

Development Management Sub Committee

Wednesday 25 April 2018

**Application for Planning Permission 17/02471/FUL
At Craigpark Quarry, 1 Craigpark, Ratho
Outdoor leisure complex incl. water sport+training facilities
infrastructure,
access(pedestrian+vehicular),landscaping+ancillary
works(full planning permission), ancillary class 1
(retail)+class 3 (food+drink) uses, tourism accommodation
facilities (PPP).**

Item number

Report number

Wards

B02 - Pentland Hills

Summary

The proposal complies with the Edinburgh Local Development Plan and the Council's non-statutory guidelines. The proposal is a unique opportunity to reuse the redundant quarry, there is no impact on the setting of the Scheduled Ancient Monument, there are opportunities to enhance the biodiversity of the site and provide enhanced cycle and footpath connections. The design is of an appropriate standard. There are no material considerations that outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LDPP, LDEL01, LDES01, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES10, LEN08, LEN10, LEN11, LEN12, LEN15, LEN16, LEN21, LEN22, LTRA01, LTRA02, LTRA01, LTRA02, NSGD02,

Report

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Recommendations

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

Background

2.1 Site description

The application site is part of the disused Craigpark Quarry, at the western edge of the village of Ratho. The Quarry ceased operations in 1990. The Quarry slopes have recently received remediation works as part of the restoration of the quarry into a country park.

The site measures approximately 23.4ha in area and is bound to the north by a strip of trees and shrubbery, next to the Union Canal, which is a scheduled ancient monument (Ref SM11097, added 15 Dec 2003), and by the Edinburgh International Climbing Arena to the north east. It is bound to the west by agricultural land and to the south by Bonnington Quarry.

The Union Canal is designated as a Local Nature Conservation Site and runs along the northern edge of the site and to the southeast the woodland formerly associated with Craigpark House (now Demolished) is listed in the Inventory of Ancient, Long Established and Semi Natural Woodland of Plantation Origin (NCC 1991).

Further south, beyond the application site, the countryside is designated as a Special Landscape Area.

Access to the site is from Clifton Road to the west.

2.2 Site History

The site was an active quarry producing hard rock until 1990, when all extraction ceased.

2 March 2003 - planning application for restoration of redundant quarry and mixed use redevelopment comprising housing, business and commercial uses, with associated engineering works, application refused (application reference 02/01597/FUL).

14 August 2006 - planning permission was granted for the erection of 117 dwelling houses on the neighbouring site and restoration of the disused quarry to the south west for public amenity purposes (formation of country park) (application reference 05/01229/FUL). An Environment Statement was submitted with this application. The proposal included 45 town houses 42 four storey apartments, and 30 detached dwelling houses. The planning permission is subject to a legal agreement, requiring amongst other matters the implementation of a phased restoration programme and landscape and habitat management plan. The approved restoration works are currently in progress.

The enabling works included the reinstatement of the site access from Wilkieston Road as the south eastern gateway for use by construction traffic for a temporary period and re-contouring of slopes for road construction, material gain from north-western area and removing dangerous cliffs.

Restoration of the quarry included;

- Slope re-profiling to provide a natural angle of repose;
- Re-use of bundled topsoil;
- Retaining established woodland on the site;
- Creating new woodland and grasslands;
- Infrastructural tree planting; and
- Safeguarding raptor habitat and nesting sites.

21 November 2014 - planning permission was granted for a material variation to planning permission Ref; 05/01229/FUL to provide amended housing layout and substitution of house types and associated works (application reference 13/02527/FUL).

2 April 2015 - planning permission was granted to erect an agricultural storage shed and manager's residence in the country park (application reference 14/02128/FUL).

17 June 2016 - A Proposal of Application Notice was submitted for the restoration of former Craigpark Quarry for outdoor countryside and water related leisure and recreation, waterside development, visitor accommodation, access infrastructure and ancillary facilities (application reference 16/03170/PAN) and was withdrawn on 22 December 2016.

11 October 2016 - planning permission was granted, subject to a legal agreement, for the erection of a Site Managers Office (application reference 16/03437/FUL), this is currently under construction.

1 December 2016 - planning permission was minded to grant for the re-shaping of slope profiles and water bodies, alterations to the proposed footpath network and proposed landscape scheme (material variation to consent 05/01229/FUL) application reference 15/05021/FUL.

21 December 2016 - A Proposal of Application Notice was submitted for the erection of an outdoor leisure complex including water sport and training facilities with ancillary (Class One) Retail and (Class Three) Food and Drink uses. Tourism accommodation facilities e.g. self-catering lodges and campsite, infrastructure, access (pedestrian and vehicular), landscaping and ancillary works (for full planning permission) (application reference 16/06366/PAN).

21 December 2016 - A Proposal of Application Notice was submitted for infrastructure provision (including operational works), landscaping and access (pedestrian and vehicular) associated with the development of the site for an outdoor leisure complex, including tourism accommodation facilities, ancillary (class one) retail and (class three) food and drink users and associated works (for planning permission in principle) (application reference 16/06371/PAN).

Adjoining Site

1 April 2015 - Application received for an application under section 42 (Town and Country Planning (Scotland) Act 1997 (as amended)) to amend the wording of conditions numbered 22 and 23 of planning consent (Ref P/PPA/LA/643) to require that at least 12 months prior to mineral extraction ceasing a detailed scheme for restoration is submitted for the approval of the local planning authority and to extend the time period permitted to 2050 to allow for completion of mineral extraction, at Bonnington Mains Quarry, Clifton Hall Road, Newbridge.

Main report

3.1 Description Of The Proposal

The application is for the erection of an outdoor leisure complex within a country park. The application seeks full planning permission for the water sport and training facilities infrastructure, access (pedestrian and vehicular), landscaping and ancillary works. Planning permission in principle is sought for the supporting buildings including ancillary class one (retail) and class three (food and drink) uses, tourism accommodation facilities.

The applicants are promoting the Wavegarden to deliver a “World class inland surf destination with ancillary activities and associated accommodation, set within a dedicated country park”.

The site will be principally accessed from the west with up to 239 car parking spaces proposed close to the site entrance in the northwest corner. A vehicular bridge outside the site boundary connects to the Edinburgh International Climbing Centre on the opposite side of the Union Canal. The car parking makes provision for coach and mini bus parking. Service access only can be gained from the southern side of the site, west of Ratho village, controlled by a Rangers Lodge.

The main Wavegarden element will be accommodated within the existing quarry utilising the existing topography and water resource. The Wavegarden facility, called The Cove, measures approximately 155 metres in length and 155 metres in width and is divided into different surfing zones. The Wavegarden component of the project would take up approximately 4.7ha of the 23.4h site area (20%), with the public country park around almost 19ha in area. The Cove will generate approximately 1000 waves per hour ranging in height from 0.8m to 2.4 m. A maximum of 100 surfers can use the water at one time.

The development is to cater for a wide range of users including:

- Surfers and Surf School; Stand Up Paddle boarders (SUP'ers), Bodyboarders, Surf Kayaking.
- Cyclists, MTB Skills.
- Skateboarders, Rollerbladers, Nordic Ski Training.
- Local Residents; Dogwalkers.
- Canal Users.
- Walking Groups.
- School Groups and Scout Groups.

Ancillary activities to be accommodated on the site include:

- A tandem zipline approx 300 meters in length proposed north to south across the central part of the site.
- A kicker jump with airbag landing to accommodate Snowboard/Freeski and surfing training; including varying grades of jump for a wider range of abilities. Flexibility built into design to accommodate more challenging tubing slide run. This would measure 20m by 65m, proposed to the southern side of the site.
- A series of tubing slides with varying degrees of height/speed ranging from 4.5 m to 12 m in height on the eastern side of the water feature.
- Segways.
- A bike skill track close to the car park.

Based on a similar facility at Surf Snowdonia, the applicants predict that the facility would accommodate 155,000 visitors per year. The facility will be closed during December, January and February. Mid-season is predicted as March, April, May, September, October, and November, with hours of operation between 10.00 – 20.00, with the High Season as June, July and August with hours of operation 08.00 to 22.00.

An orientation building is proposed at the edge of the car parking site to direct the public. Support buildings are proposed around the Cove water feature in the quarry basin. The full details of the design of the buildings will be subject to a design competition. In principle the proposed HUB reception building will include a restaurant, viewing deck, yoga studio, surf shop, function space and facilities for camping pod and luxury lodge guests. The WETS building will accommodate changing rooms, gear and equipment storage, small Food and Beverage outlet and facilities for the country park users. The Point building will include a cafe and viewing deck; facilities for camping pods guests. A Service building to house the powering technology behind The Cove would be isolated to the corner of the water feature.

Accommodation includes Camping pods and 31 lodges with a full facility option.

Funding towards a new footbridge link across the Canal was secured through previous planning permissions.

The Wavegarden Scotland proposals have been designed to complement the existing proposals to re-grade and restore the quarry as its infrastructure does not require any significant change to the re-grading and restoration proposals. Negligible changes are required to re-grading at specific locations (i.e. pathways/nodes and pod terraces) but these changes will result in no net change to the overall volume nor extent of re-grading required.

Swales and suds ponds follow the link of water drainage from the water basin to the canal on a south north flow through the centre of the site.

The application is supported by the following documents:

- Environmental Statement, (ES),
- ES Appendix,
- Economic Impact Assessment,
- Flood Risk Assessment,
- Sustainability Statement,
- Tree Survey,
- Design and Access,
- Drainage Strategy,
- Noise Assessment,
- Air Quality Assessment,
- Habitat Survey,
- Protected Species Report (confidential),
- Planning Support Statement, and
- Transport Assessment.

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

3.2 Determining Issues

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

Do the proposals comply with the development plan?

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

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

3.3 Assessment

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

- a) the principle of the proposed development is acceptable in this location;
- b) the design, scale massing and form of development is satisfactory given the setting of the site;
- c) the development would detrimentally impact upon the landscape;
- d) the proposal would be detrimental to protected species;
- e) the proposal can proceed without significant impacts in terms of contamination, noise ,air quality, flooding, drainage, aerodrome safety, hazard and archaeology;
- f) there would be any adverse effect on neighbouring residential amenity;
- g) the proposals are acceptable in terms of traffic generation, road safety and parking and access arrangements;
- h) the proposals can satisfactorily protect and enhance the setting of the Union Canal;
- i) the proposal meets sustainability criteria;
- j) the proposal has any impact on equalities or human rights; and]
- k) comments raised have been addressed.

a The principle of the proposed development is acceptable in this location

The application site is designated as countryside in the Edinburgh Local Development Plan. Policy ENV 10 advises that development would only be permitted where a countryside location is essential and that any associated buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use. The development should not detract from the landscape quality and/or rural character of the area.

