

Development Management Sub Committee

Wednesday 8 November 2017

**Application for Planning Permission 17/03186/FUL
At Edinburgh Airport Police Station, Almond Road,
Edinburgh Airport
Erection of a six storey hotel (Class 7), with associated
facilities, car parking and hard and soft landscaping (as
amended).**

Item number	4.1
Report number	
Wards	B01 - Almond

Summary

The proposal complies with the Local Development Plan. The principle of hotel use is acceptable at this location. The design, scale and layout are appropriate for the site and the development would not adversely impact upon amenity. Transport implications can be dealt with via an appropriate legal agreement. The proposal is acceptable in all other respects subject to a suitable legal agreement and conditions.

Links

<u>Policies and guidance for this application</u>	LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LEN09, LEN16, LEN21, LEN22, LEMP04, LEMP10, LTRA01, LTRA02, LTRA03, LTRA08, NSGD02, NSG, NSP, NSDCAH,
---	---

Report

Application for Planning Permission 17/03186/FUL At Edinburgh Airport Police Station, Almond Road, Edinburgh Airport Erection of a six storey hotel (Class 7), with associated facilities, car parking and hard and soft landscaping (as amended).

Recommendations

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

Background

2.1 Site description

The site, approximately 0.86 hectares in area, is within the urbanised area of the airport lying directly to the south of the airport's main terminal buildings, control tower and car park. With the exception of some trees at the northern boundary, the site has recently been cleared and is under construction to deliver a 175 bedroom hotel (planning permission 15/00661/FUL).

The site is accessed from Almond Avenue to the south which comes off Almond Drive to the west. The site is mostly level and has some existing vegetation in places. The Spitfire memorial sculpture and Jubilee Road are at the northern perimeter of the site which faces the airport control tower.

Almond Avenue to the south is privately maintained by Edinburgh Airport. It provides access to a series of small office and industrial units and several fenced compounds for car hire premises. Part of the road, including the turning circle to the east, is currently out of service due to ongoing construction at the site for a 175 bedroom hotel.

2.2 Site History

17 April 2012 - Planning permission was granted for a 350 bedroom hotel (planning reference 10/01392/FUL). The application site for that proposal was larger, extending to Fairview Road in the south.

20 July 2012 - An application for prior notification and prior approval for demolition of five existing buildings on land at Almond Avenue, Edinburgh Airport, Edinburgh determined that permission was not required (Application reference 12/01892/PND).

20 August 2012 - Planning permission was granted for temporary facade works to the approved 350 bedroom hotel development consented under application 10/01392/FUL (Application reference 12/02443/FUL).

29 July 2015 - Planning permission was granted for a 175 bedroom hotel (Application reference: 15/00661/FUL). The application site for that proposal was the same as it is for the current proposal.

9 June 2016 - An application to vary the height of the hotel granted under planning application 15/00661/FUL by 600mm was approved (Application reference 15/00661/VARY).

Main report

3.1 Description Of The Proposal

The proposal is for the erection of a 240 bedroom six storey hotel (Class 7), with associated facilities, car parking and hard and soft landscaping. Services within the hotel will include a restaurant, bar and fitness suite.

The proposal retains a similar linear form to the hotel that is currently under construction but has a larger footprint at its east elevation. A ground floor single storey area will extend from the main building at the western side of the north elevation facing Jubilee Road. It is proposed that the ground floor will be used for public areas and storeys 1 - 5 will comprise bedroom accommodation.

Construction has already begun at the site under the extant planning permission for a 175 bedroom hotel and the applicant's intention is to adapt the design and construction programme to develop the larger 240 bedroom hotel should planning permission be granted.

The proposal will be constructed from a combination of: grey brickwork and dark grey back painted glazed panels at the ground level; bronze metallic aluminium rainscreen cladding panels; grey metallic aluminium rainscreen cladding; clear glazed aluminium cladding; spandrel panelling to match bronze metallic colour; clear glazed aluminium framed curtain; and PPC louvered grey panels.

At its highest point, which is the roof level plant enclosure, the hotel will be 22.216 metres in height from its finished floor level (ground level). The proposal's AOD height is 54.616 metres.

Seventy five car parking spaces are proposed to the west of the building. The number of car parking spaces remains the same as for the extant permission for the smaller hotel. Four disabled spaces, nine motorcycle spaces and eighteen bicycle parking spaces are proposed.

The site is well served by public transport and would be within approximately 400 metres walking distance to the airport terminal and bus stops. The airport tram stop would be approximately 600 metres from the proposal.

A coach parking space, sub-station and advertising for the hotel is proposed, as well as a delivery zone, and bin storage area at the south of the site boundary. Advertising would need to come forward as a separate application.

Scheme 1

Revised drawings and information provided by the applicant include:

- Revised Landscape Plan;
- Landscape Management Plan;
- Proposed elevation plan; and
- Existing Site Plan (demonstrating area of hard standing and soft landscaping).

