

Development Management Sub Committee

Wednesday 19 April 2017

Application for Planning Permission in Principle 16/04738/PPP

**At Site 100 Metres North East Of 19, Turnhouse Road,
Edinburgh**

**Residential development, up to a maximum of 1400 units,
and ancillary commercial (Class 1 retail and Class 2 financial
and professional) including landscaping, access and
services and all other ancillary development.**

Item number	7.2
Report number	
Wards	A01 - Almond

Summary

The HSG19 site represents one of the largest housing allocations in the LDP and a significant westward expansion of the city, on land which formerly comprised green belt. It is therefore imperative that comprehensive masterplanning is undertaken to guide the long term development of the site. The masterplanning undertaken as part of this application is not sufficiently comprehensive and is contrary to the LDP Site Brief and Development Principles.

This application cannot be supported due the inclusion of the area of the Edinburgh Green Belt (5.2 hectares) to the north of Craigs Road, the lack of clarity regarding the delivery of the pedestrian/footbridge from the HSG19 site to Edinburgh Gateway, the completeness of supporting information including the Environmental Statement and the current nature of the masterplan proposition. The application as submitted is not acceptable in principle and for this reason the Council has not requested the applicant to provide further information.

It is therefore recommended that the application be refused.

Links

[Policies and guidance for this application](#)

LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES09, LEN07, LEN08, LEN09, LEN10, LEN12, LEN16, LEN20, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU02, LHOU03, LHOU04, LHOU06, LTRA01, LTRA02, LTRA07, LTRA08, LTRA09, LTRA10, LTRA12, LRS02, NSGD02, NSDCAH, NSOSS, NSGESS, NP01,

Report

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and professional) including landscaping, access and
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Recommendations

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

Background

2.1 Site description

The application site lies on the western edge of Edinburgh, to the west of Maybury Road (A902) and north west of the Maybury Road/Glasgow Road (A8) junction. The area is generally characterised by arable agricultural land but includes two farmsteadings with associated farmhouses and eight cottage dwellings.

The application site embraces 73 hectares and is defined by Craigs Road and Bughtlins Roundabout to the north, Maybury Road to the east, the Edinburgh - Fife railway line to the south western edge with the East Craigs area lying to the east and West Craigs to the south east. The site is bisected by Turnhouse Road, this extending for a distance of 1.5Km from the south eastern to the north western site corners. Meadowfield Road runs broadly north-south across the central part of the site from Craigs Road to Meadowfield Farm.

The application site also includes a triangular area of land and a rectangular strip (5.2 hectares) to the north of Craigs Road. This extends from a point 450 metres to the west of the Craigs Road/Maybury Road junction to the north of the Bughtlins Roundabout.

In terms of adjacent uses, the eastern edges of the site are generally characterised by low rise suburban and flatted development. The West Craigs Industrial Estate and Saica packaging factory also abut the site boundaries to the south eastern corners, these being partially enclosed by landscape buffers. These uses currently form the western edges to the urban area of the city.

The north western corner of the site at the junction of Turnhouse Road and Craigs Road is defined by Lennie Cottages, a group of mainly traditional cottages, and the Turnhouse Golf Course Clubhouse. The Edinburgh Airport Freight Terminal lies approximately 1km to the north west. The land to the north of Craigs Road comprises a golf course, woodland planting, open arable land, a single detached bungalow and the former Braehead Quarry which serves as a waste management facility. The Cammo Estate Park, a Designed Landscape and Historic Garden Inventory Site, lies 350-500 metres to the north of Craigs Road. Cammo Walk, a country lane providing a connection from Cammo to the Craigs Road/Maybury junction, enters the site at the north eastern corner. The LDP designates these various uses as Green Belt, with the former Braehead Quarry identified as a Safeguarded Waste Management Facility. The LDP allocates Edinburgh Airport as part of a Special Economic Area, also embracing the International Business Gateway (IBG).

The Edinburgh Gateway intermodal station lies at southern corner of the site. This facility opened during December 2016, providing access to both heavy rail and tram services. A pedestrian underpass has also been implemented beneath the A8, which provides access to the Gyle Centre and Edinburgh Park beyond.

The site topography to the south west of Turnhouse Road is relatively flat with land levels ranging from 37 metres AOD at the north west corner of the site to 50 metres AOD to the south east. The land to the north of Turnhouse Road rises gently to a ridge defined by Craigs Road which extends to the north east corner of the site occupied by West Craigs Farm. This rises to a maximum 66 metres AOD, with site levels then falling to the north of Craigs Road to 50 metres AOD.

2.2 Site History

All of the applications cited below relate entirely or in part to land associated with the application site:-

14 October 2014 - Proposal of Application Notice (PAN) submitted for residential development and ancillary retail (Class 1), Class 2 (300sqm in total) including landscape, access and services and all related ancillary development at site 100 Metres North East Of 19 Turnhouse Road. This PAN broadly relates to the extents of the current application, although the extents of land included to the north of Craigs Road have been reduced (Application reference:- 14/04156/PAN).

15 November 2016 - Proposal of Application Notice submitted for a proposed primary school and nursery development with associated access, play areas, greenspace, landscaping, car parking and other ancillary development at land 175 metres South East of Meadowfield Farm, 15 Turnhouse Road. This application was considered by Committee on 18 January 2017. (Application reference:- 16/05719/PAN).

Land to the south west of the Craigs Road/Maybury Road junction

23 December 2013 - Proposal of Application Notice for the erection of residential development with associated access, landscaping and open space at land 195 Metres South Of West Craigs Cottage, 85 Craigs Road (Application reference:- 13/05073/PAN).

23 April 2015 - Planning Permission in Principle refused for residential development with associated transport infrastructure, landscaping and open space for land at land 195 Metres South of West Craigs Cottage, 85 Craigs Road. Reasons for refusal included; non-conforming use, air-quality impact and infrastructure delivery concerns (Application reference:- 14/03502/PPP).

04 December 2015 - Appeal against refusal dismissed by Scottish Ministers (Appeal reference: PPA-230-2153). Main reason for refusal: the LDP being under examination by Ministers, the application was therefore premature and would undermine the plan-making process.

13 April 2016 - Proposal of Application Notice submitted on behalf of Taylor Wimpey UK for the erection of residential development with associated access, landscaping and open space at land 195 metres South of West Craigs Cottage, 85 Craigs Road (Application reference:- 16/00837/PAN).

18 November 2016 - Planning Permission in Principle lodged on behalf of Taylor Wimpey UK for land 195 metres South of West Craigs Cottage, 85 Craigs Road. This application is currently pending consideration. (Application reference 16/05681/PPP).

Land to the north of Craigs Road

15 November 2016 - Proposal of Application Notice submitted for the erection of residential development with associated access, landscaping and other ancillary development at land 369 metres North East of 210 Craigs Road. This application was considered by Committee on 18 January 2017. (Application reference:- 16/05742/PAN).

Main report

3.1 Description Of The Proposal

The proposal is for a planning permission in principle for residential development, up to a maximum of 1400 units and ancillary commercial (Class 1 Retail, Class 2 Financial and Professional) including landscaping, access and services and all other ancillary development.

An illustrative masterplan proposal has been submitted as part of the application. This comprises a schematic site layout for approximately 1400 residential units with green network, open space, a proposed primary school site and location for commercial development with doctors surgery and retail unit (300 square metres floorspace) to the south east of Turnhouse Road. The Environmental Statement identifies an indicative housing mix with private and affordable tenures - this being subject to detailed design and masterplanning.

An indicative layout has been superimposed to the illustrative masterplan for the West Craigs part of the application site although no details have been presented for the land to the north of Craigs Road.

A Design and Access Statement containing site analysis, an open space strategy, landscape framework and flight path height constraints diagrams has been submitted. Similar diagrams are reproduced in the Environmental Statement although in some case details presented are not identical.

Principal vehicular access points are identified at Maybury Road/Craigs Road junction and Turnhouse Road, with a bus loop through the site extending via Craigs Road, Meadowfield Road and Turnhouse Road. The location of 'possible' railway overbridge linking from the site to Edinburgh Gateway is identified to the south east corner of the site, with an existing bridge lying 480 metres to the north west identified for pedestrian access.

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 masterplan proposals are acceptable and meet the requirements of the LDP Site Brief and Development Principles;
- c) key detailed matters have been sufficiently addressed;
- d) any other material considerations are addressed;
- e) there are any developer contribution requirements;
- f) any impacts on equalities or human rights are acceptable;
- g) Issues raised in material representations.

(a) Principle of Development

HSG19 Maybury is identified in the adopted Edinburgh Local Development Plan (LDP) as a proposal for housing-led development, with an estimated capacity of 1700-2000 units on a 75 hectare site to the north and south of Turnhouse Road. Development must accord with the Maybury and Cammo LDP Site Brief and Development Principles.

The majority of the application site falls within the HSG19 Maybury allocation, as identified in LDP Table 4, New Housing Proposals. However, the application boundary also includes an area of arable land (5.2 hectares) to the north of Craigs Road. This is designated in the LDP as Green Belt.

In order to consider the issues of principle as they relate to the site and the proposed nature of the development, specific issues are assessed in turn:-

Housing led development and supporting infrastructure

LDP Policy Hou 1 states that priority will be given to the delivery of housing land supply and relevant infrastructure through sites allocated in the plan. The majority of the application site falls within the HSG19 Maybury allocation, as identified in LDP Table 4, New Housing Proposals.

The principle of housing led development on allocated parts of the site would therefore be supported subject to the necessary Environmental Impact Assessment (EIA) being undertaken to inform environmental obligations and mitigation as they relate to the site. The proposal would also be acceptable subject to adherence with the LDP Site Brief and the delivery of necessary infrastructure. In the case of HSG19, this would include transport mitigation measures at Maybury junction (T16), Craigs Road junction (T17), Barnton junction (T18) and delivery of a new non-denominational primary school at Maybury (SCH6). The LDP Action Plan also identifies a range of site specific measures.

For a Planning Permission in Principle, the description relates to all land included within the application boundary. The granting of such permission would therefore support the principle of residential development as per the description, including unit numbers, over the entire site.

The inclusion of land to the north of Craigs Road within the extents of the application presents issues in the granting of any planning permission in principle as it lies outwith the HSG19 Maybury allocation.

EIA Screening ascertained that an Environmental Statement would be required in relation to the development of this site. Limited assessment has been undertaken in the Environmental Statement for the West Craigs part of the application site, and the land to the north of Craigs Road - these areas being subject to the original EIA Scoping exercise.

A detailed review of the Environmental Statement has identified areas where further assessment is required particularly chapters relating to Hydrology, Drainage and Water Quality, Air Quality and Odour, Ecology, Nature Conservation and Biodiversity, Cultural Heritage, LVIA and Traffic and Transport. These areas need to be satisfactorily assessed in order to inform effective and comprehensive masterplanning, and would require an addendum to be prepared to the EIA/Environmental Statement. This would require a further 28 day statutory period for consultation.

However, given the issues of principle affecting the application, the Council has not requested the applicant to obtain further information that would be required for an EIA addendum.

In the absence of comprehensive and robust findings as part of the EIA process, the principle of housing led development cannot be supported.

In terms of assessing the acceptability of the proposed Class 1 retail development and Class 2 financial and professional uses, the LDP Site Brief identifies a level of local retail provision to support the development. It is not considered that the relatively modest element of retail floorspace would impact upon the viability of adjacent retail centres and this aspect of the proposed uses would therefore be acceptable in principle.

Corstorphine Community Council has noted that the submitted geological and agricultural reports accept that the proposed development area is classed as high quality farmland. However, the majority of the application site has now been allocated for housing development in the LDP, and the change of use from agriculture/arable land to new built development is therefore accepted.

Development in the Green Belt

The application boundary includes an area of arable land (5.2 hectares) to the north of Craigs Road. This is designated in the LDP as Green Belt and forms part of the rural setting for the wider HSG19 site.

LDP Policy Env 10 states that within the Green Belt, development will only be permitted where it meets one of the following criteria:-

- a) For the purposes of agricultural, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any structures, or hard standing areas are of a scale and quality of design appropriate to the use.
- b) For the change of use of an existing building, providing the building is of architectural merit or a valuable element in the landscape and is worthy of retention.
- c) For development relating to an existing use of building(s) such as an extension to a site or building, ancillary development or intensification of the use, provided the proposal is appropriate in type in terms of the existing use, of an appropriate scale, of high quality design and acceptable in terms of traffic impact
- d) For the replacement of an existing building with a new building, subject to meeting relevant requirements.

It has not been demonstrated how the proposed development of land in the Green Belt to the north of Craigs Road would address any of these criteria.

The LDP defines the Green Belt boundary at Craig's Road in line with Scottish Planning Policy following a comprehensive landscape assessment of West Edinburgh. The boundary is based upon Craig's Road which is a prominent ridgeline when viewed from recreational viewpoints and key approaches to the city, and where the additional height of development would be conspicuous and out of context with the wooded hills to the west of the city.

The road marks a clear division between the lower-lying land surrounding the airport to the south and steeper hill ground of Lennie Hill and Turnhouse Golf Course to the north and provides a viewshed (i.e. the area that can be seen) conserving southern views from Cammo Estate and Cammo Walk towards the Pentland Hills.

The presence of the ridgeline would visually contain proposed development to the south of Craigs Road (this also to include a 30 metre landscape buffer defined in the LDP Site Brief). However development across the northern slopes of the West Craigs Ridge would impact adversely on recreational receptors from locations such as Cammo Water Tower and Mauseley Hill. The land in question also aligns with the main avenue vista from the former Cammo House. Cammo is designated as nationally important garden and designed landscape on the Inventory maintained by Historic Environment Scotland and its southern parkland forms part of the locally designated Special Landscape Area.

The range of environmental impacts affecting this area have not been specifically addressed in the scope of the Environmental Statement (other than some assessment of Ecology, Nature Conservation and Biodiversity undertaken in Chapter 12). Critically the impact of developing in this area has not been addressed in the Landscape Visual Impact Assessment (LVIA). It is also not apparent, from the information submitted, as to how development would satisfy key tests for incursion into the Green Belt.

The omissions in the LVIA can be highlighted in viewpoints from Burnbrae Park (VP1) and Maybury Road (VP2) to the north east of the site which do not include potential impacts of development to the north of Craigs Road. The viewpoint from Estate Park (VP3) also affords some visibility to these areas. Given these deficiencies it is not possible to fully understand the potential cumulative visual impacts of developments across the application site. Representations have also highlighted the potential landscape and visual impact of highway improvements to Craigs Road, e.g. the introduction of street lighting and this is an issue which would need to be addressed as part of the LVIA.

The proposed development of land in the Green Belt to the north of Craigs Road is contrary to LDP Policy Env 10, Development in the Green Belt and Countryside and SDP Policy 12, Green Belts, criterion a) Maintaining the character and identity of Edinburgh; and criterion c) Maintaining the landscape character of settlements.

In relation to this matter, the applicant was advised at pre-application stage to adjust the red line boundary to exclude the area in the Green Belt and reflect the LDP allocated site. This advice was not taken on board.

Housing Land Supply

LDP Policy Hou 1 relates to the location of housing development and consists of two parts. The first gives priority to housing development in the urban area as defined in the Plan.

The area to north of Craigs Road is defined as green belt and so is not supported by part 1 of LDP Policy Hou1. Should there be a deficit in the maintenance of five year housing land supply, the site may be assessed in terms of part 2 of Policy Hou 1. This states that where a deficit in the maintenance of five year housing land supply is identified (as evidenced through the housing land audit) greenfield/greenbelt housing proposals may be granted permission where:

- a) The development will be in keeping with the character of the settlement and the local area;
- b) The development will not undermine green belt objectives;
- c) Any additional required as a result of the development and to take account of the cumulative impact, including cross boundary impacts is either available or can be provided at the appropriate time;
- d) The site is effective of capable of becoming effective in the relevant timeframe; and
- e) The proposal contributes to the principles of sustainable development;

The latest assessment of housing land supply in the City of Edinburgh is the 2016 Housing Land Audit and Delivery Programme (HLADP) which was reported to Planning Committee on 06 October 2016. With the exception of a single site, the supply of effective housing land and the delivery programme within the HLADP were agreed as reasonable with Homes for Scotland.

The HLADP examines both the supply of effective housing land (an input) and the expected delivery of new homes (the output) which is dependent on many economic and demand related factors. The 2016 HLADP recorded a significant increase in the five year delivery programme compared to previous audits. In terms of delivery, the 2016 HLADP concludes that there is sufficient effective housing land for the next five years, and in the longer term, to meet the housing land requirements set by the SDP. However, the delivery of new homes anticipated over the next five years is still below the five year delivery target (88%).

As there is no deficit in the maintenance of the five year land supply, Policy Hou 1, part 2 does not apply in this instance. The development of the land to the north of Craigs Road is contrary to Policy Hou 1.

Transport infrastructure

The reason for the inclusion of the area to the north of Craigs Road as part of the application is not explicit, although supporting information would suggest this is to allow for the delivery of an access road to link Bughtlins Roundabout with Craigs Road.

In term of delivering the necessary infrastructure to service the development of the site, the LDP identifies a new signalised cross roads at the Craigs Road/Maybury Road junction (Proposal T17) allowing bus, pedestrian and cycle access to and from Craigs Road. It does not identify a requirement for an access road to be delivered between Craigs Road and Bughtlins roundabout. The Transport Appraisal also suggests that the proposed development would be served through an upgraded Craigs Road/Maybury Road junction rather than a new access road.

LDP Policy Tra 8 states that development proposals relating to major housing, which would generate a significant amount of traffic, shall demonstrate through an appropriate transport assessment and proposed mitigation that, any required transport infrastructure and site specific requirements have been addressed as relevant to the proposal. If the applicant was unwilling to commit to the implementation of LDP Proposal T17 and pursue an alternative proposal to link Craigs Road with Bughtlins roundabout, this could reduce potential developer contributions required to deliver proposed road network improvements in the vicinity of Craigs Road/Maybury Road. The development of an alternative route linking Craigs Road with Bughtlins roundabout would be contrary to LDP Policy Tra 10 which states that that planning permission will not be granted for development which would prejudice the new roads and road network improvements.

Co-ordinated Development

The application boundary to the south of Craigs Road would appear to arbitrarily bisect the development layout as presented in the illustrative masterplan. The area of land situated between West Craigs Industrial Estate and Maybury Road forms part of the wider HSG 19 allocation. This area has been excluded from the application boundary and it is not apparent from supporting information as to how development in this area would be delivered or phased in relation to the wider masterplan. The red line boundary could result in annexation of this area thus potentially compromising the effective development of adjacent land. If developed in isolation, this area could require additional access to be created from Maybury Road - an intervention which has not been identified in the approved LDP or Action Programme.

This would not accord with the requirements of the site brief to ensure comprehensive masterplanning and phasing of development. As such, this aspect of the proposals would be contrary to LDP Policy Des2 - Co-ordinated Development, in that planning permission should not compromise a) the effective development of adjacent land; or b) the comprehensive development of the wider area as provided for in a masterplan approved by the Council. Edinburgh Design Guidance further states that a key aim for new development is to ensure that: 'adjacent development sites are not compromised and there is a comprehensive approach to layout'.

Conclusion on the principle of development

Housing led development within the LDP allocated site would be acceptable in principle subject to an EIA process being undertaken to inform environmental obligations and mitigation as they relate to the site.