The principle of the restoration and reuse of Craigpark Quarry was established through earlier planning permissions which allowed for a housing proposal on the eastern side of the site to enable restoration of the quarry. The original planning permission reference 05/01229/FUL supported a country park development. A detailed assessment was carried out of the level of development that was required in order to support a recreational facility. The result was a community parkland, the details of which were revised through planning application reference 15/05021/FUL and were assessed as having been 60% completed in 2015, satisfying planning objectives to allow the housing development to progress.

In identifying a site for a surf centre the applicant was seeking a site as “an escape and a retreat centre in a natural and relaxed setting”. Craigpark Quarry offered this, and a level of vacant brownfield land and natural land forms which the applicant couldn't find in an urban environment.

The wave pool for the surfing facility requires a certain amount of space that this countryside setting can provide. A countryside location is therefore considered appropriate for the unique facility proposed. The site is in a unique situation adjacent to the Union Canal and the Edinburgh International Climbing Centre and an interdependent relationship could evolve with the facilities creating a destination for passive leisure and recreation.

Having regard to the historical development of the site, and the development of a country park with public access, it is evidenced that the formerly approved country park element of the site will be largely retained and the proposed surfing element of the proposal will make efficient reuse of the derelict quarry and is a positive reuse of vacant brownfield land.

The ancillary activities to be accommodated on the site include a tandem zip-line, a kicker jump for snowboard/freeski and surfing training; including varying grades of jump for a wider range of abilities and a series of tubing slide runs. The tracks can accommodate Segways and a bike skill track is proposed close to the car park.

It is considered that these facilities will contribute to the surfing leisure facility, providing a broader range of activities, and will sit comfortably within the country park setting, maintaining public access. The amenity impacts are assessed in section f) of the assessment section of this report. A detailed plan has been submitted clarifying path hierarchy and access to the site.

This application is for full planning permission but includes a series of support buildings and accommodation, full details of which are to be submitted in further applications. The buildings include an orientation building proposed at the edge of the car parking site to direct the public. Support buildings are proposed around the Cove water feature in the quarry basin. These buildings are considered acceptable in principle supporting the countryside recreation facility and meet the criteria of Policy ENV 10a.

The principle of these buildings is considered to be acceptable. The full details of the design of these buildings, including scale and exact siting and associated hard landscaping will be subject to a design competition and will be assessed through further detailed planning applications.

The camping pods are considered justified in support of the recreational facility offering sustainable, on site, budget accommodation. This may be shared by users of the climbing centre.

The lodges, proposed in outline, would be sited on the high ridge of the quarry, in close proximity to Bonnington Quarry and would be accessed from the main entrance with only need for servicing and maintenance access from Wilkieston Road. The justification statement for the 31no. lodges submitted with the planning application advises that the lodges are essential to the success of the surf project.

The applicant justifies the need for the lodges on the grounds that they will provide comfortable on site accommodation for athletes using the surf park and the climbing centre. Reference is made to the Oriam National Performance Centre for Sport at Heriot Watt University Riccarton which has on site hotel accommodation. It is anticipated that the lodges will be 70% occupied by those using the facility.

The applicant has included a Lodge Accommodation Economic Benefits Statement and reference to the National Tourism Strategy 2020 and Edinburgh Tourism Strategy of 2020. The statement is supported by CEC Economic Development.

The development of the proposed lodges is considered to be of an acceptable scale ancillary to the operation of the surf garden.

Surveys produced as part of the application for Bonnington Mains Quarry identify that noise and vibration will affect the part of the Craigpark Quarry site where the luxury lodges are proposed. Mitigation measures have been proposed by the operators of the neighbouring quarry, CEMEX. It is recommended that to reduce and minimise noise, blast vibration and dust to the proposed lodges that the minerals closest to the eastern boundary of Craigpark Quarry will be worked out of Bonnington Mains first. Once the lodges are completed and in use extraction operations should cease within 170m from the proposed lodges. Additionally in terms of noise a barrier screening is recommended at 2m high to the rear of the proposed lodges.

Having regard to the above it is recommended that a committee approve a condition that would only permit the erection of the lodges once the surf park has commenced operation. Additionally no lodge should be occupied until such time as a suitable noise barrier has been erected to the satisfaction of the Local Authority.

The full details of the lodge facility will be required by detailed planning application. There is separate legislation in place that will control the operation of the lodges to avoid permanent accommodation.

In principle the proposed surf garden and ancillary facilities are considered acceptable, subject to compliance with policies of the Edinburgh Development Local Plan.

b) The design, scale, massing and form of development is satisfactory given the setting of the site

Policy Des 1 of the Edinburgh Local Development Plan supports development which contributes towards a sense of place. A design approach that draws upon positive characteristics of the surrounding area is supported.

The re-profiling of the topography of the site will contain the proposed wave facility, the camping pods and associated buildings are proposed to be set down in the quarry basin. The remaining steep slopes of the quarry will comfortably accommodate the proposed tuber slides and kicker jump with minimal visual impact.

The new wave facility is of an appropriate scale within its context accommodating approximately 20% of the larger site area, the proposed buildings will accommodate less than 20% of the site thus ensuring continued public access and public park facility to the remainder of the site. The form of development is such that it will have a minimal impact upon the surrounding landscape and will reuse quarry materials where appropriate. The proposal satisfies policy DES3 of the Edinburgh Local Development Plan which aims to ensure that features worthy of retention, such as the quarry rock face and woodland tree belt in this instance, are incorporated and enhanced through the design of the development.

The overall building footprint is proposed at 4500 square metres, set over two storeys in part. The final massing and design details of the ancillary buildings will be determined by a detailed planning application. The Design and Access Statement submitted in support of the application sets an aspiration for the architectural style of the buildings to be simple yet robust. The final building design will be determined via a competition, however the indicative approach is one of modular off site construction designed to a unique specification to reflect the natural form of the site. The competition approach is supported, however it is recommended that a condition be attached to this permission to ensure that the details of the design, height and material finish of all the proposed buildings are considered holistically and not on an ad-hoc basis, thus ensuring a cohesive form of development within the site. This approach will ensure that the requirements of policy DES 2, coordinated development, of the Edinburgh Local Development Plan are met.

The proposed landscaping approach, both hard and soft materials, will sit comfortably within the manmade form of the site satisfying policy DES 4 of the LDP. Further clarification of details is required in particular around the proposed new buildings and the details of these will be controlled through the recommended conditions.

The proposal is sensitively sited so as to have minimal impact upon the Union Canal, Scheduled Ancient Monument. Boat moorings are annotated on the drawings and whilst these do not require planning permission, they may require Scheduled Ancient Monument Consent and permission from Scottish Canals.

The proposal will result in minimal impact upon the Union Canal watercourse whilst encouraging public access across the canal, in accordance with LDP policy DES10. A new footbridge link across the Canal was partially funded through previous planning permissions. This will improve access to the site and links to EICA. Details of the final design of the bridge will be considered out with this application. Further assessment on the need for a bridge is set out in section 3.3(g).

It is concluded that the proposal will draw upon the positive characteristics of the site and will contribute to a sense of place in this part of the west of the Edinburgh. The application includes many of the recommendations of the Edinburgh Urban Design panel. The design quality of the proposed ancillary buildings will be controlled by planning condition, thereby ensuring that policy DES 1 of the Edinburgh Local Development Plan is fully complied with.

c) The development would detrimentally impact upon the landscape

The disused quarry is described in the submitted Design and Access statement as “a landscape gone to seed with fissured and crumbling rock faces, disused buildings and piles of quarry spoil and overburden throughout”. The site was left as wasteland following the closure of the quarry and recent developments have resulted in re-grading of the site to bring it to Country Park quality in accordance with the 2005 planning permission.

The overall design of the leisure park aims to use the natural resources to best advantage with rock faces, mature tree bands and natural site topography integrated in to the design. The former use of the site as a quarry has created a bowl-shaped topography. The shape of the landform naturally lends itself to locating the surf facility in the basin of the former quarry, the proposed ancillary activities and supporting accommodation will be largely contained within the natural bowl.

The applicant has submitted a Zone of Theoretical Visibility (ZTV) within the ES, in support of the application. The ZTV reveals the extent to which different components of the development will be viewed within the surrounding landscape.

The elements of the proposal which will be visible, principally to the west of the site up to the M8 and south to Bonnington Mains and west Bonnington, include the car park and the orientation building, lodges and zip wire. The ZTV highlights that the proposed lodges and the top of the kicker ramp would also be viewed from Ratho Mains and Ransfield Cottages to the east. It is concluded that the long term visibility of these structures will be minimal as the proposed structure planting matures.

LDP policy DES 9 advises that development will only be granted on sites at the green belt boundary where it promotes access to the surrounding countryside. The proposal will enhance links between the village of Ratho and the development through new footpaths and the proposed connecting bridge over the Union Canal. The proposed landscape strategy includes planting improvements along the western boundary and will enhance biodiversity through the site.

The application proposes to protect the existing woodland to the west of the site and north along the Canal corridor. It proposes groupings of single tree species planting at key nodes and entrances within the site to provide landmarks and also groups to form tree copses. It is recommended that a planning condition be applied to ensure adequate protection of existing trees throughout development work.

The overall landscape approach is acceptable in principle and satisfies LDP policy ENV 8 in that the design and species are appropriate for the site. The proposal aims for the long term establishment of a variety of landscape typologies following the key principles of the Edinburgh Living Landscape partnership project and aims to create landscapes that will be healthy, nature rich and resilient to climate change. Further details will be required by condition to ensure a holistic approach and long term maintenance.

More than 60% of the site will be retained as open space available to the general public. A detailed phasing plan is requested by condition to ensure safe public access throughout development. The proposal therefore satisfies policy ENV 20 of the Edinburgh Local Development Plan.

It is concluded, that subject to the recommended planning conditions, that the proposal will satisfactorily protect and enhance the existing landscape structure of the quarry. The proposal meets the council's expectations for landscape as set out in the Edinburgh Design Guidance of October 2017.

d) The proposal would be detrimental to protected species

The Union Canal, a Local Nature Conservation Site, lies immediately to the north of the application site. Parcels of ancient woodland and semi-natural ancient woodland surround the site. The applicant has advised that no tree felling within the site will take place to accommodate the proposed development. The woodland habitat immediately adjacent to the Union Canal will not be developed. Some scrub/woodland removal may be required and the applicant has identified the need for nesting bird check prior to disturbance/clearing or felling.

