

Development Management Sub Committee

Wednesday 22 June 2016

**Application for Planning Permission 16/00869/FUL
At Lochend Industrial Estate, 25 Queen Anne Drive,
Newbridge
Continued use of site for 24 hour secure airport car parking
with ancillary valet services.**

Item number	4.6
Report number	
Wards	A01 - Almond

Summary

The proposal does not comply with the development plan as it would lead to a permanent loss of business and industrial floorspace. It would adversely affect the modal shift from private to public transport, to the detriment of the area. Insufficient information has been submitted to establish whether or not the proposal deals adequately with flooding and drainage. The proposal does not include landscape of sufficient quality and quantity to protect the amenity of the area. It is recommended that this application is refused.

Links

<u>Policies and guidance for this application</u>	LPRW, RWE1, RWE2, RWE4, RWED1, RWED10, RWE45, RWTRA2, RWTRA3, RWTRA4, RWTRA1, RWE41, LDPP, PLDP48, PLDP71, PLDP74, PLDP39, PLDP40, OTH, NSG, NSGD02, LTS1,
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Report

Application for Planning Permission 16/00869/FUL At Lochend Industrial Estate, 25 Queen Anne Drive, Newbridge Continued use of site for 24 hour secure airport car parking with ancillary valet services.

Recommendations

1.1 It is recommended that this application be Refused for the reasons below.

Background

2.1 Site description

The application site extends to 2.07 hectares and is situated within the Lochend Industrial Estate. It is bounded by a range of employment uses on the north, south and east and, on the west, by the M9 motorway junction at Newbridge roundabout.

The site has two fenced-in areas, with a private access road between them. Area A, to the west of Queen Anne Drive, is triangular and extends to approximately 1.1 hectares. Area B, to the north of Queen Anne Drive, is rectangular and extends to approximately 1.0 hectares. Both areas are mainly level and open. The surfacing includes a concrete pad, tarmac and hardcore areas. The eastern portion of Area B is raised by on-site demolition material.

Area A operates as the main car park and has existing valet sheds and a temporary structure used as a reception block on it. Area B operates as an overspill car park. There is a 2.4 metre high, chain link fence along the boundaries of both sites. There are strips of landscaping along the site boundaries and lighting. Vehicular and pedestrian access is from Queen Anne Drive.

Areas A and B are used as secure car parking serving Edinburgh Airport, under separate temporary grants of planning permission. Area A has permission that expires in July 2017 and Area B has permission that expires in August 2017. The site can accommodate 850 vehicles.

The surrounding employment sites include a range of industrial sheds and works comprising; distribution centres, bonded warehousing, storage, hotels, car parking, pharmaceuticals testing, oil and gas R&D, a coach depot and conference/education centres. Some of these sites have associated surface car parking and landscaped grounds.

The application site is within the settlement boundary of Newbridge and Ratho Station. It is within an "Existing Business Area" in the Rural West Edinburgh Local Plan and within a "Business and Industry Area" in the Second Proposed Local Development Plan.

2.2 Site History

Whole site

6 November 2015 - proposal of application notice was submitted for full planning permission for the continued use of the site for 24 hour secure airport parking (application reference 15/05136/PAN).

Western part of the application site (Area A)

19 July 2012 - temporary permission was granted for a period of 5 years for a change of use of the site from open storage to form 24 hour secure airport parking (for approximately 200 car parking spaces), with ancillary valeting and vehicle leasing facilities (application reference 12/01282/FUL).

Eastern part of the application site (Area B)

2 October 2007 - prior approval was granted for the demolition of existing industrial buildings on the site (application reference 07/04053/PA).

25 September 2008 - application granted for the erection of class 5 (general industry) and class 6 (storage and distribution) development with ancillary class 4 (office) associated access, parking and landscaping (application reference 08/00057/FUL).

9 March 2015 - planning permission was refused for the temporary use of the site for 24 hour secure airport parking (as a retrospective use) for 5 years and authorisation was granted for enforcement action to remove that use from the site (application reference 14/02929/FUL).