However, for the present application, the principle of development is not acceptable for the following reasons:-

- i. The proposed development does not meet the requirements of the LDP Site Brief and obligations relating to infrastructure delivery as identified in the LDP Action Plan. A number of specific topic areas must be subject to further assessment in the Environmental Statement, with an addendum being prepared to allow for full assessment of the West Craigs part of the site.
- ii. The LVIA has not assessed the impact of future development within the area of Green Belt to the north of Craigs Road.
- iii. The proposals would not meet the criteria for development in the Green Belt and would adversely impact upon the designed landscape and historic garden at Cammo Park Estate. The proposed development would therefore be contrary to SDP Policy 12 and LDP Policies Env 10 and Env7.
- iv. No deficit in the maintenance of the five year housing land supply has been identified to justify incursion into the Green Belt, as per the requirements of part of LDP policy Hou 1.
- v. The proposed development of the area to the north of Craigs Road for the purpose of an access road linking Craigs Road with the Bughtlins roundabout would be contrary to LDP Policy Tra 10 and could prejudice new road and network improvements including the implementation of LDP Proposal T17.
- vi. The principle of development in the area to the south of Craigs Road could result in an uncoordinated development of the HSG19 site which would be contrary to LDP Policy Des 2.

b) The masterplan proposals are acceptable and meet the requirements of the LDP Site Brief and Development Principles;

Masterplan

The LDP Site Brief covering both HSG19 Maybury and HSG20 Cammo, states that comprehensive master planning and phasing of development will be required, drawing upon place-making and street design principles to create distinctive and sustainable urban communities at this gateway to the city. It also states that these housing sites are served by bus, rail and tram connections and will be physically integrated with their surroundings by street design and green corridors linking Cammo Estate Park and the River Almond to the north, the Gyle and Edinburgh Park to the south and IBG to the south west.

The Scottish Government Advice note on Master Planning (PAN83) advises that development proposals of this scale should be supported by a detailed masterplan which sets out how the project will be implemented through a delivery strategy with phasing, timing and funding. Proposals should also be developed with communities and organisations which have a stake in the area to ensure deliverability.

The LDP states that masterplans should be prepared by developers as part of a planning application process to demonstrate how their proposals meet the LDP's design and place-making objectives and any site specific requirements. Masterplans should also provide information on the mix of uses, how a development relates to the surrounding area and, where relevant, proposals on an adjacent sites and development phasing. The LDP Site Brief for HSG19 specifically refers to the requirement for comprehensive masterplanning and phasing of development drawing upon place-making and street design principles to create distinctive and sustainable urban communities at this gateway to the City.

In line with these requirements, the applicant has been encouraged to prepare masterplan proposals in support of a Planning Permission in Principle and engage a multi-disciplinary design team.

An initial request by the applicant to present the proposals to the Edinburgh Urban Design Panel was made to the Council in January 2016. Due to the scale and locally significant nature of the proposals, and the requirement for comprehensive masterplanning, it was considered that these proposals would be better suited to an Architecture + Design Scotland (A+DS) Design Forum series. The proposals were subject to initial scoping meetings involving Architecture + Design Scotland, the Council, the applicant and adjacent landowners during March- May 2016. However, due to a failure to agree of a number of key aspects of the site brief and a timetable for Design Forum workshops to take place in advance of a planning application being submitted, this was not pursued further by the applicant.

A single masterplanning workshop was held with the Council and the applicant in September 2016, this being based around an earlier iteration of the masterplan proposals. Pre-application advice was offered both during and following the meeting.

The application has been accompanied by an illustrative masterplan. The basic site structure, including provision of the north-south green corridor, a woodland buffer to the Craigs Road ridge and some higher density to the south eastern corner of the site would broadly align with the LDP Site Brief. However, the delivery of the pedestrian/cycle bridge to Edinburgh Gateway has a fundamental bearing on the development layout and this has not been satisfactorily addressed. Matters relating to this are further considered below.

The provision of open space, including the LDP Site Brief requirement for two large greenspaces, has not been clearly demonstrated as part of a landscape strategy. In the case of a large development site of this nature, masterplan proposals should also be supported by such a strategy to inform the landscape vision for the entire site and indicate how this will contribute to a sense of place. It would also inform the delivery of strategic landscape infrastructure including SUDS, open space provision and structural landscaping required for visual mitigation. This has not been submitted in support of the masterplan.

The treatment of site edges, particularly to the south west and north west also require further consideration to ensure that development will conserve and enhance the landscape setting of the city and strengthen the green belt boundary.

The Roads Authority has advised that the road layout and urban structure proposed for the development is of a generally traditional layout whereby the roads dominate the design rather than the reverse being the case as per the recommendation in the Scottish Government's 'Designing Streets' guidance. The design of the roads and footways should reflect the aims of both 'Designing Streets' and the Edinburgh Street Design Guidance, in particular the priority given to active travel modes and take into account the proposed school location in the centre of the development.

Although it is recognised that the layout of urban form is diagrammatic, the relative scale of the site combined with the flat topography, could result in a monotonous and repetitive layout. LDP Policy Hou 2 stresses the importance of achieving a good mix of development types and avoiding large areas of housing with similar characteristics. An urban design framework to support the masterplan would address issues relating to design identity and character to ensure greater distinctiveness and variety across the development but this has not been submitted.

The application site contains a number of distinctive features including historic built structures, mature trees and hedgerows which contribute towards landscape character, view and biodiversity and archaeological interest. Whilst some site analysis has been undertaken, it is not fully apparent how existing site features, including historic structures, mature trees and hedgerows, have been incorporated into the development layout. In particular, the presence of the Meadowfield and West Craigs Farms should be re-interpreted, either through their re-use or part retention possibly within the layout of open space.

Representations have commented on the impact that development of the site may have upon local walks and cycle paths and that the proposal does not provide for direct access to adjacent countryside or recreational opportunities, e.g. the Cammo Estate. Had comprehensive masterplanning been undertaken, this could have allowed for further analysis of both the site and local environment, including how the site relates to its broader city context, and opportunities to connect with existing route networks, adjacent sites and promote access to adjacent countryside.

In summary, the LDP requirement for comprehensive masterplanning has not been achieved and proposals do not fully address the requirements of the LDP Site Brief and Development Principles. The masterplan proposals as submitted are therefore unacceptable.

Location and delivery of the pedestrian/cycle bridge to Edinburgh Gateway

The LDP Site Brief and Development Principles identify a requirement for a pedestrian/cycle bridge to be provided to link the site with Edinburgh Gateway and deliver onward connections to the Gyle and Edinburgh Park to the south and IBG to the west. Related to this, the opportunities for higher density development within 400 metres of the bridge and development of a community focal point with local services including the primary school and healthcare facilities are also identified.

The illustrative masterplan identifies a 'possible' bridge approximately 75 metres to the south east of the location identified in the LDP Site Brief. An existing bridge lying 480 metres to the north west of the LDP location is identified for re-use.

A Feasibility Study to consider implementation of this bridge across the railway has been submitted by the applicant. This identifies four potential options including:-

- 1) Re-use of the existing overbridge, situated west of Meadowfield Farm;
- 2) Re-use of disused abutments located between the existing overbridge and Edinburgh Gateway;
- 3) On the boundary of Edinburgh Gateway Station; and
- 4) Direct access to Edinburgh Gateway Station to/from the north;

The bridge location as identified in the LDP is not included in this range of options. Although the Supplementary Transport Statement submitted by the applicant identifies a developer contribution towards the bridge, this also states that the applicant will progress an initial assessment and design of the bridge to deliver the 'optimum and most deliverable' solution.

The provision of a direct pedestrian/cycle link to the Edinburgh Gateway Station is a fundamental requirement for the development of the HSG19 site, in that it will significantly enhance accessibility to public transport, particularly to tram and heavy rail and ensure the site is less car dependant.

For the purpose of a Planning Permission in Principle, it would be reasonable to expect confirmation in relation to points of access to the application site, including the principle of delivering the bridge as per the requirements of the LDP Site Brief, rather than a series of options. The delivery of the bridge is also identified as a site specific action in the LDP Action Programme and will therefore form a key element of any S.75 legal agreement relating to the application site.

The Bridge Feasibility Study cites issues relating to airport height restrictions, which may prevent delivery of the bridge in the LDP location, although no detailed assessment has been provided to demonstrate why this would not be feasible in technical terms, or identify design solutions which could address potential issues relating to height in this location.

The masterplan proposes the re-use of the existing railway overbridge, situated to the west of Meadowfield Farm and 480 metres to the north west of the LDP location. Whilst this bridge could be retained as part of the proposals, Network Rail has confirmed in its consultation response that this bridge (OB 090/018) was built as an accommodation crossing and is owned and maintained by Network Rail. There are no rights of public access over this bridge and additional servitude rights of access would have to be secured from Network Rail. Whilst this could be pursued to provide a secondary access route from the application site, the location of this existing bridge is not optimally located to serve the wider HSG19 site or facilitate strategic cycle and pedestrian access particularly the development of the green corridor from Cammo Walk to Edinburgh Gateway. For users traversing the green corridor, an alternative route from Turnhouse Road to Edinburgh Gateway via the existing bridge would result in an approximate 1km detour. To access this facility via the Maybury junction would require a detour of approximately 800 metres. The formation of such a route via the existing bridge could also divert pedestrian and cyclists away from the south east corner of the site, which could undermine placemaking opportunities, particularly the aim of creating a community focal point to support local services including commercial and retail development.

The route leading from the existing bridge to the south west of the railway is also relatively isolated in nature, is currently un-lit and flanked by the Airport perimeter security fence, which would be uninviting, potentially intimidating and as a result little used. Given that the land and elements such as the security fence are in the control of third parties, this would require agreement to be secured from those parties if this route was to be upgraded to a higher environmental standard.

The re-use of the existing bridge as an alternative to the delivery of a new bridge in the LDP location would considerably increase walking and cycling distances, thus diminishing the effectiveness of the proposed Green Corridor from Cammo Walk to Edinburgh Gateway and the strategic pedestrian and cycle network. It would also fundamentally alter the dynamics of the site and layout as proposed in the illustrative masterplan.

The LDP Site Brief identifies the opportunity to create a community focal point providing local services in an accessible location close to new pedestrian/cycle bridge and Edinburgh Gateway, this supported by higher density development. The presence of some development, of a relative higher density to that shown for other parts of the site, has been indicated within 400 metres of the proposed pedestrian/cycle bridge location. However, the development layout for the south western part of site suggests a lack of cohesion between urban form, open space and the commercial and community uses. With ambiguity over the delivery of the proposed bridge in the LDP location, this opportunity does not yet appear to have been fully explored nor has it been demonstrated that placemaking objectives would be successfully achieved.

The masterplan proposals could also be prejudicial to the delivery of the bridge in the LDP location, in that development is identified in the vicinity of the bridge in the area immediately to the north. Where permission be granted for development in this location, this would likely compromise the implementation of the approach routes to the bridge. This aspect of the proposal would be contrary to LDP Policy Des2 a) in that it would compromise the development of the bridge and the green corridor.

The application does not address the site's location adjacent to Edinburgh Gateway Station, a key element of the LDP Site Brief, with the high level of accessibility to public transport being a reason for the allocation of the HSG19 site in the LDP. LDP Site Brief requirements are supported by consultation responses and representations.

The application does not provide a direct pedestrian/cycle link to Edinburgh Gateway, rather the illustrative masterplan only points towards this link as 'possible'. In the absence of such a link in this location, this could undermine the attractiveness of the site in terms of accessibility and in turn increase could levels of car use. The delivery of a direct bridge link to Edinburgh Gateway is therefore fundamental to the delivery of housing and the masterplanning of the application site.

In conclusion, the failure to deliver the bridge in the LDP location would also be contrary to LDP Policies Del 1, Developer Contributions and Infrastructure Delivery and Tra 8, Provision of Transport Infrastructure. The various matters outlined in relation to the delivery of the bridge and masterplan proposals would be contrary to LDP Policy Des 7 b) in that new streets within developments are direct and connected with other networks to ensure ease of access to local centres and public transport. The proposals would also be contrary the requirements of Des 7 c) which states that layout will encourage walking and cycling, and Des 7 f) public open spaces and pedestrian and cycle routes are connected with the with the wider pedestrian and cycle network. Such objectives are also highlighted in the Edinburgh Design Guidance which states that masterplans should seek to integrate with the surrounding network of streets, spaces and services and integrate new development with the Green Network.

Proposed unit numbers and density

The capacity of HSG19 has been identified as 1700-2000 dwellings, with the application red line embracing 87% of the total allocation. On the basis of the application boundary (73 hectares), the current proposal for 1400 units would realise a residential density of 19.7 dwellings per hectare (this excluding the 2 hectare primary school site). The general assumption for densities on a greenfield site would be 25-35 dwellings per hectare.

For a Planning Permission in Principle, the description of proposed development relates to all land included within the application boundary. The granting of such permission would therefore accept the principle of residential development as per the description including unit numbers. This would include the area in the Green Belt to the north of Craigs Road and the West Craigs part of the application site. Were planning permission in principle to be granted on the basis of up to 1400 dwellings, in the absence of an agreed approach for the comprehensive masterplanning of the site, this could reduce overall densities, and fail to deliver the estimated capacity for new houses identified in this allocation. LDP Policy Hou4 states that the Council will seek an appropriate density of development of each site having regard to its characteristics and those of the surrounding area and the accessibility of the site.

The LDP allocated site is land which was previously allocated as Green Belt. In order to ensure the efficient use of land, it would be expected that such a site would seek to deliver higher densities where feasible. Specifically this would include higher densities to the south east corner of the site, within 400 metres of the pedestrian/cycle bridge and the transport hub, as per the requirements of the LDP Site Brief. In general, it is considered densities in the area closest to the transport hub and existing settlement area could be further explored.

The proposed height of development across the site has been identified as being a maximum two to three storeys in scale. However, the lack of information relating to proposed development platforms and lack of clarity in relation to airport height restrictions as they affect the various part of the site, could have a significant bearing on the overall densities which can be achieved.

In the absence of a robust and comprehensive masterplan approach, including the assumptions made in relation to the LVIA, the sizes of proposed surface water attenuation storage, airport height restrictions and the issues presented by the application boundary, it is not possible to clearly define areas for development. In turn, densities of development and overall unit numbers across the wider site cannot be fully ascertained. This aspect of the masterplan proposals would not meet the requirements of LDP Policy Des 7 a) in that a comprehensive approach to the layout of buildings, streets, footpaths, public and private open spaces, services and SUDS features has not been demonstrated.

Phasing of development

The LDP Site Brief states that development should start in the eastern part of the site forming an extension of the existing built up area.

A site zone diagram (with 10 potential development zones with residential unit numbers) and indicative phasing plan have been submitted. This information does not address the entirety of the LDP allocated site and excludes strategic infrastructure e.g. transport interventions, open space and structural landscaping. The first phase of development is indicated as commencing simultaneously in various parts of the site, including two points on Turnhouse Road and plots situated to the north west corner and northern site edge. This approach is unlikely to deliver a coherent place, or series of places, which take account of the delivery of strategic infrastructure. The relative accessibility of the south east corner of the site and its proximity to public transport and local facilities must also be taken into consideration in the phasing of development.

The indicative phasing strategy does not reflect an agreed masterplan approach or the LDP Site Brief and Development Principles, which state that development should start in the eastern part of the site forming an extension of the existing built up area. There is an absence of detailed phasing information against which a Section 75 legal agreement could be attached, including delivery of the pedestrian/cycle railway overbridge in the LDP location. The proposals would therefore be contrary to LDP Policy Del 1, Developer Contributions and Infrastructure Delivery.

Conclusion on the proposed Masterplan

The LDP Site Brief states that comprehensive masterplanning and phasing of development should draw upon place-making and street design principles to create distinctive and sustainable urban communities at the gateway to the City.

Whilst a number of aspects of the LDP Site Brief have been identified in the masterplan proposals, including the provision of the north-south green corridor, planting to the Craigs Road ridgeline and potential interventions to Turnhouse and Craigs Road there are a number of significant aspects which have not been clearly demonstrated. These would include phasing of development including the delivery of strategic infrastructure, open space and the provision of a second large greenspace. The opportunity for higher density development and the creation of a community focal point to the south east corner of the site has not been fully explored.

The masterplan proposals have not been supported by comprehensive and robust site analysis or clearly informed by the findings of the Environmental Statement, including the LVIA. The West Craigs part of the site has not been fully assessed and the masterplan layout has not sought to re-interpret the presence of Meadowfield or West Craigs Farms.

The delivery of the pedestrian/cycle bridge in the LDP location is a fundamental issue which must be addressed as part of any masterplan proposal. The delivery of the bridge has a substantial bearing on the function and dynamics of the HSG19 site and the wider locality. Should the bridge link not be secured in the LDP location, it would significantly limit the accessible nature and sustainability of the application site. The location and delivery of the pedestrian/cycle bridge to Edinburgh Gateway does not meet the requirements of the LDP Site Brief, LDP Policies Del1, Des 2 and Des 7 b) c) and f) and Tra 8.

The HSG19 site represents one of the largest housing allocations in the LDP and a significant westward expansion of the city, on land which formerly comprised green belt. It is therefore imperative that comprehensive masterplanning is undertaken to guide the long term development of the site, as well as promoting high quality urban design. A design vision for the site has not been clearly articulated through the current masterplan proposals, nor is this supported by a landscape strategy or urban design framework.

Although the masterplan proposals are illustrative at PPP stage, the masterplanning undertaken as part of this application is not sufficiently comprehensive and contrary to the LDP Site Brief and Development Principles. The proposals have not been sufficiently developed and the development layout cannot be supported.

(c) Detailed matters to be fully addressed

The following matters have been assessed and are not considered to fully meet the requirements of the LDP and Council guidance. Given the matters of principle affecting the application as outlined in sections a) and b) there has not been further engagement with the applicant on these matters. These matters would need to be addressed through an addendum to the Environmental Statement and other supporting documentation.

- Visual Impact and the setting of the city;
- Landscape and Open Space;
- Flooding/SUDS;
- Archaeology;
- Airport Safeguarding;
- Transport; and
- Air Quality.

Visual Impact upon landscape setting of the city

The Strategic Landscape Assessment prepared as part of the LDP, recognised the potentially significant landscape impacts in the development of this site. In citywide terms the level of impact was considered acceptable relative to other sites and it was deemed suitable for housing development. As an allocated site in the LDP, it has been assessed through plan-making process in terms of principal landscape features, strategic green infrastructure and wider access links, which accordingly have helped inform the LDP Site Brief.

Although the principle of housing development across the majority of the application site is accepted within the LDP, the Landscape Visual Impact Assessment (LVIA) does not mark the application site boundary on the visualisations which makes it difficult to identify the area which needs to be assessed. The LVIA has not fully addressed the potential visual impacts of development due to a lack of information regarding proposed development platforms and consequential building heights. The underlying geology and sloping topography of the more elevated parts of the site could also require land levels to be raised, yet such details have not been established as part of the application.

The presence of the Cammo Park Estate, included in the inventory of design landscapes and historic gardens, situated to the north west of Craigs Road must also be considered. LDP Policy Env 7 states that development will only be permitted where there is no detrimental impact on the character of the site recorded in the Inventory of Gardens and Designed Landscapes. The Non Technical Summary of the Environmental Statement identifies minor/moderate effect on the setting of one Inventory Garden and Designed Landscape. However, without detailed assessment, particularly its inclusion as part of the LVIA, the potential landscape impacts of developing the area to the north of Craigs Road, including the setting of the Inventory Garden and Design Landscape cannot be established.

The West Craigs part of the application site, to the south of Craigs Road, forms the northern edge to the HSG19 allocation, and as such the boundary with the Green Belt. Without LVIA being undertaken for this area, the impact of development and requirements for mitigation cannot be fully established. This aspect of the proposals would therefore be contrary in LDP Policy Des 9 - Urban Edge Development, part c) which states that permission will only be granted on such sites where it includes landscape improvement proposals that will strengthen the green belt boundary.

The nature of proposed landscape mitigation measures to the north western and south western edges of the application also require further consideration in relation to LDP Policies Des 9 a) and c) Urban Edge Development, including how development would conserve and enhance the special landscape character of the city and strengthen the Green Belt boundary.

The north western boundary to the application site excludes the north western part of the HSG19 allocation. In the absence of agreed details of phasing and how this part of the HSG19 allocation may eventually be taken forward, it should be recognised that this area may not be built out for many years. Without a strong landscape boundary in this location, this could result in urban development in close proximity to the Green Belt boundary which could have a detrimental effect on the landscape setting of the city from the north west. The edge treatment which is provided to this boundary should be flexible such that it operates as a temporary Green Belt edge but allow for future expansion in a planned way.