The development largely avoids encroachment within the Local Nature Conservation Site along the canal with only a footpath and the previously approved connecting bridge over the canal falling within the designated area.

Local Development Plan policy ENV 16 advises that planning permission will not be granted for development that would have an adverse impact on species protected under European or UK law, unless a full survey has been carried out of the current status of the species and its use of the site, and that suitable mitigation has been proposed.

The applicant carried out an extended phase 1 Habitat Survey in January 2017 and May to July 2017 and a Protected Species Survey (a redacted version is available on the portal). The survey found that habitat within the site was considered suitable to support protected species including badger, bat and otter.

Great Crested Newts

Representations have been received regarding the potential presence of great crested newts on the site. The findings of the surveys may be summarised as follows;

Extended Phase 1 Habitat Survey

No evidence of great crested newts (GCN) was recorded using a habitat suitability index (HSI) assessment of two ponds on site. Pond 1 had below average suitability whilst pond 2 had average suitability to support GCN; no evidence of great crested newts were noted during the time of survey. However their presence could not be ruled out and an environmental DNA (eDNA) survey during the appropriate season (mid-April to late June) was recommended.

Protected Species Survey

In May 2017 updated HSI assessments were undertaken on ponds 1 and 2 and a further three ponds in the surrounding locality. The results showed that ponds 1,2,5 have poor suitability and pond 3 and 4 average suitability. These surveys were also supported by eDNA surveys. This involves taking water samples which are then sent off for analysis.

Limitations

One ditch could not be surveyed due to access restrictions therefore commuting potential/presence of GCN here cannot be ruled out: however with lack of suitable habitat on site, this is not thought to limit the conclusion.

Conclusion/Further surveys

The habitat for GCN was limited to two ponds offering average suitability in ponds off site (ponds 3 & 4). However eDNH indicated an absence of GCN at the time of survey. Whilst the survey acknowledges this it does not negate the presence of GCN in proximity to the site, it is considered unlikely that they will use features on the site and within the surrounding area. No further works are therefore proposed at this stage.

However if there is a time lapse of 12 months from the date of survey further studies should be undertaken. This approach has been supported by Scottish Natural Heritage. A condition to ensure this is therefore recommended.

Badgers

There is evidence of badger activity along the Union Canal.

Lothian Badger Group has objected to the proposal and advise that badgers may return to the site once the housing development is completed.

In mitigation, the Protected Species Report recommends that a preconstruction survey be undertaken two months prior to construction, and should include a minimum of two weeks camera trap monitoring to better assess the level of use of the sett and potential impact. This will inform the requirement (if any) for consultation with SNH to obtain licensing that allows disturbance of the sett during construction activities. A condition to ensure this is therefore recommended.

Bats

Bats were observed foraging around the woodland habitat.

No roosting bats were observed emerging from the northern cliff face during the bat activity survey. Significant changes occurred to the south cliff face during controlled explosions and therefore it was concluded unlikely that bats use the cliff faces on sites to roost.

The report recommends that any tree felling on the site should be pre-inspected for bats and necessary licence obtained. Recommendations are made with regard to proposed protocol throughout works to avoid disturbance to bats. Lighting details for the overall scheme should be carefully considered to avoid illumination of woodland and scrub habitat which may affect bats and badgers. A condition to meet these requirements is recommended.

No other evidence of protected species was recorded during field studies.

Habitat to support nesting birds was identified on the site, appropriate conditions to ensure their protection during the breeding season are recommended.

The application proposes to provide a variety of habitats within the site to increase biodiversity and target species from the Local Bio-diversity Action Plan. It is proposed to retain the existing woodland and understorey planting along the Canal corridor, providing a mature backdrop to the site. Proposed woodland would be a mix of deciduous and evergreen planting, with shrub understorey. Swale planting is proposed to provide an impenetrable planting character to the perimeter of the wave pool, concealing the secure boundary fence. Wildflower meadows are proposed on the terraces with meadow grasslands retained on the steep slopes. The proposal accords with policy DES 3 of the Local Development Plan which aims to provide new habitat and further the conservation of biodiversity.

Scottish Natural Heritage advise that the project has the potential to improve access to and enjoyment of the natural heritage. Habitats need protection from construction impacts and the approval of a detailed landscape and habitat management plan will ensure long term commitment to management of the site. It is recommended that the mitigation methods set out in the Environmental Statement in 4.4.5 Table 4.1 are adhered to throughout works.

It is concluded that subject to adhering to the mitigation methods in the ES, an approved Landscape Habitat Management Plan and the recommended conditions, the proposed development should not encroach upon protected species within or around the development site to the satisfaction of LDP policy ENV16. The proposal meets with the Edinburgh Design Guidance October 2017.

e) The proposal can proceed without significant impacts in terms of contamination, noise, air quality, flooding, drainage, aerodrome safety, hazard and archaeology

Policy ENV22 of the Edinburgh Local Development Plan aims to ensure that new development will not result in unacceptable levels of pollution to water, air and soil quality.

The proposal has been subject of an Environmental Impact Assessment which considers the potential for the development to result in significant effects on the environment both positive and negative.

Water

The application has been supported by a detailed Flood Risk Assessment which assesses all sources of flood risk including rivers, surface water, sewers, ground water and artificial sources. SEPA has raised no objection to the proposal on flood risk grounds.

A Drainage Strategy has been submitted in support of the application. It advises that the proposed wave generator is designed to be self-sufficient in terms of water attenuation, treatment and general maintenance. A temporary discharge consent would be required from Scottish Canals should operational disposal to the canal ever be required. Discharge rates have been agreed between the applicant and Scottish Canals.

Surface water will be treated prior to disposal through the promotion of infiltration systems including SUDs. Scottish Water advise that they generally restrict the connection of surface water into the sewer system. The disposal of water from the site is required to comply with General Binding Rules 10 and 11 of the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR), as amended.

The foul drainage network will connect to the existing foul drainage for the neighbouring residential development. Scottish Water has raised no objection to the proposal.

Air

The ES includes an assessment of the proposed development upon local air quality and dust, generated through the construction phase and exhaust emissions from construction traffic and plant on local air quality.

Due to the proposed traffic route being directed south away from the village of Ratho there was no assessment of the impact of traffic generated during the operational phase.

The impact of the construction traffic upon dust and air quality can be mitigated by good site practice including water sprays and site storage. Table 5-6 in the ES summarises the effects for Air Quality and Dust with a summary of mitigation/enhancement measures.

An Air Quality Impact assessment was submitted on 2 March 2018 which provided assessment of the potential air quality impacts associated with the proposed development through the operational phase. The site is located in an area where local air quality is generally good. The application site is not located within an Air Quality Management Area.

The results of the assessment show that the additional emissions associated with the development generated traffic would have a negligible impact on pollutant concentrations at all the assessment receptors. It is concluded that the development proposals comply with national and local policy for air quality. Environmental Protection support the provision of sustainable transport options including the provision of Electric Vehicle Charging points and a Travel Plan to help mitigate traffic related air quality impacts. Informatives to achieve this are recommended. Further details are required with regards to the proposed centralised energy centre which will serve the main buildings.

Noise Impact Assessment

The Environmental Statement considers potential noise from the construction phase of the development. The ES addresses the piling from construction which would be undertaken by a drop hammer rig and advises that it would not cause significant harm to identified receptors.

The Environmental Statement concludes that the impact of the construction on the Cala Homes will be minor and negligible. In mitigation it is recommended that best practice be adopted throughout the construction programme. This may include temporary acoustic barriers.

In addition to the ES, a Noise Impact Assessment has been submitted which addresses the noise from the wave machine and the proposed associated leisure activities. These are considered to be compatible with a country park, including bicycles and the use of the zip wire.

The applicant has highlighted that the main area of activity will be concentrated in the basin area of a former quarry, which is approximately 30m below the perimeter of the site. The majority of operational activities will take place in this area and the nearest residential properties will be shielded from operational noise by the topography.

The applicant had originally provided a summary of events that they proposed being held on the site including:

- Surf competitions
- Night surfing event
- Official launch of the new Olympic Team GB Surfers, Climbers and Ski and Snowboard teams ahead of Tokyo 2020
- Chilled live music
- Winter/Christmas markets
- Farmers markets
- Summer outdoor cinema nights

Environmental Health are concerned that these activities may have an adverse impact on the residential amenity. However the applicant has advised that they are willing to accept a condition to ensure only the activities covered in the noise assessment can be developed out until further supporting materials are produced to demonstrate that the other activities will not adversely impact local residential amenity.

Concerns regarding late night activity by lodge/pod users can be managed by the on site manager and the applicant has suggested a Management Plan specifying details such as a 24 hour help line for residents to call, and time limits on the use of sound equipment within the site. A condition is recommended to control the hours of operation of the wave garden between the hours of 8am and 8pm. It is predicted that during the winter months the demand for use will be shorter.

Environmental Protection recommend conditions are attached to ensure residential amenity is protected.

Construction Vibration

The ES states that there may be vibration from construction activities. This is assessed as coming principally from piling which would only cause cosmetic damage within 20metres from the piling activity. There will be a Construction Environmental Management Plan prepared prior to the commencement of construction. This will include environmental commitments during construction including a Pollution Prevention Plan/Pollution Management Plan. Further controls will be imposed by the Building Warrant.

The site is in close proximity to Bonnington Mains Quarry which is still an active quarry, and therefore the site may experience some vibration from blasting.

Aerodrome Safety

BAA has raised no objection to the proposal subject to conditions in respect of Bird Hazard Management Plan and SUDs details.

Waste

The applicant will be required to pursue trade waste uplifts with a commercial operator.

Soil Quality

There has been a substantial element of restoration to the quarry over the past few years. Geo-environmental phase I and phase II reports would be required for the building warrant application to assess the site for contaminants and ensure the site is suitable for leisure use. An appropriate condition is recommended.

Archaeology

It is recognised that whilst much of the site has been quarried, the north west corner contains an area of high ground which has not been significantly impacted by the quarry. There will be new paths through this area. Archaeology recommend that given the occurrence of prehistoric burials in similar locations on the north side of the canal that there is low possibility that there are significant remains in this location. The proposal does not include works directly affecting the Union Canal. However future works such as the erection of a bridge or moorings will require scheduled ancient monument consent. An appropriate condition in respect of archaeology is recommended.

Conclusion

The ES Schedule of Mitigation has recommended that a Construction Environmental Management Plan will be prepared prior to the commencement of construction. This will include environmental commitments during construction, including a Pollution Prevention Management Plan and ecology. In conclusion, it is considered that subject to the recommended condition, the proposal can proceed without significant environmental impacts.

f) Impact on neighbouring residential amenity

Policy ENV 5 aims to protect the amenity of local residents from development.

