

Development Management Sub Committee

Wednesday 19 April 2017

**Application for Planning Permission 15/05852/FUL
At Site 250 Metres West Of 100, Eastfield Road, Edinburgh
Proposed development of hotel of up to 230 bedrooms with
bar, conference, meeting rooms, café and food areas with
associated landscaping, car parking access and
infrastructure works.**

Item number	4.8
Report number	
Wards	A01 - Almond

Summary

The principle of a hotel and the ancillary uses complies with the Edinburgh Local Development Plan and non statutory guidelines and is acceptable in this location. The proposal is of an appropriate design and scale and there will be no transport implication. The proposal will make a financial contribution to WETA and the Tram network.

Links

<u>Policies and guidance for this application</u>	LDPP, LEMP05, LEMP10, LDEL01, LDEV02, LDES01, LDES02, LDES04, LDES06, LDES07, LDES08, LEN22, LEN09, LEN12, LTRA02, LEN21, LEMP10, LTRA01, LTRA08, LTRA09, NSG, NSGD02, NSP, NSDCAH, NSESBB,
---	---

Report

Application for Planning Permission 15/05852/FUL At Site 250 Metres West Of 100, Eastfield Road, Edinburgh Proposed development of hotel of up to 230 bedrooms with bar, conference, meeting rooms, café and food areas with associated landscaping, car parking access and infrastructure works.

Recommendations

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

Background

2.1 Site description

The application site lies approximately 8 miles west of Edinburgh city centre and is within walking distance of Edinburgh Airport and the adjacent tram stops and Park and Ride facilities. The site is situated on the corner of Fairview Road and Eastfield Road, on the south west corner of the roundabout on the approach to the Airport. The site is flat and grassed over. All buildings that were formerly connected to farming and the Port Royal golf range have been cleared. There are electricity cables and pylons along the northern boundary which the applicant has advised will be replaced underground prior to development commencing. An existing pavement runs along Eastfield Road and Fairview Road.

An existing hotel, operating as Edinburgh Airport Hilton Hotel, is located on the eastern side of Eastfield Road, directly opposite the site. The application site and land immediately to the south and west is part of the existing Royal Highland Showground site that has been subject to an outline masterplan that includes the development of a range of commercial uses in the eastern section. The Masterplan includes a hotel on the application site. The Committee were minded to grant the masterplan subject to a section 75 legal agreement (reference history section). No formal decision has been issued.

An application for a 5 storey, 350 bed hotel was approved on the site at Almond Avenue to the north, followed by an application for a 150 bed Hampton by Hilton Hotel. A digital media screen has recently been installed directly south of the proposed hotel.

The area to the south east (directly south of the existing Hilton Hotel) forms part of the wider area known as the International Business Gateway that is subject to an outline planning application for a mix of housing, leisure, retail and business uses.

2.2 Site History

The Development Management Sub Committee on 24 April 2011 were minded to grant Planning Permission in Principle for the Royal Highland Showground Masterplan which encompasses this site, subject to a section 75 legal agreement application reference 10/01832/PPP.

On 25 February 2015 the Development Management Sub Committee granted a reduction in financial contributions for application reference 10/01832/PPP.

On 12 August 2015 the Development Management Sub Committee agreed the principal clauses of the Section 75 Agreement to secure financial contributions to tram and other transport infrastructure considered necessary to support the redevelopment of the Royal Highland Centre over time, including the initial phases.

On 20th August 2015 the applicant was issued with a Minded to Grant decision notice with 6 months to sign into the legal agreement, expiring 19th February 2016. On 20 February 2017, in order to progress the s75 in respect of application reference 10/01832/PPP, the Council solicitor sent an email to the solicitors acting for the Royal Highland and Agricultural Society of Scotland requesting confirmation of the extent of the RHASS title. The RHASS has acknowledged receipt of that email and noted that the confirmation has been requested for 20 March 2017.

Adjacent Sites

On 7 December 2015 an application was lodged for planning permission in principal for a Mixed use development inc. business + employment uses (class 4), (class 6); hotels (class 7) + ancillary uses including retail (Class 1), financial + professional services (Class 2), food + drink (Class 3), residential institutions (Class 8), residential (Class 9), non-residential at Land 160 Metres North Of 2 Eastfield Road Edinburgh, referred to as the International Business Gateway, application reference 15/05580/PPP.

On 17 October 2016 a Proposal of Application Notice was submitted by Edinburgh Airport for the demolition of existing buildings and redevelopment of the site for mixed use including hotel (class &) food and drink (class 3), petrol filling station (sui generis), retail (class 1) office (class 4) with associated infrastructure (including access, service arrangements, car parking, landscaping and public access), application reference 16/05145/PAN.

Main report

3.1 Description Of The Proposal

The proposal is for a 230 bed hotel with reception, lounge, bar and eating areas, meeting and conference facilities along with appropriate landscaping and car parking. The ground floor footprint would be 1525 square metres and would take an L-shaped form on the north eastern corner of the site. The proposed building would be 5 storeys in height with an overall floor area of just under 8000square metres.

The building would be elevated from the existing street level for flood risk purposes at approximately 1.55m AOD. The ground floor elevation would be fully glazed with public spaces such as restaurant and bar proposed on the ground floor level. The proposed building would be clad with Alucobond cladding panels and Sto render. Corner design elements are proposed to provide visual interest.

Public access to the building is by means of a covered canopy off Eastfield Road to the front of the building, as well as a rear entrance to provide access from the car park. The southern entrance to the building would be accessed by a DDA compliant ramp from Eastfield Road.

Car parking provision of 10 spaces will be provided to the rear of the site and will be access controlled to limit car parking to hotel guests and visitors only. Cycle parking will be provided as part of the development. The proposal will also accommodate coach parking, and parking bays for disabled users are proposed close to the building entrance.

A 3 metre wide footpath and cycleway will be provided around the boundary of the site.

Services and refuse will be provided within the building and a dedicated back of house service area will be provided.

The proposal includes a landscape plan which consists of street trees to line the roads, ornamental planting and open area on the site frontage. A flood channel is proposed designed to accommodate 1:200 year flooding including a wet swale. A one metre deep bio retention strip is proposed for storm water storage.

Supporting Statement

The application is supported by the following documents which are available to view on the Planning and Building Standards Online Services:

- Ecology Report;
- Planning Statement and PAC report;
- Transport Statement;
- Cultural Heritage Statement;
- Design and Access Statement; and
- Flood Risk Assessment.

The application has been subject to an EIA screening which concluded that it was not required.