The proposed south west boundary to the site extends for a length of 1.2km and this will form a significant new edge to the urban area of the city. The deliverability of the proposed buffer tree planting could be significantly affected by airport requirements and would therefore need to be tested as part of a landscape strategy to fully understand the potential visual impact of development and ensure a suitable landscape setting for the development. As proposed this aspect of the proposal would also fail to meet the requirements of LDP Policy Des 9 a).

Therefore, in the absence of sufficient details being provided for assessment as part of the LVIA, the application does not address the requirements of LDP policies Des 1 - Design Quality and Context, Des 4 - Development Design - Impact on Setting, Env 7 - Historic Gardens and Designed Landscapes, Des 9 - Urban Edge Development and Env 10 - Development in the Green Belt and Countryside or the Edinburgh Design Guidance, Section 1.7.

Landscape Infrastructure and Open Space

The LDP Site brief identifies strategic landscape infrastructure to be delivered as part of the development including the green corridor and woodland planting to the Craigs Road ridgeline. The proposals identify the location and a potential hierarchy of open spaces, green corridors, and strategic landscaping.

However, the application proposal does not make provision for two large greenspaces as per the LDP site brief nor has it been established whether 20% of the overall site area would constitute usable open space as per LDP Policy Hou 3. In order to determine whether, the omission of the second large greenspace would be acceptable, and inform further negotiation with the Council as per the requirements of LDP Policy Env 20, the proposed open space provision across the HSG19 allocation, must be quantified through a comprehensively masterplanned approach supported by a landscape strategy. This would be expected for a large strategic development site of this nature. A landscape strategy should seek to provide a vision for the entire site and indicate how this will contribute to a sense of place. It also informs the delivery of strategic landscape infrastructure including SUDS, open space provision and structural landscaping required for visual mitigation. This is critical if the site is to be sold off to a number of parties in that it would provide a framework across the site and can be used to drive future design quality. A landscape strategy can also be used to inform phasing of development.

There is a lack of detailed information relating to trees and hedgerows on the site to assess whether the proposals meet the requirements of LDP Policy Env 12 which states that development will not be permitted if it is likely to have a damaging impact on trees or woodland worthy of retention unless necessary for good arboricultural reasons.

Landscape and open space aspirations for the development could be significantly impeded by SUDS and airport requirements and these must be fully ascertained through further design development and the preparation of a landscape strategy to support an agreed masterplan approach. The absence of design integration between the layout of urban form, open space and SUDS features currently fail to demonstrate compliance with LDP Policy Des 7. It is expected that careful attention is paid to these issues at EIA/PPP stages, in order that the integral placemaking role of the proposed green infrastructure is not diminished or adversely impacted by such requirements at future stages of the planning process.

Whilst conventional above-ground storage is unlikely to be achievable given airport restrictions, there are several types of SUDS component that can be used successfully in proximity to the airport, e.g. bio-retention. However, such measures need to be designed into the overall urban design of the site and require the sufficient space. There is also a need to ensure such measures are compatible with landscape design and function of open space, in that some means of attenuation prevent the planting of trees, for example.

Flooding and Drainage

The Council's Flood Prevention Team has commented that the applicant has not provided details for the part of the application which is included in the red-line boundary to the south of Craigs Road. As a result, Flood Prevention would object to this application on the grounds of insufficient information.

Flood Prevention has also requested that further information should be provided by the applicant to show approximate locations and size of the proposed surface water attenuation storage within the proposed housing arrangement. Ideally these should be provided above ground as this is a greenfield site although requirements of airport guidance with regard to flocking bird strike must also be considered. SEPA has remarked that the proposed masterplan does not highlight attenuation surface water features on site.

The requirement to demonstrate surface water attenuation within the housing layout could have a significant bearing on the masterplan proposals presented as part of the application, in that this could greatly affect the design and extents of open space and as such, the developable area, layout and unit numbers.

Flood Prevention has also identified that the proposal to drain surface water to the River Almond via a new surface water pipe through land owned by Lord Rosebery is crucial to the development. Flood Prevention would therefore object to any planning permission without evidence to demonstrate this arrangement is agreeable to the Lord Rosebery Estate. To date, no such evidence has been submitted.

LDP Policy Env 21 states that planning permission should not be granted for development that would increase a flood risk or be at risk of flooding itself. This has not yet been clearly demonstrated.

Information relating to surface water attenuation storage needs to inform the masterplan approach for the site including the requirements of LDP Policy Des 7a).

Transport

The Roads Authority has commented on the content of the Transport Appraisal and supplementary transport statement submitted by the applicant. The comments have considered the relationship with the Council's WETA Refresh Study 2016, the phasing of development and the delivery of site specific transport actions as per the Council's Action Programme including the bridge link to Edinburgh Gateway, proposed parking levels and the street layout.

Transport Scotland has no objection to the proposal, on the understanding that the traffic generated by the application site has been incorporated as part of the traffic modelling undertaken for the WETA Refresh Study, and its associated traffic impact on the trunk road network has therefore been taken into consideration.

The WETA Refresh Study 2016 has developed a wide ranging package of transport measures, with contributions to address area wide transport interventions (through Contribution Zones), being reflected in the Council's LDP Action Programme and 'Developer Contributions and Infrastructure Delivery' Guidance. The various transport measures as they relate to the site are outlined in section (e) of the report.

The original Transport Appraisal (TA) submitted as part of the application, pre-dated the publication of the finalised WETA Refresh Study and does not refer to it. However, the Supplementary Transport Statement has acknowledged the requirement for the TA to align with the WETA Refresh findings and has applied predicted traffic conditions.

The applicant has made reference in the TA to the transport actions in the Maybury/Barnton contribution zone, namely the improvements at the Maybury, Craigs Road and Barnton junctions.

The applicant concludes that predicted impact at these locations will be mitigated by proposed transport interventions in accordance with the Action Programme, although no details have been provided on the phasing of development and the completion of these actions. The Roads Authority has commented that the modelling assumptions would appear relatively low and the layout of streets and parking provision does not currently reflect these aims. These issues could have a significant bearing, not only on the masterplan approach, but also in seeking to minimise car use and promote modal transport choice.

The ability of the local road network to cope with increased traffic levels and impacts to air quality have been highlighted in a large proportion of representations. In order to demonstrate that the concerns are being satisfactorily addressed it is important that the full range of transport mitigation measures are confirmed. In view of the issues raised by the Roads Authority, it would be premature to accept the assumptions of the traffic modelling and parking provision at this stage. It is also not apparent whether all the recommendations arising from the WETA Refresh are fully reflected in the masterplan proposals.

It has not yet been demonstrated that cumulative transport impacts and required transport infrastructure including site specific transport principles have been adequately addressed as per the requirements of LDP Policy Tra 8 and there is insufficient information to fully assess the application.

The Scottish Government's 'Designing Streets' guidance and LDP Policy Des 7 - Layout Design, highlight the requirement for a comprehensive and integrated approach to the layout of buildings, streets, footpaths and cycle paths, which encourages walking and cycling. Such issues need to be fully considered as part of comprehensive masterplanning for the site.

Air Quality

An air quality assessment has been submitted as part of the Environmental Statement - Chapter 10 - Air Quality and Odour. Environmental Protection has expressed concern regarding the adverse impacts a development of this size and scale may have on air quality, as well as the cumulative effects of other development coming forward in the West Edinburgh area. Whilst acknowledging the application site forms part of an LDP allocation for housing development, LDP Policy Env 22 advises that proposals will be assessed to ensure proposed development does not adversely affect air quality in identified Air Quality Management Areas (AQMAs) or by cumulative impacts lead to creation of further AQMAs in the city.

Environmental Protection understands that the transport assessment has underestimated the trip rates and if this is the case, then the figures would have an adverse impact on the air quality assessment. Environmental Protection still believes that the worst case scenario in terms of impact upon air quality has not been supplied and recommends the application is refused due to the likely adverse impacts this development will have on local air quality.

Matters relating to air quality and increased traffic levels arising from the proposed development, including concern that house building targets are being prioritised over issues such as air quality and ability of infrastructure to cope with increased traffic levels, have been identified in large proportion of the representations received.

The Council's WETA Refresh Study has identified a number of transport mitigation measures that will need to be fully delivered in order to minimise the impacts on local air quality. Development of this scale needs to be supported by effective mitigation to ensure there will be no significant adverse effect on air quality. This would include a range of modal transport choices which minimise reliance on the car. The HSG19 site has been allocated on the basis of its accessibility to public transport, particularly its proximity to Edinburgh Gateway and the delivery of the pedestrian/cycle bridge is fundamental to achieving this aim.

The Environmental Statement submitted by the applicant and supporting transport information including traffic modelling has not yet demonstrated, that the requirements of LDP Policy Env 22 in relation to air quality would be achieved.

Archaeology

The application site is centred upon two historic farms, Meadowfield and West Craigs, the origins of which date to the 18th and 15th/16th centuries respectively. The application site also contains a range of important rural historic buildings associated with these two farms dating back to the late 18th- early 19th century. Archaeological evidence from the surrounding area suggests that the site has significant potential for containing archaeological evidence dating back to early prehistory.

An assessment of heritage assets affecting the site is provided in the Environmental Statement, Chapter 13 - Cultural Heritage. This considers both buildings and potential for buried archaeology within the application site and locality, although full assessment of these issues has not been provided for the north eastern part of the application site, including West Craigs Farm and West Craigs Cottages.

The City Archaeology Officer has advised that the Meadowfield farmhouse and steading form an important part of the historic character of the area. As such their loss would be considered a significant impact on the character of the area. Every effort should be made to retain the steading and layout of this historic farm which the current illustrative masterplan fails to do. Although the Meadowfield farmhouse has now been badly damaged by fire, it is recommended that the layout of the steading and design is retained as a focal point of the new development with new building designed to reflect and interpret the layout and form/character, reusing as much as possible of the original fabric.

The lack of detailed assessment and the potential loss of West Craigs Farm and West Craigs Farm Cottages would be contrary to LDP Policies Env 8)b and Env 9 and the City Archaeology Officer has recommended the application is refused consent on this basis.

Airport Safeguarding

The site is located outside the Airport Public Safety Zone as identified in the LDP. Given the proximity of the application site to the Edinburgh Airport and the south east runway, flight path safeguarding affects all part of the site which has a major bearing on the heights and overall level of development proposed.

The Environmental Statement, Figure 3.2, identifies potential height constraints (Plan dated 28 July 2016), a similar diagram also being reproduced in the Design and Access Statement (Plan dated 22 September 2016). Neither plan includes data for the West Craigs part of the application site.

Edinburgh Airport, recommends the use of various conditions relating to the operation of the Airport, including the submission of SUDS and Landscaping details. A condition is also stipulated to limit the heights of development as based upon a version of the above diagram.

The information presented in relation to maximum building heights suggests 2-3 storey development with traditional pitched roof forms. However, the maximum building height zones as they affect various parts of the site are not clearly defined. In order for such a condition to be enforceable, flight path safeguarding requirements, as they affect all parts of the application site must to be clearly presented. The establishment of clear height parameters, based around the use of contour information must be considered as an integral part of masterplanning for this site.

Should Committee be minded to approve the application, it would be suggested that a condition still be applied to limit the height of building and structures, but this should omit reference to the above plans.

Airport restrictions also have significant implications for SUDS design on the application site. In order to ensure this fully integrates with an agreed masterplan and landscape strategy, it is suggested that such issues, including the use of techniques such as Bio-retention are further explored with the Airport.

(d) Other material planning considerations;

The following aspects of the proposals are considered broadly acceptable subject to other matters being satisfactorily addressed, e.g. comprehensive masterplanning and should the Committee be minded to approve the application, such issues could be dealt with through condition or informative as required:-

- Ecology and Protected Species
- Affordable Housing;
- Education;
- Impacts to residential amenity; and
- Sustainability.

Ecology and Protected Species

The Environmental Statement, Chapter 12 has been submitted in support of the application and has considered ecological matters relating to the site. This outlines a number of surveys and assessments which have taken place in relation to the site from 2013-2016. In general terms the ecology of the site and potential impacts to protected species are well understood and the conclusion is that there will be no significant impact upon habitats as a result of the development of this site.

No bat survey data has been provided for the West Craigs part of the site, including West Craigs Farm. Survey work undertaken in relation to a separate application (16/05681/PPP) did survey the buildings in this part of the site and found very low quality roost opportunity and no evidence of any roost. The Edinburgh and Lothian's Badger Group have also confirmed constraints in relation to badgers on this part of the site, and in the event of any planning approval being granted this matter would need to be addressed through condition.

Survey work relating to the wider application site has confirmed that the presence of bat roosts elsewhere and a derogation licence for their removal would therefore be required prior to any of the affected buildings being demolished. The applicant has provided further clarification in relation to an error in the Environmental Statement and that future survey work will need to be undertaken, to ensure that no offence will be submitted under the Habitat Regulations 1994.

However, further survey work will need to be undertaken in relation to bats, and should Committee be minded to approve the application, consent must not be issued until such survey work has been completed.

Given the range of issues which need to be addressed in relation to the Environmental Statement, further survey work relating to bats and badgers could be provided as part of the addendum to the Environmental Statement

Subject to additional survey information being provided, to demonstrate that the proposals would not impact on species protected under European or UK law, the proposals would meet the requirements of LDP Policy Env 16 - Species Protection.

Proposed housing, including affordable housing provision

LDP Policy Hou 2- Housing Mix, states that the Council will seek the provision of a mix of house types and sizes where practical, to meet a range of housing needs, including those of families, older people and people with special needs, and having regard to the character of the area and its accessibility. The illustrative masterplan proposal identifies a range of urban forms which could deliver a range of house types across the majority of the HSG19 Maybury allocation. The Council's Affordable Housing Policy (AHP) requires that a minimum 25% homes are of approved affordable housing tenures. On the basis of approximately 1400 homes being built, there would be a requirement for 350 affordable homes. The provision of affordable housing as part of the development would form an integral part of any S.75 legal agreement.

The applicant has confirmed that the affordable properties would be tenure blind and include social rented housing, mid market rented housing and low cost home ownership. These would consist of a combination of low/mid rise flats and houses and would include homes specifically for elderly people. In view of this, the proposal has the potential to create a diverse and inclusive community.

However, the delivery of this must be supported by comprehensive masterplanning and a clear overall vision for the site, which is not yet adequately developed. In the absence of the delivery of the bridge to Edinburgh Gateway being resolved, in the LDP location, this site will not fulfil its potential in relation to accessibility.

There are also concerns relating to the application boundary, as previously outlined in section 3.3 (a) of the report could affect overall unit numbers, the capacity of the wider allocation and the masterplan approach. In the absence of sufficient clarity on these issues there would be insufficient detail on which to base a S.75 agreement.

Education

Issues relating to required developer contributions for education are considered in section (e) of the report.

However, if the appropriate contribution is provided by the developer, Communities and Families do not object to the application. Subject to the conclusion of a suitable S.75 legal agreement, this aspect of the proposals would meet the requirements of LDP Policy Del 1, Developer Contributions and Infrastructure Delivery.

Impacts to residential amenity

All the residential properties within the extents of the site, other than West Craigs farmhouse and West Craigs Farm Cottages are unoccupied. A number of residential properties lie at the northern and north western peripheries of the site, including Lennie Cottages and Craigs Road. Suburban housing development is situated in the areas to the east and south east of the application site.

While the proposal will fundamentally change the character of the area it is not considered to create an adverse impact on neighbouring residential amenity. Policy and guidance would require adequate separation distances secured at detailed planning stage(s). It would also be expected that an agreed masterplan approach supported by a landscape strategy would identify effective landscape buffers to provide both effective screening and separation between proposed residential and adjacent industrial uses.

The former Braehead Quarry, which serves as a composting facility handling household and commercial waste, lies to the northern edge of the application site. The site is identified in the LDP as a safeguarded waste management facility (RS2). LDP Policy RS2 states that development in the area immediately surrounding an existing or safeguarded waste management facility will only be allowed if it is demonstrated that there will be no adverse implications for approved waste handling operations.

Environmental Protection note that the Council have received odour complaints from existing residential properties which are located approximately 500 metres from the composting site boundary. The masterplan proposals identify that the closest development would lie approximately 100 metres to the south of this facility. However, this would be separated by the ridge to Craigs Road, and both existing and proposed landscaping. The separation between the composting site and the application site should assist in protecting future residents from odour nuisance during the normal operation of this site. Although a failure in the management of odour emissions from this site, combined with a north westerly wind could lead to odour nuisance arising.

This site is regulated by SEPA and is required to control the emissions of dust and odour. Complaints regarding the operation of the site would also be referred to them as regulator. In view of the regulatory regime and proposed level of separation it is not therefore considered that the operation of this site would be affected by proposed residential development.

The operation of the airport, including the freight facilities at Turnhouse Road have also been cited in representations. These largely relate to the accessibility of the freight handling facility, and the impact of development on the local road network.

Assessment of noise issues to the suitability of the site for residential development has been undertaken as part of the Environmental Statement - Chapter 11 - Noise and Vibration. This has considered road traffic noise sources, which have been assessed at various points around the site and the adjacent composting site.

Further noise assessment information has been provided by the applicant. However, this would need to be formally considered as part of the addendum to the Environmental Statement and re-advertised under the EIA regulations.

Noise and fumes from the Airport has been identified as an issue in representations. However, the site does not lie beneath the principle flight path and falls outside the noise contours for the airport. The Airfreight facility is considered sufficiently remote from the site with existing residential properties located in the immediate vicinity. It is not therefore considered that the application site would be adversely affected by aircraft noise or the Airfreight operations and Environmental Protection will not therefore require these aspects to be further investigated.

The Edinburgh - Fife railway running along the south western edge of the site also forms a potential noise source and this matter would require further investigation to inform any noise mitigation measures.

Subject to further detailed assessment being undertaken in relation to noise and contaminated land with mitigation measures being identified, it is not considered that the amenity of future occupiers of the development would be adversely affected. The proposal would therefore meet relevant requirements of LDP Policies Des 5 - Development Design - Amenity and Env 22, with regards to soil quality.

Sustainability

The applicant has submitted a sustainability statement in support of the application including a carbon reduction declaration. The proposal is for Planning Permission in Principle and with regards to Carbon reduction that further details be provided at the detailed application stage.

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 below:

Essential Criteria	Available	Achieved
Other material planning issues;		
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	20
Total points	80	70

The proposal would therefore meet the essential criteria and satisfies LDP Policy Des 6.

(e) Developer Contributions

The Action Programme prepared in relation to the LDP, this now being supported by the Developer Contributions and Infrastructure Delivery Supplementary Guidance, approved by Planning Committee 30 March 2017. The LDP Action Programme and Supplementary Guidance is being used coordinate development proposals with the infrastructure and services needed to support them.

The Guidance explains that where multiple developments need to fund the delivery of strategic infrastructure actions, contribution zones have been established within which legal agreements will be used to secure developer contribution.

Should the Committee be minded to approve the application the following developer contributions are applicable to the HSG19 site and would need to be included as part of any future S.75 legal agreement:-

Affordable Housing

The applicant is seeking planning permission in principle for up to 1400 homes. Should consent be granted 25% of these homes should be secured as affordable housing through legal agreement. The applicant is in agreement with this requirement.

Education

The application site falls within Sub-Area W-1 of the West Edinburgh Contribution Zone.

The Council's Action Programme identifies a requirement for a new 21 Class Primary School and 60/60 Nursery on the site (Estimated Capital Costs £14,887,301, Servicing and Remediation £3,073,781, Land £525,000).

The applicant has suggested that Craigmount High School be extended. However, the Council's Action Programme identifies a requirement for a new Secondary School to mitigate the cumulative impact of development in West Edinburgh. A proposed site for this facility has yet to be established (Estimated Capital Costs £19,293,885, Servicing and remediation £6,489,180, Land £3,000,000).