Supporting Statement

The applicant has included a number of technical documents in support of the application. These are available to view on the Planning & Building Standards Online Services:

- Pre-Application Consultation Report;
- Design & Access Statement;
- Transport Assessment (including Green Travel Plan Framework);
- Air Quality Statement;
- External Lighting Design Report;
- BREEAM Pre-Assessment;
- Energy Statement;
- Noise Assessment;
- Archaeological Desk based Assessment;
- Flood Risk Assessment and Drainage Impact Assessment;
- Geo-Environmental Assessment;
- Arboricultural Assessment;
- Ecological Survey and Assessment;
- Ecological Survey Update; and
- S1 Sustainability Form.

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 hotel development is acceptable;
- b) the scale, design and height of the proposals are acceptable;
- c) the proposal would affect road safety;
- d) the proposal would impact upon air quality;
- e) the proposal satisfies the sustainability criteria;
- f) the proposal has any implications for archaeology;
- g) the proposal would have an impact upon landscape and habitats;
- h) the proposal would have implications for flooding;
- i) the proposal would be affected by contaminated land;
- j) the proposal would impact upon amenity; and
- k) the proposal would impact on equalities or human rights.

a) Principle

The principle of a hotel on the site was previously established with the granting of planning permission on 17 April 2012 for a 350 bedroom hotel (planning reference 10/01392/FUL) and a further granting of permission on 29 July 2015 for a 175 bedroom hotel (planning reference 15/00661/FUL). The 175 bedroom hotel is currently under construction and the applicant seeks to adapt the construction for a larger 240 bedroom hotel at the site, subject to attaining planning consent.

At a strategic policy level, the principle of expanding Edinburgh Airport and associated commercial and mixed uses is broadly supported in the National Planning Framework 3 (2014). The strategic importance of the airport and associated growth is also identified in the SESplan Strategic Development Plan (2013).

In a Local Development Plan (LDP) context, clause b) of LDP policy Emp 10 Hotel Development further identifies that hotel development will be permitted within the boundary of Edinburgh Airport. The site is located within the Edinburgh Airport Special Economic Area (Policy Emp 4) which requires ancillary proposals to the airport to have a direct functional link to the airport and accord with the West Edinburgh Strategic Design Framework (WESDF) and other LDP policies. The proposal intends to provide hotel accommodation to meet demand from growing passenger numbers at Edinburgh Airport.

The proposal is acceptable in principle at this location.

b) Scale, design and height of the proposals

The siting of the building is informed by restrictions on the site including retaining views from the control tower and underground cables around the perimeter of the site. The proposals make use of a site which has been partially previously developed.

LDP policies Des 1 - Des 8 and Des 11 specify design criteria for proposals. The WESDF further sets out strategic design principles for west Edinburgh covering buildings, landscape, movement, infrastructure and airport specific design principles.

The hotel building's design is linear in nature with parking and landscaped areas surrounding it. The building's position on the site will continue to mark Jubilee Road as the entrance into the airport and also contribute towards the gateway experience into Edinburgh at the airport. Proposed materials include aluminium cladding and glazed windows on principal elevations, grey brick work at the ground level, and a glazed curtain wall face public areas. The site is accessible and public transport and active travel connections to the hotel are good.

The hotel building is proposed to be six storeys in height, reaching 22.216 metres at its highest point from the finished floor level (ground level). This is broadly comparable to other buildings in the area such as the terminal building and multi-storey car park which are approximately 18 metres and 17 metres in height. The neighbouring airport control tower is 57 metres in height and will retain its prominence in the local area and surrounding key views. The proposed height is the same as the extant hotel permission which is under construction. The views to the Airport Control Tower will be retained when approaching from the south, for example along the A8.

Police Scotland has no objections but identified that the proposal is at the largest and busiest airport in Scotland and is sensitive with regard to security in the area. The police request that a number of design recommendations are considered by the applicant. Some of these recommendations such as the creation of defensive boundaries via landscaping, natural surveillance through selective planting and good lighting as identified in the applicant's external lighting report are already addressed. Further measures identified by Police Scotland should be carefully considered by the applicant.

The proposals suitably respond to WESDF principles where applicable and the LDP policies Des 1 - Des 8, and Des 11 relating to design.

The siting, scale, design and height of the proposed hotel are acceptable.

c) Road Safety

The application is accompanied by a Transport Assessment. The assessment considers national and local planning policy, sustainable accessibility, a travel plan framework, as well as existing and future traffic conditions. Transport has reviewed the supporting information and raises no objection, subject to conditions and a legal agreement. A contribution will be required towards the West Edinburgh Transport Contribution Zone (£272,482) and the Edinburgh Tram (£722,000) in accordance with the Council's Developer Contributions and Infrastructure Delivery Supplementary Guidance. Contributions made under the legal agreement associated with the extant consent for the 175 bedroom hotel will need to be reviewed and considered as part of discussions for a new legal agreement.

Transport notes that parking standards for hotel development in this area are assessed on merit using Zone 2 standards as the starting point. Zone 2 standards require a maximum of 96 spaces for a 240 bedroom hotel. The applicant proposes 75 parking spaces. This is considered acceptable because of the proposal's accessibility by public transport (bus and tram). The site is located close to the airport and within walkable distance from the terminal building.