20 August 2015 - a review of the above decision was upheld by the Council's Local Review Body and temporary permission was granted for a revised period of 2 years, so as to allow the Council to assess the impact of this development, in conjunction with the western site in 2017, should permission be re-applied for. The LRB took into consideration the applicant's arguments that:

- the facility is integral to the operation;
- traffic impacts will be low;
- evidence showed little impact on air quality;
- the site is not currently used for industrial purposes and unlikely to be in the near future; and
- the impacts of such a use would be more detrimental than the proposed use.

The LRB was of the opinion that the proposed scheme was not contrary to policies TRA2, E2 and ED1 of the Rural West Edinburgh Local Plan and policy Emp 8 of the Second Proposed Local Development Plan.

Main report

3.1 Description of the Proposal

The proposal is to make permanent the current use of the site for 24 hour secure car parking with ancillary valet services. It does not include proposals for temporary or permanent structures, landscaping or other physical development.

Car park customers would continue to be received at the temporary reception structure on the west of the site, have their car parked and then be transported to and from Edinburgh Airport by a private low-emission shuttle bus. Valeting services would continue to be offered to customers whose private vehicles are left at the car park. The east part of the site would continue to be used for overspill parking. The application describes the use as 'low cost airport parking'.

In support of the application, the applicant has submitted the following documents:

- Advice note on Lighting near Airports;
- Air Quality Impact Assessment;
- Design and Access Statement (revised);
- Planning Summary;
- Planning Supporting Statement;
- Pre-Application Consultation (PAC) report;
- Sustainability Statement; and
- Transport Statement.

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

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 proposed use is acceptable on this site;
- b) design and layout;
- c) the proposal raises any traffic or road safety issues;
- d) there are any flooding and drainage issues;
- e) the proposal raises any equalities or human rights issues;
- f) there are any other material issues; and
- g) public and community council comments have been addressed.

a) Use

The site is within a designated 'Existing Business Area' in the Rural West Edinburgh Local Plan (RWELP). RWELP Policy ED1 (Sites for Business and Industry) safeguards areas for business (Class 4), general industry (Class 5) or storage and distribution (Class 6) uses. Car parking is a 'stand alone' use which is not within classes 4, 5, or 6. The car valet service carried out on the site is an ancillary use.

RWELP Policy ED1 states that, in designated Business and Industry areas, uses other than classes 4 to 6 will only be permitted where:

- compatible with business and industrial activity; and
- there would be no significantly adverse impact on the overall amount, quality, or distribution of the business and industrial land supply in the local plan area; and
- they are compatible with the character of the site and the surrounding area in terms of the nature of the use, siting, layout and design and where there would be no significantly detrimental traffic or environmental impact. This aspect of the policy is considered in sections 3.3(b) and 3.3(c) below.

Second Proposed Local Development Plan

Policy Emp 8 of the Proposed Plan, currently at examination, is a material consideration. It states that development, including the change of use, which results in the loss of business, industrial or storage floorspace or potential will not be permitted in these areas. It is stricter than RWELP Policy ED1 in that it does not allow for uses other than business and industry. The proposal would lead to the permanent loss of business and industrial floorspace, contrary to policy Emp 8.

Compatibility

The use is compatible with business and industrial activities in the area.

Business and industry land supply

The applicant's supporting statement concludes that the site is unsuitable for Class 4, 5 and 6 development. It refers to previous unsuccessful marketing of part of the site, argues that there is sufficient employment land, states that other larger sites with easier access to the motorway network would be preferred by certain users and cites viability constraints.

Business Partnerships (Economic Development) was consulted. It advised that, in its view, use of the site now and in the longer term as a car park would not prohibit its future use as an industrial site.

However, since planning permissions were granted for the present temporary use, the supply and demand of industrial units and land has been analysed. A report to the Council's Economy Committee on 15 September 2015 summarises this. It found that:

- there is a potential shortage of industrial supply in Edinburgh;
- the market is unlikely to deliver the required space without intervention;
- there may be a need for more industrial land in the LDP; and
- demand is heavily weighted towards West Edinburgh.

A further analysis of the industrial and office space within West Edinburgh indicates that the market within this area can be quite unpredictable. Based on average levels of demand over the past six years it could be expected that the existing office space would be fully let in approximately 3 years, 5 months and the industrial space in approximately 2 years, 5 months. These figures should be read with caution as the volatility of the market makes it difficult to predict the demand.