The Council has assessed the impact of the proposed development on the identified education infrastructure actions and current delivery programme, as set out in the Action Programme and Supplementary Guidance.

The Education Appraisal prepared as part of the LDP, has considered the impact of new housing sites allocated in the LDP, including the application site. Appropriate education infrastructure actions to mitigate the cumulative impact of development are identified. The required contribution will therefore be based on established 'per house' and 'per flat' rates for the appropriate part of the Zone as follows:-

Per unit infrastructure contribution requirement:

- Per flat - £2,892
- Per house - £15,854

Per unit land contribution requirement:

- Per flat - £628
- Per house - £3,673

Transport

The application site is located within the Maybury/Barnton Transport Contribution Zone.

This identifies that the Maybury HSG19 site should contribute £2,033,511, this representing a 71% share of required contributions to the zone. Specifically this would deliver Transport Proposals T16 Maybury Junction, T17 Craigs Road junction and T18 Barnton Junction allowing costs to be apportioned between sites and developers.

Site Specific Transport Actions for HSG19 would also include:-

- Relevant Transport Contribution Zone as defined within Supplementary Guidance and Updated Action Programme, Dec 2016;
- Maybury- Edinburgh Gateway pedestrian/cycle route including bridge over the railway, ramps and cycle paths to the Gyle, A8 and Gogar Link Road. WETA estimate £4.32 million;

- TRO for lower speed limit along Turnhouse Road (1.5km) or on-road segregated cycleway. £420k;
- TRO for lower speed limit along Turnhouse Road;
- Input into design team's re-design of Maybury Road for cycling and walking. Design £87,500;
- Bus route Craigs Road/Turnhouse Road and upgrade bus infrastructure on Turnhouse Road; and
- New footway/cycleway along south-west side of Turnhouse Road and 3no. crossing facilities at Turnhouse Road and Craigs Road and Maybury Road.

Further contributions would also apply in respect of City Car Club. In addition, the applicant would be required to prepare all road determination/stopping up/traffic regulation orders (as appropriate), plans and meeting the full cost of advertising the orders. Electrical vehicle charging outlets should also be considered for this development, including dedicated charging spaces, ducting and infrastructure to allow vehicles to be readily accommodated in the future.

The LDP Site Brief identifies the widening of Craigs Road, although this is not reflected in the Action Programme as a site specific action, the requirement for upgrading would need to be reflected as part of any S.75 agreement.

Edinburgh Tram

Contributions apply to all new developments requiring planning permission within the defined proximity of the existing and proposed tram lines, and throughout the city with regard to major developments.

The south western part of the application site falls within the 250 and 500 metre Tram Contribution Zones as defined in the Draft 'Developer Contributions and Infrastructure Delivery' Guidance. Tram contributions will therefore apply to development of the HSG19 site. The application site falls within different zones, as such the zone closest to the tram would apply. The determination of the zone is also based on the shortest walking distance between any part of the site and the nearest edge of the constructed tram corridor. In this instance, the shortest walking distances to the tram corridor would be assumed to be via the bridge link to Edinburgh Gateway, which is a site specific measure relating to the development of the site. The level of contribution towards Edinburgh Tram would therefore need to be calculated on this basis.

Green Space Actions

- Edinburgh Gateway Station to Maybury and Cammo green corridor - provision of a strategic (2.5 ha) green corridor link - respective developers for each site, Planning and Transport. £320k).
- Northern woodland planting at Maybury (3.5 ha).

Health Care

The application site is located within the West Edinburgh Healthcare Contribution Zone.

The Developer Contributions and Infrastructure Delivery Supplementary Guidance, March 2017 identifies a requirement for a new medical practice to mitigate the impact of new residential development in West Edinburgh (including Maybury, South Gyle, Edinburgh Park and IBG) to be delivered 2018-24. This highlights potential co-location with Maybury Primary School.

Potential developer contribution rates would be dependent upon the proposed nature of the health care scheme and the additional population served by the scheme.

Total costs are estimated at £6 million to be split between H&SC Partnership and developers.

Conclusion

The applicant has indicated their willingness to contribute to the delivery of the 21 Class Primary School and 60/60 Nursery on the application site and a potential extension to Craigmount High School. The applicant has also demonstrated their commitment to the delivery of the Council's Affordable Housing Policy requirements on the site, with an affordable housing provider named as joint applicant.

Greenspace actions including the provision of the green corridor through the site, as it relates to land in the ownership of the applicant, and the northern woodland planting are also elements identified in the illustrative masterplan although no mechanism for delivery with adjacent land owners is identified.

Maybury/Barnton Transport Contribution Zone requirements are referred to in the Supplementary Transport Statement, with a number of site specific transport actions identified as part of the Design and Access Statement. However, the applicant's commitment to the delivery of the Edinburgh Gateway pedestrian/cycle bridge in the LDP location is unclear, as discussed in sections 3.3 (b).

Given the recommendation for refusal, a S.75 legal agreement would not be pursued at the current time. However should Committee be minded to approve the application, it is recommended that all Action Programme measures as they affect the site, including the provision of the pedestrian/cycle bridge, should be incorporated into a S.75 agreement.

(f) Equalities or human rights

The proposal is for planning permission in principle and the full impact of the proposal upon equalities and human rights would be considered at a subsequent detailed planning application stage.

(g) Issues raised in material representations

Refer to representations section below.

Pre-application process

A Proposal of Application Notice (14/04156/PAN) was submitted to City of Edinburgh Council on 14 October 2014. The extents broadly relate to the extents of the current application, although the extents of land included to the north of Craigs Road have been reduced. The development description outlined Residential development and ancillary retail including Class 1 and Class 2 (300 sq m in total), landscaping, access, services and all related ancillary development.

A pre-application report was presented to the Committee on 11 February 2015. The Committee noted the key issues at that stage in the process.

The PAN set out a proposed programme of pre-application consultation. A copy was sent to the following organisations;

Community Councils

- Corstorphine
- Cramond & Barnton

Neighbourhood Partnerships

- West Edinburgh

Ward Councillors

- Drumbrae/Gyle

Public Exhibition

A public exhibition took place on 26 November 2014 at the Marriot Hotel, Glasgow Road, Edinburgh. The details and feedback are set out in the Pre Application Consultation Report dated October 2016. This is available to view on the Planning and Building Standards Online Services.

The applicant also met with four Community Councils with an interest in the proposed location including Ratho and District, Corstorphine, Cramond & Barnton and Drum Brae on 2 February 2015, to provide a presentation and Q & A session.

Publicity summary of representations and Community Councils

The application was advertised on 21 October 2016, with a 28 day period for comment to take account of the accompanying Environmental Statement. Both Corstorphine and Cramond & Barnton Community Councils requested to be considered as statutory consultees for this application. Twenty nine letters of representation have been received, these include 28 letters of objection and 1 letter in support - one these being a detailed response from Edinburgh Airport.

Community Councils

Cramond & Barnton Community Council wish to record all concerns and recommendations at this stage:-

- Urge officials and members to appreciate cumulative effects of several major development in community council area, where road, education and GB services are operating over capacity - assessed in section 3.3 (c) and (d).
- Decision on this application is premature and permission should be withheld until Supplementary Guidance on contribution zones has been prepared and delivery of roads and educational infrastructure can be assured - supplementary guidance which sets out new contribution zones has now been prepared. This would provide a suitable basis for a S.75 to be prepared allowing infrastructure contributions to be secured.
- Permission should be withheld until Cross-Border Transport Appraisal, including identification of mitigation measures are identified and deliver assured - the WETA Refresh Study has considered cross-border transport issues, including potential transport mitigation measures.
- Permission should be withheld until SESplan's Cross Boundary Contributions Framework has been published - contributions towards transport infrastructure are being established through the Council's LDP Action Programme, these being informed by the WETA Refresh Study findings. SESplan Cross Boundary Contributions framework does not currently exist.
- New Craigs Road/Maybury Road junction should be replaced by approach access to Maybury Road via a 4th arm to Boughtlin Roundabout. This should be accompanied by substantial landscaping to minimise impacts of roads infrastructure in distant views, including those from the Cammo Estate - addressed in section 3.3 (a). The principle of development on land to the north of Craigs Road and an access road linking Craigs Road with the Boughtlin Roundabout is not supported in the Development Plan.
- Signalised pedestrian/cycle crossing should be implemented at Craigs Road junction to provide more direct link to Craigmount High School - Noted. This is a detailed design matter to be considered as part of further masterplanning and subsequent planning applications.
- Need to assess impacts of proposed changes to road access arising from this development, including access to the Airport Freight terminal on Turnhouse Road and Airport emergency incident responses - Noted. This matter is further considered in section 3.3 (c).
- Need to review design of Barnton and Maybury Road junctions in relation to traffic flows - assessed in section 3.3 (c).
- Welcome provision of strategic walking/cycle route through the site between Cammo Walk and Edinburgh Gateway. Further consideration should be given to provision of an Underpass at Craigs Road to facilitate this objective - assessed in section 3.3 (b).
- Planning permission should not be granted until additional GP services can be provided to satisfy expanded populations - Noted. Provision for healthcare facilities identified in the LDP Site Brief although no formal mechanism to secure S.75 contributions towards healthcare facilities at the current time.

- Community Council recommends inclusion of a woodland buffer strip along the northern side of Craigs Road, before the landscape buffer to the south of Craigs Road becomes established - this area falls outwith the application red line boundary. Woodland buffer to the south of Craigs Road is considered to provide effective landscape mitigation for the proposed development.
- Recognises that some elements are more appropriate to a full planning application rather than the current application in principle - issues of detail including EIA process and masterplanning need to be considered at PPP stage.

Corstorphine Community Council object, in summary:-

- Increased traffic levels and air pollution, specifically at St John's Road in Corstorphine - assessed in section 3.3 (c).
- Peak hour gridlock likely to generate most pollution when school children are present as pedestrians - assessed in section 3.3 (c).
- Query 10% assumed reduction in traffic flows at East Craigs given reluctance to abandon car ownership and usage - assessed in section 3.3 (c).
- Feedback from neighbouring community council suggests that Lothian Buses are unwilling to operate planned route change to No.31 service. - provision of bus loop through the site is an LDP Site Brief requirement.
- Increase in delivery vehicles using Craigs Road (West) - assessed in section 3.3 (c) and (d).
- Increased traffic noise - assessed in 3.3 (d).
- General concern re. lack of infrastructure provision and environmental decrement given increase in housing density - assessed in 3.3 (a) (b) and (c).
- Geological and agricultural reports accept that the proposed development area is classed as high quality farmland - assessed in 3.3 (a).

Representations

Comments

One letter submitted in support of the proposals stated:

- Look forward to seeing the development and the option of buying.

The main reasons for objection to the proposal are summarised as follows:

Objections

Principle of development

- Proposed development is generally related to the approved LDP - assessed in section 3.3(a).
- Concern regarding the loss of Green Belt, prime agricultural land, landscape, natural environment, amenity benefits to local residents - assessed in section 3.3(a).
- Concern regarding development of land to the north of Craigs Road which is designated Green Belt - assessed in section 3.3(a) and found that proposal in contrary to the SDP Policy 12 and LDP Policy Env 10.

- Concern regarding additional housing in this part of the city, the scale of development, which represents the size of a small town, impact on the local community and environment - assessed in section 3.3 (a) and (b).
- Concern that house building targets being prioritised over issues such as air quality and ability of infrastructure to cope with increased traffic levels - assessed in section (c).
- Concern regarding the nature of housing development proposed with minimal levels of affordable housing - assessed in section 3.3 (d).
- Impact of development upon local walks and cycle paths - assessed in section 3.3 (b).
- Proposal does not provide opportunities for direct pedestrian, cycle access and recreational opportunities from the application site to the Cammo Estate and the River Almond Walkway, relying solely on Cammo Walk - assessed in section 3.3 (b).
- This site is preferable to LDP HSG20 at Cammo Fields in that it is closer to the A8 Corridor, tram and rail access and results in less visual impact being hidden by the Craigs Road ridgeline - the application site must be assessed on its individual planning merits, however, tram and rail access assessed in 3.3 (b) and visual impact in 3.3 (a) and (c).
- Design response should respond to the green belt edge, feature a soft permeable boundary and not be juxtaposed by dense development - assessed in 3.3 (a) and (c).
- Development must include adequate drainage to avoid localised flooding in the vicinity of Lennie Cottages - assessed in section (c).
- Impact on protected species - bats known to roost in the local area - assessed in section (d).

Land to the north of Craigs Road

- Conflicting statements regarding intentions for land to the north of Craigs Road, including the proposed access road to Boughtlin roundabout, use of land for open space and housing and justification for incursion into the Green Belt - assessed in section 3.3 (a) and (g).
- Various comments regarding the acceptability of new road access between Craigs Road and Boughtlin Roundabout - both objecting and supporting. This aspect of the proposals has not been supported by detailed layout or supporting analysis - assessed in section 3.3 (a).
- Landscape and visual impact of highway improvements to Craigs Road, e.g. introduction of street lighting - assessed in section 3.3 (a).

Transport

- Concern regarding impact of development to the surrounding road network, existing traffic flows and levels of transport infrastructure required to support the proposed level of development - assessed in section 3.3 (c).
- Development will increase congestion and place pressure upon existing network including Craigs Road, Maybury Road, Maybury, Gogar and Barnton junctions, Corstorphine Road and St Johns Road - assessed in section 3.3 (c).
- Remedial measures identified in the application will be insufficient to address major transport problems - assessed in section 3.3 (c).

- Impact of additional traffic levels on air quality, emissions high levels of air pollution notably at St Johns Road - assessed in section 3.3 (c).
- Further measures required to promote public transport and active travel in preference to the private car - assessed in section 3.3 (b) and (c).
- PPP application should include a more detailed and robust assessment of all transport impacts across all modes - assessed in section 3.3 (c).
- The Transport Appraisal does not take into account the ability of existing bus/tram/rail services or identify enhancements beyond the existing no.31 bus service to serve the proposed development - assessed in section 3.3 (c).
- Traffic Assessment cites 2012 figures which must be out of date - assessed in section 3.3 (c). Supplementary transport statement acknowledges WETA Refresh Study modelling undertaken in 2016.
- Transport Assessment does not consider transport impacts in relation to the Council's WETA Refresh Study, nor does it identify necessary transport interventions or funding mechanisms - assessed in section 3.3 (c).
- Transport Assessment requires to be updated in relation to the WETA Refresh Study - assessed in section 3.3 (c).
- Introduction of proposed bus gate at Turnhouse Road will result in all traffic having to exit via Craigs Road/Maybury Road. This could lead to rat-running via Turnhouse and Cammo Road, Cammo Walk - This is a detailed design matter to be considered as part of further masterplanning and future planning applications.
- Transport Assessment does not consider the impact of proposed development in relation to the operation of Edinburgh Airport's Cargo Village at Turnhouse, including the proposed introduction of bus gate at Turnhouse Road and re-routing of traffic along Craigs Road to access the A8 Corridor - assessed in section 3.3 (c).
- The Transport Appraisal and Design & Access Statement identifies the principal vehicular access is to be provided by an upgraded Craigs Road/Maybury Road junction. No formal appraisal has been undertaken in support of this - assessed in section 3.3 (a) and (c).
- Existing Maybury junction and proposed Craigs Road/Maybury Road junction should include priority measures for pedestrians and cyclists including Toucan crossings. These should be in place prior to development - it is accepted that the detailed design for LDP Proposal T17 should incorporate such requirements.
- Concern regarding detail Craigs Road/Maybury Road junction including pedestrian priority measures and through access to the eastern side of Craigs Road - it is accepted that the detailed design for LDP Proposal T17 should incorporate such requirements.
- Suitability of Craigs Road (east) for additional traffic which will form a key pedestrian route to Craigmount High School - Noted, status of this route is unlikely to significantly change as a consequence of the proposals.
- Lack of detail in relation to proposed traffic levels and road improvements for Craigs Road (west), operational difficulties due to topography and amenity impacts to local properties - Noted. LDP Site Brief identifies requirement for upgrading of Craigs Road.
- Lack of detail in relation to the design of Turnhouse Road. This should include a 2 way shared use segregated path - this requirement is identified in the LDP Site Brief and detail should be developed through further masterplanning and subsequent detailed applications.

- Proposals should include additional measures to enhance Maybury Road for cycle access - Noted, anticipated that off-street cycle network would be enhanced to provide alternative to Maybury Road.
- Additional crossing point to East Craigs Rigg should also be implemented - pedestrian access across Maybury Road would be further considered in relation to the detailed design for LDP Proposal T17.
- Proposals offer limited opportunities to travel from the site by bike - Noted. LDP Site Brief identifies a range of measures to enhance cycle connectivity to the wider area.
- Proposals should provide further road link between Turnhouse Road to Gogar Link Road to the west - no such proposal is identified in the current development plan and the principle would not therefore be supported in planning terms.

Other infrastructure

- Impact of additional development upon local services and amenities, including capacity of existing schools, GP, medical and other community services - Noted, LDP Action Programme requirements seek to address such deficiencies, although no formal mechanism to secure S.75 contributions towards healthcare facilities at the current time.
- Welcome delivery of major public transport infrastructure, e.g. Edinburgh Gateway Intermodal Station, but it is essential that the pedestrian/cycle connection is in place across the railway prior to the development being occupied. Adequate cycle parking also required at the Station, improved integrated ticketing between bus, tram and rail - assessed in section 3.3 (b) and (c).
- Welcome north-south green corridor through the site - this is important for children heading to Craigmount High. It is essential this is in place prior to the development being occupied - assessed in section 3.3 (b) and (c).
- Welcome inclusion of shared use path along site's southern boundary but should be complemented by segregated cycle paths on both Turnhouse and Craigs Road - Noted. Such matters need to be considered as part of further masterplanning for the site.
- The size of the site with some houses > 1 km from rail/tram stop would require shuttle bus from the western end of site - considered in section 3.3 (b). Such matters would need to be considered as part of further masterplanning for the site.

Environmental Statement

- Contradicting statements in Environmental Statement, Chapter 10.1 regarding aircraft noise and air traffic fumes from the airport. - assessed in section 3.3 (d).

Non material

- Disruption to transport infrastructure during construction of development - not a relevant planning consideration although applicant has indicated that a Construction Environmental Management Plan would be prepared.
- Increased levels of traffic on Craigs Road would result in structural damage to properties - not a relevant planning consideration.

- Change in status of Craigs Road would result in a loss in property values - not a relevant planning consideration.
- Loss of private views from properties lying adjacent to the site - not a relevant planning consideration.
- Proposals should provide direct access from Burnbrae area (to the north east) for direct car travel to and from the city centre - not a relevant planning consideration.
- Possibility of Lennie Cottages being connected to the main drains if development goes ahead - not a relevant planning consideration and would need to be agreed with Scottish Water/developer of the site.

Conclusion

The HSG19 site represents one of the largest housing allocations in the LDP and a significant westward expansion of the city, on land which formerly comprised green belt. It is therefore imperative that comprehensive masterplanning is undertaken to guide the long term development of the site. The masterplanning undertaken as part of this application is not sufficiently comprehensive and is contrary to the LDP Site Brief and Development Principles.

This application cannot be supported due the inclusion of the area of the Edinburgh Green Belt (5.2 hectares) to the north of Craigs Road, the lack of clarity regarding the delivery of the pedestrian/footbridge from the HSG19 site to Edinburgh Gateway, the completeness of supporting information including the Environmental Statement and the current nature of the masterplan proposition. The application as submitted is not acceptable in principle and for this reason the Council has not requested the applicant to provide further information.