Transport further advises that the applicant should consider developing a Travel Plan including provision of pedal cycles (including electric cycles), secure cycle parking, public transport travel passes, a welcome pack, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), and timetables for local public transport.

In conclusion the proposal is acceptable in terms of transport and road safety subject to conditions and a suitable legal agreement.

d) Air Quality

The Glasgow Road Air Quality Management Area (AQMA) is approximately 1.2 kilometres from the application site. The applicant has submitted an air quality impact statement to highlight any likely impacts this proposed development may have on the nearby AQMA for Nitrogen Dioxide (NO₂). Information regarding the proposed energy system and fuels has been provided as well.

The proposal for a larger hotel at the site retains the same level of vehicle parking as the extant consent, this is satisfactory to Environmental Protection. Visitors and staff to the proposed larger hotel will be encouraged to utilise public transport or active travel. Environmental Protection advises that the proposal is acceptable and the applicant is encouraged to develop a Green Travel Plan to help mitigate traffic related air quality impacts.

The proposal is acceptable in terms of air quality. An informative relating to electric vehicle charging as requested by Environmental Protection.

e) Sustainability

The applicant submitted a sustainability statement form, a BREEAM Pre-Assessment report and an Energy Statement in support of the application.

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

Essential Criteria	Available	Achieved
Section 1: Energy Needs	20	20
Section 2: Water conservation	10	10
Section 3: Surface Water run-off	10	10
Section 4: Recycling	10	10
Section 5: Materials	30	20
Total Points	80	70

The points where the application does not meet the full score for the essential criteria relates to the promotion of recycled materials and reducing site waste. The BREEAM Pre-assessment report concludes that the building will achieve a score of 71.4% which is an 'Excellent' rating overall.

In addition to the essential criteria the building will incorporate aero-thermal heat pump technology (VRF heating and cooling) with a combined heat and power unit feeding into the domestic hot water system. Timber will be sustainably sourced.

The sustainability measures are acceptable.

f) Archaeology

An archaeological desk based assessment was submitted with the application and found that no sites of potential archaeological interest are known to exist within the development area. A Written Scheme of Investigative Works (WSIW) has been submitted as well.

Two conditions attached to the extant planning permission for the 175 bedroom hotel relating to further archaeological work and protection of the Spitfire memorial have been discharged. The Spitfire memorial is currently protected by hoarding from on-going construction work and the provision of a WSIW by the applicant negates the requirement for any pre-commencement conditions.

The City Archaeologist has reviewed the information submitted and concludes that there is no further requirement for archaeological fieldwork or surveys to be undertaken as a result of the site's recent planning history.

The proposal is acceptable in terms of archaeology.

g) Landscape and habitat

The applicant has provided a suite of landscape information including a detailed landscape plan and a maintenance plan which will be required by condition to be implemented within six months of the proposal being completed. Tree pit details have been provided and tree species identified in the West Edinburgh Landscape Framework have been included in the landscape plan. The information provided is consistent with the requirements of LDP policy Des 8 Public Realm and Landscape Design and the WESDF.

The applicant's detailed landscaping plan will need to satisfy the requirements of Edinburgh Airport prior to being implemented. It is recommended that this be secured by condition.

An ecological survey that was submitted with the extant permission was provided by the applicant which confirmed that the habitats present within the site are of low nature conservation and ecological value. The applicant provided an update to this survey that confirmed the site has now been cleared for construction purposes for the 175 bedroom hotel and this was apparent during a site visit. There are no implications with regard to protected species or habitats.

The proposal is acceptable in terms of impact on landscape and habitat.

h) Flooding

The site sits approximately 70 metres to the north of an area of land identified in the LDP as Important for Flood Management. The applicant provided supporting information with the application with regard to flood risk and drainage, as well as the City of Edinburgh Council's self-certification forms for flooding and drainage.

SEPA objected to the proposals initially on flood risk and drainage grounds and requested additional information from the applicant to inform their revised consultation response. Further information relating to finished floor levels, areas of cut/fill and areas of hard standing and undeveloped land was provided and, following dialogue with the applicant, SEPA removed its initial objection to the proposals.

Following a review of the information submitted and clarification on matters relating to SUDS adoption and surface water management, Flood Prevention is satisfied that no further issues require attention or clarification. No conditions have been suggested by Flood Prevention.

SUDS details require agreement from Edinburgh Airport, who requested that this matter be addressed by condition.

When considered against information submitted by the applicant, the proposals comply with LDP policy Env 21 Flood Protection, however SUDS proposals must satisfy Edinburgh Airport.

i) Contaminated Land

The applicant submitted a geo-environmental assessment report with the planning application. Environmental Protection has advised that based on the information submitted, the land in question is suitable for the proposed use as a hotel and no pre-commencement conditions are suggested.

j) Amenity

There are no neighbouring residential properties in close proximity to the proposal that would be impacted in terms of daylight, privacy, overshadowing or noise from activities at the hotel. The applicant has submitted a noise impact assessment with respect to ensuring suitable noise insulation in the building from external sources. The assessment concludes that a minimum level of acoustic glazing required to ensure a good level of amenity will be provided. Environmental Protection has not raised any concerns with regard to amenity and the proposals are acceptable.

k) Human Rights Impact

The development will improve the immediate environment and introduce a hotel in close proximity to the airport and public transport routes. The proposal is a public building and as such will need to comply with Building Standards to ensure public accessibility for all. Car parking spaces for disabled customers will be provided. Consequently there are no significant issues that require action.