The proposed facility is unique to Scotland, with Surf Snowdonia being the only comparable facility within the UK. The applicants predict that the facility would accommodate 155,000 visitors per year. A comparison is made to Glen Nevis as a visitor attraction that accommodates such a large number. As a comparison, the neighbouring EICA attracts 240000 visitors per year.

The site operated for many years as a quarry, with planning permission recently being granted for new housing next to a country park. The current landowner is committed legally to Cala, the neighbouring house builder, to complete the country park and open in June 2018.

The proposed leisure development will change the nature of the recently approved country park by introducing commercial elements which will result in more people, which will result in more noise and more traffic to the area. It is considered however, that with the approval of a signage strategy to divert visitors away from the village and operational controls in place that the proposal should not be disruptive to village life.

The applicants submitted a Noise Assessment which identifies the noise impact of the wave generating plant, surfing areas and activities, and the zip lines on the nearest noise sensitive receptors, being the new Cala Homes.

The findings of the assessment predict that noise from the wave generator and activities would be no greater than low impact.

The noise from the zip wire is assessed as being below the recommendation of the WHO Guidelines and BS 8233:2014 for uninterrupted sleep, albeit that the zip wire activity would not be used through the hours of darkness.

The accommodation proposals would be controlled by the submission of an Operational Noise Management Plan, by condition, to be adhered to by future end users.

The old fire road at the back of Hallcroft Park properties would be reopened and will allow public access to the site. In order to maintain the privacy of the back gardens of Hallcroft Park a condition is recommended to ensure appropriate screening is erected to the rear of the back gardens.

The operation hours of the various elements of the proposal are very much dictated by the demand, weather and hours of natural daylight. Operating hours can be controlled by condition and an appropriate condition to achieve this is recommended.

With regards to potential odours, the applicant has confirmed that it will provide specific details on where the flues will be located serving the commercial cooking operations in the full planning applications for the buildings. The applicant has confirmed that all the likely locations for the flues will terminate at roof level with the capability of achieving 30 air changes per hour. The applicant has confirmed that the likely locations of the flues will be in excess of 30m from the existing residential properties.

Site operations can be controlled by a Construction Management Plan.

Concern regarding safety of proposed fire pits will be for the site manager to control as this is not development.

It is concluded that subject to the adherence of the recommended conditions that the impact of development upon the neighbouring residents will be minimal.

g) The proposals are acceptable in terms of traffic generation, road safety and parking and access arrangements

Policy TRA 1 of the Local Development Plan encourages development on sustainable sites which are accessible by modes of transport other than the car.

The application has been accompanied by a Transport Assessment (TA) which has used a similar facility in Surf Snowdonia to predict the number of transport movements. The main access to the site will be along the B7030 Cliftonhall Road, using the approach to the EICA.

The no.20 bus route currently runs to the edge of Ratho village, terminating at Hallcroft Park. There are ongoing discussions with regards to extending that bus route into the new Cala housing site which would allow for easy access into the Country Park, Wave Garden. The traditional cart route accessing the site from Hallcroft Park to the east will be reopened allowing for local pedestrian/cycle access to the site and connecting to the bus stop.

The development lies to the south of the canal tow path which offers the potential for cycle and pedestrian access to the site. A new bridge across the canal has been partially funded through the approved housing development. The Transport Assessment in support of the application makes great emphasise on the accessibility of the site by alternative modes of Transport, the bridge would provide a crucial link in achieving accessibility and as such further funding is required to complete this link. The applicant has shown agreement in principle to providing additional funding to ensure enhanced sustainable routes to the development. A legal agreement to achieve this is therefore recommended.

Adequate provision for cycle parking will be made on site in accordance with policy TRA 3 and space is available for mini bus parking and electric vehicle charging points.

Policy TRA 2 of the Local Development Plan aims to ensure that proposed car parking is kept at low levels. The proposed parking provision is considered to be acceptable given the scale of the development and includes the previous commitment for the approved Country Park. The car parking will be managed by the management of the Wave Garden. The internal management of the different users to the country park i.e. mountain bikers and dog walkers will be controlled by onsite management.

The TA suggests a commitment by the applicant to employ a Travel Plan coordinator. Pedestrian and cycle opportunities will be encouraged for staff who live nearby.

Access to the lodges will be principally from the northwest end of the site with visitors being transported across the site by buggy. The access from Wilkieston Road in the south will only be available for servicing the lodges, thus trying to discourage visitors from travelling unnecessarily through Ratho Village.

The applicant has proposed a signage strategy providing new and improved signage and tourist brown signage out on the M8 and M9 and into West Lothian to assist traffic in avoiding Ratho village.

The internal management of the different users and the safety of site use will be the responsibility of the site operators.

The TA concludes that the impact of the resultant traffic will be negligible. The proposed development is not predicted to result in significant detriment to existing users of the transport network. Transport Scotland raised no concern with regards to the potential impact of the proposed development on the trunk road.

CEC Transport has raised no objection to the proposal subject to conditions and a financial contribution to enable the bridge over the canal to be delivered.

It is concluded that subject to the installation of the bridge over the canal, that the site will be fully accessible by public transport, cycling and walking and that the proposal will improve upon the existing network and satisfies policy TRA1 of the Local Development Plan.

h) The proposals can satisfactorily protect and enhance the setting of the Union Canal, Scheduled Ancient Monument

Policy ENV 8 of the Local Development Plan aims to protect important remains from development.

The application site lies to the south of the Union Canal, Scheduled Ancient Monument. The proposed development does not extend to the canal. The nearest hard core would be in the north west corner to form a car parking for visitors to the site. The tow path will be retained as a traffic free pedestrian route.

The previously approved planning application (ref 05/01229/FUL) granted permission for a bridge crossing in principle. A sum of £100,000 was received through application 05/01229/FUL for the establishment of a footbridge/cycleway over the Union Canal to link to the canal towpath and EICA. Adequate space is provided at this part of the site for bridge landings. The bridge will be delivered by CEC and will require Scheduled Ancient Monument consent from Historic Environment Scotland.

The application illustrates 14 boat moorings along the southern side of the canal. These do not require planning permission but will require Third Party Works Approval from Scottish Canals.

Scottish Canals support the application and recognise that this unique facility will bring new visitors to the area. Historic Environment Scotland raise no objection to the proposal, subject to further dialogue in respect of the bridge.

The proposal would not affect the setting of the Union Canal Scheduled Ancient Monument and satisfies policy ENV8 of the Local Development Plan.

i) Sustainability

The development responds to the need to regenerate the former quarry site. The surf facility requires a significant water demand. It is proposed that a water treatment facility will be provided on site which will allow water to be recycled to reduce the water use of the development. It is proposed that the buildings on site will recycle rainwater and grey water to be used for the purpose of flushing toilets. Additionally it is proposed that buildings will be designed to minimise energy needs, principally through the orientation of the buildings to maximise solar gain. Full details will require to be submitted to satisfy the planning conditions in respect of building design.

The applicant has completed the Sustainability Statement Form. The applicant advises that a number of measures have been investigated and will be included in the final design. The detailed design stage will supply information on the location of any renewable energy equipment proposed as part of the detailed design of buildings. The proposal suggests that there may be city car club provided within the site and provision for electric vehicles.

The proposal has been classed as a major development and has been assessed against Part B of the standards. The applicant has scored the application where possible at this stage; as follows:

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

The proposal almost meets the essential criteria in accordance with policy Des 6 of the Edinburgh Local Development Plan. The 10 point failure could be rectified when full details of the building design comes forward. Where possible the buildings have been orientated to maximise solar gain and minimise energy needs. This is considered to be an acceptable position at this stage in the design.

j) The proposal has any impact on equalities or human rights

The proposal will be accessible to the public and therefore all buildings and spaces will require to be built out to satisfy building standards.

Car parking for disabled uses is included within the layout. Issues with respect to neighbouring amenity are addressed in section 3.3(f). An Equalities and Rights Impact Assessment has been completed.

k) Material representations or community council comments raise issues to be addressed

The planning application and the Environmental Statement were advertised on 23 June 2017. 605 letters of representation were received, 563 letters of support, 35 letters of objection and 7 letters of comment.

Scheme 2 was advertised on 24 November 2017. 75 letters of representation were received, 65 letters of support, 7 letters of objection and 2 letters of comment.

Scheme 1- Ratho and District Community Council support the application in principle but identified deficiencies within the Planning application.

Scheme 2- Ratho and District Community Council

Ratho and District Community Council raise the following issues:

- Lodges only for commercial gain (addressed in section 3.3a).
- Sale or lease of any part of the public park requires specific consent of CEC (addressed in section 3.3).
- No information regarding the berths/moorings proposed (planning permission not required for this element).
- The berths and lodges should be in phase 2 of the phasing plan (will be assessed in recommended conditions).
- 15/05021/FUL legal agreement still pending (Legal agreement now signed).
- Continual disruption to the public park beyond the June 2018 curfew imposed by previous legal agreement for completion, conflict with basic principles of the original consent of 05/01229/FUL (addressed in section 3.3f).
- Issue of access to public space, reduced by the introduction of accommodation (addressed in section 3.3c).

Support

In support of the application the following comments have been received:

- Support for national centre/world class facilities
- Encourage people into sport
- Provide jobs and tourism goods for economy
- Good proximity next to EICA
- Meets demand for increasing popularity of sport
- Welcome all various facilities proposed
- Will attract visitors from all over the UK
- Will not destroy the landscape
- Great location in the central belt Scotland
- Promotes healthy lifestyle
- Physical and mental benefits
- Invest in this sport
- Support from Suds school

Comment

- Concern re footpath at the back of Hallcroft Park, concern re loss of privacy and security (addressed in section 3.3f).
- Concern regarding the lengthy planning history and the loss of historic planning obligations in particular (will be addressed through conditions/new legal agreement).
- Lack of completion of the country park and fulfilment of conditions and obligations in relation to the residential planning permission application ref 15/05021/FUL and 16/03437/FUL (for review through conditions/legal agreement).

Lothian Buses comment

The Transport Assessment refers to communication with Lothian Buses. Apart from a phone call with a member of our Commercial Department, Lothian Buses have had no communication with WSP. In particular we have not received either of the e-mails shown in the appendix which would suggest that the e-mail address used was incorrect. We are interested in discussing this matter further but have received no response to my e-mail to CEC of 26 June or follow up verbal requests.

Objection

The reasons for objection may be summarised as follows:

Ecology

- Thousands of newts have been killed over the course of developments (addressed in section 3.3d).
- Loss of bat colony (addressed in section 3.3d).
- Loss of breeding birds (addressed in section 3.3d).