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

3.4 Conditions/reasons/informatives

Reasons:-

1. The proposal is contrary to Strategic Development Plan Policy 12 and Local Development Plan Policies Env 7, Env 10, Des 9 a) and c) and Hou 1 in that the proposed development of land to the north of Craigs Road has not been assessed through the LVIA, would undermine greenbelt objectives, the nature of the urban edge and setting of the special character of the city and the setting of the Cammo Park Estate recorded in the Inventory of Gardens and Designed Landscapes. No deficit in the maintenance of the five year housing land supply (as evidenced through the housing land audit) has been identified to justify incursion into the green belt, as per the requirements of Hou 1.
2. The proposal is contrary to Local Development Plan Policies Des 1, Des 4, Des 9 c) and Env 10 in the proposals including information submitted as part of the LVIA have not demonstrated that development would conserve and enhance the landscape setting and special character of the city or include landscape improvements which would strengthen the green belt boundary.

3. The proposal is contrary to Local Development Plan Policy Tra 10 in that the proposed development of an access road to link Craigs Road with the Boughtlin Roundabout could prejudice new road and network improvements including the implementation of LDP Proposal T17.
4. The proposal is contrary to Local Development Plan Policy Des 2 a) in that extents of proposed development to the south of Craigs Road could compromise the effective development of adjacent land.
5. The proposal is contrary to Local Development Plan Policies Del 1, Tra 8, Des 7 b) c) and f) in that the proposals would fail to provide a pedestrian/cycle bridge link between the site and Edinburgh Gateway as per the location identified in the LDP, this also limiting the effective development of strategic pedestrian, cycle and green networks. Development identified in the vicinity of the LDP bridge location, immediately to the north, could compromise the development of the bridge and green corridor and thereby contrary to LDP Policy Des2 a).
6. The proposal is contrary to Local Development Plan Policies Des 7 in that a comprehensive approach to the layout of buildings, car parking, open space and SUDS features, including surface water attenuation within the layout has not been demonstrated.
7. The proposal is contrary to Local Development Plan Policy Env 21 in that it has not been fully demonstrated that the development would increase flood risk or be at risk of flooding itself.
8. The proposal is contrary to Local Development Plan Policies Des 3, Env8 b) and Env 9 in that insufficient information has been provided in the Environmental Statement to assess the archaeological and historic value of West Craigs Farmhouse and Steading and West Craigs Farm Cottage or to how these buildings could be incorporated and enhanced through the design proposals.

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

A Proposal of Application Notice (14/04156/PAN) was submitted to City of Edinburgh Council on 14 October 2014. The extents broadly relate to the extents of the current application, although the extents of land included to the north of Craigs Road have been reduced. The development description outlined Residential development and ancillary retail including Class 1 and Class 2 (300 sq m in total), landscaping, access, services and all related ancillary development.

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8.2 Publicity summary of representations and Community Council comments

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These representations raise the following material issues:-

Cramond & Barnton Community Council wish to record all concerns and recommendations at this stage.

- Urge officials and members to appreciate cumulative effects of several major development in community council area, where road, education and GB services are operating over capacity.
- Decision on this application is premature and permission should be withheld until Supplementary Guidance on contribution zones has been prepared and delivery of roads and educational infrastructure can be assured.
- Permission should be withheld until Cross-Border Transport Appraisal, including identification of mitigation measures are identified and delivery assured.
- Permission should be withheld until SESplan's Crosss Boundary Contributions Framework has been published.
- New Craigs Road/Maybury Road junction should be replaced by approach access to Maybury Road via a 4th arm to Bughtlin Roundabout. This should be accompanied by substantial landscaping to minimise impacts of roads infrastructure in distant views, including those from the Cammo Estate.
- Signalised pedestrian/cycle crossing should be implemented at Craigs Road junction to provide more direct link to Craigmount High School.
- Need to assess impacts of proposed changes to road access arising from this development, including access to the Airport Freight terminal on Turnhouse Road and Airport emergency incident responses.
- Need to review design of Barnton and Maybury Road junctions in relation to traffic flows.
- Welcome provision of strategic walking/cycle route through the site between Cammo Walk and Edinburgh Gateway. Further consideration should be given to provision of an Underpass at Craigs Road to facilitate this objective.
- Planning permission should not be granted until additional GP services can be provided to satisfy expanded populations.
- Community Council recommends inclusion of a woodland buffer strip along the northern side of Craigs Road, before the landscape buffer to the south of Criags Road becomes established.
- Recognises that some elements are more appropriate to a full planning application rather than the current application in principle.

Corstorphine Community Council object, in summary

- Increased traffic levels and air pollution, specifically at St John's Road in Corstorphine.

- Peak hour gridlock likely to generate most pollution when school children are present as pedestrians.
- Query 10% assumed reduction in traffic flows at East Craigs given reluctance to abandon car ownership and us.
- Feedback from neighbouring community council suggests that Lothian Buses are unwilling to operate planned route change to No.31 service.
- Increase in delivery vehicles using Craigs Road (West).
- Increased traffic noise.
- General concern re. lack of infrastructure provision and environmental decrement given increase in housing density.
- Geological and agricultural reports accept that the proposed development area is classed as high quality farmland.

Representations

One letter submitted in support of the proposals stated:

- Look forward to seeing the development and the option of buying.

The main reasons for objection to the proposal are summarised as follows;

Principle of development

- Proposed development is generally related to the approved LDP;
- Concern regarding the loss of Green Belt, prime agricultural land, landscape, natural environment, amenity benefits to local residents;
- Concern regarding development of land to the north of Craigs Road which is designated Green Belt;
- Concern regarding additional housing in this part of the city, the scale of development, which represents the size of a small town, impact on the local community and environment;
- Concern that house building targets being prioritised over issues such as air quality and ability of infrastructure to cope with increased traffic levels;
- Concern regarding the nature of housing development proposed with minimal levels of affordable housing;
- Impact of development upon local walks and cycle paths;
- Proposal does not provide opportunities for direct pedestrian, cycle access and recreational opportunities from the application site to the Cammo Estate and the River Almond Walkway, relying solely on Cammo Walk;
- This site is preferable to LDP HSG20 at Cammo Fields in that it is closer to the A8 Corridor, tram and rail access and results in less visual impact being hidden by the Craigs Road ridgeline;
- Design response should respond to the green belt edge, feature a soft permeable boundary and not be juxtaposed by dense development;
- Development must include adequate drainage to avoid localised flooding in the vicinity of Lennie Cottages; and
- Impact on protected species - bats known to roost in the local area.

Land to the north of Craigs Road

- Conflicting statements regarding intentions for land to the north of Craigs Road, including the proposed access road to Boughtlin roundabout, use of land for open space and housing and justification for incursion into the Green Belt;
- Various comments regarding the acceptability of new road access between Craigs Road and Boughtlin Roundabout - both objecting and supporting. This aspect of the proposals has not been supported by detailed layout or supporting analysis; and
- Landscape and visual impact of highway improvements to Craigs Road, e.g. introduction of street lighting.

Transport

- Concern regarding impact of development to the surrounding road network, existing traffic flows and levels of transport infrastructure required to support the proposed level of development;
- Development will increase congestion and place pressure upon existing network including Craigs Road, Maybury Road, Maybury, Gogar and Barnton junctions, Corstorphine Road and St Johns Road;
- Remedial measures identified in the application will be insufficient to address major transport problems;
- Impact of additional traffic levels on air quality, emissions high levels of air pollution notably at St Johns Road;
- Further measures required to promote public transport and active travel in preference to the private car;
- PPP application should include a more detailed and robust assessment of all transport impacts across all modes;
- The Transport Appraisal does not take into account the ability of existing bus/tram/rail services or identify enhancements beyond the existing no.31 bus service to serve the proposed development;
- Traffic Assessment cites 2012 figures which must be out of date;
- Transport Assessment does not consider transport impacts in relation to the Council's WETA Refresh Study, nor does it identify necessary transport interventions or funding mechanisms;
- Transport Assessment requires to be updated in relation to the WETA Refresh Study;
- Introduction of proposed bus gate at Turnhouse Road will result in all traffic having to exit via Craigs Road/Maybury Road. This could lead to rat-running via Turnhouse and Cammo Road, Cammo Walk;
- Transport Assessment does not consider the impact of proposed development in relation to the operation of Edinburgh Airport's Cargo Village at Turnhouse, including the proposed introduction of bus gate at Turnhouse Road and re-routing of traffic along Craigs Road to access the A8 Corridor;
- The Transport Appraisal and Design & Access Statement identifies the principal vehicular access is to be provided by an upgraded Craigs Road/Maybury Road junction. No formal appraisal has been undertaken in support of this;
- Existing Maybury junction and proposed Craigs Road/Maybury Road junction should include priority measures for pedestrians and cyclists including Toucan crossings. These should be in place prior to development;

- Concern regarding detail Craigs Road/Maybury Road junction including pedestrian priority measures and through access to the eastern side of Craigs Road;
- Suitability of Craigs Road (east) for additional traffic which will form a key pedestrian route to Craigmount High School;
- Lack of detail in relation to proposed traffic levels and road improvements for Craigs Road (west), operational difficulties due to topography and amenity impacts to local properties;
- Lack of detail in relation to the design of Turnhouse Road. This should include a 2 way shared use segregated path;
- Proposals should include additional measures to enhance Maybury Road for cycle access;
- Additional crossing point to East Craigs Rigg should also be implemented;
- Proposals offer limited opportunities to travel from the site by bike; and
- Proposals should be further road link between Turnhouse Road to Gogar Link Road to the west.

Other infrastructure

- Impact of additional development upon local services and amenities, including capacity of existing schools, GP, medical and other community services;
- Welcome delivery of major public transport infrastructure, e.g. Edinburgh Gateway Intermodal Station, but it is essential that the pedestrian/cycle connection is in place across the railway prior to the development being occupied. Adequate cycle parking also required at the Station, improved integrated ticketing between bus, tram and rail;
- Welcome north-south green corridor through the site - this is important for children heading to Craigmount High. It is essential this is in place prior to the development being occupied;
- Welcome inclusion of shared use path along site's southern boundary but should be complemented by segregated cycle paths on both Turnhouse and Craigs Road; and
- The size of the site with some houses > 1 km from rail/tram stop would require shuttle bus from the western end of site.

Environmental Statement

- Contradicting statements in Environmental Statement, Chapter 10.1 regarding aircraft noise and air traffic fumes from the airport.

Non material

- Disruption to transport infrastructure during construction of development;
- Increased levels of traffic on Craigs Road would result in structural damage to properties;
- Change in status of Craigs Road would result in a loss in property values;
- Loss of private views from properties lying adjacent to the site;
- Proposals should provide direct access from Burnbrae area (to the north east) for direct car travel to and from the city centre; and

- Possibility of Lennie Cottages being connected to the main drains if development goes ahead.

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**

The site is allocated as Housing Proposal HSG19 and Green Belt in the adopted Edinburgh Local Development Plan 2016.

The following policies and guidance are also material to the determination of this application:-

The Strategic Development Plan (SESPlan) June 2013, Policy 12 - Green Belts

Supplementary Guidance: Developer Contributions and Infrastructure Delivery, Finalised 30 March 2017

Edinburgh Local Development Plan, Action Programme, December 2016

Date registered

3 October 2016

Drawing numbers/Scheme

01

Scheme 1

David R. Leslie

Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Francis Newton, Senior Planning Officer
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Links - Policies

Relevant Policies:

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

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

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

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

LDP Policy Env 7 (Historic Gardens and Designed Landscapes) protects sites included in the national Inventory of Gardens and Designed Landscapes and other historic landscape features.

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

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 10 (Development in the Green Belt and Countryside) identifies the types of development that will be permitted in the Green Belt and Countryside.

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

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 20 (Open Space in New Development) sets out requirements for the provision of open space in new development.

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

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 Hou 1 (Housing Development) sets criteria for assessing the principle of housing proposals.

LDP Policy Hou 2 (Housing Mix) requires provision of a mix of house types and sizes in new housing developments to meet a range of housing needs.

LDP Policy Hou 3 (Private Green Space in Housing Development) sets out the requirements for the provision of private green space in housing development.

LDP Policy Hou 2 (Housing Mix) requires provision of a mix of house types and sizes in new housing developments to meet a range of housing needs.

LDP Policy Hou 3 (Private Green Space in Housing Development) sets out the requirements for the provision of private green space in housing development.

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

LDP Policy Hou 6 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

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 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 Tra 7 (Public Transport Proposals and Safeguards) prevents development which would prejudice the implementation of the public transport proposals and safeguards listed.

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.

LDP Policy Tra 10 (New and Existing Roads) safeguards identified routes for new roads and road network improvements listed.

LDP Policy Tra 12 (Edinburgh Airport Public Safety Zones) establishes a presumption against new development within the Airport Public Safety Zones apart from in exceptional circumstances.

LDP Policy RS 2 (Safeguarding of Existing Waste Management Facilities) outlines the circumstances development surrounding an existing or safeguarded waste management facility will be permitted.

Supplementary Guidance: Developer Contributions and Infrastructure Delivery – Finalised – 30 March 2017.

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 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.

The Open Space Strategy and the audit and action plans which support it are used to interpret local plan policies on the loss of open space and the provision or improvement of open space through new development.

Non-statutory guidelines 'The Edinburgh Standards for Streets' sets out principles and guidance whose aim is to achieve a coherent and enhanced public realm.

National Policy Designing Streets: This document sets out government aspirations for street design and the role of the planning system in delivering this as part of a wider agenda to improve urban design and placemaking generally.

Appendix 1

Application for Planning Permission in Principle 16/04738/PPP

**At Site 100 Metres North East Of 19, Turnhouse Road,
Edinburgh**

**Residential development, up to a maximum of 1400 units,
and ancillary commercial (Class 1 retail and Class 2 financial
and professional) including landscaping, access and
services and all other ancillary development.**

Consultations

Economic Development comment

The application is primarily for housing and therefore has the potential to contribute to economic growth. However, this is a matter that Planning are best placed to assess in terms of whether this proposal represents sustainable growth and the Economy Service has no further comments to make at this stage.

Cramond + Barnton Community Council comment

From the outset this Community Council wishes to record it's continuing view that this development is inappropriate, given potential impacts of traffic generation specific to this development and resulting from cumulative flows from this and other proposed developments in West and North Edinburgh and beyond on the A8 and A90 corridors and, especially, the Barnton and Maybury Junctions.

However, the Community Council accepts that this development is part of LDP2 and likely to go ahead. In this context, we wish to ensure that traffic, educational, medical and landscape issues are fully taken into account by the City Council in considering this application, as these affect the communities we represent and the amenities our community and adjacent communities enjoy.

Consideration of Planning Applications in Isolation

While recognising that the planning system requires this application to be considered on its individual merits, issues relating to the consideration of proposed developments in North and West Edinburgh, without recognition of the cumulative impacts on infrastructure and public services - especially roads, education and health, have been highlighted in a recent joint paper to the Council from the Chairs of Queensferry & District, Kirkliston, and Cramond & Barnton Community Councils.

This paper was discussed at a meeting chaired by the North West Locality Manager and attended by senior representatives of Planning Services. We would urge planning officers and elected members to appreciate the cumulative effects of the several major LDP2 developments in our community council areas, where roads, education and GP services are all operating at, or over, capacity.

Prematurity

In the above context, Cramond & Barnton Community Council contends that any current decision on Application 16/04738/PP is premature given:

the intended production of Supplementary Guidance on contribution zones as outlined in LDP2 Del1. Also, Del2 states that 'Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time'.

We have been unable to ascertain that funding and implementation commitments have been made by the City Council to deliver the required roads improvements - especially at the Maybury, Barnton and Craigs Road Junctions or Bughtlin Roundabout, and to deliver the educational infrastructure required to support the proposed development. Permission for development of the scale proposed should be withheld until the Supplementary Guidance on contribution zones has been prepared and delivery of the required roads and educational infrastructure can be assured, as consistent with LDP2 policies Del 1 and Del2.

both SESplan and the LDP Reporter have highlighted issues of traffic generation and congestion arising from growth in cross-border traffic and cumulative effects of proposed developments in the City, Fife and the Lothians. Such issues were not fully assessed in the preparation of LDP2, have been the subject of the SDP2 Transport Appraisal and will be assessed in the Cross-Border Transport Appraisal.

As indicated in SDP2 Transport Appraisal, traffic flows and congestion issues associated with the A8 and A90 corridors and Barnton and Maybury Junctions are forecast to be significantly higher than previously estimated and corridors and junctions and road corridors are likely to require more substantial up-grades than proposed in LDP2 (e.g. 'smart' traffic lights as the sole solution to Barnton Junction congestion is risible).

Consequently, permission for the proposed development should be withheld until -

the results of the Cross-Border Transport Appraisal, including the identification of detailed mitigation measures for the A8 and A90 corridors and Maybury and Barnton Junctions, are identified and the delivery of appropriate measures is assured

SESplan's Cross-Boundary Transport Contributions Framework has been published, as this will focus on mitigation measures for key 'hotspots' on the transport network, which may include the Maybury and Barnton Junctions.

Specific Traffic and Roads Issues

There is a lack of clarity on whether a new Craigs Road/Maybury Road Junction (as proposed by the Council) or an additional arm to the Bughtlin Roundabout (proposed by the applicants) is the most appropriate option for access to/egress from the proposed development and existing/proposed land uses at Turnhouse. The Community Council has considered both junction options and recommends that -

The LDP2 proposal for a new Craigs Road/Maybury Road Junction, should be replaced by access to Maybury Road via a fourth arm to Bughtlin Roundabout, along with signal controls and widening of traffic lanes at this Roundabout.

A signalised pedestrian/cyclist crossing should replace the proposed road junction at Craigs Road, to provide a more direct link to Craigmount High School and the eastern footway on Maybury Road than the proposal to provide a Puffin (pedestrian) crossing mid-way between the Craigs Road Junction and Bughtlin Roundabout.

Provision of any new Bughtlin Roundabout approach road should be accompanied by substantial landscaping to minimise the landscape impacts of road infrastructure, traffic and street lighting on views from Cammo Estate and adjacent open space and the Cammo, Barnton and East Craigs residential areas.

The principal reason underpinning these recommendations is that interruptions to the through flow of traffic on Maybury Road should be minimised, especially as further interruptions will be required to enable access to/egress from the future Cammo development. In addition, development of the Craigs Road/Maybury Road Junction is likely to increase 'rat-running' and other traffic crossing directly over Maybury Road onto the eastern section of Craigs Road and past Craigmount High School, on a road unsuitable for additional traffic.

The Bughtlin Roundabout option will have more substantial landscape impacts than the Craigs Road/Maybury Junction alternative; hence, substantial landscaping works will be required to mitigate such impacts.

The Community Council is aware that Craigs Road and Turnhouse Road are essential emergency incident access routes for Edinburgh Airport and that ready access from Turnhouse airfreight complex to Maybury Road and the wider trunk road network is essential to airfreight operators and Edinburgh's economy. The Community Council emphasises the need for robust assessments of the impacts of proposed changes to road access arrangements associated with this development, including restrictions on through-access on Turnhouse Road, on Airport emergency incident responses and airfreight operations.

Whether or not the Council accepts the Community Council's arguments on prematurity in respect of roads infrastructure commitments, the Community Council has concerns in respect of increased levels of traffic flows and congestion at the Barnton and Maybury Junctions following this and other developments at West Craigs, Turnhouse and Cammo. As highlighted above, initial results of the Cross-Border and SDP2 Transport Assessments confirm our long-standing concerns. Consequently, the Community Council emphasises the need for the City Council to review the traffic engineering design of Barnton Junction with the intention of easing traffic flows, especially from Maybury Road and Whitehouse Road onto Queensferry Road. 'Smart' traffic lights alone will be insufficient to reduce congestion at this junction.

While welcoming provision of a strategic walking/cycling route through the site to Edinburgh Gateway Transport Interchange and the Gyle and connecting to the proposed Cammo Walk walking/cycling route, consideration is required as to how these routes can most safely and effectively be linked across Craigs Road, which will have significantly increased traffic flows for the proposed and future developments as well as current uses at Turnhouse (e.g. airfreight depot, golf course, etc.). It is suggested that consideration be given to provision of an underpass for the walking/cycling route crossing of Craigs Road.