Conclusion

In conclusion, the proposal complies with the Local Development Plan. The principle of hotel use is acceptable at this location. The design, scale and layout are appropriate for the site and the development will not adversely impact upon amenity. Transport implications can be dealt with via an appropriate legal agreement. The proposal is acceptable in all other respects subject to a suitable legal agreement and conditions.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. 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 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
- 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 3 'Wildlife Hazards.'
- 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.

2. 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 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
- others that you or the Authority may specify and having regard to Advice Note 3: Wildlife Hazards].

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.

3. 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 3 'Wildlife Hazards'. 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.

4. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.

5. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
6. The developer must submit a maintenance schedule for any SUDS infrastructure for the approval of the Planning Authority.

Reasons:-

1. 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.

2. 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.
3. 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 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
4. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
5. In order to enable the planning authority to consider this/these matter/s in detail.
6. In order to enable the planning authority to consider this/these matter/s in detail.

Informatives

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation to transport infrastructure.

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

The applicant will be required to contribute:

- a. The sum of £272,482 towards West Edinburgh Transport Contribution Zone as per September 2017 Developer Contribution and Infrastructure Delivery guidance; and
- b. The sum of £722,000 (based on 240 hotel units in Zone 1) to the Edinburgh Tram in line with the Developer Contributions & Infrastructure Delivery Supplementary Guidance dated March 2017.

The above sums are to be; indexed linked and the use period to be 10 years; from date of payment.

2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport.
6. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles, including off-street spaces. The applicant should therefore advise the Council if he wishes any off-street bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved.

7. Prior to the use being taken up, a rapid electric vehicle charging point, capable of 70 -50kW (100 Amp) DC with 43kW (63 Amp) AC output as shown on drawing no. L (90)02 REV D dated 21 September 2017 shall be implemented.

Financial impact

4.1 The financial impact has been assessed as follows:

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

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

No representations have been received.

Background reading/external references

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

Statutory Development

Plan Provision

The application site is shown to be in the Urban Area and a Special Economic Area (Emp 4) in the adopted Edinburgh Local Development Plan (LDP).

Date registered

10 July 2017

Drawing numbers/Scheme

1-5, 6A, 7-10, 12,

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Sean Fallon, Planning Officer

E-mail:sean.fallon@edinburgh.gov.uk Tel:0131 469 3723

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 11 (Tall Buildings - Skyline and Key Views) sets out criteria for assessing proposals for tall buildings.

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 16 (Species Protection) sets out species protection requirements for 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 Emp 4 (Edinburgh Airport) sets out criteria for development proposals at Edinburgh Airport and requires they accord with the West Edinburgh Strategic Design Framework.

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

LDP Policy 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 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

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

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.

Relevant Non-Statutory Guidelines

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

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

Appendix 1

Application for Planning Permission 17/03186/FUL At Edinburgh Airport Police Station, Almond Road, Edinburgh Airport Erection of a six storey hotel (Class 7), with associated facilities, car parking and hard and soft landscaping (as amended).

Consultations

Scottish Water comment

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Water

There is currently sufficient capacity in the Marchbank Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Foul

Unfortunately, according to our records there is no public Scottish Water, Waste Water infrastructure within the vicinity of this proposed development therefore we would advise applicant to investigate private treatment options.

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request.

Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.

If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.

Please find all of our application forms on our website at the following link <https://www.scottishwater.co.uk/business/connections/connecting-yourproperty/new-development-process-and-applications-forms>

Next Steps:

Single Property/Less than 10 dwellings

For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.

10 or more domestic dwellings:

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

Non Domestic/Commercial Property:

Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk.

Trade Effluent Discharge from Non Dom Property:

Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.

If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?".

Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found using the following link <https://www.scottishwater.co.uk/business/ourservices/compliance/trade-effluent/trade-effluent-documents/trade-effluent-notice-form-h>.

Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.

For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com.

Archaeology comment

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

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

This application must be considered therefore under terms Therefore, this application must be considered therefore under terms the Historic Environment Scotland Policy Statement (HESPS) 2016, Scottish Planning Policy (SPP), PAN 02/2011 and Edinburgh Local Development Plan (2016) Policies DES3 & ENV9.

As stated in the accompanying Desk-based assessment compiled by Oxford Archaeology, the site although affected by modern development has a moderate potential for containing significant archaeological remains relating to earlier medieval and prehistoric activity, though probably low potential for later medieval and WWII remains. I concur with the reports assessment that any surviving remains are likely to be isolated and possibly truncated due to modern landscaping and construction activities.

