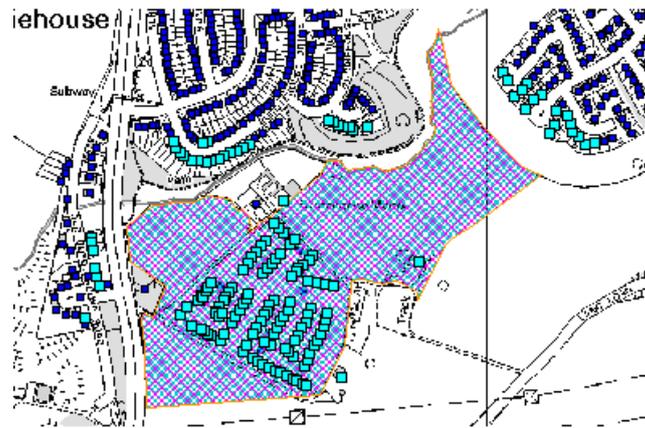
*4.1 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit <http://www.sepa.org.uk/environment/water/flooding/flood-maps/>*

*4.2 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.*

*4.3 The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to the City of Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: “Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities” outlines the transitional changes to the basis of our advice in line with the phases of this legislation and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes>*

## Location Plan

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