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 the development proposed is acceptable;
- b) the proposal complies with the West Edinburgh Strategic Design Framework;
- c) will not prejudice the comprehensive planning of the wider area;
- d) the height scale and siting of the proposed building is acceptable;
- e) the proposal will affect the biodiversity of the area;
- f) the proposal will provide acceptable landscape infrastructure;
- g) the proposal will impact upon highway safety;
- h) the proposal will have a detrimental impact upon air quality;
- i) the proposal will detrimentally affect flooding;
- j) the proposal meets the Edinburgh Standards for Sustainable Buildings; and
- k) equalities and Human Rights Impact.

a) Principle

In considering the acceptability of the proposal, regard has to be had to the development plan and other material considerations. The development plan for the area comprises the approved Strategic Development Plan for South East Scotland (SESplan) (June 2013), and the Edinburgh Local Development Plan, adopted November 2016.

The Edinburgh Local Development Plan (LDP) policy EMP5 supports the development and enhancement of the Royal Highland Centre (RHC) where it accords with the approved Masterplan. The proposal must also accord with the West Edinburgh Strategic Design Framework. Supporting information will be required to demonstrate how the proposal will contribute to meeting the mode share targets set out in the WESDF.

Based on that policy framework the expansion of the Royal Highland Showground was supported in principal in accordance with a Masterplan. The most recent decision of the outline Masterplan by Planning Committee on 20 August 2015 was minded to grant, subject to a legal agreement. That legal agreement has yet to be concluded, therefore there is still no approved Masterplan for the Royal Highland Showground.

Although there is an absence of an approved Masterplan, the principle of the hotel on the corner site is acceptable in policy terms and accords with the development strategy set out in the RHASS Masterplan, as approved in principle subject to the conclusion of a legal agreement. The Masterplan includes hotel development of up to 12,391 square metres. This proposal is for 8000 square metres of hotel.

Since the original determination of the RHASS Masterplan, the National Planning Framework of 2014 (NPF) states that "West Edinburgh is a significant location for investment, with the airport, the National Showground and the International Business Gateway, development here will require continued coordination and planning to achieve a successful business led city extension which fulfils its potential for international investment, new jobs and high quality of place".

The site is well located, within walking distance of Edinburgh Airport and the adjacent tram stops and park and ride facilities.

It is concluded that the principle of a hotel in this location is acceptable and will serve the function of the RHC and Edinburgh Airport.

b) West Edinburgh Strategic Design Framework (WESDF)

NPF 3 identifies the vision for West Edinburgh in that it will become an employment led city extension. Its success will be measured in terms of international investment, new jobs and quality of place. The new hotel meets with this aspiration and will serve the growth of the airport and the future development of the Royal Highland Centre.

The West Edinburgh Strategic Design Framework advises that "development should aim to achieve the highest standards of architectural design and contribute to the image of Edinburgh as a modern, prosperous city through creating a contemporary high quality architectural aesthetic."

The Framework sets out the key aims for the Royal Highland Centre to provide a mix of showground and related uses with good accessibility by public transport, set within a strong and identifiable landscape to create a distinctive place.

The proposal meets with principle RHC9 of the WESDF which supports some buildings at the main entrances to the showground site in order to provide a sense of gateway.

It is considered that the proposed hotel accords with elements of the WESDF and will not prejudice the comprehensive planning of the wider area. It is recommended that a condition be applied to ensure appropriate materials prior to works commencing.

c) Design, Height and Siting

Policy Des 11 of the Edinburgh Local Development Plan advises that planning permission will only be granted for development which rises above the building height prevailing generally in the surrounding areas where the landmark enhances the skyline and surrounding townscape and is justified by the proposed use, where the scale of the building is appropriate in its context, and where there would be an adverse impact on important views of landmark buildings and the historic skyline.

Principle B5 of the WESDF advises that buildings should contribute towards the gateway experience into Edinburgh and Scotland. At particular points there will be opportunities for landmark buildings, for example at tram stops and the ends of avenues. These buildings may be higher than the prevailing building height. However their landmark quality should be achieved through signature design rather than necessary height. Any landmark proposal will require to be supported by a detailed context evaluation which should include the consideration of impact on key views.

The minded to grant RHASS masterplan has detailed buildings along Eastfield Road to be mainly two and three storeys in height with some four storey buildings at particular landmark locations. The proposed development will be built upon a plinth approx 1.5 metres above ground level and built to five storeys high, with double height (5m) at ground floor and plant on the roof, set back by 3metres from the principal elevations. The applicant has justified this approach having regard to the prominent corner position on the approach road to Edinburgh Airport.

The proposal would be read against the backdrop of the airport buildings, airport car park and the airport tower. It will be one of the first buildings in the delivery of the RHC development and precedes the development of the future International Business Gateway (IBG) to the east of the site. It is key in the place making for the area, setting the position of all other buildings in this location, with Fairview Road potentially evolving as the principle entrance to the showground, providing access to the Almond Avenue hotel and associated development on the opposite site of Fairview Road and the proposed development of Fairview Mill to the west.

The building responds well to Eastfield Road (primary road frontage) and Fairview Road (secondary road frontage). The building will provide a visual marker and addresses this prominent corner position accordingly. The proposed height is considered justified in this location. Landscape Visuals demonstrate that it would not have a detrimental impact upon the evolving surrounding townscape and it would not have an impact on longer views back to city or to the firth of forth. The scale of the building is acceptable in its context and the proposal accords with the West Edinburgh Landscape Framework.

The proposed hotel is of a simple design which reflects the Moxy product. The use of sto render with grey aluminium Alucobond cladding is considered acceptable in principle and the fuscia pink Moxy branding by lighting is appropriate in this location, however a condition to ensure appropriate materials is recommended. The proposal includes a satisfactory element of landscaping and can achieve links into the footpath network around the site.

The siting of the building addressing the corner position with detailed elevation corner features provides visual interest. It is considered that the proposed design, siting and height of the building is acceptable in its context.

d) Biodiversity

The application was accompanied by an Extended Phase 1 Habitat Survey which established that there are no protected habitats, with the majority of the survey area being dominated by amenity grassland which is of low ecological and conservation value. This has not changed substantially since the previous Extended Phase 1 survey of the area in 2010 undertaken a part of the RHASS Masterplan.

The mixed woodland existing boundary of the site provides potential breeding and foraging habitat for birds and foxes and also potential bat foraging. The woodland is of moderate ecological value and is predominately characterised by native species such as hawthorn, ash and willow. The area of woodland plantation that will be lost within the site boundary is relatively limited and similar habitat occurs in the surrounding area, around the Gogar Burn and screen planting at Edinburgh Airport. The trees to be lost have low potential as bat roosts, and represent a limited area of potential bat foraging habitat. The mature trees to the south of the survey area which were identified as having moderate bat roost potential will not be affected by the hotel development as they are outside the site boundary.

No signs of badgers were recorded during the survey and consultations with the LBBG confirmed that no badger sets occur at the site or in the near vicinity.