GP Services

GP services in North West Edinburgh are currently under major strain and most are operating over capacity and not accepting new patients. Planning permission for this development should not be granted until assurances are provided by NHS Scotland that additional GP services can be provided to satisfy the expanded populations, resulting from this development and adjacent developments west of Maybury Road (e.g. West Craigs, Cammo).

Landscape Issues

The Community Council welcomes inclusion of a 30m green buffer zone along the northern boundary of the site and southern edge of Craigs Road. However, we note that the applicants' 'Environmental Statement: Figure 4.2: Site Analysis - Opportunities' identifies scope to 'Provide large area of green space north of Craigs Road' and 'Provide buffer tree planting north of Craigs Road'. These opportunities are not fulfilled by the current proposals.

The application site includes land to the north of Craigs Road. Hence, given the skyline location of Craigs Road, requirements for street lighting, and increased traffic flows from the proposed development and activities at Turnhouse, The Community Council recommends inclusion of a woodland buffer strip along the northern side of Craigs Road. This would 'mirror' the buffer strip on the southern side of Craigs Road and reduce daytime landscape and night-time light pollution impacts of Craigs Road and its traffic flows on the skyline, as viewed from Cammo Estate parkland, current/proposed housing at Cammo, Barnton and East Craigs, and traffic on Maybury Road.

In addition, given the landscape consultants' recognition of the potential landscape impacts of the proposed housing nearest to the Craigs Road skyline, before the proposed landscape buffer to the south of Craigs Road becomes established, the Community Council recommends that any planning permission should be conditional on planting a treed buffer zone along the northern boundary of the site during, or in advance of, the first stage of development, including a significant proportion of semi-mature trees.

Appropriateness of Submission

In preparing this submission, the Community Council recognises that some elements are more appropriate to a full planning application, rather than the current application in principle; however, we wish to record all our concerns and recommendations at this stage to influence the future development of the proposals as well as consideration of the current application.

Further Information

The Community Council appreciates the Council's consideration of this submission. Please do not hesitate to contact the Community Council for clarification or discussion on any of the aspects included in this submission.

Corstorphine Community Council

Our main concerns centre on the cumulative impacts of the Western Edinburgh developments on traffic density, grid locking and resultant air pollution in particular with respect to certain areas such as St. John's Rd. where such problems have already been identified, We have also noted the traffic assessment documentation supplied by the developer on the Planning Portal and would take issue with some of the predictions contained their in.

The consensus opinion is that this development with other planned major developments in the West of Edinburgh and associated with S. Queensferry & District will add significantly to increases in traffic density resulting in enhanced air pollution profiles at local junctions and specifically on St. John's Road in Corstorphine Village. Peak hour gridlocks are likely to generate most pollution especially when pedestrian school children are present.

We have examined the 6.88 mb. traffic assessment file on the portal and find the assumed 10% reduction in local E. Craigs base load with assumed no natural increases elsewhere as somewhat difficult to accept given the general reluctance by the young, active, house buying and working population to abandon car ownership and use.

The traffic report mentions the no. 31 bus re - route but feedback from a neighbouring community council suggests that Lothian buses are unwilling to operate this planned route change. Large Post Office delivery vehicles are also likely to add further to Craigs Rd., West congestion. Traffic noise is also of some concern.

Other concerns concern general lack of infrastructure provision and environmental decrement given the proposed overall increase in housing density and the speculative nature of future planning to accommodate future work/social/leisure/entertainment requirements - we note that the geological and agricultural reports prepared for the development admit that most of the proposed developmental area is classed as high quality farmland, capable of supporting a wide variety of crops.

CEC Flood Prevention comment

In support of the above planning application the Flood Prevention Unit has reviewed the following documents:

*Flood Risk Assessment, version 2.0 date 28/06/2016
Location Plan drawing, number LOC(01) revision F
Drainage Strategy Plan, revision B*

In order to better inform the planning application process further information is required with respect to drainage.

The applicant has not secured an independent check of the FRA as part of the self-certification submission.

The applicant has not submitted a self-certification declaration, checklist, or independent check of the SWMP.

The proposed discharge rates for surface water discharge as noted in Table 4 of the SWMP are acceptable to CEC Flood Prevention and the detailed development of drainage arrangements for the individual zones through future applications shall be in line with these limits.

Please provide a drawing which shows approximate locations and sizes of proposed surface water attenuation storage with the proposed housing arrangement. Ideally these should be above ground as this is a greenfield site.

The proposal to drain surface water to the River Almond via a new surface water pipe through land owned by Lord Roseberry is crucial to the development and planning permission should not be granted until an agreement to proceed on this basis has been formalised.

CEC Flood Prevention further comment

Following Ruairidh McArthur's latest information about this site Flood Prevention has the following comments.

Points 1 and 2 on the attached memo have now been addressed.

Points 4 and 5 require further information, discussion and agreement prior to determination.

CEC Flood Prevention further comment

In support of the above planning application the Flood Prevention Unit has reviewed the following documents:

Flood Risk Assessment, version 2.0 date 28/06/2016

Location Plan drawing, number LOC(01) revision F

Drainage Strategy Plan, revision B

Independent check certificates for both Flood Risk Assessment and Drainage Strategy Plan

Self-Certification checklist

Overland flow path drawings numbered 1000 and 1001

The applicant has not provided details for the part of the site which is included in the red-line boundary to the South of Craigs Road. As a result, Flood Prevention would object to this application on the grounds of insufficient information. Flood Prevention is aware that this land is the subject of another application (16/05681/PPP) which may be linked. The association, phasing, and timescales have not been clarified so they have been assumed to be separate at this time.

With respect to the what has been submitted for the other parts of the site within the red line boundary the proposed discharge rates for surface water discharge as noted in Table 4 of the SWMP are acceptable to CEC Flood Prevention. The detailed development of drainage arrangements for the individual zones through future applications shall be in line with these limits.

It is noted in Section 3.0 of the Drainage Strategy Plan that the parcel of land to the North of Craigs Road is to remain undeveloped.

In addition to a full suite of information to be submitted for the land to the South of Craig Road the applicant is requested to submit further information in line with the points below.

The applicant shall provide a drawing which shows approximate locations and sizes of proposed surface water attenuation storage within the proposed housing arrangement. Ideally these should be above ground as this is a Greenfield site - however airport guidance with regard to flocking bird strike should be considered. Without this Flood Prevention cannot confirm that sufficient space has been left to include surface water attenuation storage within the housing layout. As such there is a potential for an increase in flood risk as a result of the increase in impermeable area within the application boundary.

The application proposes to drain surface water to the River Almond via a new surface water pipe laid through land owned by Lord Roseberry. As this pipe is crucial to the development drainage, Flood Prevention would object to any planning permission without evidence demonstrating that this arrangement is agreeable to the Lord Roseberry estate.

SEPA comment

We ask that the planning condition(s) in Section 2 and 3 be attached to the consent. If these will not be applied, then please consider this representation as an objection. Please also note the advice provided below.

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

Advice for the planning authority

1. Flood Risk

1.1

We have reviewed the information provided in this consultation and it is noted that the application site (or parts thereof) lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.

1.2

The risk identified at this site is from surface water flooding. We would note that the top north east corner of the site is showing a significant area of surface water ponding. A member of the SEPA Flood Risk Team has observed water ponding within this part of the site and google street view also corroborates this. As significant depths of surface water are shown ponding against the railway line we would recommend that development avoids these areas to ensure a sustainable approach to development and no increase in flood risk elsewhere. The council should be satisfied that the risk of surface water flooding is mitigated on site and there is no increase in flood risk elsewhere. As the site is surrounded by higher land, capturing the surface water entering the site will also require consideration. We would note that the Flood Risk Assessment (FRA) has used FEH CD-ROM v3 to derive rainfall estimates. We would strongly recommend that the FRA reviews these estimates using the updated FEH webservice which contains updated rainfall estimates (FEH13).

1.3

As noted in the FRA, no watercourses were identified during the topographical survey or the site visit. However, there are water mains and combined sewers flowing through and adjacent to the site which will need careful consideration to ensure there is no flood risk associated with failure of these pipes. We would strongly recommend that no property is built on top of or immediately adjacent to these pipes to reduce the residual flood risk. Access to these pipelines should be considered as well as flow-paths through the site should surcharging or a burst pipe occur. Finished floor levels elevated above proposed ground levels and landscaped to direct water away from property is recommended.

1.4

The site is close to the Bughtlin Burn however it is our understanding that the site boundary is located immediately out with the functional floodplain. That said, we support Section 4 of the FRA which states that backing up of the land drainage will be considered at the detailed design stage. To ensure there is no increase in flood risk elsewhere we would recommend that development is located out with this area.

1.5

As noted in our pre-planning comments (PCS140743), the council should be minded that development here without a strategic and holistic approach may affect the viability of the Gogar Burn realignment. If development takes places in a piecemeal approach then it may prohibit the preferred realignment route which would benefit existing development and infrastructure.

1.6

We would recommend that contact is made with the Flood Prevention Officers within Edinburgh Council to glean any information/ local knowledge that they may possess.

1.7

We would welcome re-consultation during the detailed planning stage. We would advise that should development be located within areas at risk of flooding and the risk not be adequately addressed we may object at the detailed planning stage.

2. Drainage

2.1

Drainage is a material planning consideration as set out in PAN 79 Water and Drainage. 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.

Waste water drainage

2.2

We note from the supporting planning information that the intention is to connect the development to the public foul sewer network.

2.3

We note that the applicant has been in discussions with Scottish Water. It will be for Scottish Water to ensure that sufficient capacity exists in the public sewerage network to accommodate the proposal. Should Scottish Water determine that capacity exists, they must ensure that the proposal does not have a detrimental effect on the water quality of the river.

Surface water drainage

2.4

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.

2.5

The drainage strategy for the site suggests that the applicant will seek to direct some site runoff away from the water environment to the combined sewer with Scottish Water's approval. It is difficult for us to determine if a CAR licence is required until there is certainty about this and the scale of development draining to the River Almond. However, on the understanding that Scottish Water would be unwilling to allow a new connection of surface water to the combined sewer it is likely that a CAR licence would be required.

2.6

We would highlight to the planning authority in order to inform their discussions with Scottish water that it should be noted that Scottish Water only accepts surface water into a combined system in exceptional circumstances. Removing surface water from the combined sewer is beneficial as it, increases capacity in infrastructure for future development and reduces the risk of pollution events; this is particularly relevant in the context of the increased development in the surrounding area. We will expect Scottish Water and the applicant to ensure that all reasonable efforts are made to remove surface water from the combined sewer.

2.7

We have considered the relevant information within the application and based on the details provided we are satisfied that the proposed principles of Sustainable Urban Drainage Systems (SUDS) for the application for planning permission in principle are appropriate, with 2 levels of SUDS to be incorporated into the detailed design and SUDS will be designed to CIRIA standards. While we are content with this approach it has not been confirmed in detail how this will be achieved. We therefore request that a condition is attached to any approved consent for all phases of development requiring full details of the finalised surface water management scheme. To assist, the following wording is suggested:

2.8

Prior to the commencement of any works, full details of the finalised SUDS scheme for all individual phases of development shall be submitted for the written approval of the planning authority, in consultation with SEPA, and all work shall be carried out in accordance with the approved scheme.

2.9

Reason: To ensure adequate protection of the water environment from surface water run-off.

2.10

Please note that given the scale of the development (1400plus units), the surface water drainage system/discharge may need a licence under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). The Strategy author should note that dividing the development into regional SUDs does not reduce the level of regulation from licence to GBR.

2.11

We would highlight that it is at the applicants own commercial risk if amendments to the masterplan are required in order to accommodate appropriate SUDS on site. Currently the proposed masterplan does not highlight attenuation surface water features on site. We would highlight that SUDS also provide opportunities for increased amenity and biodiversity value of sites. While we are aware of potential concerns over open water in close proximity to the airport as highlighted in the support information this does not in itself explain the absence of swales or basins from the plans. Therefore, we have concerns that the full amenity of properly designed SUDS at the site may not be realised. Ultimately this is a matter for the planning authority to determine.

2.12

We have not considered the water quantity aspect of this scheme. Comments from Scottish Water, where appropriate, the Local Authority Roads Department and the Local Authority Flood Prevention Unit should be sought on any water quantity issues including the acceptability of post-development runoff rates for flood control.

2.13

There are no issues with potential consentability provided appropriate SUDs are used in accordance with the Simple Index Approach.

3. Pollution prevention and environmental management

3.1

We note from the supporting planning material that the development of the site will follow a Construction Environmental Management Plan (CEMP); appendix 2 of the ES provides further detail on the proposed content of the plan. We support this as it is a key management tool to implement the Schedule of Mitigation. In order to ensure that this is delivered we request that a condition is attached to this planning permission requesting the preparation and submission of a CEMP for the different phases of this development.

3.2

We would highlight that to avoid contamination of aquatic habitats it is imperative that during the construction phase silt and any other pollutants such as oils and concrete are not allowed to enter watercourses, as they can cause significant ecological damage. Run-off of any contaminated water to drains or burns should be avoided by following carefully laid-out work procedures and following guidance provided in SEPA's Pollution Prevention Guidance. Run-off of silt can be contained by the use of settlement lagoons, silt-traps and bunding but should be situated away from watercourses.

3.3

We welcome the general mitigation principles and pollution prevention measures set out in the ES. Some of proposed measures relate to works which may be regulated by us. However, many of the works will not be regulated by us and consequently should be secured by planning conditions. Therefore, we request that a condition is attached to the consent requiring the submission of a site specific construction environmental management plan (CEMP). If this is not attached, then please consider this representation as an objection. To assist, the following wording is suggested:

3.4

At least two (2) months prior to the commencement of any works, a site specific construction environmental management plan (CEMP) must be submitted for each phase of development for the written approval of the planning authority in consultation with SEPA and other agencies such as SNH as appropriate and all work shall be carried out in accordance with the approved plan.

3.5

Reason: to control pollution of air, land and water.

3.6

We would highlight to the applicant that we will expect to see further details (plans etc.) of the proposed construction phase SUDS as part of the finalised CEMP.

4. Air Quality

Air Quality

4.1

The proposed development will be in an area that is currently not affected by poor air quality. An air quality modelling assessment has been carried out and it predicts that the development will not have a significant impact on local air quality. The City of Edinburgh Council should be satisfied that the assessment has considered the cumulative impact of all development that will add traffic to the road network - particularly along main commuter routes. 'Land-Use Planning and Development Control: Planning for Air Quality' (Produced by Environmental Protection UK and Institute of Air Quality Management, 2015) explains how a cumulative impact should be undertaken.

Greenhouse gas emissions

4.2

We note that the development is located some distance from local amenities, therefore there is likely to be an increase in the number of journeys made by car. Whilst this figure may appear to be insignificant, when considered alongside other developments across Scotland, the cumulative increase in the distance travelled by car - and subsequent emissions of carbon dioxide - could undermine the Scottish Government's commitment to reduce emissions of greenhouse gases.

4.3

Scottish Planning Policy sets out an approach to integrating transport and land use planning by supporting a pattern of development and redevelopment that 'reduces the need to travel and as a consequence reduce emissions from transport sources'. It also states that 'Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where the transport assessment does not identify satisfactory ways of meeting sustainable transport requirements.'

4.4

Greenhouse gas emissions from road traffic are expressed as grams of carbon dioxide emitted per kilometre travelled (g/km), therefore every additional km travelled will increase the emissions of greenhouse gases. Road transport emissions account for 72.4% of all transport emissions of greenhouse gases and cars account for over half road emissions. 'The Climate Change (Scotland) Act 2009 sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set in secondary legislation' Section 5 of the Scottish Government's Climate Delivery Plan3 describes the issue in detail.

Cumulative effects of development

4.5

When considered in isolation, a single development will appear to have a negligible impact on local air quality. However, when the same development is considered alongside other developments in the area, the cumulative impact could be more significant - particularly along main commuter routes. SEStran4 has warned 'the allocation of extensive new land for development underlines the importance of integrating land-use and transport planning in the SEStran area, building these links into the forthcoming City Region plan and other development plans. Failure to do so will lead to further significant increases in car use', and 'It has been demonstrated that the

SEStran area faces particular challenges in catering for the travel volumes and patterns resulting from the anticipated growth in population and employment in the area. In addition to the forecast increase in the number of jobs, the trend of dispersal of jobs, services and homes will, if it continues, bring further pressure to bear on the transport network.' Transport Scotland advise 'With several proposals in close proximity, a more detailed Transport Assessment of the cumulative impact Advice for the planning authority of the proposals may be more appropriate than one for each proposal in isolation'.

Advice for the planning authority

5. Flood Risk Caveats & Additional Information for the applicant

5.1

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/>

5.2

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).

5.3

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.

5.4

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/>

Building Standards comment

A Geo-environmental Phase I + II reports would be required for the Building Warrant application.

Police Scotland comment

We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.

Scottish Natural Heritage comment

Summary of advice

A proposal of this nature will involve substantial changes to the current site and therefore significant impacts to the existing landscape character and visual amenity. We consider the proposal put forward in the PPP application and supporting EIA has the potential to fulfil the natural heritage requirements for the site as set out in the site development brief. However, we provide some commentary on the detail and delivery of these matters.

The situation regarding bats should be clarified before the buildings are demolished or it could lead to an offence being committed under the Habitats Regulations (1994).

Background

Strategic context

This site is strategically important in the expansion of the city westwards. As an allocated site in Edinburgh's second Proposed Plan, it has been assessed through the plan-making process in terms of strategic green infrastructure (GI) and wider access links, which accordingly have helped inform the Development Brief for the site.

APPRAISAL OF THE IMPACTS OF THE PROPOSAL AND ADVICE

Landscape and visual impacts/ green infrastructure

The application area is in part prominent and wholly within an open and agricultural location on the edge of the City of Edinburgh. While we note that a proposal of this nature will involve substantial changes to the current site and therefore significant impacts to the existing landscape character and visual amenity, we note it is currently proposed for allocation as part of the emerging Local Development Plan. It therefore is included within the proposed growth strategy for the city, which includes redefinition of this area of the Edinburgh Green Belt.

SNH made no formal representation on this site at the LDP stage. We have however supported City of Edinburgh Council in the promotion of development briefs for this area of the city and we acknowledge that these briefs have sought to reduce or mitigate possible adverse landscape and visual impacts, while also providing necessary open space and green infrastructure to support urban growth.

We consider the proposal put forward in the PPP application and supporting EIA has the potential to fulfil the natural heritage requirements for the site as set out in the site development brief. If proposals set out in the EIA and supporting masterplan documents are taken forward to appropriately well designed and detailed standards, the proposal could provide a predominantly housing-led development with a defined landscape setting and favourable green network connectivity, offering amenity and recreational benefits. We do however draw attention to the potential for any street lighting required along the Craigs Road to lessen the effectiveness of the proposed northern landscape buffer, potentially creating landscape and visual impacts on the minor but locally important ridgeline along Craigs Road.

We would advise that the open space parameters, street network and active travel measures, as set out within the proposed layout plans, the open space strategy, and as conveyed elsewhere in the design and access statement, are secured as submitted. We advise that measures to ensure appropriate detailed design and delivery of environmental mitigation can be usefully secured through appropriately worded conditions. Such measures include the retention of existing features such as trees, hedgerows and stone walls, which are important aspects of local landscape character. The long-term maintenance and management of the proposed green infrastructure are also relevant to securing the delivery of mitigation measures.

We provide below, in summary form, additional advice on certain aspects of the proposal:

Airport safeguarding and likely restrictions on planting and water management

We note that the likely influence of bird-strike risk has been mentioned in the EIA but as yet there is insufficient detailed information as to how Civil Aviation Authority requirements on these matters may influence the layout of open spaces, surface water control and the character and layout of planting. We advise that careful attention to these issues should be applied now and in future phases of planning for this site, in order that the integral placemaking role of the proposed green infrastructure is not diminished or adversely impacted by such requirements at future stages of the planning process.