Amenity

- The old fire road at the back of Hallcroft Park properties could allow public access to the back gardens and loss of privacy (addressed in section 3.3f).
- Change from the peaceful country park proposal to an adventure park and holiday village (addressed in section 3.3f).
- Concern at potential for anti-social behaviour and noise from the proposed on site residential accommodation and impact on neighbours (addressed in section 3.3f).
- More people will result in more noise and more traffic (addressed in section 3.3f).
- Disruption to peaceful village life (addressed in section 3.3f).
- Noise from zip wire/snowboarding jumping, MTB jumps (addressed in section 3.3f).
- Need to control operating hours (addressed in section 3.3f).
- Concern regarding site operations (addressed in section 3.3f).
- Impact of large scale lighting upon the character of the rural area and the local biodiversity (addressed in section 3.3d).

- Noise and light pollution (addressed in section 3.3e).
- Lack of information regarding proposed events (addressed in section 3.3e).

Traffic, Highway Safety and Access

- significant increase in traffic on the surrounding road network (addressed in section 3.3g).
- impact on the safety of cyclists and pedestrians (addressed in section 3.3g).
- concern for road safety at the area of the proposed access from the B7030 Newbridge to Wilkieston Road (addressed in section 3.3g).
- potential for significant car parking by visitors on residential roads adjacent to the site (addressed in section 3.3g).
- Mountain bike track needs control as possible conflict with dogs and walkers (addressed in section 3.3g).
- Concern regarding access from Wilkieston Road to the luxury lodges (addressed in section 3.3g).
- Concern for safety of children (addressed in section 3.3g).
- Further information required regarding the upgrading of the surrounding roads which are narrow country roads, particularly B7030 (addressed in section 3.3g).
- Public transport improvements are required (addressed in section 3.3g).
- Canal moorings may restrict passing vehicles (addressed in section 3.3g).

Non-material

- Concern regarding the ultimate ownership and lease arrangements of the site (for reassessment through the new legal agreement).
- No information regarding the supply of power and water to the facilities (not a planning matter).
- Given the history of the private developer of the adjoining Edinburgh International Climbing Centre eventually rescued from financial collapse by CEC and the Public Purse, that any consent to this proposal is insured against a similar potential demise in which case requiring full reinstatement of the country park at the Proprietor's expense (not a planning matter).
- Need to regulate the occupants of the extra accommodation (not a planning matter).
- Scheme has changed since the initial PAN consultation with the introduction of Zip wire and 31 luxury lodges and added features (proposal acceptable within the PAN regulations).
- There remains questions over accessibility to the public park beyond the “dawn to dusk” opening of the surf facility (hours of operation of the surf facility addressed by planning condition, the site will remain ungated and accessible 24 hours a day).
- Concern regarding safety of proposed fire pits.

Conclusion

The proposal complies with the Edinburgh Local Development Plan and the Council's non-statutory guideline. The proposal is a unique opportunity to reuse the redundant quarry, there is no impact on the setting of the Scheduled Ancient Monument, there are opportunities to enhance the biodiversity of the site and provide enhanced cycle and footpath connections. The design is of an appropriate standard. There are no material considerations that outweigh his conclusion.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. Notwithstanding the information submitted on the plans hereby approved, detailed planning permission must be sought for all the support buildings (including orientation building, HUB reception building, WETs building and Service Building), the recreation facilities (including the water sports facility, zip wire, ski and snowboard kicker, the tubing slide and ancillary structures), and the visitor overnight accommodation buildings (including lodge and pod buildings) shown on the proposed masterplan drawing reference 14048 L106 EOO. The total gross floor area of the buildings should not exceed 4500 square metres and the buildings should not exceed two storeys in height A.O.D.

The detailed application should include the following information:

- Height, massing, siting and ground floor levels.
- Design and external appearance of all buildings, roof form, open space, public realm and other structures.
- All operational aspects of water sports facility, open space and public realm.
- Existing and finished site and floor levels in relation to Ordnance Datum.
- Roads, footways, cycleways, servicing and layout of car parking and cycle parking provision in accordance with standards agreed within the approved layout; including an access management plan.
- Amendments of any treatment to adopted roads and footways.
- Surface water management, drainage arrangements, SUDs proposals and SUDs maintenance plan.
- All operational aspects and noise assessment of the commercial and business uses including details of servicing arrangements, opening hours, all external plant, machinery and/or ventilation, hours of deliveries and collections, inclusion of a site management plan; details should be provided which confirm that the ventilation will meet the relevant criteria.
- Waste management and recycling facilities.
- External lighting, including floodlighting and street lighting arrangements for the development.
- Site investigation/decontamination arrangements.
- Ecological studies including mitigation works to protect against any damage to protected species, bats, otters and badgers full details of the proposed centralised energy centre.

- Detailed soft and hard landscaping plan and levels around the proposed buildings.
 - A schedule of all plants to comprise species, plant size and proposed number and density.
 - Inclusion of hard and soft landscaping details including tree removal.
 - Landscape management plan including schedule for implementation and maintenance of planting scheme.
 - Any boundary treatments, including noise barriers.
2. Prior to the commencement of works a Construction Environmental Management Plan (CEMP) will be submitted to the Planning Authority for approval, in consultation with relevant Statutory Consultees. The CEMP will detail the procedures and methods to be followed to minimise any potential adverse effects of construction on the local environment relating to local air quality, noise and vibration levels, water resources, habitats and species, visual amenity and ground conditions. The approved CEMP shall include the mitigation methods set out in the Environmental Statement in 4.4.5 Table 4.1 and shall be adhered to by contractors working on the site.

Within the CEMP the following shall be carried out:

- a. A pre-construction survey of Great Crested Newts shall be undertaken prior to the commencement of works which will inform the requirement for any further consultation with SNH including licensing requirements or mitigation.
 - b. Prior to any tree felling the site should be pre-inspected for bats and necessary licence obtained.
 - c. A pre-construction survey of badgers shall be undertaken two months prior to construction, and should include a minimum of two weeks camera trap monitoring. This will inform the requirement (if any) for consultation with SNH to obtain licensing that allows disturbance of the sett during construction activities. The applicant is reminded that should the design of the proposed development further change any works located within 30m of the potential outlier sett must be reassessed by a suitably qualified ecologist at the earliest opportunity. An updated badger survey should be completed no more than one month prior to the commencement of works associated with the proposed development in the North West of the site.
3. Only the tree/s shown for removal on the approved drawing/s shall be removed, and no work shall be carried out on the remaining trees at any time without the approval of the Planning Authority.
4. The trees on the site shall be protected during the construction period by the erection of fencing, in accordance with BS 5837:2012 "Trees in relation to design, demolition and construction".
5. The approved landscaping scheme shall be fully implemented within six months of the surf facility becoming operational.

6. Construction details, specifications, including trade names where appropriate, of all proposed external materials shall be submitted to and approved in writing by the Council as Planning Authority before work is commenced on site. Note: sample panels of the materials are to be erected and maintained on site for an agreed period during construction.
7. Footpath and cycle-path connections from the development to the external networks to be provided, prior to the opening of the surf facility, generally in accordance with the approved planning drawings with specific connections to Hallcroft Park and the Cala Craigpark development where existing public transport connections are available.
8. The onsite overnight visitor accommodation hereby approved in principal, including camping pods and lodges, shall not be occupied until the surf facility is fully operational and open to the public.
9. Full details of fencing to the rear of the houses on Hallcroft Park, backing onto the reopening of the old cart road, shall be submitted to the Planning Authority for approval, and erected prior to the opening of that route.
10. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the developer and approved by the Planning Authority.

That approved programme of work should 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 developer.

11. Parking for a minimum of 58 cyclists (inclusive of both employees and visitors) shall be provided on site prior to the full operation of the surf facility. General cycle storage (short stay) should be covered and secure, located adjacent to the main entrances of the public buildings. Cycle parking for employees (long stay) should comprise secure, covered cycle storage situated close to the building(s) but preferably out of sight of the general public. Details shall be submitted for the approval of the Planning Authority.
12. Parking shall be provided in accordance with the approved planning drawings inclusive of disabled spaces which will constitute 8% of the total provision - 239 car parking spaces, 9 minibus parking spaces and 5 coach parking spaces.
13. i) Prior to the commencement of construction works on site:

- a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
- b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
14. The water sports facility, the zip wire, the ski and snowboard kicker and the tubing slide shall only operate between the hours of 8 am and 8pm.
15. The hub building shall be open between the hours of 08.00 and 23.00 hours only.
16. 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.

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, rooks and any communal roosts of starlings, woodpigeons, and corvids to nest, roost or loaf on the site, this includes buildings and trees. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gulls, rooks, starlings, woodpigeons and any corvid activity must be monitored on the site and all roofs checked regularly to ensure that these do not utilise the roof. Any of these birds 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.

17. 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.

Reasons:-

1. In order to enable the planning authority to consider this/these matter/s in detail.
2. To provide mitigation to any significant environmental residual effects arising from the development.
3. In order to safeguard protected trees.
4. In order to safeguard protected trees.
5. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
6. In order to consider these matters in more detail.
7. To encourage sustainable forms of transport to the site.

8. The level of accommodation proposed is only acceptable in the countryside as an ancillary element to the leisure facility.
9. In order to protect the privacy of adjoining neighbours.
10. In order to safeguard the interests of archaeological heritage.
11. To encourage alternative modes of transport.
12. In order to ensure that the level of off-street parking is adequate.
13. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
14. In order to safeguard the amenity of neighbouring residents and other occupiers.
15. In order to safeguard the amenity of neighbouring residents and other occupiers.
16. 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.
17. 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/>).

Informatives

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. 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.
3. 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.
4. The applicant will be required to enter into a suitable legal agreement covering the following matters, which take cognisance of this application and the previous 05/01229/FUL and 15/05021/FUL permission.
 - a) An agreed date for 100% completion of the park.

The agreement shall secure public access to the Country Park during daylight hours.

The agreement shall require the whole park site to be kept in one ownership subject to the same provisions as the existing S75 agreement for this site.

An obligation shall be made on the developer to ensure the maintenance of the park in perpetuity. This shall make reference to the Bond included in the previous applications.

b) The agreement shall require the submission and approval of a finalised Landscape and Habitat Management Plan which shall comply with BAA requirements for bird management and include a bird hazard management plan. It shall include tree retention details, planting proposals, habitat creation and protected species measures, as well as a schedule relating to the phased implementation and the maintenance of all landscape works. The LHMP shall be implemented and reviewed on a regular agreed basis by a specified Ecological Clerk of Works. The findings of the review shall be implemented as agreed.

c) A contribution of £444,689 towards the provision of a new footbridge/cycleway over the Union Canal to link the new development and the National Climbing Centre.