Accordingly it is recommended that a programme of archaeological works is undertaken prior to development. In essence this will see a phased archaeological programme, the initial phase being a 10% archaeological evaluation of the site at the earliest opportunity. The results of which would allow for the production of appropriate mitigation strategies to be drawn up to ensure the protection and/or the excavation and recording of any surviving archaeological remains.

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

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

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

Gate-Guardian Memorial

It is to be welcomed that adjacent RAF Gate-guardian memorial (replica Spitfire) situated on Jubilee Road is to be retained in situ within an enhanced setting as a focal point for the development. It is however essential in order to avoid accidental damage during development that a mitigation strategy is submitted to CECAS which describes how this important memorial will be protected during development.

It is recommended that that the following condition is attached to this consent to ensure that this is undertaken prior to construction.

'No development shall take place on the site until the applicant has submitted to CECAS and the Planning Authority for approval a conservation strategy/plan for the protection of the gate-guardian memorial during development.'

Archaeology further comment

As discussed have had time to review both the protection measures re the Spitfire memorial and also the archaeological report from AOC detailing the results of an archaeological evaluation. In terms of the Spitfire memorial I'm happy that the applicants information and scheme is sufficient to protect this memorial during development and that the recommended condition need not be attached to this consent.

In terms of the archaeological evaluation. Although some significant remains were found i.e. rig and furrow, given the sparse nature and condition of these remains I've concluded that there is only a limited potential for further remains to be uncovered. Accordingly I've concluded that there is no further requirement for archaeological fieldwork to be undertaken and that accordingly the requirement for an archaeological planning condition to be attached to this application is no longer required.

Police Scotland comment

- o Development site is at Largest/Busiest Airport in Scotland*
- o Transport Infrastructure/Crowded Places are at High Level of threat from terrorist attack within the UK*
- o Such attacks may include the use of explosive devices within vehicles, those carried upon the person or concealed within the building. Firearms and weapons attacks are also a possibility*
- o The site is very close to critical infrastructure for the airport, the Control Tower*
- o The site is also much closer to the terminal than any of the existing airport hotels*
- o The site is adjacent to the airport's only access road*
- o The site is close to "airside" /apron at Gate 1*
- o The site is likely to fall within the evacuation zone (200m) if a vehicle borne improvised explosive device were to be found landside at the airport.*

With these facts in mind we would strongly recommend the following:

- 1. The hotel is surrounded on all sides by roadways giving easy access and egress of the building and car parking. It is therefore important to create clearly defined boundaries, which could either take the form of fencing, walls, defensive shrubbery or a combination of these. Further to this it is recommended that due to this easy access, a robust landscaping strategy be used to provide a good vehicle standoff to all elevations of the building paying particular attention to the main entry points at reception. Suitable PAS 68 approved vehicle barriers/planters are highly recommended to prevent vehicle encroachment/penetration into reception area or other areas where people may gather in large numbers. These should be situated as far away as possible from the building to maximise stand off and minimise damage to building if explosion were to occur. Police CTSA's should be consulted for further guidance here. To provide good access control around the delivery area, a fenced enclosure accessed through a controlled gate is recommended.*
- 2. Car Park Design - Create open drop off area where no vehicle waiting is permitted. Clear signage will be required to reinforce this. This should be covered by CCTV and physically viewable from reception so that it can be strictly/swiftly enforced. Height restriction barriers should also be utilised to prevent larger vehicles entering the site. Secure remainder of car park with appropriate barriers and strictly control access to hotel guests only. No long stay parking should be permitted at this site.*
- 3. CCTV - Should be installed in line with Home Office Operational Requirement Guidance. As a minimum the CCTV should record the registration numbers of all vehicles entering the site and identifiable images of all persons entering the hotel (staff and guests). All cameras, wiring and recording/monitoring equipment must be secured. The cameras should be mounted to offer maximum cover, and signage to that effect should be placed at all entrance and exit ports. The capability to monitor the car park and grounds outside should also be considered. Coverage over all exit points and busy areas within the hotel should also be considered. Design will be in co-ordination with external lighting and landscaping. CCTV systems must be installed to BS EN50132-7: CCTV surveillance systems for use in security applications. Police Scotland have trained CCTV Liaison Officers/CTSA's who should be consulted when work commences on the design of the system.*
- 4. Public areas within hotel. Clean design with no features/furniture that provides opportunities for the concealment of any item.*
- 5. Good lighting improves the opportunities for surveillance and can reduce the fear of crime. On site lighting for roadways, footpaths and car parks must comply with BS 5489:2013. Where conflict with operational issues or local statutory legislation such as conservation areas, the lighting provision should be agreed with the ALO. No lighting installation should be considered in isolation if CCTV is to be used within the site, complimentary design process must be followed. It is anticipated that the pedestrian route to the airport terminal building will be utilised throughout the hours of darkness and therefore particular attention is required to ensure a safe route is created.*

6. *Selective planting is an effective way of reducing opportunities for crime. The layout of the site affords excellent natural surveillance. Landscaping and shrubbery should be planted in such a way as not to impede natural surveillance, CCTV, lighting or act as a potential hiding place or climbing aid to access the building. As a general rule, taller plants should be planted closer to walls and graded to lower plants and shrubs, these should be selected to have a mature growth height no higher than 1 metre from ground level and branches of trees should be above the normal sight line in order to maximise natural surveillance across the development. (i.e. no branches below 2 metres)*