There is now a greater need to safeguard sites within designated Business and Industry Areas for those purposes, particularly in West Edinburgh. While long-stay car parking can be compatible with adjacent industrial operations, there is not the equivalent identified need for it as there is for industrial land.

No recent marketing of the whole site is provided. There is an existing mix of business and industry within the industrial estate and near to the application site. This suggests that the site is not unreasonably located for business and industry use. It is beside the M9 and accessible from it on a route useable by heavy goods vehicles.

The temporary uses represent 30 FTE (full time equivalent) jobs. Given normal industrial employment densities, it is likely that Class 4, 5, and 6 development here would have the potential for significantly more FTE jobs as well as associated benefits to the wider city economy. As such, parking use represents an 'opportunity cost' in job terms.

The report to the Economy Committee and the progress of the Proposed Plan represent material changes in circumstances since the temporary consents were granted. The proposed permanent use of the site is contrary to the RWELP and Proposed Plan policies which seek to protect an adequate supply of industrial land.

The applicant has referenced the Edinburgh Airport Masterplan (2011) and the Airport Surface Strategy (2012) in support of the application. The applicant states that the present business supports the airport and its expansion. The second Proposed Plan post-dates both of these and the proposed use is not included in acceptable classes in safeguarded Business and Industry areas. It is also noted that Planning does not control customer destination.

While a current temporary business giving economic benefit may be supported, there is likely to be a longer term potential net loss due to the permanent loss of industrial and business land in the west of Edinburgh.

The applicant has not demonstrated the feasibility of alternative sites which may be suitable for its operation and which would not result in the permanent loss of land for industry.

In summary, while continuation of the current temporary use would not, in broad theoretical terms, prohibit future business and industry use, the proposed permanent use is not the plan-led use supported by the Rural West Edinburgh Local Plan or the Proposed Local Development Plan and it will, in practice, limit the supply of land for business and industry.

b) Design

The surrounding business and industry area is mainly functional in character. The business sites within it include permanent buildings with areas of maintained landscaping. Some sites have external car parking. Car, coach and lorry movements are normal in this business and industry area.

The site layout is acceptable, with the reception area positioned near the main entrance. While efforts have been made to give the temporary reception structure a welcoming appearance, and it may be suitable for a temporary period, it is not suitable for a permanent use. No application for a permanent reception structure has been received for this site

The existing permanent valet sheds are functional in appearance. The perimeter chain link fence is similar in height and appearance to several fences within the estate. It is an appropriate design in keeping with the character and appearance of the area.

There are some strips of landscaping. Although the temporary nature of the existing use may not have required detailed consideration of landscaping, the permanent change of use sought does. The application does not include landscaping proposals. The varied and, in parts, un-made-up site surfaces, pile of demolition spoil on the east boundary and lack of considered landscaping give the site a temporary character, and, particularly on the east of the site, do not make a positive contribution to the area character.

Other businesses in the industrial estate incorporate design elements, particularly in respect of landscaping, which contribute a greater degree of attractiveness and air of permanence than the proposal site. As a permanent use, the proposal does not make a suitable contribution to the overall visual character of the area in terms of the temporary reception structure and the landscaping.

c) Traffic and road safety

The applicant has submitted a Transport Assessment in support of the proposal. It concludes that the proposed permanent use of the site for 24 hour secure low cost airport parking is a low traffic generator which would make no practical difference to the operation of the network.

The Council's Local Transport Strategy (2014-2019) ('LTS'), which was approved by the Transport and Environment Committee on 14 January 2014, is a material consideration. Para 14.2.2 of the LTS states 'In order to mitigate the impacts of access to the airport and keep the road network operating efficiently the Council wants to minimise the number of associated car trips and maximise use of public transport services'.

The use of low-emission buses for part of a customer journey is positive. However, the provision of private low cost car parking near to the Airport does not encourage greater use of public transport from point of origin to point of destination.

The applicant considers the private shuttle buses servicing its site to be 'akin to public transport'. There are similarities, such as transporting a number of people at one time. However, it is not public transport. The current use of shuttle buses removes private vehicles from some of the nearby and airport road network. It does not remove private cars from the wider network or encourage people to use public transport for their whole journey to and from the airport ('point-to-point').