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. A parking management strategy shall be developed and submitted for approval by the Council. In association with this a proposal for monitoring the use of the car park to be developed and submitted to the Council for approval. The approved monitoring regime to be implemented for a period of 24 months from the opening of the development. All costs associated with the implementation of the management and monitoring of the car park to be met by the applicant.
7. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles, 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.

8. Electric vehicle charging infrastructure to be provided at a rate of 1 in every 6 standard car parking spaces (a minimum of 38). Slower chargers for long stay purposes should be served with 7Kw chargers with 70 or 50kW (125 Amp) DC with 43kW (63 Amp) AC unit made available for at least 10% of the total spaces provided. 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.
9. For the duration of the development, between the commencement of development on the site until its completion, a notice shall be displayed in a prominent place at or in the vicinity of the site of the development, readily visible to the public and printed on durable material.
10. The developer shall consult with the the BAA before erecting a crane on the site.

Advice from BAA is as follows;

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.

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/>)

11. No tree shall be felled during the bird breeding season (March -September) unless otherwise agreed in writing by the Planning Authority.
12. Geo-environmental Phase I and II reports would be required for the Building Warrant application.
13. Scottish canals should be consulted on bridge landings, lighting and signage strategy, water supply/drainage in to the canal. Third party works approval will be required through the Scottish Canals official process.
14. The canal is designated as a Scheduled Ancient Monument. Any work that affects a Scheduled Monument will require Scheduled Monument Consent from Historic Environment Scotland.

15. 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. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details.
16. The applicant is advised that the use hereby permitted relates solely to the watersports facility, the zip wire, the ski and snowboard kicker, the tubing slides and the tourist accommodation facilities. Public events, unrelated to these activities, may require a licence.
17. All proposed energy plant must comply with the Clean Air Act, details of required chimneys should be submitted at the detailed planning stage. Plant above 1Mw may require a secondary abatement technology. Biomass is not appropriate for this site.
18. Construction Mitigation
 - a) All mobile plant introduced onto the site shall comply with the emission limits for off road vehicles as specified by EC Directive 97/68/EC. All mobile plant shall be maintained to prevent or minimise the release of dark smoke from vehicle exhausts. Details of vehicle maintenance shall be recorded.
 - b) The developer shall ensure that risk of dust annoyance from the operations is assessed throughout the working day, taking account of wind speed, direction, and surface moisture levels. The developer shall ensure that the level of dust suppression implemented on site is adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.
 - c) Internal un-surfaced temporary roadways shall be sprayed with water at regular intervals as conditions require. The frequency of road spraying shall be recorded as part of documented site management procedures.
 - d) Surfaced roads and the public road during all ground works shall be kept clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping shall be recorded as part of documented site management procedures.
 - e) All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.
 - f) Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.

g) This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.

h) No bonfires shall be permitted.

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

The planning application and the Environmental Statement were advertised in the Edinburgh Evening News on 23 June 2017. 605 letters of representation were received. 563 letters of support, 35 letters of objection and 7 letters of comment.

Scheme 2

Additional information was received with respect to justification for the lodge accommodation, phasing programme, path hierarchy and access and tree details.

The application was re-advertised on 24 November 2017.

A further 74 letters of representation were received, 65 letters of support, 7 letters of objection and 2 letters of comment.

The reason for support are largely as scheme 1 with enthusiasm for the sports facility and suggestion that the development also include a skateboarding and pump track. Support has also been given to the impact of the Edinburgh economy.

A full assessment of the representations can be found in the main report in the Assessment Section. The comments from Ratho and District Community Council can be found in the consultation section.

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 designated as countryside in the Edinburgh Local Development Plan.

Date registered

31 May 2017

Drawing numbers/Scheme

1-4, 5a,6a,7a, 8-16, 17a, 18-24,

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Jennifer Paton, Senior Planning Officer

E-mail:jennifer.paton@edinburgh.gov.uk Tel:0131 529 6473

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy 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 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 10 (Waterside Development) sets criteria for assessing development on sites on the coastal edge or adjoining a watercourse, including the Union Canal.

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 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 11 (Special Landscape Areas) establishes a presumption against development that would adversely affect Special Landscape Areas.

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

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

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, parking, streets and landscape, in Edinburgh.

Appendix 1

**Application for Planning Permission 17/02471/FUL
At Craigpark Quarry, 1 Craigpark, Ratho
Outdoor leisure complex incl. water sport+training facilities
infrastructure,
access(pedestrian+vehicular),landscaping+ancillary
works(full planning permission), ancillary class 1
(retail)+class 3 (food+drink) uses, tourism accommodation
facilities (PPP).**

Consultations

Edinburgh Urban Design Panel

Summary

1 Recommendations

1.1 *In developing the design, the Panel supports the following aspects and therefore advocates that these should remain in the proposals:*

- o The emerging design concept and sensitive restoration of the landscape;*
- o Commitment of the design team to look beyond the red line of the application boundary, particularly to maximise landscape integration and access opportunities.*

1.2 *In developing the proposals the Panel suggests the following matters should be addressed:*

- o The broader inclusivity of the proposed facility and the need to reflect this in the proposed design, uses and activities on offer;*
- o Consider the character of the entire park in the further development of the landscape design proposals;*
- o Encourage the further development of the pedestrian and cycle network to maximise accessibility to all levels of the site;*
- o Promote the use of an architectural competition for the design of the individual buildings on the site;*
- o Further explore access and opportunities via the Union Canal;*
- o Promote sustainable design measures to minimise the carbon footprint of the development including renewable energy and the potential for hydro electric power generation.*

Main Report

2 Introduction

2.1 The proposal for review is the proposed development of a leisure complex including water sports and training facilities with ancillary retail and food and drink uses, tourist accommodation, infrastructure and landscape works at the former Craigpark Quarry, Ratho and West Edinburgh. These proposals were identified for consideration by the Panel due to the significance of the site and design issues raised, particularly those relating to the re-use and landscape restoration of the former quarry.

1.2 This is the first time that these proposals have been reviewed by the Panel

1.3 No declarations of interest were made by members of the Panel.

1.5 This report should be read in conjunction with the pre meeting papers which provide concept plans, sections and elevations these supported by contextual information and site analysis.

1.6 This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations who are represented at the Panel forming a differing view about the proposals at a later stage.

3 Project Concept

3.1 Overall, the Panel strongly supported the nature of the proposals and the emerging design concept.

3.2 The Panel expressed some reservation to the broader inclusivity of the proposed facility. It was noted that not all visitors will be there surfing and the facility should seek to offer an openness for the wider user also promoting the function of the space as one which is accessible to all. The project design should also further consider opportunities for integration with the Country Park and adjacent leisure facilities.

3.3 The Panel would strongly encourage the consideration of complementary activities, e.g. other watersports activities or educational opportunities as part of the development and these should be considered from the outset. The development of complementary activities could also help the overall viability of the proposals, and their relationship with the existing Edinburgh International Climbing Arena (EICA) and Union Canal.

3.4 The Panel strongly encouraged the notion of a 'living or outdoor classroom' to promote educational opportunities.

3.5 The Panel noted that the adjacent Bonnington Quarry to the south is due to be re-enacted in the near future. The Panel expressed concern regarding the potential impacts arising of dust and noise and whether these could have a detrimental impact to the proposals. The implications of the re-opening of the quarry and requirement for mitigation should be further considered.

4 Landscape Design

4.1 The Panel welcomed the restoration of the denuded landscape from previous quarry function and the landscape restoration to create a Country Park. The Panel were also encouraged by the commitment of the design team to looking beyond the red line of the application boundary, particularly to maximise integration of the proposals with the surrounding landscape and to promote alternative access routes immediately outwith the site.

4.2 The Panel noted the intention to implement previously approved landscape restoration proposals for the site. However, the Panel felt that this should not inhibit the overall landscape design approach with the character of the whole park being taken into consideration not just the original country park. The Panel remarked that the landscape restoration undertaken to date has largely been engineering based. In view of this, the Panel would encourage the use of more 'playful' land forms and a more informal landscape design approach. The Panel welcomed the re-use of the quarry features as part of the design approach, although the further use of softer material treatments would also be encouraged.

4.3 The Panel commented on the relative tightness and enclosed nature of the site. The visual containment provided by the cliff faces and surrounding land levels give the impression of isolation but it is not apparent how the presence of the housing development adjacent will affect the character of the site. The Panel felt that further consideration should be given to land forms across the site to maintain the visually isolated and rural character of the site.

4.4 The Panel commented on the design approach for fencing and boundary treatments, which could greatly impact upon the landscape character of the site. Other forms of protection measures including ha-ha's and defensive planting would be strongly encouraged. All fence lines should be clearly illustrated as part of the overall landscape design approach.

4.5 The Panel noted that the central SUDS facility already in place through previous permission. However, the further use of reed beds could promote the wider biodiversity of the site.

4.6 The Panel noted that proposed camping facilities these would comprise camping pods in managed areas with opportunities for informal 'wild' camping in other parts of the site. Camping would be tented and would not include motor homes. The Panel recommended that the location and design of facilities to support camping, including sanitation facilities and possible security measures should be further considered to ensure good integration with the landscape.

4.7 The Panel welcomed the proposed use of soft landscape treatments akin to a country park rather than an area of hard-standing.

5 Architectural Design

5.1 The Panel noted that a number of structures are proposed adjacent to the beach area, to the north eastern side of the wave pool. These would provide a 'Hub' to accommodate changing facilities, ticketing, café and retail. A further building to accommodate plant would be situated to the southern end of the wave pool. A building to provide Park Ranger facilities has previously been consented to the south east corner of the site.

5.2 The Panel noted that it was intended to take design cues from the previous industrial activities on the site and agreed that these influences could offer very different dynamics, e.g. a softer landscape based approach or an 'edgy' industrial aesthetic.

5.3 The Panel urged the design team to consider about 'pushing the boundaries' and exploring 'alternative' design solutions. In order to deliver such aspirations, the use of an architectural competition for the design of individual buildings was strongly encouraged by the Panel.

6 Accessibility and Connectivity

6.1 The Panel expressed some concern regarding the accessibility of the proposed facility, with the existing EICA not particularly accessible in view of the relatively limited public transport serving the area. The patronage of the facility is therefore likely to be car based. However, the Panel commented that the presence of the Union Canal and the development of existing bus routes could improve the accessibility and in turn the viability of the facility.