7. *Information on the styles of doors, windows and access control systems for the development are not known at the time. All external doors to be PAS 24 and windows to have laminated glazing throughout the building.*

8. *Good access control is essential to prevent unauthorised entry to the bedrooms floors of the hotel and thereafter to control access from here to the roof areas. The positioning of the reception should afford a view of the lift and stairway entrance and it is recommended that this access be covered by good natural surveillance and/or formal surveillance in the form of CCTV.*

We highly recommend that although there are no major issues with this development, due to its position adjacent to a major iconic site with an increased threat level that the above recommendations are taken into consideration.

Edinburgh Airport comment

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

Submission of a Bird Hazard Management Plan

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

- o monitoring of any standing water within the site temporary or permanent*
- o sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).*
- o management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'*
- o reinstatement of grass areas*
- o maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow*
- o which waste materials can be brought on to the site/what if any exceptions e.g. green waste*
- o monitoring of waste imports (although this may be covered by the site licence)*
- o physical arrangements for the collection (including litter bins) and storage of putrescible*

- o waste, arrangements for and frequency of the removal of putrescible waste
- o signs deterring people from feeding the birds.

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

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

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

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

Submission of 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:

- o any earthworks
- o grassed areas
- o the species, number and spacing of trees and shrubs
- o details of any water features
- o drainage details including SUDS - Such schemes must comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
- o others that you or the Authority may specify and having regard to Advice Note 3: Wildlife Hazards].

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 3 'Wildlife Hazards'. The submitted Plan shall include details of:

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

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

Reason: To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/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' (available at <http://www.aoa.org.uk/policy-campaigns/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' (available at (<http://www.aoa.org.uk/policy-campaigns/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.

SEPA comment

Advice for the planning authority

We have received two pre-planning consultations on this proposed development and we have advised on the need for information relevant to flood risk and drainage. The information on flood risk submitted with the planning application does not address all our concerns and there is no information on drainage.

We object to this planning application, therefore, on the grounds of lack of information on flood risk and drainage. We will review this objection if the issues detailed in Sections 1 and below are adequately addressed.

Flood Risk

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

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

We previously responded to pre-application consultation on this proposed development on 03 May 2017 and 11 July 2017. On both occasions we identified that we would object to a planning application on the grounds of lack of information on flood risk. Most recently we advised that either compensatory storage was provided or the site was redesigned. We also advised that if land raising and compensatory storage was to be undertaken we would only support this if the City of Edinburgh Council (CEC) confirmed that the site was previously developed.

Review of the Flood Risk Assessment (FRA) has identified that compensatory storage will be provided and that the proposed development will be situated on raised ground. The compensatory storage is stated in section 4.2.5 of the FRA to "be provided by lowering levels in the car park area, equivalent to the volume of storage lost through raising levels at the building." We would note that no calculations have been provided for this compensatory storage and we would require these calculations to be presented before we can remove our objection. Our Technical Flood Risk Guidance for Stakeholders can provide guidance on calculations of compensatory storage, which can be access here: <https://www.sepa.org.uk/media/162602/ss-nfr-p-002-technical-flood-risk-guidance-for-stakeholders.pdf>

As land raising and compensatory storage are proposed for this site, clarification is required on the land classification of the site and if it is deemed previously developed, i.e. brownfield. This should be confirmed by CEC.

We note that due to a small area of floodplain loss on the outskirts of the floodplain, conveyance of the flood waters will likely not be adversely affected but the applicant may wish to explore this further.

Clarification is also required on the finished floor levels (FFL) of the proposed development. Previously the FFL was stated to be 32.4m, this is now shown, in the FRA, to be 32.215m, however drawing titled site plan shows FFL at 32.225m.

We note that the information provided in the FRA makes reference to Fairhurst FRA undertaken for an adjacent site. We assume that Curtins has permission to reference this data and use the findings to inform their site layout and design.

Summary

In summary, clarification is needed on the following points before we can review our objection to the proposed development:

- o Compensatory storage calculations.*
- o Land use of the site and if this is deemed previously developed.*
- o Clarification of finished floor levels.*

Caveats & Additional Information for Applicant

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/>

We refer the applicant to "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).

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

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.

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 City of Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice in line with the phases of this legislation and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>

Drainage

In our letter of 03 May 2017 (our reference PCS/152659), we advised the following.

- o The application should contain details of proposals to connect to the foul sewer. For this scale of development we can only really expect discharge to the Scottish Water foul sewer.*
- o Proposals for Sustainable Urban Drainage Systems (SUDS) should be supported by the output from the Simple Index Approach tool, details of which can be found in the current edition of the CIRIA Manual.*

The application should be supported by proposals for the discharge of foul water and acceptable and adequate proposals for SUDS.

SEPA further comment

I am writing in response to the additional information which has recently been submitted in support of planning application 17/03186/FUL. This information has been submitted to address SEPA's objection to the application on the grounds of lack of information on flood risk and drainage.