The development encourages private cars into the area. The proposal is contrary to achieving the public transport mode share targets within the Transport Infrastructure Study for West Edinburgh (TISWEP). The TISWEP report was approved by Council's Planning Committee on 6 October 2011 and is based on achieving a 50% mode share target for travel to west Edinburgh to be by public transport, cycling and walking. The proposal is contrary to RWELP Policy TRA1

The LTS acknowledges that some types of car access (in particular drop off or taxi access) generate more vehicle trips per air passenger journey than parking at or near the Airport. Therefore a certain level of parking is needed to manage traffic to the airport. The Airport Masterplan envisages long-stay car-parking provision for those accessing the airport as approximately 65% off-airport. It does not specify where that should be. The proposal site is not within the Edinburgh Airport Masterplan site or identified as a park and ride site in the development plan.

In summary, the proposal does not encourage sustainable transport use and is contrary to the LTS and TISWEP, which are relevant material considerations. The proposal is contrary to Policy Tra 1 of the Rural West Edinburgh Local Plan and Policy Tra 1 of the Proposed Plan.

d) Flooding and drainage

The applicant was asked to submit flooding and drainage information. This has not been supplied and the Council's Flooding team cannot provide a consultation response. SEPA was consulted and does not raise an objection. Without the requested information the Council cannot be reassured that flooding and drainage issues will not cause problems.

The application is insufficient in respect of flooding and drainage information. If Committee is minded to grant permission, it is recommended that the application is continued to allow the submission of appropriate information.

e) Equalities and human rights

Considerations in this application include access and dedicated parking. The applicant should ensure that the access to the proposed use is suitable for those with mobility issues and that appropriate, designated parking for the disabled is provided. Although there is no ramp to the temporary reception structure, the applicants have provided details of alternative arrangements. The applicant has stated that it is not necessary for a customer to enter the reception area as they can be taken directly to a waiting shuttle bus.

There are no adverse impacts raised in terms of human rights.

f) Other material issues

Archaeology

The site is within an area of archaeological significance. The City Archaeologist has confirmed that the application will have no known archaeological implications as no new ground breaking works are proposed.

Air quality

The application site is south-west of an Air Quality Management Area (2012) located to the east side of Newbridge Roundabout along the A8 corridor. Environmental Assessment has raised concerns regarding the proposal's impact on air quality and on the ability of the Council to realise the Air Quality Action Plan. There has been considerable discussion between the applicant and Environmental Assessment on this issue. The applicant's Air Quality Impact Assessment (AQIA) concludes that there is no significant difference in predicted air quality between continuing the present temporary use and reverting to the previous use. Environmental Assessment emphasises that air quality is not improving in the nearby AQMA as it had predicted, and still exceeds the EU and UK limit values. It considers that any development that adds further pressure is a cause of concern, that the proposal is contrary to the Local Transport Strategy, and recommends refusal. However, the site has operated as a temporary use for some years and the impact has not been shown to be sufficient to justify refusal.

Airport

Edinburgh Airport was consulted and has not responded. The proposal does not include altering the built form on the site. The applicant is aware of the Airport Operator's Association and General Aviation Awareness Council Advice Note 2, Lighting near Aerodromes.

Mining

The site is within a Development Low Risk Area. The Coal Authority advises that, should planning permission be granted, the Coal Authority's Standing Advice should be included in the decision notice as an informative.

An Environmental Impact Assessment (EIA) screening has been done and an Environmental Statement is not required.

In summary, the application is acceptable in terms of archaeological and coal-mining implications subject to an informative. There are concerns about impact on air quality.

g) Representations and Community Council comments

The application was subject to a pre-application consultation exercise. A pre-application consultation report is available to view on Planning and Building Standards Online Service. The application was advertised on 15 March 2016. One representation, from Ratho and District Community Council, was received. It made comments neither objecting to nor supporting the Planning Application.

Comments;

- Consideration should be given to the provision of improved 'give way' road markings at the junction of Harvest Drive and Harvest Road to improve general road safety - this issue has been brought to the attention of Transport which has not commented on it as yet; and
- Public access information should be provided to the site to direct users via Harvest Drive /Harvest Road and Newbridge - this is not controlled by Planning.