In conclusion the proposal would not have a detrimental impact upon existing habitats and will provide some new planting to enhance biodiversity, within the airport guidelines.

e) Landscape Infrastructure

The applicant has developed the landscape infrastructure for the hotel having regard to the West Edinburgh Landscape Framework and acknowledging the restrictions of the airport.

The primary frontages of Eastfield Road and Fairview Road provide for ornamental tree planting and a three metre path to accommodate pedestrians and cyclists. A one metre bio retention strip is proposed to provide storm water storage.

Within the car park ornamental planting, formal hedge planting and tree planting will be accommodated.

Avenue style tree planting is proposed along Eastfield Avenue set back from the utilities at a spacing of 10metres. Open canopied species are proposed which is consistent with the recommendations of the West Edinburgh Landscape Framework.

A three metre pedestrian and cycle way is proposed fronting Eastfield Road and Fairview Road linking the site to the wider area. A DDA compliant ramp is included which will provide access from the eastern entrance to the bus stop on Eastfield Road.

The proposed landscape infrastructure is acceptable in principle and meets with the objectives of the West Edinburgh Landscape Framework.

f) Highway Safety

Vehicular access to the hotel is proposed via a new simple priority junction from Fairview Road to the west via Eastfield Road, accessed from the A8 to the south. The existing access from Eastfield Road will be stopped up. The Transport assessment predicts that the majority of the trips (approx 79%) to the hotel will be by car. The TA indicates approximately 100 two way vehicle trips to and from the hotel during a typical weekday peak hour. No assessment of the impact of this level of transport has been given.

Transport have raised no objection to the level of trip generation however in order to encourage more sustainable forms of transport and meet WETA requirements a contribution of £194,552 will be required towards WETA, this is based on the final WETA report of Dec 2016.

Edinburgh Airport has highlighted the fact that the proposed site access includes land outwith the red line boundary. Further permissions from third party landowners may be required to implement an acceptable site access. The applicant rectified this by revising drawings to ensure that the access point can be delivered within land owned by RHASS.

The application site is in close proximity to established pedestrian routes. The proposal includes the provision of cycle and footpath around the east and northern boundary of the site that will connect into the wider network. The nearest cycle route is currently the A8 cycle path to the south. The application includes the provision of 22 cycle parking spaces which meets CECs minimal parking standards.

The application proposes 100 car parking spaces which meets the criteria of standards for this level of development in this location.

The tram stop is located within 500m from the development site connected by footways. A contribution of £518,284 to TRAM is requested from Transport, based on figures dated 26 January 2016. The applicants accept this financial contribution which will be secured via a legal agreement.

A bus stop is situated outside the application site on Eastfield Road providing frequent services between the airport and Edinburgh City Centre, Leith Ocean Terminal and Halbeath Park and Ride.

In conclusion, it is considered that a safe means of access can be gained to the hotel development. It is in close proximity to the Tram stop and bus stops and the applicant has agreed to pay the Transport Infrastructure contribution generated from the development. Transport matters are satisfied.

g) Air Quality

The application includes a total of 100 car parking spaces which meets the maximum standards for the level of development in this location (zone 5b).

The applicant has not undertaken an Air Quality Impact Assessment as the car parking figure sits below the trigger. To meet Environmental Protection request to offset and mitigate the air quality impacts associated with the proposed 100 spaces, the applicant has agreed to install electrical vehicle charging points.

It is concluded that provided such measures are implemented then the proposal will not have a detrimental impact upon air quality in this location.

h) Flooding

The site is within an Area of Importance for Flood Management. Policy ENV 21 of the LDP aims to ensure that the development does not result in an increased flood risk for the site being developed or elsewhere. Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how adequate compensatory measures are to be carried out, both on and off the site. In some circumstances suitable flood management or mitigation measures may not be achievable.

The applicant has worked closely with Edinburgh Airport to reach a solution regarding flooding issues. SEPA is now satisfied that the technical information that has been submitted is sufficient to demonstrate that the flow path, compensatory storage and alteration to the small watercourse don't increase flood risk elsewhere in the vicinity.

However, the proposed compensatory storage area is on land owned and controlled by RHASS, outwith the application red line boundary. Whilst acceptable in principle it is important to ensure that this can be achieved in perpetuity, RHASS may move or sell the land. In this instance the applicant has agreed that this be secured by a section 75 legal agreement.

The SUDs proposals will need final clearance by Edinburgh Airport. An initial response in respect of the revised scheme is that swales are normally discouraged as these can attract bird activity.

However in this case, Edinburgh Airport recognise that as it is for a flood risk event only, the swales would need to be netted and that the outflow is maintained. Therefore if a flood does occur, the risk of birds is reduced with netting.

Whilst it is not an ideal solution to have flooding dealt with off-site, it is recognised that the site is currently in the owner of RHASS and that a legal agreement should ensure it is kept in perpetuity.

i) Sustainability

The applicant has completed the Sustainability Statement Form. The applicant advises that the Vastint Moxy brand hotel is a Low Carbon design building which is constructed in a controlled environment and bolted together on site. This approach ensures little waste throughout production. The building will accommodate a standard heat recovery ventilation, LED lighting technology, variable speed drives and pumps and energy efficient lifts.

The proposal has been classed as a major development and has been assessed against Part B of the standards. The points achieved against the essential criteria are set out in the table below:

Essential Criteria	Available	Achieved
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
Total points	80	80

The proposal meets the essential criteria.

The proposal satisfies policy Des 6 of the Edinburgh Local Development Plan.

j) Equalities and Human Rights Impact

The proposal includes buildings which will be accessible to the public. Access for people with physical disabilities will be required to meet with current building standards. Issues with respect to protecting neighbouring amenity has been addressed in section 2.3 e). An Equalities and Rights Impact Assessment has been completed.

Conclusion

In conclusion, the proposal satisfies the criteria of the West Edinburgh Strategic Design Framework and the West Edinburgh Landscape Framework and will meet the objectives of the National Planning Framework to direct commercial growth to the west of Edinburgh. The design is acceptable and the principle of the development complies with the LDP.

A legal agreement is required to secure transport infrastructure, tram contribution and flooding matters.

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

3.4 Conditions/reasons/informatives

Conditions:-

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

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

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. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.
4. Before any part of the development is brought into use, the cycle parking as shown on the approved plans shall be completed and available for use.
5. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority. The submitted plan shall include details of:
 - monitoring of any standing water within the site temporary or permanent
 - sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>).
 - management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached
 - reinstatement of grass areas
 - maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow
 - which waste materials can be brought on to the site/what if any exceptions e.g. green waste
 - monitoring of waste imports (although this may be covered by the site licence)
 - physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
 - signs deterring people from feeding the birds.