On the basis of this information, we can withdraw our objection on the grounds of lack of information.

Advice for the planning authority

1. Flood Risk

1.1 We are now in a position to remove our objection to the proposed development on flood risk grounds. Notwithstanding the removal of our objection, we expect the City of Edinburgh Council to undertake its responsibilities as the Flood Prevention Authority.

1.2 We previously responded to this application on 03 May 2017, 06 July 2017 and most recently on August 2017. We objected due to a lack of information on flood risk. Most recently we required that the land use of the site is confirmed by the planning authority and we advised that calculations of the compensatory storage and clarification of the finished floor levels were needed.

1.3 The correspondence dated August 2017 confirms that the finished floor level (FFL) of the proposed development is 32.4m, providing a freeboard of 600mm, which we support. This FFL is also shown on the drawings recently submitted. We do note, however, that the Flood Risk Assessment submitted with this consultation still shows a FFL of 32.225m. We are content, however, that the drawings recently submitted as a part of the planning application identify the FFL at 32.4.

1.4 The cut/fill report as well as the correspondence identifies that the displaced volume (fill) due to the proposed development is 128m³. The cut area of 136m³ allows a storage area of 134m³ around the car park. The difference is due to approximately 2m³ of fill being in the car park area. The drawing titled Proposed Levels Layout shows that the storage area will be cut at different levels across the car park, which we also support.

1.5 A drawing identifying the developed and undeveloped areas of the site was provided by the applicant and the City of Edinburgh Council agrees that this drawing is accurate. It would appear that this site is 'hybrid' site which other nearby sites have also been considered in the past with both greenfield and brownfield components.

1.6 As there are a large number of applications for development within this area we recommend that the City of Edinburgh Council considers undertaking a holistic approach supported by a detailed Flood Risk Assessment. The approval of piecemeal development within this area will restrict any future flood protection works or realignment of the Gogar Burn.

Caveats & Additional Information for Applicant

1.7 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit <http://www.sepa.org.uk/environment/water/flooding/flood-maps/>

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

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

2. Drainage

2.1 We also objected to this application on the grounds of lack of information on the discharge of foul water and acceptable proposals for SUDS.

2.2 On the basis that the planning authority is satisfied that the proposal for foul drainage can be achieved and is satisfied that the proposals for SUDS are satisfactory, we can remove our objection on these points.

Regulatory advice for the applicant

3. Regulatory requirements

3.1 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in the local SEPA office at:

Silvan House, SEPA 3rd Floor, 231 Corstorphine Road, Edinburgh EH12 7AT.

Tel: 0131 449 7296

Roads Authority Issues

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

1. The applicant will be required to contribute:

a. The sum of £272,482 towards West Edinburgh Transport Contribution Zone as per September 2017 Developer contribution and Infrastructure Delivery guidance (see note b);

b. the sum of £722,000 (based on 240 hotel units in Zone 1) to the Edinburgh Tram in line with the Developer Contributions & Infrastructure Delivery Supplementary Guidance dated March 2017; The sum to be indexed as appropriate and the use period to be 10 years from date of payment;

2. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;

3. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles, including off-street spaces. The applicant should therefore advise the Council if he wishes any off-street bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;

4. The developer must submit a maintenance schedule for any SUDS infrastructure for the approval of the Chief Planning Officer.

Note:

a. Current Council parking standards for hotel development in this area are assessed on merit using Zone 2 standards as the starting point. Zone 2 standards require a maximum of 96 spaces for 240 bedroom hotel. The applicant proposes 75 parking provision and is considered acceptable because of its accessibility by public transport (bus; tram). The proposal includes coach drop off/pick up parking bay near the main entrance of the proposed development. It also includes 9 motorcycle and 18 cycle parking provision.

b. Contribution per hotel room is £1,135.34. The WETA contribution is based on trip rate.

TRAMS - Important Note:

APPLICANT TO CONSULT WITH EDINBURGH TRAMS

The proposed site is on or adjacent to the Edinburgh Tram which is now operational. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:

- o Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;
- o Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
- o Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
- o Any excavation within 3m of any pole supporting overhead lines;
- o Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use;
- o The Council has issued guidance to residents and businesses along the tram route and to other key organisations that may require access along the line.

See our full guidance on how to get permission to work near a tram way <http://edinburghtrams.com/community/working-around-trams>.

Environmental Assessment comment

The proposed site is located on Almond Avenue, adjacent to the boundary of Edinburgh Airport and approximately 150 m to the southeast of the Airport Terminal building. Access to the proposed hotel will be from Almond Avenue. Currently the site is occupied by a former police station and car rental buildings, as well as a small car parking area. The area surrounding the site is predominantly commercial with airport offices located 50 m to the northwest, the Hilton Hotel 150 m to the east and some residential properties approximately 200 m to the south along Eastfield Road.