Active travel and pedestrian connectivity across East Coast Main Line (ECML)

We note the application indicates a 'possible bridge' crossing the ECML at the southern corner of the site. Given the strategic importance of a bridge in this location, connecting walking and cycling routes to Edinburgh Gateway Station and to longer distance routes and destinations beyond, we would have hoped for firmer commitment at the PPP stage to deliver this key aspect of active travel infrastructure. We highlight that the bridge is a requirement that is set out in the Council's site brief and we also highlight that planned strategic green networks and active travel networks, both within the development site and more widely within West Edinburgh, converge on this location. We consider failure to deliver a crossing in this location would reduce the likely success of the green networks and active travel connections in this area of the city.

Green network design, habitats and multi-functionality of open spaces

While we note and broadly support the spatial layout of proposed open spaces and green networks as put forward in the PPP, we note that there is, as yet, little detail of the form and function of such open space. We would encourage further details on these matters and the promotion of strategic layouts and designs which promote green infrastructure to be multi-functional and delivering multiple benefits as required by Scottish Planning Policy. Specifically for this site, and in addition to amenity and active travel functions, we would encourage the development to also promote a diversity of open spaces and areas which promote sustainable forms of surface water management and the creation of new habitats within and around the application area. For example, we note the potential for linking elements of woodland, woodland edge and grassland or meadow habitats in the larger north-south and east-west green networks through the site.

European Protected Species - Bats

The most recent Direct Ecology report (2016) confirmed a roost at 126 Turnhouse Road and a likely one at the Farmhouse. They advised that a derogation licence would need to be sought before the buildings were demolished (para 5.2.2).

However, the ecology chapter by ECOS in the Environmental Statement contradicts this and says that the Direct Ecology survey found no evidence of roosting bats (12.8.1. (b.3)).

We have no record in our database of a licence having been applied for at Turnhouse Road.

This situation should be clarified before the buildings are demolished or it could lead to an offence being committed under the Habitats Regulations (1994).

Other protected species

The protected species mitigation summarised in the CEMP should be strictly adhered to.

Scottish Natural Heritage further comment

We refer to our letter of 9 November 2016 and further correspondence of 14 November in response to Stuart Buchanan. Detailed background information and advice in these letters remains relevant. Our response to the latest, additional information is set out below.

Landscaping and Airport Safeguarding issues

We welcome the further information provided by the applicant on this issue. It demonstrates the nature of the design measures which may allow the landscaping scheme to progress within the parameters set by the Civil Aviation Authority (CAA) and as set out in their guidance CAP772: Wildlife Hazard Management at Aerodromes (2014).

At this stage we understand that there has been no detailed advice from CAA in relation to their views on the planting layout and mitigation strategy proposed in this development.

Therefore, while we recognise that this is an application of Planning Permission in Principle (PPP), in the absence of any agreement from the CAA on the landscaping proposals at this stage of the planning process, we continue to advise the Council that there still appears to be some degree of uncertainty over the detailed viability and delivery of the landscape proposals as set out.

In particular, we highlight the relative importance of the proposed structure planting on the elevated parts of the site which is to act as landscape mitigation for the development. We therefore continue to advise that issues that may affect the design and detailed delivery of the planted and habitat aspects of the Masterplan layout are appropriately understood, and that the measures to deliver appropriate green infrastructure design and landscape mitigation of the proposal as set out in the PPP application and EIA, are secured.

Active Travel and Pedestrian Connectivity across the ECML

We note the further information regarding the intended future use of the existing bridge over the ECML. This is welcomed and we support the relationship the Masterplan sets out with this bridge, and community hub, primary school and large greenspace. However, for clarity, our earlier advice referred to the proposal for a pedestrian/cycle bridge as set out in the Development Principles for area HSG19 of the Second Proposed Edinburgh Local Development Plan. We note that green network and access provision has been designed to align with this point and that a connection point for a future new pedestrian bridge 'has been included within the Masterplan to accommodate future delivery by CEC in the future, should CEC wish to install such a bridge at its expense'.

Green Network Design, Habitats and Multi-functionality of Open Spaces We welcome the further description of the various elements of greenspace and habitat connectivity highlighted in the further written information and supported by the 'Landscape Framework Overlay' drawing. We advise that the scale, width dimensions and broad locations of these features, as set out in this further information, is secured. We also advise that the detailed design of path access arrangements, play, sports and growing spaces as suggested by this submission, are also secured.

European Protected Species - Bats

The latest information says that bat roost potential was identified at 126 Turnhouse Road, but the bat licence application paragraph of the Direct Ecology report identified an actual roost.

Direct Ecology advised that three nocturnal surveys would be needed to support a licence application and the latest information states that a detailed bat survey will be carried out in the year prior to development.

We are unable to provide advice until these surveys are completed and, if appropriate, a species protection plan has been produced. Once these are available we will be happy to advise but only if you are uncertain about:

*the adequacy of the survey and protection plan;
whether a species licence will be needed; or,
the prospects of a species licence being granted.*

All bat species found in Scotland are classed as European protected species and are fully protected under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).

Waste Services

Following the recent restructure, engagement with planners, architects and developers now sits within this team. We are able to provide the strategic overview and my colleagues who are technical officers will deal with the operational aspects on a geographical basis.

Waste Management Responsibilities

The Waste and Cleansing Service will be responsible for managing the waste from households and any Council premises only.

It will be the responsibility of third party commercial organisations to source their own trade waste uplifts. Architects should however note the requirement for trade waste producers to comply with legislation, in particular the Waste (Scotland) Regulations which require the segregation of defined waste types to allow their recycling. This means there will need to be storage space off street for segregated waste streams arising from commercial activities.

Any appointed waste collection contractors, appointed to manage commercial waste, could be expected to have similar requirements to the Council in terms of their need to be able to safely access waste for collection.

Compliance with Waste Strategy (Domestic Waste Only)

The provision of a full recycling service is mandatory in Scotland, so that developers must make provision for the full range of bins (either individual Containers for each property, or communal bins for multiple properties). These must be stored off street at all times, except on the day of collection (in the case of individual bins).

Given the area and the waste management arrangements for neighbouring properties, We would have assumed that the waste collection will be by and combination of kerbside collection and communal bins, so that some residents are not responsible for presenting the waste on the street on the correct collection days, and removing the containers afterwards, while others will be.

Ideally we would seek to provide one service or the other; however on a development of this scale there may be sufficient scale for both, and we would welcome early engagement with the architects to better understand this issue.

Regardless of this, the waste collection teams will require safe and efficient access to these, and therefore cognisance must be taken of our comments below in relation to operational viability.

The bins provided for communal waste collections would be for landfill waste, mixed recycling for paper and packaging, glass and food.

Key points are:

each bin store must accept the full range of materials in bins, segregated as outlined above. It is not acceptable to have some types of bin and others in a different collection point, as recycling is a fully integrated part of the service;

the maximum size of a food bin is 500 litres; and that of a glass bin is 660 litres, which are both smaller than other types of waste due to weight issues; -provision must be made for the storage and disposal of bulky wastes such as furniture produced by the residents, and indeed access to those by our collection teams.

For individual kerbside collections, we would provide each property with landfill (140 litres); mixed recycling (240 litres), glass (box), food box and internal caddy. All of these must be presented on the day of collection and removed thereafter. They must otherwise be stored off street at all times.

Operational Viability

Developers need to ensure that services are accessible so that our collection crews can provide the service in a safe and efficient manner, taking account of turning circles, length and width of vehicles, distance bins must be pulled, surfaces, slopes and so on. Obviously sufficient capacity must also be provided to allow successful collection of each segregated waste stream.

Architecture + Design Scotland comment

A&DS held limited pre-application discussions with the applicant and the council in connection with the site. However our typical pre-application engagement process was not carried out and we are not in a position to provide an appraisal of the quality of the masterplan and development proposals. Our response to the planning application is to re-state our offer of support to the project through a Design Forum workshop process, see below. This may be relevant to planning conditions in the event of a grant of consent and it may, for example, link to support for further masterplanning work or Design Coding to be carried out at AMSC stage.

Background

The masterplanned proposals for the site were identified by City of Edinburgh Council as a Locally Significant project eligible for support by A&DS via a Design Forum workshop and appraisal process. Whilst this support was discussed in connection with pre-application design development at Planning Permission in Principle stage a number of constraints prevented the intended Design Forum workshop process and Appraisal taking place prior to the present application.

Offer of Support

We have offered to facilitate Design Workshops at AMSC stage in the event that both the applicant and the council are in favour of a significant process of Design Review and development following a Planning Permission in Principle. The purpose of such a process would include:

To help align proposals amongst the various land interests of HSG 19 inclusive of West Craigs, Denedin Canmore, Taylor Wimpey and Rosebery Estates.

To provide independent design review of the quality of the urban design, landscape and architectural frameworks proposed and any documentation targeting 3rd parties such as developed Masterplanning or Design Codes.

To help align proposals with relevant infrastructure initiatives of City of Edinburgh Council and other agencies such as Maybury Road junction alterations, the Gogar transport interchange and access to local services.

Transport Scotland comment

The Director does not propose to advise against the granting of permission. Transport Scotland's response is made on the understanding that the traffic generated by the application site has been incorporated as part of the traffic modelling undertaken for the West Edinburgh Transport Appraisal (WETA), and that it's associated traffic impact on the trunk road network has therefore been taken into consideration in the provision of a contribution towards the associated works at Newbridge Junction.

Network Rail comment

Whilst Network Rail has no objections in principle to the proposal, due to its close proximity to the operational railway we would request that the following matters are taken into account:

Whilst it is anticipated that the majority of journeys from the site to Edinburgh Gateway Station will be by walking or cycling, it is considered that further infrastructure is required within the adjacent Maybury masterplan area to encourage public transport journeys as identified in the accompanying Transport Statement. It is therefore suggested that a bus stop or turning facility with waiting shelter in the vicinity of the existing or proposed bridge crossing is included.

Furthermore, whilst it is hoped that sustainable modes of transport would be the preferred travel to the station, it is possible that some journeys would be by car and that the adjoining area to the north of the railway station could be the subject of on-street car parking issues. It is therefore suggested that consideration is given to a dedicated set down area and/or car parking area in the vicinity of the existing or proposed bridge crossings.

These requirements should therefore be included in the consideration of the Transport Statement and masterplan. It is worth noting that the Reporters' findings stated that 'this is a matter which may be of relevance to achieving enhanced public transport access and modal shift targets'.

The design and implementation of any new bridge over the railway will have to comply with current Railway Standards and Guidelines and will be subject to further discussions and agreement with Network Rail.

In regards to the existing bridge over the railway, OB 090/018

According to our records this bridge was built as an accommodation crossing and is owned and maintained by Network Rail. There are no public rights of access over this bridge. If any pedestrian/cycle links are proposed over this bridge, additional servitude rights of access/bridge agreements will have to be secured from Network Rail.

In addition to the above, the following matters must also be taken into account, and if necessary and appropriate included as conditions or advisory notes, if granting the application:

Uncontrolled drainage towards the railway may have a direct impact on the reliability and frequency of the rail transport in your area.

All surface or foul water arising from the development must be collected and diverted away from Network Rail Property. (Any Sustainable Urban Drainage Scheme should not be sited within 10 metres of railway infrastructure and should be designed with long term maintenance plans which meet the needs of the development).

The railway can be a dangerous environment. Suitable barriers must be put in place by the applicant to prevent unauthorised and unsafe access to the railway.

If not already in place, the applicant must provide a suitable trespass proof fence of at least 1.8 metres in height adjacent to Network Rail's boundary and provision for the fence's future maintenance and renewal should be made. We recommend a 1.8 metre high 'rivetless palisade' or 'expanded mesh' fence. Network Rail's existing boundary measure must not be removed without prior permission.

The proximity and type of planting proposed are important when considering a landscaping scheme. Leaf fall in particular can greatly impact upon the reliability of the railway in certain seasons. Network Rail can provide details of planting recommendations for neighbours.

Where trees/shrubs are to be planted adjacent to the railway boundary these should be positioned at a minimum distance from the boundary which is greater than their predicted mature height. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. Issues often arise where sensitive development types are sited in close proximity to the rail line.

The applicant should be aware that any proposal for noise or vibration sensitive use adjacent to the railway may result in neighbour issues arising. Every endeavour should be made by the applicant in relation to adequate protection of the uses contained within the site.

Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.

Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a 'fail-safe' manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a 'possession' which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.

CEC Affordable Housing comment

Introduction

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

Housing requirements by tenure are assessed in line with the Affordable Housing Policy (AHP) for the city.

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

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

Affordable Housing Provision

This application is for a development consisting of approximately 1410 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% homes of approved affordable housing tenures, so if for example, 1410 homes were built this would be a requirement for 352 affordable homes. This is a joint application partnership between West Craigs Ltd (WCL) c/o Cardross Asset Management and Dunedin Canmore Housing Association (DCHA-a Registered Social Landlord), who will be providing 25% of the affordable housing on site. This is welcomed by the department.

Affordable Housing (25%) is to be provided in two areas, north and south of Turnhouse Road, and separated by the proposed Primary School site. Dunedin Canmore has specifically requested that the areas designated for affordable housing are central to the development, are of sufficient scale to allow a mix of affordable tenures that can accommodate a mix of client groups and be tenure blind. This method of development is considered to be essential for the successful management of the Affordable Housing area and is supported by this department.

The applicants confirm that the properties would be tenure blind and include a mix of social rented housing, mid market rented housing and low cost home ownership. These would consist of a combination of low/mid rise flats and houses and would include some homes specifically for elderly people.

The affordable homes should be fully compliant with latest building regulations and further informed by guidance such as the relevant Housing Association Design Guides and Housing for Varying Needs design procedures.

This department requests that in subsequent detailed applications, the locations, numbers and tenures of the affordable homes should be identified within the development site. In terms of accessibility, the applicant has confirmed that all new homes are located within a close proximity of both bus and tram links to the City Centre.

Summary

The applicant has made a commitment to provide on site affordable housing and this is welcomed by the department. The number and breakdown of tenures are still to be finalised. It has been identified by the applicant that DCHA will manage the affordable homes and the Council will be keen to work with both the developer and RSL to assist as much as possible to deliver a mixture of good quality affordable homes. These details will need to be confirmed in subsequent detailed applications and the affordable homes will be secured by a Section 75 Legal Agreement. This approach will assist in the delivery of a mixed sustainable community.

In summary:

25% of affordable housing required will be delivered onsite, in a range of affordable tenures across two locations, enabling mixed communities

The affordable housing will include a variety of house types and sizes to reflect the provision of homes across the wider site

In the interests of delivering mixed, sustainable communities, the affordable housing will be expected to be identical in appearance to the market housing; an approach described as 'tenure blind'

The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.

Archaeology comment

The site is centred upon two historic farms Meadowfield and West Craigs, located on the northern side of Edinburgh Airport and former RAF base of Turnhouse, the origins of which back to the 18th and 15th/16th centuries respectively. The site contains a range of important rural historic buildings associated with these two farms dating back to the late-18th / early- 19th century. Archaeological evidence from the surrounding area also suggests that the site has significant potential for containing archaeological evidence dating back to early prehistory

As such the site has been identified as containing occurring within and area being of archaeological and historic significance both in terms of buried archaeology and surviving rural farm buildings and cottages. Accordingly, this application must be considered under terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP) and Historic Environment Scotland Policy Statement (HESPS) 2016 and also CEC's Edinburgh Local Development Plan (2016) Policies ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Turnhouse Road Milestone(s)(CHS 31)

As stated in the Environment Statement the application will potentially impact upon a historic Milestone situated on Turnhouse Road (GUARD site CHS 31). Given the local historic importance of this marker stone and the significance of its fixed geographic location it is essential that this stone is retained in its historic location. As such it is essential that detailed drawings are submitted for approval that will see its retention in situ and that a condition is attached to ensure that appropriate conservation measures are put in place to secure its protection during development based upon the following:

'No development shall take place on the site until the applicant has secured the implementation of an archaeological conservation plan for the Turnhouse Road Milestones (GUARD site CHS 31) which has been submitted by the applicant and approved by the Planning Authority.'

Historic Buildings

In addition to the following specific points relating to individual historic buildings we would like to make the following general comments. GUARD's description of the historic buildings in particular the address's of the Meadowfield Group of buildings is confusing e.g. Meadowfield House (CHS 34) could be taken as referring to 4 separate cottages situated at 17-23 Turnhouse Road. It is suggested that the descriptions of the buildings located within the development area be looked at again and the use of Postal address used for those out with the named farms. Furthermore any-resubmission must look at updating the condition reports of these buildings as although vacant it is hard to agree with GUARD's statement in 13.4.5 that they are all derelict, a term used in the report which conveys a poorer condition.

Meadowfield Farm; Farm house (CHS 33), Steading (CHS32) & Cottages (CH37) house (CHS 34) Chapter 13.6.1 (Direct Impact Assessment) of the Environmental Statement undertaken by GUARD has significant and conflicting aims for this group of four historic 18th - 19th century farm and rural domestic buildings which makes proper assessment impossible. The 1st paragraph on page 17 of this section states that it is anticipated that removal of Meadowfield farmhouse, steading, house at Meadowfield/Turnhouse Rd and Meadowfield Cottages would be required in order to facilitate redevelopment. Yet in the last sentence of this paragraph this is contradict by stating 'It is proposed to retain and renovate these structures'.

This group of three historic buildings at Meadowfield, in particular the steading and farmhouse, are in my opinion certainly of local archaeological significance and certainly not of Lesser significance as attributed by GUARD in table 13.6. Indeed given their history of development from the start of the period of Agricultural Improvement in the L-18th /E-19th century their local significance could be considered broader in terms of contributing to the wider Lothians region. Therefore the retention of these historic buildings would be considered important and certainly consistent with CEC design guidance in regards to place making. As such their loss would have a greater Moderate significance to that of Minor as suggested by GUARD.

Although it may not be possible to save Meadowfield Farmhouse due to recent vandalism, the loss of Meadowfield steading and to a lesser extent both the house on Turnhouse Road (CHS 34) and Meadowfield Cottages (CHS 37) would be considered as significant adverse impacts and contra to ENV8 & 9. The retention and reuse/conversion of these three buildings would be supported.

However if consent is granted for this scheme it is essential that Detailed Historic Building surveys of these buildings is undertaken prior to any demolition/ development. In terms of the proposed level of archaeological recording, the level 1 historic building survey as set out by GUARD (see page 21, chapter 13.7.1 para 2) is insufficient and not acceptable given the greater significance of these structures. Rather if granted it is essential that more detailed surveys are undertaken of these buildings (level 2-3) requiring phased internal and external elevations and plans, photographic and written survey and analysis. This will be linked with an appropriate programme of archaeological works to deal with any associated buried remains.

West Craigs Farmhouse (CHS 36 & 35)

Although unlisted West Craig Farm in my opinion is considered to be an important local survival of a Georgian Farmhouse dating from the period of Agricultural Improvement starting in the late 18th century and whose origins date back to AD1506 (S Harris, Place Names of Edinburgh). Although undoubtedly 'altered' from its original date of construction (We would like to know what 200 year old building is not) this in our opinion does not distract from its local archaeological and historic significance.

Given the age of this building combined with the historic evidence suggesting that this is the last of a series of farm buildings going back to perhaps the 16th century, it is therefore fundamentally important in assessing the archaeological/heritage impact of this application that it is fully considered. Although within the 'Red Line' of the application as discussed above the supporting documents do not appear to provide any information about what is proposed for this historically important group of farm buildings.

In my opinion the potential loss of West Craig Farmhouse would be considered as having a significant adverse archaeological impact and one that is contra to planning policies E30 and ENV8b & ENV9. As such it is recommended that this application is refused consent.

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

West Craigs Farm Cottages

The 19th century cottage situated on the entrance to West Craigs Farm from Craigs Road is clearly depicted on the 1st Edition OS map yet is another site not mentioned in GUARD's Culture Heritage Chapter or within the submitted indicative plans. Although not designated this historic farm workers cottage associated with West Craigs Farm is in my opinion of local historic/archaeological significance. Accordingly it is recommended that this building is retained as its loss would be considered as having a significant adverse archaeological impact and contra to Policy ENV8 &9.