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

6. Development shall not commence until details of the Sustainable Urban Drainage Schemes (SUDS) have been submitted to and approved in writing by the Planning Authority. Details must comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)'. The submitted Plan shall include details of:
 - attenuation times;
 - profiles & dimensions of water bodies; and
 - details of marginal planting.

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

Reasons:-

1. In order to safeguard the interests of archaeological heritage.
2. In order to enable the planning authority to consider this/these matter/s in detail.
3. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
4. To encourage alternative modes of transport.
5. It is necessary to manage the development in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Edinburgh Airport.
6. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site.

Informatives

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4 'Cranes and Other Construction Issues'.

3. The Bird Hazard Management Plan must ensure that flat/ shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access ladders or similar. The owner/ occupier must not allow gulls, to nest roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/ occupier when detected or when requested by BAA Airfield Operations staff. The owner/ occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/ occupier must obtain the appropriate licences from the Scottish Executive Environment and Rural Affairs Department (SEERAD) before the removal of nests and eggs.

4. 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.

5. To mitigate air quality impact the applicant is requested to install electrical vehicle charging points to Environmental Health Standards

"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".

6. The drainage swales shall be covered in netting to deter attracting birds, to the satisfaction of CAA safeguarding.

7. Transport requirements:

- a) Access to the car parking area is to be by bell mouth, i.e. not dropped kerb;

- b) Any gate or doors must open inwards onto the property. Any access barrier should be located a minimum of 6m from the edge of carriageway to allow a vehicle to wait off carriageway;

- c) The works to form the access on Fairview Road must be carried out under permit and in accordance with the specifications;

- d) The works to construct the footway on Eastfield Road to be an adoptable standard;

- e) All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Transport if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2002 regulations or British Standard 8300:2009 as approved by the Head of Transport.
- f) In accordance with the Council's LTS Travplan3 policy, the applicant should submit a draft Travel Plan prior to first occupation of the premises and a final Travel Plan within 12 months of that date. The scope to be agreed with the Head of Planning and Transport. The Travel Plan should include agreement to provide pedal cycles (inc. electric cycles), secure cycle parking, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport and a monitor within the property capable of displaying real time public transport information;
- g) Cycle parking to be provided for guests and staff in a secure and undercover location. Current Council standards for a hotel in this area require 1 space per 10 bedrooms for guests and staff, i.e. 22 spaces. The number, location, specification and design to be to the satisfaction of the Chief Planning Officer.
8. For further information on airport safeguarding please refer to Advice Note 6 Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)' (available at <http://www.aoa.org.uk/operations-safety/>).
9. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation to transport infrastructure, tram contributions and flooding matters.

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.

Financial impact

4.1 The financial impact has been assessed as follows:

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

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Pre-application discussions took place on this application. A Pre Application Notification was submitted on 3 June 2015. A formal Public Exhibition was held at the Hilton Hotel, Eastfield Road on 5 June 2016. The exhibition was advertised twice in the local press, in the Edinburgh Evening News on Monday 29 June 2015 and Monday 6 July 2015 and by posters that were distributed to a number of local venues including Ratho Post Office; Kirkliston Community Centre; Ratho Community Centre; Morrison's, Gyle; Scotmid, Ratho Station; Scotmid, Newbridge; Ratho Park Golf Course.

8.2 Publicity summary of representations and Community Council comments

The application was advertised in the Edinburgh Evening News on 12 January 2016. No letters of representation have been received.

Background reading/external references

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

**Statutory Development
Plan Provision**

National Planning Framework 2014 sets out strategic development priorities to support the overarching objective of promoting sustainable economic growth. It states that "West Edinburgh is a significant location for investment, with the airport, the National Showground and the International Business Gateway, Development here will require continued coordination and planning to achieve a successful business led city extension which fulfils its potential for international investment, new jobs and high quality of place.

Scottish Planning Policy (SPP) 2014 sets out national planning policies which should influence Local Development Plans and be material considerations in determining applications. SPP assumes a presumption in favour of development that contributes to sustainable development though design, economic growth and transport.

The adopted Edinburgh Local Development Plan identifies the site as within a special economic area.

Date registered

22 December 2015

Drawing numbers/Scheme

1, 2a,3-8,9a,10a,11-12,13a,14-20,

David R. Leslie

Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Jennifer Paton, Senior Planning Officer
E-mail:jennifer.paton@edinburgh.gov.uk Tel:0131 529 6473

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Emp 5 (Royal Highland Centre) sets out criteria for development proposals at the Royal Highland Centre and requires they accord with the West Edinburgh Strategic Design Framework.

LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

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

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.

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

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

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

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

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.

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

LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

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

LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

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.

LDP Policy Tra 8 (Provision of Transport Infrastructure) sets out requirements for assessment and mitigation of transport impacts of new development.

LDP Policy Tra 9 (Cycle and Footpath Network) prevents development which would prevent implementation of, prejudice or obstruct the current or potential cycle and footpath network.

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.

Non-statutory guidelines on 'PARKING STANDARDS' set the requirements for parking provision in developments.

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

NSESBB Non-statutory guidelines Part B of 'The Edinburgh Standards for Sustainable Building' sets principles to assess the sustainability of major planning applications in Edinburgh.

Appendix 1

Application for Planning Permission 15/05852/FUL At Site 250 Metres West Of 100, Eastfield Road, Edinburgh Proposed development of hotel of up to 230 bedrooms with bar, conference, meeting rooms, café and food areas with associated landscaping, car parking access and infrastructure works.

Consultations

Archaeology comment

As discussed in the Cultural Heritage Assessment produced by ERM in response to this application the site lies adjacent to the southern boundary of the present day Edinburgh Airport, constructed on and across the western boundaries of the former RAF Turnhouse. RAF Turnhouse was open in 1915 and continued in service throughout the Cold War though in 1966 it had become a domestic airport. The base played an important and historic role in WWII, with planes from 2 RAF volunteer reserve Squadrons stationed here were credited with the first kills on UK soil by the RAF during this conflict.

In addition recent archaeological evidence has demonstrated that River Almond Valley and the surrounding Newbridge and Gogar areas in which this site lies have been extensively occupied for over 5000 years. The main focus of this settlement would appear to be the high ground and river banks either side of the river and the nationally important ritual complex of Huly Hill at Newbridge. Additionally the Cat Stane and its associated 6-9th century burial ground located within the airport itself, adjacent to the River Almond and main airport runway, further support the evidence that the site occurs within an area of archaeological potential.

This application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Rural West Edinburgh Policy E30. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

As stated in the accompanying Cultural Heritage Appraisal by ERM, the site has a moderate potential for containing significant archaeological remains dating back to prehistory and possibly also relating to the nearby WWII RAF base. Accordingly it is recommended that a programme of archaeological works is undertaken prior to development. In essence this will see a phased archaeological programme, the initial phase being a 10% archaeological evaluation of the site at the earliest opportunity. The results of which would allow for the production of appropriate mitigation strategies to be drawn up to ensure the protection and/or the excavation and recording of any surviving archaeological remains.