Conclusion

The proposal does not comply with the development plan as it would lead to a permanent loss of business and industrial floorspace. It would adversely affect the modal shift from private to public transport, to the detriment of the Local Transport Strategy. Insufficient information has been submitted to establish whether or not the proposal deals adequately with flooding and drainage. The proposal does not include landscape of sufficient quality and quantity to protect the amenity of the area

It is recommended that this application be Refused for the reasons below.

3.4 Conditions/reasons/informatives

Reasons:-

1. The proposal would lead to a permanent loss of business and industrial land and impact on land supply, contrary to policy ED1 of the Rural West Edinburgh Local Plan and policy Emp 8 of the Second Proposed Local Development Plan.
2. The proposal is in an inappropriate location and will adversely impact upon transport proposals to the detriment of the area. The proposal is contrary to policies Tra 1 of the Rural West Edinburgh Local Plan and policy Tra1 of the Second Proposed Local Development Plan.
3. The proposal has potential adverse impact on a pluvial flooding area and insufficient information has been submitted to establish that the proposal will not have a detrimental impact on flooding and drainage, contrary to Policy E45 of the Rural West Edinburgh Local Plan and Env 21 of the Second Proposed Local Development Plan.
4. The proposal has an adverse impact on the character of the area as it does not have landscape of sufficient quality and quantity to mitigate the adverse visual effects of the car park and as a consequence fails to accord with policies E41 and E42 of the Rural West Edinburgh Local Plan.

Financial impact

4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

There is no pre-application process history.

8.2 Publicity summary of representations and Community Council comments

This application was advertised on 15 March 2016 and one representation, from Ratho and District Community Council, was received. It made comments neither supporting nor objecting to the proposals.

A full assessment of the issues raised in the representation can be found in section 3.3(f) of the main report.

Background reading/external references

To view details of the application go to;

- [Planning and Building Standards online services](#)
- [Edinburgh City Local Plan and Rural West Edinburgh Local Plan](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

Relevant Development Plans

The current Development Plan for this site, comprises the Strategic Development Plan for South East Scotland (June 2013) (SESplan) and The Rural West Edinburgh Local Plan 2006 and Alteration 2011(RWELP).

Rural West Edinburgh Local Plan

The site is within a designated 'Existing Business Area' in the Rural West Edinburgh Local Plan (RWELP). RWELP Policy ED1 (Sites for Business and Industry) applies. It safeguards areas for business (Class 4), general industry (Class 5) or storage and distribution (Class 6) uses. Other uses are acceptable in limited circumstances.

Strategic Development Plan

The Strategic Development Plan sets out a spatial strategy which recognises existing development commitments and promotes a sustainable pattern of growth.

Other material considerations

Second Proposed Local Development Plan

The Second Proposed Plan identifies the site as within a 'Business and Industry Area' where development, including the change of use, which results in the loss of business, industrial or storage floorspace or potential will not be permitted.

The current adopted RWELP will remain in force until replaced by the adopted Local Development Plan.

Scottish Planning Policy (2014)

Date registered

24 February 2016

Drawing numbers/Scheme 01,

John Bury

Head of Planning & Transport
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Links-Policies

Relevant Policies:

Relevant policies of the Rural West Edinburgh Local Plan.

Policy E1 seeks to prevent development which would be inconsistent with local plan objectives for sustainable development.

Policy E2 states that development proposals affecting Air Quality Management Areas (AQMA's) should not impede the achievement of National Air Quality Objectives.

Policy E4 states that development proposals should fully take into account the likely effects on the environment and include measures to mitigate any adverse effects.

Policy ED1 says that the Council will support the development of sites ECON1- ECON11 for the preferred uses outlined in the Schedule of Economic Development Proposals subject to the criteria listed.

Policy ED10 says that within the local plan area the height and detailed design of buildings will be controlled to ensure that airport operations and aircraft movements are not inhibited.

Policy E45 says that as a general principle all new residential and business development should be designed to avoid or manage any threat to susceptible properties from a 200 year flood.