Therefore without addressing the future retention of this locally significant historic building it is not possible to recommend approval of this PPP application.

Buried Archaeology

Having read through the Cultural Heritage Chapter 13 of the Environment Statement by GUARD it contains several significant major errors in terms of collation of evidence in discussing the archaeology background and therefore assessing the potential impacts of development, summarised as follows: example:

Chapter 13.4.1 Prehistoric sites (8000BC-AD 600) although it is true to state that there are no known sites from the site it does not provide a full account of the wide range of significant sites known from the study area. For example it only mentions the scheduled Gogar Mains cropmarks (sites 10 & 11) at Gogar, yet there own soon to be published excavations undertaken on our behalf during the Edinburgh Tram development recorded a wide range of prehistoric sites dating back to the Mesolithic at Gogar plus evidence for early medieval settlement. In addition the published results from the Maybury Park excavations by CECAS are also not included and further attest to the wide range of archaeological sites from the area including 2 Roman Temporary Camps.

Chapter 13.4.2. States that there are no known medieval sites. This is plainly in accurate as not only is West Craigs Farm historically recorded as in existence from the 16th century but GUARD themselves excavated substantial remains of the Medieval village of Gogar as part Edinburgh Tram development.

Chapter 13.4.3 Post medieval (AD 1600-2000). The site occurs on the northern boundary of Edinburgh Airport in particular its historic core formed by the former RAF Turnhouse. This early airbase was formed during WWI and played an important role in both World Wars up until the 1950s. Yet there is NO mention of this site within this chapter. Given the close proximity of the sites it is probably that ancillary archaeological remains may be encountered on this site e.g. pill boxes and potentially UXBs.

Given the significant omissions and errors within GUARD's Environmental Statement's Cultural Heritage Chapter it is essential that it is amended and resubmitted.

The proposals will require significant ground breaking works in regards to the construction of the various phases of development. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 19th/20th century farming and military activity through to prehistoric sites. Given the deficiencies mentioned above in GUARD's ES Cultural Heritage assessment it is considered that site will have a greater probability of encountering significant remains than that concluded by GUARD (see 13.6.1, p17 para 2).

Given the potential for significant archaeological resources to occur across the proposed area, it is essential that if consent is granted for this scheme that an archaeological mitigation strategy is undertaken prior to submission of any further detailed (FUL/AMC) applications, demolition or development.

In essence this strategy will require the undertaking of phased programme of archaeological investigation, the first phase of which will be the undertaking of archaeological evaluation (min 10%) linked to comprehensive metal detecting survey & field walking. The results from this initial phase of work will allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains during each phase of development.

Public Engagement

As stated not only does the site contain significant historic buildings but it is likely to contain a wealth of associated remains dating back to early prehistory. It is therefore considered essential therefore that a programme of public/community engagement is undertaken during all subsequent phases of development. The full the scope of which will be agreed with CECAS but will include site open days, viewing points, temporary interpretation boards and exhibitions.

If consented it is essential therefore that a condition be applied to any consent if granted to secure this programme of archaeological works based upon the following CEC condition:

'No demolition, development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis, reporting, publication, preservation, public engagement) 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.

Archaeology further comment

Further to the applicant's response of the 5th January to my earlier consultation response in respect to this PPP application for proposed residential development, we have managed to read over it and would like to make the following specific comments.

Meadowfield Historic Buildings

It is welcomed that the response gives clarification and confirms that the historic buildings on Turnhouse Road (17, 19, 21, 23, 25, 124 & 126) will be refurbished and retained. In terms of Meadowfield Farmhouse itself we acknowledge that the recent extensive arson at the property has led to the conclusion that it will be lost. That said as we stated this farmhouse and accompanying steading form an important historic character of the area. As such their loss would be considered a significant impact and every effort should be made to retain the steading and layout of this historic farm within the final designs, which the current masterplan fails to do. It is recommended that that the steading is retained.

If this is not possible then it is recommended that the layout of the steading and design is retained as a focal point of the new development with new buildings designed to reflect and interpret the layout and form/character (reusing as much as possible the original fabric). This will significantly contribute to the design of the new scheme and be in line with earlier CEC design briefs for the area and also Scottish Government and CEC Design Guidance and Place Making Agendas.

Given the above clarifications and recommendations which now contradict significantly the information contained in the Environmental Statement (which forms the statutory point of reference), it is considered essential that such issues are confirmed and fully assessed through an addendum to the Environmental Statement.

Furthermore, in terms of historic building recording mitigation we stand by earlier stated recommendations which require a higher level of recording these buildings remains unaltered.

West Craigs Farm & Cottages

Our earlier concerns remain valid i.e. this area is within the application red-line boundary of the application and therefore the archaeology and historic buildings MUST be fully assessed and address within this application through the (revised) Environmental Statement with the aim to retain and reuse the sites historic buildings.

Buried Archaeology

All the sites mentioned as being omitted from the EIA chapter are by definition non-statutory i.e. in Scotland a site is either designated or non-designated. As these sites are neither scheduled monuments nor listed buildings their response is contradictory and wrong as being non-statutory sites they must be included in the EIA reports as per their methodology.

It is essential therefore that an addendum to the Environment Statement covering this is updated and resubmitted in support of the EAI to take this into account.

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:

monitoring of any standing water within the site temporary or permanent sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>).

management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and 'loafing' birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached

reinstatement of grass areas

maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow

which waste materials can be brought on to the site/what if any exceptions e.g. green waste

monitoring of waste imports (although this may be covered by the site licence)

physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste

signs deterring people from feeding the birds.

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

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

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.

Height Limitation on Buildings and Structures

No building or structure of the development hereby permitted shall exceed the height specified in the attached document.

Reason: Development exceeding these heights would penetrate the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger aircraft movements and the safe operation of the aerodrome.

See Advice Note 1 'Safeguarding an Overview' for further information (available at <http://www.aoa.org.uk/operations-safety/>).

Submission of Landscaping Scheme

No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Planning Authority, details must comply with Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design' (available at <http://www.aoa.org.uk/operations-safety/>). These details shall include:

any earthworks

grassed areas

the species, number and spacing of trees and shrubs

details of any water features

drainage details including SUDS - Such schemes must comply with Advice Note 6 'Potential Bird Hazards from Sustainable urban Drainage Schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>).

others that you or the Authority may specify and having regard to Advice Note 3: Potential Bird Hazards from Amenity Landscaping and Building Design and Note 6 on SUDS].

No subsequent alterations to the approved landscaping scheme are to take place unless 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.

Submission of SUDS Details

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

Attenuation times

Profiles & dimensions of water bodies

Details of marginal planting

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

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

We would also make the following observations:

Cranes

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

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

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

Environmental Assessment comment

The application site is currently an open space to the west of Maybury Road. The site has boundaries with Cammo Country Park, Turnhouse Golf Course and the Civic Amenity Site located on the site of the former Braehead Quarry to the north, a railway line to the south, West Craigs Industrial Estate and residential housing to the east and Edinburgh International Airport to the west. Some low density commercial and industrial uses are located directly to the east and west of the site. To the east of West Craigs North and beyond Maybury Road is the residential areas of East Craigs

This is a Planning Permission in Principle (PPP) application on housing site HSG 19 as per the Edinburgh Local Development Plan. The principle of development at West Craigs North has therefore been established. The plan allocates West Craigs North between 1700 and 2000 residential units to be developed on the site. It is noted that the applicant is applying for a lower density develop which is welcomed. The site boundary does extend beyond the above mentioned HSG 19 site.

Although this is a PPP application the applicant has provided detailed plans of the proposal. Environmental Protection does have concerns with this proposed mainly with regards to local air quality even with the reduced density.

Local Air Quality

Environmental Assessment raised concerns regarding the potential impacts this development may have on local air quality. Traffic generated by the development will add to existing high traffic flows on Maybury Road, Glasgow Road and Queensferry Road. There is also a composting facility located to the north-west of the application site which is a potential source of dust and odour emissions. It is noted that there are one hundred existing residential properties along stretches of these roads within 1 km of the site. The applicant has therefore submitted a supporting air quality impact assessment which has considered the potential impacts from construction activities at the application site, the impacts of emissions of traffic generated by the proposed development once operational and the cumulative impact of emissions of traffic generated by the proposed development and other planned development in the local area that is likely to impact on traffic flow on the same routes. The air quality impact assessment has been carried out based on 1650 residential units being developed within the application site. This is to ensure a worst case scenario as the application is only for 1400 residential units.

Local Authorities undertake air quality monitoring in order to meet its duties under Part IV of the Environment Act. This includes measurements of Nitrogen Dioxide (NO₂) at various locations across the city using diffusion tubes including some of which are within 2 km of the development site. The NO₂ diffusion tube measurements from across Edinburgh show high concentrations exceeding the 40 $\mu\text{g}/\text{m}^3$ annual mean objective are present next to busy roads, particularly within street canyons. In the vicinity of the proposed development site, exceedences have been recorded on the Glasgow Road and at the Barnton junction. Annual mean concentrations at other locations around the Barnton junction are below the objective level. The applicant predicts that the increase in concentrations of nitrogen dioxide and PM_{2.5} (Particulate Matter) will have mostly negligible impacts, but there are a number of locations that experience slight to moderate adverse impacts. For PM₁₀, the impacts will all be

negligible. The proposed development will not cause any new exceedences of the objectives. Environmental Protection concludes that any operational adverse impact is unacceptable.

The air quality predictions are based on traffic data that include the committed developments of the HSG20 allocation (Cammo), the remainder of the HSG19 allocation (Rosebery Estates and Taylor Wimpey) and the East of Millburn Tower residential development. The cumulative effects of road traffic emissions are explicitly included and are 'not significant' according to the assessment. Environmental Protection would have preferred a greater number of committed developments to be considered.

Cumulative Impacts

There is provision in the Local Development Plan for further 1450 - 1750 residential properties at Maybury and 500-700 new residential properties at Cammo. In addition to this 'Special Economic Development Areas' have been identified north of the Glasgow Road at the Royal Bank at Gogarburn and at the Royal Highland Centre. Although each planning application must be considered on its own merits, within the confines imposed by national, regional and local policies in circumstances such as this it presents difficulties when developments are permitted sequentially, with each individually having only a relatively low polluting potential, but which cumulatively result in a significant worsening of air quality.

All of these potential developments will cumulatively generate additional traffic on the local network leading to an increased risk that the air quality objectives for PM10 and NO2 will not be met in the immediate vicinity of the junctions of Maybury Road with Queensferry Road, St John's Road and the Glasgow Road. The potential cumulative impact of already committed development plus the residential development at Cammo has been modelled by the applicant and the output of the model states that the annual mean objective for NO2 is likely to be met at most of the receptor locations allowing for the cumulative effects of committed development and the proposed development at Cammo, the remainder of the HSG19 allocation (Rosebery Estates and Taylor Wimpey) and the East of Millburn Tower residential development as well as this proposed development.

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

Although Environmental Protection welcomes the proposed reduced density of this site we still have concerns with the likely impacts this development may have on local air quality. The air quality impact assessment has identified issues and Environmental Protection is not convinced that the air quality impact assessment is a worst case scenario. Environmental Protection understands that the transport assessment has

underestimated the trip rates. If the Transport Assessment has underestimated the figures then this would have had an adverse impact on the air quality impact assessment. Environmental Protection also supports the integration of sustainable transport modes serving the site. The site is well placed to access the new Gateway however the applicant has not committed to providing the required infrastructure to link the development site to the new rail hub via a footbridge. The applicant should commit to keeping car parking numbers down to a minimum with green travel plans provided. Electric Vehicle charging infrastructure should also be included in such applications.

The applicant has identified that adverse impacts will be created during the construction phase. The applicant has suggested mitigation measures to control this. These are standard for a development of this size and scale and conditions would be recommended at the detailed stage if consented.

Composting

There is an existing composting site north-west of the application site in 2012 the site handled 32,259 tonnes of household and commercial waste. The site is regulated by Scottish Environment Protection Agency (SEPA) and is required to control emissions of dust and odour.

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

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

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

Contaminated Land

The applicant has submitted a Site Investigation details which is currently being assessed by Environmental Protection. Until this has been completed Environmental Protection recommends that a condition is attached to ensure that contaminated land is fully addressed.

Noise

Environmental Assessment raised concerns regarding the potential noise impacts from the A902. Details of mitigation will be required during the detailed stage. This must be submitted in the form of a noise impact assessment which details exactly what mitigation measures are required. This will need to include all the main transport noise sources surrounding the site including rail and road. There are also a number industrial uses neighbouring the site such as the industrial estate to the south of the site and composting facility. The site is outside the noise contours for the airport therefore we will not require this aspect to be further investigated.

Therefore Environmental Assessment recommends the application is refused due to the likely adverse impacts this development will have on local air quality. If consent is granted the following conditions must be attached;

Conditions

Prior to the commencement of construction works on site:

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

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

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

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

Informative

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

Bedrooms - 30dB LAeq, T and 45dB LAfmax

Living Rooms - 35 dB LAeq, D

T - Night-time 8 hours between 2300 - 0700

D - Daytime 16 hours between 0700 - 2300

Construction phase mitigation measures to be included in any detailed consents.

Children + Families comment

The Council has assessed the impact of the growth set out in the LDP through an Education Appraisal (Updated December 2016), taking account of school roll projections. To do this, an assumption has been made as to the amount of new housing development which will come forward ('housing output'). This takes account of new housing sites allocated in the LDP and other land within the urban area.

The Council's assessment has indicated that additional infrastructure will be required to accommodate the cumulative number of additional pupils from development. Education infrastructure 'actions' have been identified and are set out in the Action Programme and current Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery'.

Residential development is required to contribute towards the cost of education infrastructure to ensure that the cumulative impact of development can be mitigated. To ensure that the total cost of delivering the new education infrastructure is shared proportionally and fairly between developments, Education Contribution Zones have been identified and 'per house' and 'per flat' contribution rates established.

Assessment and Contribution Requirements

Assessment based on:

*280 Flats
1120 Houses*

This site falls within Sub-Area W-1 of the 'West Education Contribution Zone'.

The Council has assessed the impact of the proposed development on the identified education infrastructure actions and current delivery programme, as set out in the Action Programme and Supplementary Guidance.

The Education Appraisal considered the impact of new housing sites allocated in the LDP, including the application site. Appropriate education infrastructure actions to mitigate the cumulative impact of development are identified. The required contribution will therefore be based on the established 'per house' and 'per flat' rate for the appropriate part of the Zone.

The application is for planning permission in principle. The S75 should be based on the established 'per house' and contribution 'per flat' contribution figures set out below.

If the appropriate contribution is provided by the developer, Communities and Families does not object to the application.

Per unit infrastructure contribution requirement:

*Per Flat - £2,892
Per House - £15,854*

Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q1 2015 to the date of payment.

Per unit land contribution requirement:

Per Flat - £628

Per House - £3,673

Note - no indexation to be applied to land contribution.

Proposed New Primary School

The Council's Action Programme identifies a requirement for a new 21 class primary school and nursery on the site. The estimated delivery date for the new school is August 2021. The Action Programme will be annually reviewed and therefore actions, including the delivery of the proposed primary school, will be subject to review and change.

The masterplan identifies a site for the new primary school; this reflects the location of the new school site which has been safeguarded within the Council's Local Development Plan. Communities and Families would require confirmation that the primary school site identified is 2 hectares prior to its approval.

If the Council is 'minded to grant' the application then delivery mechanisms for the school will need to be agreed with the developer through an appropriate planning agreement.

Secondary School Accommodation

The applicant has suggested that Craigmount High School should be extended, however the Council's Action Programme identifies a requirement for a new secondary school to mitigate the cumulative impact of development in West Edinburgh.

Roads Authority comment

The application should be continued.

Reasons:

The applicant has made reference in the Transport Assessment (TA) and the subsequent supplementary transport statement, of the requirement for the site specific transport actions as per the Council's adopted Action Plan Programme. No details on the phasing of the development and the completion of these actions have been provided by the applicant.

The applicant has also made reference in the TA to the transport actions in the Maybury/Barnton contribution zones, namely the improvements at the Maybury, Craigs Road and Barnton junctions, and these improvements are included in the assumptions made in the TA traffic modelling. No details on the phasing of the development and the completion of these actions have been provided by the applicant. It should be noted that the design of the Turnhouse Road / Maybury Road junction is not finalised and may be subject to amendments which may affect the TA information.

The TA in section 4.7 makes the assumption that a relatively low 37% of travel to work trips will be by private car. The Council would support this target figure as it is in line with mode share targets. However the layout of the streets and the level of parking provision does not reflect these aims and there are concerns that the mode share targets used in the traffic modelling will not be achieved.

The TA considers that zone 5b of the Councils parking standards should apply rather than using the matrix approach recommended for large developments. Zone 5b parking provision is generally one car parking space per dwelling. The WETA refresh makes reference to parking control and management (section 5.3) and states that to achieve a high public transport/active travel mode share, it is vital to consider measures to control car use. This should include a controlled parking zone within the West Craigs area and limiting the level of off street parking (driveways, garages etc) each development provides. The developer should look at reducing the amount of parking provision in line with the 37% public transport / active travel mode share target.

The road layout and building structure proposed for the development is of a generally traditional layout whereby the roads dominate the design rather than the reverse being the case as per the recommendations in the Designing Streets policy document. The design of the roads and footways should reflect the aims of this document in particular the priority given to active travel modes and take into account for example the proposed school in the centre of the development (including safe routes to school routes).

Site specific transport actions include the provision of a cycle / pedestrian bridge over the railway to link to both Edinburgh Gateway station and facilities at the Gyle and routes beyond. Mention is made of this requirement in the TA and is marked on the Masterplan drawing as 'possible bridge'. To ensure that this vital link is delivered and is an important part of the overall transport infrastructure the developer should provide clarification on the phasing (with reference to (1) above) and ensure that the road/footway links to this link is central to the design of the development layout.

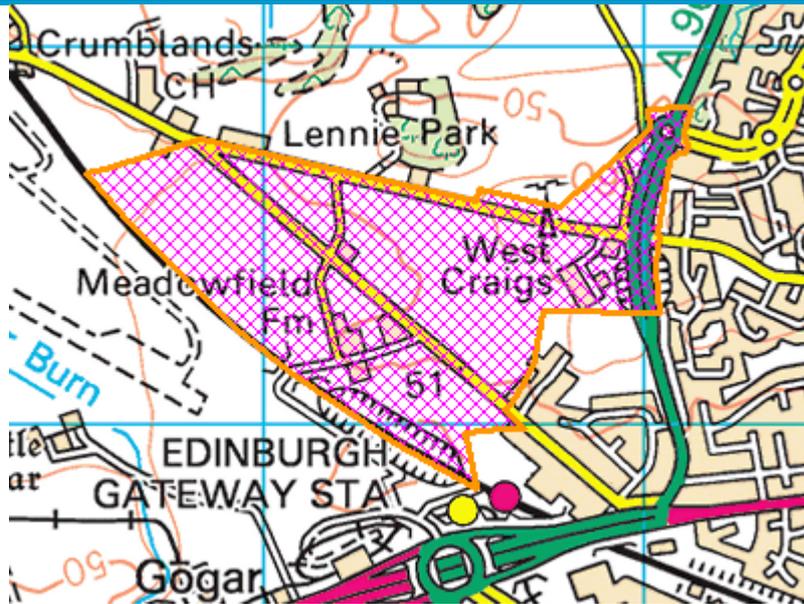
The developer should note that contributions will be required for transport improvements as per the Local Development Programme/Action Plan as identified in WETA (Oct 2016) and these will be reserved matters. They will also be contributions towards City Car Club provision and the Edinburgh Tram.

In addition, the applicant will require to prepare all road determination/stopping up/traffic regulation orders (as appropriate) plans and meeting the full cost of advertising the orders. A Quality Audit as per Designing Streets will be required when submitting the AMC, the scope and terms of which should be agreed with the Council.

All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed.

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.

Location Plan



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