It is recommended that that the following condition is attached to this consent to ensure that a programme of archaeological works is undertaken prior to construction.

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

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

Transport comment - 26 January 2016

We have no objections to the application subject to the following being included as conditions or informatives as appropriate:

1. *Consent should not be issued until the applicant has entered into a suitable legal agreement to:*

a) *contribute the sum of £518,284 to the Edinburgh Tram (based on Zone 2, 213 bedroom hotel (£488,684), 180m² bar (£29,600), 70m² function space (£0));*

b) *contribute the sum of £2,000 to progress a suitable order under Section 207 of the Town and Country Planning (Scotland) Act 1997 to stop up the access on Eastfield Road;*

c) *contribute the sum of £2,000 to progress a suitable order to redetermine sections of Eastfield Road and Fairview Road as necessary (see Note ii. below);*

d) *provide a draft travel plan prior to first occupation and a final travel plan within 12 months of first occupation;*

2. *Cycle parking to be provided for guests and staff in a secure and undercover location. Current Council standards for hotel in this area require 1 space per 10 bedrooms for guests and staff, i.e. 22 spaces. The number, location, specification and design to be to the satisfaction of the Head of Planning and Transport;*

3. *Access to the car parking area is to be by bell mouth, i.e. not dropped kerb;*

4. Any gate or doors must open inwards onto the property. Any access barrier should be located a minimum of 6m from the edge of carriageway to allow a vehicle to wait off carriageway;
5. The works to form the access on Fairview Road must be carried out under permit and in accordance with the specifications;
6. The works to construct the footway on Eastfield Road to be an adoptable standard;
7. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Transport if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2002 regulations or British Standard 8300:2009 as approved by the Head of Transport.

Note:

- i. Sections of Fairview Road and Eastfield Road adjacent to the proposed development are currently not adopted, i.e. they are 'private roads' as defined under Section 151 of the Roads (Scotland) Act 1984. It is understood that the responsibility for maintenance etc. lies with Edinburgh Airport. The applicant should be satisfied that they have the necessary authority and permissions to carry out work on these sections;
- ii. It is unclear from the drawings provided as to the proposed footway layout on Eastfield Road. A redetermination order may be required;
- iii. Current Council parking standards for Zone 5b permit up to a maximum of 1 space per 2.5 bedrooms for hotels (max. 86 spaces for 213 rooms), up to 1 space per 15m² for bars etc. (max. 12 spaces for 180m²) and up to 1 space per 30m² for function rooms (3 spaces for 70m²) giving a total of 100. The development proposes to provide 100 spaces;
- iv. The applicant should provide a real time information monitor within the reception area for public transport.

Transport comment - 16 March 2017

No objections to the application subject to the following being included as conditions or informatives as appropriate:

1. Consent should not be issued until the applicant has entered into a suitable legal agreement to:
 - a. Contribute the sum of £518,284 to the Edinburgh Tram (based on Zone 2, 213 bedroom hotel (£488,684), 180 sq.m bar (£29,600) and 70 sq.m functions space (£0);
 - b. Contribute the sum of £194,552 towards the infrastructure works identified in the final West Edinburgh Transport Appraisal report (Dec 2016);

- c. *Contribute the sum of £2,000 to progress a suitable order to redetermine sections of Eastfield Road and Fairview Road as necessary (see note ii below);*
 - d. *In accordance with the Council's LTS Travplan 3 policy, the applicant is to provide a draft travel plan prior to first occupation and a final travel plan within 12 months of first occupation;*
 - e. *In accordance with the Council's LTS Travplan3 policy, the applicant should submit a draft Travel Plan prior to first occupation of the premises and a final Travel Plan within 12 months of that date. The scope to be agreed with the Head of Planning and Transport. The Travel Plan should include agreement to provide pedal cycles (inc. electric cycles), secure cycle parking, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport and a monitor within the property capable of displaying real time public transport information;*
2. *In accordance with the Council's LTS Travplan3 policy, the applicant should submit a draft Travel Plan prior to first occupation of the premises and a final Travel Plan within 12 months of that date. The scope to be agreed with the Head of Planning and Transport. The Travel Plan should include agreement to provide pedal cycles (inc. electric cycles), secure cycle parking, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport and a monitor within the property capable of displaying real time public transport information;*
 3. *Cycle parking to be provided for guests and staff in a secure and undercover location. Current Council standards for a hotel in this area require 1 space per 10 bedrooms for guests and staff, i.e. 22 spaces. The number, location, specification and design to be to the satisfaction of the Chief Planning Officer;*
 4. *Access to the car parking area to be by bell mouth, i.e. not dropped kerb;*
 5. *Any gates or doors must open outwards onto the property. Any access barrier should be located a minimum of 6m from the edge of the carriageway to allow a vehicle to wait off the carriageway;*
 6. *The works to form the access on Fairview Road must be carried out under permit and in accordance with the specifications;*
 7. *The works to construct a footway on Eastfield Road to be to an adoptable standard;*
 8. *All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Planning and Transport if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved by the Head of Planning and Transport;*

9. *Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future.*

10. *The applicant should note that the proposed access 'road' on the west side of the development, should it be extended at a future date to serve further development to the south, may be required to be to an adoptable standard, including drainage and lighting.*

Note:

i. *Sections of Fairview Road and Eastfield Road adjacent to the proposed development are not adopted i.e. they are 'private roads' as defined under section 151 of the Roads (Scotland) Act 1984. It is understood the responsibility for maintenance etc lies with Edinburgh Airport. The applicant should be satisfied that they have the necessary authority and permissions to carry out work on these sections.*

ii. *It is unclear from the drawings provided as to the proposed footway layout on Eastfield Road. A redetermination order may be required.*

iii. *Current Council parking standards for Zone 5b permit up to a maximum of 1 space per 2.5 bedrooms for hotels (max. 86 spaces for 213 rooms), up to 1 space per 15 sq.m for bars etc (max 12 spaces for 180 sq.m) and up to 1 space per 30 sq.m for function rooms (3 spaces for 70 sq.m) giving a total of 101 spaces. The development proposes to provide 100 spaces.*

iv. *The applicant should provide a real time information monitor within the reception area for public transport.*

Waste Services comment

Waste and Fleet Services takes no stance either for or against the proposed development but as a consultee would make the following comments:

The development is commercial; as such Waste and Fleet Services may not be the service provider for the collection of waste as the users of the site will be responsible for arranging their collections and will choose who they wish to collect their waste. However it is imperative that adequate provision is made for the storage of waste off street, and that cognisance is taken of the need to provide adequate space for the storage of segregated waste streams in line with the Waste (Scotland) Regulations which require the source separation of dry recyclable materials, glass, food, etc and these will likely be in bulk bins.