6.2 The Panel noted that the nearest bus stops to the site are located at Wilkieston Road or Hallcroft Park to the east, approximately 500 metres distant. The frequency of existing bus services are poor, particularly in comparison to other part of the city, and could not be easily extended into the site. However, the project proposal should seek to promote the most direct walking route to the nearest bus stops.

6.3 The Panel felt that the Council should seek to promote public transport accessibility to the site through a Section 75 agreement. To support this aim, the Panel suggested that a shuttle bus service could be trialled to Ingliston P&R and the tram route.

6.4 The Panel commented that the draw of the facility would not only be citywide, but also regional and national. In view of this, the Panel enquired whether, as part of the wider promotion of the facility, incentives could be offered to discourage car use.

6.5 The Panel welcomed the notion of 'one way' canoe or cycle hire along the Union Canal from the Lochrin Basin. This could enhance access possibilities from Edinburgh City Centre to offer an exciting proposition and should be explored further.

6.6 The Panel noted that the bridge proposal to link the site with the EICA and Union Canal cycleway to the north was previously identified as part of Section 75 agreement for housing development to the north east of the site with potential funding support from Sustrans. The feasibility of this proposal is currently being further considered. The Panel also commented on the pronounced level difference between the two sites. The requirements of the Equality Act would require the bridge approaches to be ramped.

6.7 The Panel enquired to the proposed car parking arrangements and to whether these would need to be larger than the existing Country Park facility. The nature of the operation would see steady usage of the facility throughout the day with surfers booked into particular slots. The requirement for additional parking provision would need to be further considered as the project develops.

6.8 The Panel noted that the proposed network of paths would largely reflect the consented Country Park scheme. However, the Panel would encourage further development of the pedestrian and cycle path network to maximise accessibility to all levels of the site.

7 Sustainability

7.1 The Panel noted a range of sustainable design measures currently being considered as part of the project including the use of renewable power sources for the wave maker plant and re-use of existing rock within the site in the development of landscape features. However, the Panel would further encourage the use of measures to minimise the carbon footprint of the development, including renewable energy and the potential for hydro-electric power generation.

Archaeology comment

The proposed development site occupies the site of the former late Victorian Craigpark Quarry and is bounded to the north by the Union Canal (a Scheduled Ancient Monument). Quarrying activities to the north of the canal and the insertion of the M8 extension in the 1990's have revealed significant prehistoric burial remains along with Anglian occupation of the 7-9th centuries AD.

Although the site has been significantly impacted upon by the quarrying activities, the NW corner of the site contains an area of high ground which may have been relatively unaffected and as such may be regarded as having archaeological potential. Further, the effects of the site on the bordering Scheduled Ancient monument must be considered Accordingly this application must be considered under terms the of Historic Environment Scotland's Policy Statement (HESPS) 2016, Scottish Planning Policy (SPP), PAN 02/2011 and 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.

As stated the development will largely be contained within the former quarry site already subject to recent landscaping works, in areas with no archaeological implications. However, the NW corner of the site contains an area of high ground which appears not have been significantly impacted upon by the operation of the quarry. The plans indicate landscaping and new paths in this area. Given the occurrence of prehistoric burials in similar locations during quarry of the sister site on the north side of the canal there is a low possibility that such significant remains survive in this location. Accordingly, it is recommended that a programme of archaeological work is undertaken prior too/ during to development in this area in order to fully excavate, record, analyse any significant remains that may be disturbed.

In terms of the impacts upon the Union Canal. It is considered that there are no significant impacts upon either its setting nor physical remains by these proposals. However as works affecting this scheduled monument will require consent, HES must be consulted.

It is recommended that the following condition is attached if consent is granted to ensure that this programme of archaeological works is undertaken.

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

The work would 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.

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 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

This proposed development will be fed from Newbridge Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water.

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.

We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

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 nondomestic 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/our-services/compliance/tradeeffluent/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.

Waste Services comment

If this development is purely commercial then there is no need to agree waste strategy with us.

As this is a commercial development, the Council will not be the provider of waste management services to this property. 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 would need to be storage space off street for segregated waste streams arising from commercial activities. Depending on the size and use of the property it may also be that they are required to segregate other streams such as fluorescent lamps, batteries and electrical equipment as well.

It would be the responsibility of any third party commercial organisations using the site to source their own trade waste uplifts.

Building Warrant comment

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

Scottish Canals comment

We are pleased to see this exciting visitor attraction come forward for this canalside site. The unique facility will help to bring new visitors and appeal to the area. Generally, the proposals look well considered and appropriate to their setting.

The canal offers the site an attractive waterside setting which we are keen to see celebrated and enhanced with treatment appropriate to its heritage and character. This will help to ensure that the Union Canal, a Scheduled Monument, continues to thrive and be enjoyed by future generations to come. Scottish Canals seeks to work in partnership with the Council with a view to ensuring delivery of canalside improvements which are supported by the Edinburgh Union Canal Strategy in developing opportunity for tourism, business and community resource.

- 1. For any work occurring adjacent or on Scottish Canals Land, the developer is obliged to seek our Third Party Works Approval through our official process. This can be found at: <https://www.scottishcanals.co.uk/corporate/our-estate-works-planning/third-party-works/>*
- 2. The canal is designated as a Scheduled Monument. Works that affect a Scheduled Monument may need Scheduled Monument Consent from Historic Environment Scotland.*
- 3. The canal is used by protected species, such as bats and otter. A Phase 1 habitat survey or a protected species report should be considered.*
- 4. We are pleased to see the full integration of the canal edge into the scheme design with proposals to encourage people to enjoy the waterside environment. The detail of this requires agreement with Scottish Canals to ensure the continued operation and navigation of the canal and Historic Scotland for Scheduled Monument consent. It will require refinement to allow for moorings and operation purposes and we will be able to liaise and develop with the applicant on this at the appropriate stage through our Third Party Works procedure.*
- 5. We note that the proposals may require water supply/ drainage into the canal from the basin. This is subject to our separate agreement with the applicant.*
- 6. It is noted that the masterplan includes the potential new footbridge across to the climbing centre which is being looked at by the City Council. We would be supportive of this new connection and look forward to details in due course. At this stage adequate space for bridge landings should be allocated to allow future delivery.*

7. *Lighting - it would be good to see details of the proposed lighting scheme as this is brought forward. There will be requirement to provide appropriate lighting to the canal edge for safe access, etc. It would also be appropriate to see enhancement of lighting to the existing bridge across to the climbing centre and improved path lighting into the village to facilitate use by the local community. We would welcome involvement in a signage strategy to enhance local navigation.*

Economic Development comment

Edinburgh's economic strategy, "A Strategy for Jobs 2012-17" aims to achieve sustainable economic growth through supporting the creation and safeguarding of jobs in Edinburgh. A key element of delivering jobs-driven economic growth is the provision of an adequate supply of workplaces.

Commentary on existing uses

The area in question is a brownfield site which is a former quarry; the quarry ceased operating in the 1990s. There is an existing permission in place for this site to become a country park. The site is currently disused and supports no jobs.

Commentary on proposed uses

Leisure Complex

The main portion of this application covers the creation of a unique to Scotland leisure complex in the form of a "Wavegarden" creating a synthetic wave for surfers, and other sports, to learn, practice and compete.

The applicant has attached an economic impact statement, using similar methodology to that which the Economic Development Service uses, regarding this use as it is not comparable to other uses in Edinburgh. The economic impact statement outlines that there will be 46 permanent jobs created at the complex, temporarily increasing to 52 in the high season. Taking the Scottish Government multipliers into account the development has the potential to create 15 additional jobs in Edinburgh via the effects of supply chain expenditure and expenditure by employees, taking the total number of permanent new jobs to 61. As the average GVA added per employee in the arts, entertainment and recreation sector of Edinburgh is £13,334 (2014 prices) these jobs have the potential to create an additional £613,364 in GVA for Edinburgh per annum, increasing to £813,374 once multiplier effects are taken into account.

The creation of this new attraction in Scotland has the potential to add to the existing tourist attractions in the Edinburgh city and region and the Economic Development Service acknowledges this potential to contribute to the economy in this way. The potential to host additional competitions in the city would also add to the economic impact of this development, albeit for short periods. The applicant's statement estimates visitor numbers will reach 155,000 after year five. While there are no directly comparable facilities in Scotland, the Nevis Range has recorded 150,865 visits¹ in 2009 and could be a comparable venue due to the seasonal increase in visitors from skiing, even though there are other ski facilities in Scotland. We would not be able to confirm that these visitors are solely travelling to Edinburgh to use the Wavegarden and could be counted as additional.

Of the 155,000 visits per annum it is estimated in the provided Economic Impact Statement that 26% (40,300) will be users who are not local to Edinburgh. The average visitor spend in Edinburgh is £92. Assuming these figures, after year five, the centre has the potential to support £3.7m of additional visitor expenditure in Edinburgh annually, supporting new jobs in the tourism sector. Based on average visitor spend profiles, it is anticipated that 38% (£1.4 million) of this expenditure would be on accommodation (part of this figure could reasonably be assumed spent within the Wavegardn complex) while 62% (£2.3 million) would be in the wider economy on eating and drinking; shopping; entertainment; and travel and transport.

The site itself is adjacent to the Union Canal and connections to this asset are encouraged by the Economic Development Service in line with the Edinburgh Union Canal Strategy. The applicant refers to the Union Canal Strategy in their application and we welcome their ongoing engagement with Scottish Canals to utilize connections with the Union Canal while protecting the sites heritage.

Ratho is already the location of the Edinburgh International Climbing Arena (EICA) and connections between the EICA, Union Canal and the Wavegarden has the potential to create an outdoor pursuits hub. The benefits of the proximity to these existing uses has been acknowledged in the application.

Class 1 (retail), Class 3 (food and drink), Accommodation

The application contains an element of retail, food and drink and accommodation services, however the jobs associated with these uses have been included as part of the wider job creation figure submitted by the applicant.

Summary response to consultation

The site currently does not support any jobs and creating a leisure complex on this area would benefit Edinburgh through jobs created. Developing this site has the potential to create 61 in Edinburgh and the surrounding area with the annual contribution to the economy being estimated as £813,374.

The estimated visitor number of 155,000 after year five, the figures in the lead up to this are not provided but it could be assumed that they would increase on a gradual scale. These visitors would also contribute to the wider Edinburgh economy though additional spend on accommodation and food on and off site as part of their trip which has the potential to generate an additional £3.7m of visitor expenditure in Edinburgh.

As the site is currently economically inactive the job creation and additional GVA associated with the development would be of greater benefit to Edinburgh than the undeveloped site.