Policy TRA2 states that proposals will not be permitted where it would have an unacceptable impact on the existing road network; public transport operations; air quality; road safety, residential amenity and walking and cycling.

Policy TRA3 says that a transport assessment will normally be required for significant development proposals.

Policy TRA4 says that development proposals should make specific provision for the needs of cyclists and pedestrians and provide convenient and safe access to existing or proposed networks where practicable.

Policy TRA1 says that development with the potential to generate significant levels of personal travel should be located on sites which minimise the need to travel and are easily accessible by foot, cycle or public transport.

Policy E41 encourages high standards of design for all development and its careful integration with its surroundings in terms of scale, form, siting, alignment and materials. New development should improve energy efficiency and reduce noise pollution.

Relevant policies of the Proposed Local Development Plan.

Second Proposed LDP Policy Emp 8 (Business and Industry Areas) protects identified areas for business, industrial and storage development.

Second Proposed LDP Policy Tra 1 (Location of Major Travel Generating Development) supports major development in the City Centre and sets criteria for assessing major travel generating development elsewhere.

Second Proposed LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Second Proposed LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Second Proposed LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Other Relevant policy guidance

Relevant Non-Statutory Guidelines

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.

Local Transport Strategy - The Strategy lists a number of options for improving Edinburgh's transport service including: developing an integrated transport system for the city; lowering speed limits in certain areas to reduce road accidents and encourage cycling and walking; continuation of the School Streets pilot, which encourages young people to walk or cycle to school; continuing action to alleviate air quality problems and undertake further work on developing a Low Emission Zone; and, looking at the possibility of assigning a dedicated officer to work with major employers and other agencies on travel planning.

Appendix 1

Application for Planning Permission 16/00869/FUL At Lochend Industrial Estate, 25 Queen Anne Drive, Newbridge Continued use of site for 24 hour secure airport car parking with ancillary valet services.

Consultations

Archaeology comment

The site lies within (an area) of archaeological significance principally relating to Prehistoric settlement and ritual activity centred upon Huly Hill burial mound and stone circle located opposite. However given that no new ground breaking works are proposed, it is considered this renewal application will have no known archaeological implications.

Coal Authority comment

The application site does not fall with the defined Development High Risk Area and is located instead within the defined Development Low Risk Area. This means that there is no requirement under the risk-based approach that has been agreed with the LPA for a Coal Mining Risk Assessment to be submitted or for The Coal Authority to be consulted.

In accordance with the agreed approach to assessing coal mining risks as part of the development management process, if this proposal is granted planning permission, it will be necessary to include The Coal Authority's Standing Advice within the Decision Notice as an informative note to the applicant in the interests of public health and safety.

Economic Development comment

It is our view that the use of this site now and in the longer term as a car park would not prohibit it's future use as an industrial site. Given that there are currently no live proposals to develop the site for industrial use the approval of this application would not block alternative uses. Indeed there would be nothing to prevent someone from buying the site in the future and applying for an industrial development at that time.

Environmental Assessment comment

Environmental Assessment has previously provided consultation responses for temporary parking on this application site (14/02929/FUL and 12/01282/FUL). It should be noted that Environmental Assessment did recommend that one of the applications should have been refused. This was due to the adverse impacts the operation of the site would have had on the newly declared Air Quality Management Area (AQMA) on Glasgow Road. The AQMA was declared due to exceedances of the statutory objective

for annual concentrations of the pollutant Nitrogen Dioxide at the properties of residents on Glasgow Road.

The applicant has submitted a supporting air quality impact assessment which has recommended that the applicant will install Electric Vehicle Charging facilities. However it is understood that Planning and Transport have concerns regarding this application as it does not comply with the Councils Local Transport Strategy.

Therefore on balance Environmental Assessment recommend the application is refused as it is contrary to the Council Local Transport Strategy and potential adverse impacts it may have on the AQMA.

If consent is granted then the applicant must install at least one rapid electric vehicle charger. Environmental Assessment would recommend that the following is attached as a condition with access for taxis and general public permitted;

Charging outlet(s) should be of the following standard:

70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.