It should be noted that the legislation also requires that adequate provision is made for the effective segregation of materials within the building not just at the point of collection.

In addition a development may also require to arrange separate collection of materials such as fluorescent bulbs, bulk materials (such as mattresses etc) which may arise from the routine operation of the building and which may require specialist collection and sufficient storage on the premises until a collection can be made.

SEPA comment

We object to this application on the grounds of lack of information on flood risk. We will review this objection if the issue detailed in Section 1 (summarised in Section 1.9) is addressed adequately.

In addition, we ask that the planning condition in Section 2.1 is attached to any consent. If this condition is not to be applied then please consider this representation as another ground for objection.

Advice for the planning authority

1. Flood Risk

1.1 We object to the proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy and PAN 69.

1.2 In the event that the planning authority proposes to grant planning permission contrary to this advice on flood risk, the Town and Country Planning (Notification of Applications) (Scotland) Direction 2009 provides criteria for the referral to the Scottish Ministers of such cases. You may wish to consider if this proposal falls within the scope of this Direction.

1.3 The application is supported by a detailed Flood Risk Assessment (FRA) which includes 1D/ 2D components and the as-built information associated with the tram works. No details on the LiDAR accuracy have been provided.

1.4 The flows for the Gogar Burn would appear to be reasonable and in agreement with flows that were derived during the internal review of the FRA. We agree that it is difficult to derive a pooling group that was not heterogeneous. Review of the flows for the River Almond would appear to be on the low side when comparing Craigiehall. Interestingly, the Craigiehall Qmed for the last 30 years of data is closer to 140m³/s than 124m³/s. The 1:2 year estimated peak flow of 102m³/s in Table 2 is also lower than estimated using the donor methodology. Pooling group details in the FRA for the River Almond at Craigiehall have QMED values ranging from 0.461-16.04m³/s which are not comparative with the QMED of Craigiehall. The applicant should confirm that an increase in River Almond flows does not increase flood risk on-site.

1.5 The 200 year extent drawing (110181/GIS/2001/A) does not show a connection between the Gogar Burn and the floodplain. We assume this is solely a feature of the drawing boundary between the 1D and 2D model domain.

1.6 There is a small watercourse located along the north western perimeter of the site. It is not clear whether it is culverted under Fairview Road prior to reaching the site. An access road is proposed for the north-west corner of the site. Any changes to the small drainage ditch should be considered further.

1.7 *Compensatory storage is mentioned within the FRA but no details are provided on whether it is achievable, i.e. the site is confirmed as brownfield, that it will not increase flood risk elsewhere by maintaining storage and conveyance capacity, that the area of proposed compensatory storage belongs to the applicant, and can be maintained in perpetuity. As such we object due to a lack of information as we cannot comment on the suitability of the compensatory storage proposal. Should compensatory storage not be achievable, or the site be confirmed as Greenfield, we would object in principle to any land-raising on-site. If compensatory storage is proposed to the west of the site, any small watercourses and surface water flood risk will need to be considered further.*

1.8 *We are aware of on-going discussions to realign the Gogar Burn which may alter the flood risk in the future. We have previously highlighted to the City of Edinburgh Council that a holistic approach should be taken when considering flood risk mitigation to the general area from the Gogar Burn. Additional development along the Gogar Burn may restrict the ability to realign the Gogar Burn.*

Summary

1.9 *In summary, the following issue must be addressed before we can review our objection.*

- o Evidence that compensatory storage can be provided on site.*

Caveats & Additional Information

1.10 *The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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.*

1.11 *We refer the applicant to the document Technical Flood Risk Guidance for Stakeholders. This document provides generic requirements for undertaking Flood Risk Assessments. Please note that this document should be read in conjunction SEPA Planning Authority protocol (Policy 41).*

1.12 *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.*

1.13 *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.*

2. Sustainable Urban Drainage Systems (SUDS)

2.1 A planning condition is necessary that the applicant will provide, before works begin on site a detailed plan will be submitted for the approval of the planning authority. This detailed design should identify the appropriate levels of SUDS for this type and scale of development and should demonstrate, for confirmation by the planning authority, that the SUDS are appropriately sized and that source control SUDS will be used.

SEPA further comment

We are writing in response to the email from Robert Evans of 01 June 2016, to which was attached a Flood Risk Assessment (FRA) Addendum. The email and addendum were addressed, in part, to allow SEPA to withdraw its objection of 02 February 2016 (our reference PCS/144560) to planning application 15/05852/FUL on the basis of lack of information on flood risk: in this response we also set out the requirement for a condition to address Sustainable urban Drainage Systems (SuDS).

On the basis of the information provided we cannot remove our objection and we are uncertain about the progress of proposals for developing SuDS.

Advice for the planning authority

1. Flood Risk

1.1 We maintain our objection to the proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy.

1.2 In the event that the planning authority proposes to grant planning permission contrary to this advice on flood risk, the Town and Country Planning (Notification of Applications) (Scotland) Direction 2009 provides criteria for the referral to the Scottish Ministers of such cases. You may wish to consider if this proposal falls within the scope of this Direction.

1.3 We commented on the larger Royal Highland Show site in November 2010. Our understanding is that this area was to be allocated for offices rather than a hotel. We agreed that compensatory storage was to be provided for the land-raising on site. We noted that based on the previous modelling undertaken as part of the Royal Highland Show development site, ground levels below 33mAOD (the predicted 1:200 year flood level was 32.7mAOD with 300mm freeboard included) in the north-east corner of the site were designated as a flood storage area. Land-raising was proposed for this area of the development to minimise any flood risk to the planned office buildings. As a compensatory storage measure, the adjacent car parking area was to be lowered. The net increase in compensatory storage was deemed to be 24,000m³, although we noted that part of the area to be lowered was potentially already designated as a flood storage area. As the majority of the area to be lowered was out with the 1:200 year flood outline and there was a net gain in flood storage volume, we were satisfied with the proposal.

1.4 A variety of flood levels have been produced for this area as outlined in Section 3.4 of the Fairhurst FRA (2015) ranging from 31.27-32.7mAOD. There appears to be reasonable agreement between Figure 4 and Appendix A flood outlines although our understanding is that there is a difference in 1.05 metres between these modelled flood levels. We would note that we have not reviewed the ERM Addendum FRA (2011) mentioned in the Fairhurst FRA (2015).

1.5 From our previous response we noted that there is uncertainty deriving flows for the Gogar Burn. We also noted that the QMED for Craigiehall was on the low side and that the pooling group appeared to be using catchments that were not representative of the Craigiehall gauge. We have had no further clarification on these flows. There is mention in the December 2015 FRA, however, that an increase in flows by 20% does not significantly change the flood levels to the site hence we are satisfied that the higher flows have been considered.