In 2010, the applicant prepared an air quality assessment to support a planning application for the 'Edinburgh Airport Hotel', consisting of 350 rooms and associated parking for 313 vehicles. The air quality assessment concluded that the potential air quality impacts would be Negligible and that the 'Edinburgh Airport Hotel development is acceptable from the perspective of air quality.' In April 2012 planning permission for the proposed hotel was granted. In 2015 the applicant decided to submit a new planning application for a smaller Edinburgh Airport Hotel consisting of 175 rooms and associated parking for 75 vehicles. This is currently being constructed, however a further application was submitted in 2017 by the applicant to allow for a 240 bed hotel with the same level of parking for 75 vehicles. As such the red line boundary has also reduced in size to just include the northern half of the previously assessed site.

The site is approximately 1.2km from the eastern edge of the current Glasgow Road Air Quality Management Area (AQMA), between the M9 and Ratho Station on the A8, which has been declared for exceedances of the annual mean objective concentration for nitrogen dioxide (NO₂).

Local Air Quality Impacts

The applicant has submitted an air quality impact statement to highlight likely impacts this proposed development may have on the nearby AQMA for Nitrogen Dioxide (NO₂). The applicant has also submitted details on the proposed energy system and proposed fuels. No further details are required regarding the emissions from the proposed flue as the size of the gas energy plant falls below the required threshold.

The scale of this proposed developments and parking numbers is satisfactory however based on the fact the density of development has reduced from that previously consented. It should be noted that any applications for the remainder of the consented development site will need to be assessed on its own merits. The main source of pollution in on Glasgow Road is traffic generated and this site will introduce an increased number of vehicles onto the network. The proposed numbers of parking spaces are acceptable and the applicant has committed to installing a rapid electric vehicle charging point which should be made accessible to public and taxi trade. The applicant has considered the full range of mitigation measures open to them. We would normally encourage developers to work with Environmental Protection to produce a Green Travel Plan which should incorporate the following measures to help mitigate traffic related air quality impacts;

- 1. Keep Car Parking levels to minimum.*
- 2. Car Club facilities (electric and/or low emission vehicles).*
- 3. Provision of electric vehicle charging facilities.*
- 4. Public transport incentives for staff.*
- 5. Improved cycle/pedestrian facilities and links.*
- 6. Taxi specific rapid electric vehicle charging points.*

It should be noted that Grants are also available for the installation of EV charge points from the Scottish Energy Saving Trust. More information can be found at:

<http://www.energysavingtrust.org.uk/scotland/Organisations/Transport/Electric-vehicles/Electric-Vehicle-Charge-Point-Funding>

The Scottish Government in the 'Government's Programme for Scotland 2017-18 has a new ambition on ultra-low emission vehicles, including electric cars and vans, with a target to phase out the need for petrol and diesel vehicles by 2032. This is underpinned by a range of actions to expand the charging network, support innovative approaches and encourage the public sector to lead the way, with developers incorporating charging points in new developments. Therefore, the commitment of installing a rapid charger of the following standard is welcomed and shall be recommended as a condition;

70 or 50kW (100 Amp) DC with 43kW (63 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.

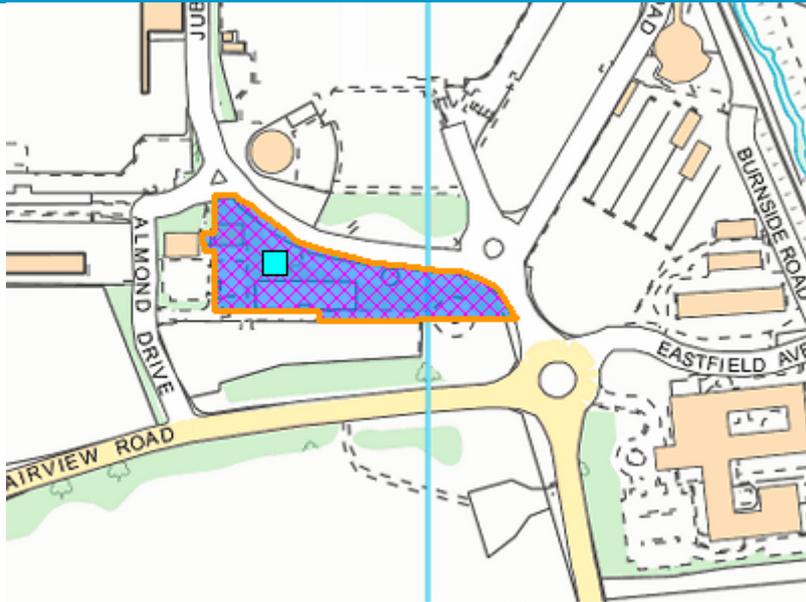
Contaminated Land

The applicant has submitted a Ground Investigation Report which has been assessed by Environmental Protection. As such, there is no requirement for additional supporting information to address this consideration, either directly in support of the application or through use of a planning condition.

Therefore, Environmental Protection offer no objection subject to the following condition.

Prior to the use being taken up, a rapid electric vehicle charging point, capable of 70 - 50kW (100 Amp) DC with 43kW (63 Amp) AC output as show on drawing no. L (90)02 REV D dated 21 September 2017 shall be implemented.

Location Plan



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