Informative

1. Electric vehicle charging points should be installed in accordance with Transport Scotland's Switched On Scotland: A Roadmap to Widespread Adoption of Plug-in Vehicles (2013).
2. Buses operating from the site should be fully electric.

Environmental Assessment further comment

Following Environmental Assessment's original response we have met with the applicant to discuss the Local Air Quality Impacts in more detail. It was agreed that the worst case scenario with regards trips generated did represent a worst case scenario. The applicant did also emphasise that customers will be informed not to enter the site via the Glasgow Road. However the fact remains that the site is located in very close proximity to the Glasgow Road Air Quality Management and that Transport also have concerns regarding the continued use of this site as a Park and ride facility.

Therefore Environmental Assessment continues to recommend the application is refused as it is contrary to the Council Local Transport Strategy and potential adverse impacts it may have on the AQMA.

If consent is granted then the applicant must install at least one rapid electric vehicle charger. Environmental Assessment would recommend that the following is attached as a condition with access for taxis and general public permitted;

Charging outlet(s) should be of the following standard:

70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.

Informative

1. *Electric vehicle charging points should be installed in accordance with Transport Scotland's Switched On Scotland: A Roadmap to Widespread Adoption of Plug-in Vehicles (2013).*
2. *Buses operating from the site should be fully electric.*

Ratho + District Community Council comment

Ratho + District Council does not object to the continued use of this car parking and valet service but offers the following comments:

1. *It should be re-iterated that the public access information provided to the site should direct users via Harvest Drive /Harvest Road and Newbridge;*
2. *Consideration should be given to the provision of improved 'give way' road markings at the junction of Harvest Drive and Harvest Road to improve general road safety.*

Transport

ROADS AUTHORITY ISSUES

The application should be refused.

Reason:

Provision of long term car parking at this location is considered contrary to Para 14.2.2 of the Council's Local Transport Strategy and to achieving the public transport mode share targets as detailed in the TISWEP report approved by Council's Planning Committee on 6 October 2011.

(http://www.edinburgh.gov.uk/download/meetings/id/33679/item_13_transport_infrastructure_study_for_west_edinburgh_phase_1_-_report_by_transport_infrastructure_and_environment_committee)

Transport does not support the airport masterplan in respect of its intention to increase parking within the airport boundary or the surrounding area.

SEPA comment

We object to this planning application on the grounds of lack of information on surface water drainage and potential impact on the water environment. We will review this objection if the issues detailed in Section 1 below are adequately addressed.

Advice for the planning authority

1. *Surface Water Drainage*

1.1 *The treatment of surface water runoff by sustainable drainage systems (SUDS) is a legal requirement for most forms of development, however the location, design and type of SUDS are largely controlled through planning. As responsible authorities under 2(2) Water Environments and Water Services (Scotland) Act 2003, planning authorities are required to work to prevent deterioration in and promote improvements in Scotland's water environment. Ensuring development sites are serviced with appropriate SUDS is one of the key ways in which SEPA consider planning authorities can discharge these duties. We encourage surface water runoff from all developments to be treated by SUDS in line with Scottish Planning Policy.*

1.2 *Furthermore planning authorities have been designated responsible authorities under the Water Environment and Water Services (Designation of Responsible Authorities and Functions) Order 2006. As such authorities are required to carry out their statutory functions in a manner that secures compliance with the objectives of the Water Framework Directive (i) preventing deterioration and (ii) promoting improvements in the water environment in order that all water bodies achieve "good" ecological status by 2015 and there is no further deterioration in status. This will require water quality, quantity and morphology (physical form) to be considered.*

1.3 *We note that the application form states that no arrangements shall be made for sustainable drainage of surface water. It further states that the proposals will not require new or altered water supply or drainage arrangements. No further information has been submitted with the planning application in relation to the surface water drainage.*

1.4 *We note that the planning history of the proposed site and that it is comprised of two neighbouring sites (each with their own planning permissions for their existing use). The combining of the sites brought the total site area to 2.07hectares, therefore prompting a consultation with SEPA.*

1.5 *We understand that the proposed planning application proposes no changes to the existing nature of the development; however SEPA has no information regarding how the site is to be drained, where the water is being drained to and what valet activities are taking place on site, such as car washing.*