1.6 The Fairhurst FRA (2015) identified a small drain/ burn beside Fairview Road. It was unclear whether this watercourse was within the site boundary and whether any changes to it were proposed. We have not received any additional information regarding our query.

1.7 The compensatory storage identified in the Fairhurst FRA Addendum report (2016) should complement the larger Royal Highland Show site which has a larger area designated for compensatory storage to facilitate the larger development. In our previous response we noted that no information had been provided regarding whether the area designated for compensatory storage belonged to the applicant and could be maintained in perpetuity. We also highlighted that surface water flood risk would require further consideration. No additional information has been provided in the Fairhurst FRA (2016).

1.8 Based on the Compensatory Storage Details - Plan drawing, the compensatory storage would appear to be approximately 50% in the 1:200 year flood plain. In addition, it would appear to include a small drain and a soakaway for a nearby development (as shown in the Fairhurst FRA (2015)). The area designated as compensatory storage would appear to have moved from what was originally identified in the Fairhurst FRA (2015). The Compensatory Storage Details - Plan drawing does not appear to match the description in the Fairhurst FRA Addendum report (2016) which states that "The proposed compensatory storage will be located 60m west of the site, on the edge of the 200yr flood extent".

1.9 It remains unclear whether the land use designation for this area is greenfield or brownfield.

Summary

1.10 In summary, clarification is needed on the following points before we would consider reviewing our objection to the proposed development:

o Additional information on the feasibility of the proposed land-raising and compensatory storage considering the small drain, adjacent soakaway, location of the compensatory storage in relation to the 1:200 year flood extent, ownership and maintenance (in perpetuity) of the land allocated for compensatory storage, surface water flood risk, and the larger RHS development.

Caveats & Additional Information

1.11 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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/>

1.12 We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>. Please note that this document should be read in conjunction Policy 41 (Part 2).

1.13 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.

1.14 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 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/>.

2. SuDS

2.1 In our letter of 02 February 2016 we noted that a: "planning condition is necessary that the applicant will provide, before works begin on site a detailed plan to be submitted for the approval of the planning authority. This detailed design should identify the appropriate levels of SUDS for this type and scale of development and should demonstrate, for confirmation by the planning authority, that the SUDS are appropriately sized and that source control SUDS will be used"

2.2 There is a lack of information on SuDS in the supporting documents, but in his email of 01 June, Robert Evans writes that a: " planning condition would be appropriate that the applicant will provide, before works begin on site a detailed plan will be submitted for the approval of the planning authority. This detailed design should identify the appropriate levels of SUDS for this type and scale of development and should demonstrate, for confirmation by the planning authority, that the SUDS are appropriately sized and that source control SUDS will be used".

2.3 From his email it appears that the applicants accept that it is appropriate for a condition on SuDS to form part of any planning permission, but as we have seen no proposals for drainage, we do not know if proposals for SuDS are acceptable or what stage of development these proposals have reached, but we can confirm that we have not been consulted on draft proposals.

SEPA further comment

We are writing in connection to my letter to you of 16 June 2016 (our reference PCS/147187), particularly point 1.9: "It remains unclear whether the land use designation for this area is greenfield or brownfield".

Since writing to you on the 16 June 2016 there has been correspondence between you and Mr Robert Evans, which is copied below. On the basis that the City of Edinburgh Council, as planning authority, deems the land covered by planning application 15/05852/FUL as not greenfield land, we consider that this point has been addressed and we look forward to receiving the further information which we summarised as follows.

o Additional information on the feasibility of the proposed land-raising and compensatory storage considering the small drain, adjacent soakaway, location of the compensatory storage in relation to the 1:200 year flood extent, ownership and maintenance (in perpetuity) of the land allocated for compensatory storage, surface water flood risk, and the larger RHS development.

SEPA further comment

We are writing in response to the email from Mr Robert Evans of Muir Smith Evans of 09 September 2016. On the basis of this email, and the information attached to it, we are not in a position to withdraw our objection to planning application 15/05852/FUL. We will be able to review our objection when the information provided in Sections 1 and 2 is provided.

1. Flood Risk

1.1 We maintain our objection to the proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy.

1.2 In the event that the planning authority proposes to grant planning permission contrary to this advice on flood risk, the Town and Country Planning (Notification of Applications) (Scotland) Direction 2009 provides criteria for the referral to the Scottish Ministers of such cases. You may wish to consider if this proposal falls within the scope of this Direction.

1.3 We previously responded to this application in June 2016 and maintained our objection in relation to flood risk concerns. There was a lack of clarity regarding the location and capacity of the partly culverted small watercourse and whether any changes were proposed. We highlighted that no information had been provided regarding whether the area designated for compensatory storage belonged to the applicant and could be maintained in perpetuity. In addition, surface water flood risk would require further consideration to complement the proposed compensatory storage and flow path network.

1.4 We then responded to the application in July 2016 after receiving clarification from Edinburgh Council on the land use designation for the site. We accepted that the modelled flood levels were similar to those produced in other reports. The difference between an earlier model and the latest Flood Risk Assessment was attributed to an earlier model which was superseded by the 2010 Edinburgh tram infrastructure model. The report also clarified that there were minor errors in the naming of the pooling group data.

1.5 From the latest correspondence, the small watercourse will be diverted from its current location, which is through the area designated for compensatory storage, to around the southern and eastern boundary of the compensatory storage area. There will be a connection between the culverted watercourse and the compensatory storage area. The flow entering the compensatory storage area will be limited by the upstream culvert capacity. The correspondence notes that the contribution of the small watercourse during the Gogar Burn design event has been taken into account as part of the hydrological analysis. This is important should flows in the downstream section of the small watercourse back up when water levels in the Gogar Burn are high.

1.6 The capacity of the culvert has not been assessed and the condition of the culvert is also unknown. As the culvert will receive flows from the compensatory storage area, the SuDS discharge, and the small watercourse, we would recommend that the capacity and condition of the culvert is investigated.

1.7 From the information provided, the development is to be land-raised and as such the risk of flooding to the development is reduced. As compensatory storage has been shown to be feasible at this site and a flow path is included to ensure flood water accesses the compensatory storage area, the distribution of water over the area will change. We recommend that the applicant demonstrates that the flow path, compensatory storage, and the alterations to the small watercourse do not increase flood risk elsewhere.

1.8 It is unclear from the information submitted how the SuDS will operate, and remain flood free. Please see Section 2.

1.9 The report does state that the compensatory storage area is on land which is owned and controlled by The Royal Highland & Agricultural Society of Scotland and as such the drainage and flood attenuation will be maintained in perpetuity. We would reiterate that the City of Edinburgh Council will need to be satisfied with this and consideration given to a legal agreement to ensure it is maintained in perpetuity, especially when the show ground may potentially be relocated in the future.

Caveats & Additional Information for Applicant

1.10 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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/>

1.11 We refer the applicant to the document "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>. Please note that this document should be read in conjunction Policy 41 (Part 2).

1.12 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.

1.13 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.

1.14 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 "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/>.

2. Sustainable urban Drainage Systems (SuDS)

2.1 The latest information does not include information on SuDS, with the exception of detailing of a swale on the drawing. The swale and any other required SuDS should be clarified in the context of a Simple Index Approach. The SIA tool can be found in the SUDs Manual.

2.2 We should also advise you and the applicant that the diversion and extension of the culvert for land gain is a controlled activity under the Controlled Activities Regulations. SEPA has a presumption against culverting for land gain.

SEPA further comment

We are writing in response to additional information which has been submitted to the City of Edinburgh Council in support of planning application 15/05853/FUL. This includes: Additional Modelling Technical Note (14 October 2016); Fairhurst Level 3 FRA (dated December 2015); correspondence from Edinburgh Airport to RHASS (01 February 2012.); detailed drainage drawings; an outline of the Simple Index Approach to site SuDS (03 October 2016).

Advice for the planning authority

On the basis of this information, we can withdraw our objection to planning application 15/05852/FUL.

1. Flood Risk

1.1 We maintained our objection in our last response in September 2016 as additional information was required which demonstrated that the flow path, compensatory storage, and the alterations to the small watercourse does not increase flood risk elsewhere. We also recommended that the capacity and condition of the culvert were investigated.

1.2 A letter from Edinburgh Airport to the RHASS (01 February 2012) confirms that Edinburgh Airport will maintain this culvert which will receive the flows from the compensatory storage, SUDS, and small watercourse, as long as the discharge from the surface water drainage is controlled to greenfield runoff rates. As such, it appears that Edinburgh Airport is satisfied with this proposal.

1.3 An Additional Modelling Technical Note (14 October 2016) has been provided by Fairhurst. The Technical Note demonstrates that the proposed design compared with the existing conditions provided in the Level 3 FRA (dated December 2015) will not increase flood risk elsewhere as a consequence of the land-raising and compensatory storage design. As such we are satisfied that the flood risk to the site has been mitigated and there is no increase in flood risk elsewhere.

1.4 We reiterate that the compensatory storage area is on land which is owned and controlled by The Royal Highland & Agricultural Society of Scotland and as such the drainage and flood attenuation will be maintained in perpetuity. As such, Edinburgh Council will need to be satisfied with this and consideration given to a legal agreement to ensure it is maintained in perpetuity, especially when the show ground may potentially be relocated in the future.

Caveats & Additional Information for Applicant

1.5 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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/>

1.6 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.

1.7 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 Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note "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/>.

2. Sustainable urban Drainage Systems (SuDS)

2.1 We consider that the information now provided for SuDS is satisfactory and the requirements for SuDS will be met.

2.2 In terms of the watercourse engineering proposal, we can confirm that a CAR authorisation will be required in accordance with SEPA's Practical Guide to CAR. Specifically, a licence from SEPA is required for the diversion or culverting of a minor watercourse for land gain. We would encourage opening of existing culverts (de-culverting) wherever possible. The local Regulatory Services Team should be contacted for advice. (Contact details at Section 3.)

Edinburgh Airport comment

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

Submission of a Bird Hazard Management Plan

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

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

- o *physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste*
- o *signs deterring people from feeding the birds.*

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

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

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Edinburgh Airport Airside Operations staff. In some instances it may be necessary to contact Edinburgh Airport Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Scottish Natural Heritage before the removal of nests and eggs.

Submission of SUDS Details

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

- o *attenuation times*
- o *profiles & dimensions of water bodies*
- o *details of marginal planting*

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

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

Transport

Having reviewed the supporting documentation prepared in support of the application contained within CEC's planning portal, EAL consider there to be insufficient information in respect of the proposed site access, in order to draw a conclusion on the application's impact on the existing road network, which serves Edinburgh Airport.

It is noted that the Transport Statement does not provide any detail or operational assessment of the site access layout. It could be expected for a detailed planning application that a site access layout to a suitable scale should be provided demonstrating the horizontal geometry of the junction, visibility splays and pedestrian infrastructure. The only layout in which a site access is illustrated appears to be the landscape plan (ref 5141908). We note that this plan has minimal information in relation to the site access; however it does demonstrate that part of the proposed site access appears to be located out with the application's red line boundary.

We note that no appraisal of the proposed hotel's traffic impact on the existing Eastfield Road corridor or the Eastfield Road / Fairview Road roundabout has been considered within the Transport Statement. In addition, we note that CEC's Planning & Transport response does not make reference to the requirement for contributions linked to transport infrastructure improvements (in line with the TISWEP contributions framework).

Therefore, on the basis of the observations above, EAL does not consider the information provided to be sufficiently complete for us to draw a conclusion on the application's impact on the existing road network or the suitability of its approach to addressing such impact."

We would also make the following observations:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/operations-safety/>)

Lighting

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

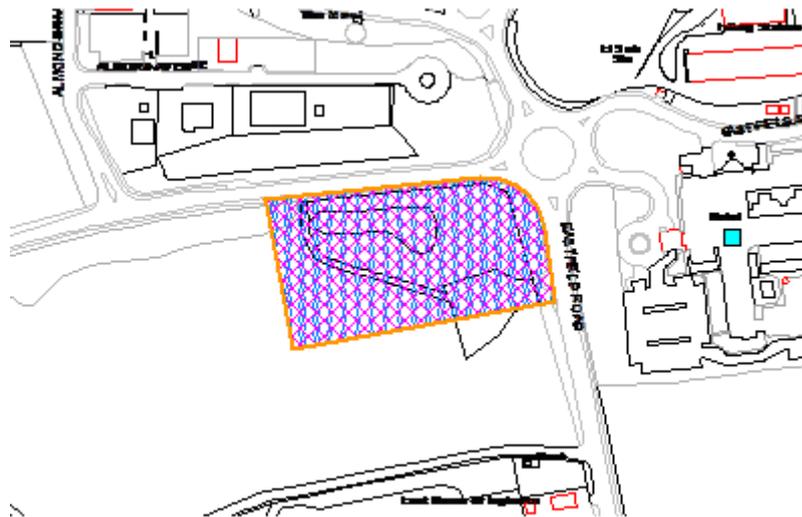
We, therefore, have no aerodrome safeguarding objection to this proposal, provided that the above conditions are applied to any planning permission.

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

CEC Flood Planning comment

We would reiterate that the occupier for the site is responsible for maintenance of the drainage channel to ensure it allows flows to be directed away from property entrances and that any silt or debris is removed on a regular basis.

Location Plan



© Crown Copyright and database right 2014. All rights reserved. Ordnance Survey License number 100023420

END