1.6 *Therefore we object to the application due to a lack of information on surface water drainage and the potential impact on the water environment. The objection will be reviewed if appropriate information as detailed in section 1.8 below is provided in order to demonstrate that a satisfactory Sustainable Drainage System (SUDS), with no unacceptable adverse impact on the water environment, can be accommodated on site.*

1.7 *In accordance with the requirements of The Water Environment (Controlled Activities) (Scotland) Regulations 2011, also known as The Controlled Activity Regulations (CAR) surface water runoff arising from the hardstanding areas, inclusive of roads and roofs will require to be collected, treated and disposed of using sustainable drainage techniques.*

1.8 We would request the submission of a scaled annotated site plan which demonstrates that an appropriate surface water (SUDS) scheme can be accommodated within the site layout.

1.9 If it is intended to drain surface water to the public sewer, Scottish Water must be contacted to ensure there is existing capacity within the system for drainage from the development. Furthermore it should be clarified with Scottish Water that the drainage of surface water from the site into the system at this point would not lead to any increase in discharges from any combined sewer overflow (CSO).

2. Flood Risk

2.1 We have no objection to the proposed development on flood risk grounds. Notwithstanding this we would expect City of Edinburgh Council to undertake their responsibilities as the Flood Prevention Authority.

2.2 We have reviewed the information provided in this consultation and it is noted that the application site lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map.

2.3 The risk identified at this site is from surface water flooding only. Further investigation into the risk of surface water flooding at this site is recommended to ensure the proposed development will not be at risk of flooding and nearby existing property and infrastructure will not be at an increased risk of flooding. We also recommend that contact is made with the Flood Prevention Officers within Edinburgh Council and/or Scottish Water to glean any information/ local knowledge that they may possess.

2.4 The current application is for the continued use of the site as a car park. Given the continued low sensitivity use of the site and that the flood risk identified at this location is from surface water and we hold no further information indicating a flood risk at this site we have no objection to this application.

SEPA further comment

We received further information from the agent, as listed below, to allow us to remove our objection on the grounds of lack of information regarding surface water drainage and potential impact on the water environment. The drawings supplied are adequate and demonstrate the adequate level of treatment of the surface water on site.

Submitted information:

- o Email from Craig Anderson to SEPA, dated 16 May 2016 with attachments
- o Drawing No. G16012_200 Proposed Surface Water Sewer Layout
- o Drawing No. G16012_210 Existing Surface Water Flow Arrows

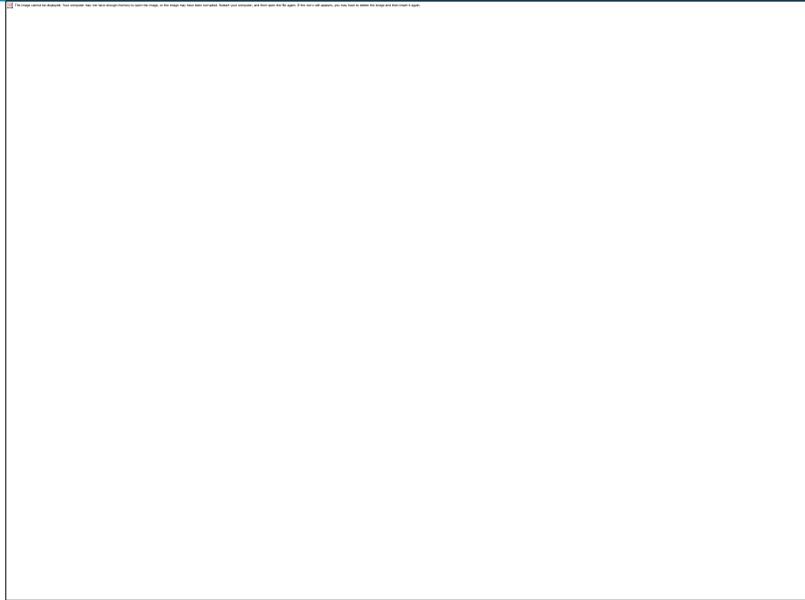
Transport Scotland comment

The Director does not propose to advise against the granting of permission.

Trams

CEC Trams have no comment to make on this application.

Location Plan



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