Economic Development comment - Economic Benefits Statement

This response is specifically with regard to the development of accommodation comprising 31 lodges and associated economic impact statement submitted by the applicant as part of an outdoor leisure complex within a country park.

An original response by Economic Development dated 27 June 2017 was submitted on the basis of the proposed overall complex and associated economic impact statement covering the full site.

Edinburgh's economic strategy, "A Strategy for Jobs 2012-17" aims to achieve sustainable economic growth through supporting the creation and safeguarding of jobs in Edinburgh. A key element of delivering jobs-driven economic growth is the provision of an adequate supply of workplaces

Commentary on existing use

The area in question is a brownfield site which is a former quarry; the quarry ceased operating in the 1990s. There is an existing permission in place for this site to become a country park. The site is currently disused and supports no jobs.

Commentary on proposed uses

The application covers the creation of a unique to Scotland leisure complex with associated class 1 (retail), class 3 (food and drink) and on-site accommodation. The leisure complex aspect involved the creation of a "Wavegarden", or synthetic wave for surfers, and other sports to learn, practice and compete.

The original economic impact statement submitted covering the full site outlined that there will be 46 permanent jobs created at the complex, temporarily increasing to 52 in the high season. Taking the Scottish Government multipliers into account the development has the potential to create 15 additional jobs in Edinburgh via the effects of supply chain expenditure and expenditure by employees, taking the total number of permanent new jobs to 61. As the average GVA added per employee in the arts, entertainment and recreation sector of Edinburgh is £13,334 (2014 prices) these jobs have the potential to create an additional £0.61 in GVA for Edinburgh per annum, increasing to £0.81m once multiplier effects are taken into account.

The original application contains an element of accommodation services, however the jobs associated with these uses have been included as part of the wider job creation figure submitted by the applicant.

Commentary on proposed lodge accommodation

The latest economic impact statement deals specifically with the lodge aspect of the proposed accommodation for the site. As in the initial economic impact statement provided, the applicant again uses similar methodology to that which the Economic Development service uses.

It is proposed to develop 31 lodges, consisting of 15 two-bedroom lodges (sleeping four people) and 16 three-bedroom lodges (sleeping 6 people). This would provide 156 beds across the lodge accommodation, with a potential 59,940 bed nights available (number of beds x 365 days in a year).

The economic impact statement submitted by the applicant estimates that the lodges would support 6 FTE jobs which is a reasonable assumption for this type of accommodation. This could provide gross value added (GVA) of £0.16m based on 'accommodation' classification at 2015 prices. Once multiplier effects are taken into account the lodges could support 7.8 FTE jobs and provide a GVA of £0.23m.

It should be noted that the estimates for employment and GVA were included within the Economic Development response to the original economic impact assessment for the proposed development of the whole site. The calculation of jobs supported and potential GVA of the lodges aspect of accommodation were included within this and therefore the figures supplied above are not in addition. This would be with the caveat that the calculations on the whole site were based on the information provided by the applicant and using the overall general classification of the site as 'arts, entertainment and recreation' and not breaking down the individual different components of the site such as by different accommodation, catering, leisure, etc.

Of the applicants projected 155,000 visits per annum it is estimated in the provided economic impact statement that 26% (40,300) will be users who are not local to Edinburgh. The average visitor spend in Edinburgh is £92. Assuming these figures are achieved, after year five the centre has the potential to support £3.7m of additional visitor expenditure in Edinburgh annually, supporting new jobs in the tourism sector. Based on average visitor spend profiles, it is anticipated that 38% (£1.4 million) of this expenditure would be on accommodation with some of this reasonably assumed to be spent within the Wavegarden complex) while 62% (£2.3 million) would be in the wider economy on eating and drinking; shopping; entertainment; and travel and transport.

As calculated above the proposed lodges would have 56,940 bed nights available. VisitScotland figures state that the annual average self-catering unit occupancy rates for Edinburgh & Lothians is 68% (2016 figures¹). Applying this average to bed nights gives 38,719 bed nights for the proposed lodges and therefore daily visitors. The caveat here is assuming a lodge unit is booked at full occupancy, though of course this may not necessarily be the case depending on group size for a booking. As these are visitors staying on site, the 38% accommodation component can be subtracted from the £92 average daily visitor spend. This means daily visitors would each spend an average of £58 in the wider economy, (£2.25m) with some of this likely spent on the Wavegarden site facilities.

Summary response to consultation

The site currently does not support any jobs and as per the initial Economic Development response creating a leisure complex on this area would benefit Edinburgh through jobs created. Developing this site has the potential to create 61 FTE jobs in Edinburgh and the surrounding area with the annual contribution to the economy being estimated as £0.81m.

Within the proposed development are plans for 31 lodges supporting an estimated 7.8 FTE jobs and providing a GVA of £0.23m. These figures are a component part of the jobs supported and GVA provided for the overall leisure complex, and not in addition. The lodges provide a potential 59,940 bed nights and at an annual average self-catering unit occupancy rate of 68%¹, this would be 38,719 bed nights assuming full occupancy of a lodge unit per booking. Daily visitors using the lodges would potentially spend an additional £2.25m in the wider economy, which would in turn support creation of further jobs in Scotland.

As the site is currently economically inactive the job creation and additional GVA associated with the lodges would be of greater benefit to Edinburgh than the undeveloped site.

SNH comment

We note the illustrative proposals and the likely range of impacts to existing site conditions, including substantial areas of cut and fill to accommodate the proposals. However, while acknowledging these likely impacts we broadly welcome the approach adopted to site layout and detailed design.

As currently proposed we recognise that the project seeks to work with and enhance the natural features of the site, including existing areas of habitat and prominent rock features. From SNH's perspective, if suitably implemented to high standards, and maintained thereafter, the project has the potential to improve access to and enjoyment of the natural heritage. This relates to the proposals within the application area but also in terms of providing positive habitat and public access linkages to the wider area.

Delivery of Habitat Protection and Proposed Landscape Works

We advise that the accommodation of the built development proposals within a naturalistic landscape setting will rely on a detailed and combined approach to the retention and protection of existing habitats, along with the successful delivery of the proposed landscape works.

We advise that all areas of habitat retention are suitably identified through drawings and protected on site from any construction impacts. We note and welcome the red line around the existing woodland listed in the Scottish Semi-Natural Woodland Inventory and advise that the proposals for protection and future enhancement of this site asset should be secured through further detailed proposals.

We also highlight that there are significant areas of new planting set out in the masterplan and associated detailed and softworks drawings and other areas. In particular, we note the strengthening of the perimeter woodland planting which could deliver wider landscape and habitat benefits.

While there are as yet no detailed planting specifications for such areas we broadly welcome the approach to planting layout, as set out in the 'softworks' drawing. This illustrates the proposals will predominantly utilise native species. We would recommend that further detailed plans and specifications, in line with the submitted layout proposals, are produced prior to commencement of the project.

Landscape and Habitat Management Plan

We consider the successful delivery of a natural setting for this development over the longer term will to a large extent rely on how the site is maintained and managed. We would therefore recommend that a Landscape and Habitat Management Plan is secured through any proposed consent to ensure appropriate maintenance of the existing habitats and proposed landscaping. We would advise that sufficient financial commitment towards the delivery of management proposed should also be evidenced and secured. A Landscape and Habitat Management Plan will also support the relatively intimate and amphitheatre impression to the Wavegarden and help to realise the 'garden' aspect of the proposal.

Access rights and responsibilities

We note and welcome path and access proposals within and connecting to outwith the application area.

In recognising the planning history of the site and the existing nearby housing, we would be supportive of a clearly defined approach to promoting public access in relation to the application area. We would suggest that an access management plan could be the most appropriate means for achieving such clarity over the longer term.

We do however advise that you consult your Council's Access Officer to ensure appropriate measures related to the access rights and responsibilities for the site.

Protected species

We note the updates in Section 4.4.5 of the Environmental Statement on the protected species recommendations set out in the Technical Report, Wavegarden, Edinburgh, Extended Phase 1 Habitat Survey (WSP, February, 2017). We recommend that the mitigation measures set out in Table 4-1 are fully considered.

SNH further comment

While we do not consider the further information and changes to the development proposal substantially alters the SNH advice on this application we wish to maintain our position on much of our previous advice particularly that important details relating to the site, its accessibility and management, should be provided. These matters are highlighted below.

Public Access

We note that an access management plan has not been submitted as part of the further information. We therefore remain uncertain on proposals for public access management. We strongly advise that such information is produced to clearly illustrate areas where statutory access rights are to be maintained and areas where they are to be withdrawn.

Details of how public access will be managed should also be provided, including the design and location of any proposed fencing or other security measures. We note that fencing is mentioned in the note from the Edinburgh Urban Design Panel but we cannot locate information on this important part of the application. We would highlight that fencing and gates to the development has the potential to impact adversely on both public access and wildlife movement but there may be means to reducing adverse effects through well considered design approaches.

Delivery of Habitat Protection and Proposed Landscape Works

We welcome further information regarding protection of existing woodland listed in the Scottish Semi-Natural Woodland Inventory and further details of planting in areas that are central to the site. We would recommend that all such works should be secured as the Council sees fit, through the use of planning conditions or legal agreements.

Landscape and Habitat Management Plan

We maintain our advice that a Landscape and Habitat Management Plan should be provided in order to secure the stated ambitions for the successful delivery of a natural setting for this development over the longer term. We consider this an important aspect of the overall proposal and we would advise that sufficient financial commitment towards the delivery of management over the longer term should also be evidenced and secured.

Given the requirements for a Bird Hazard Management Plan as set out by Edinburgh Airport, including maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow we would advise that there is merit in understanding in advance the effect that such requirements will have on the overall development, the scope for additional planting to be delivered and its ability to produce a natural setting and screening of built proposals. We would therefore suggest there is merit in securing such information in advance.

Finally, we would like to reiterate that full consideration be made on all potential impacts on protected species.

SNH further comment

SNH has been contacted by members of the public concerned about the proposal impacting on protected species including great crested newts. However, we are reassured by the protected species surveys carried out to date that the proposal's potential impacts on protected species have been fully considered to date and that negative impacts are unlikely.

Nevertheless, we advise that the mitigation measures outlined in the Environmental Statement (Table 4-1) and detailed in the Protected Species Report (WSP, August 2017) be conditioned if your Council is minded to grant consent to the proposal i.e. CEC could conclude on the application with a view to further surveys being carried out prior to the commencement of works, as detailed in these reports.

ScotWays comment

Although we do have an interest in a nearby path (LC35, the Union Canal towpath) which may be affected by this development, that particular path is also designated as a Core Path in the City of Edinburgh Council's Core Paths Plan, as well as being part of the National Cycle Network. As such, if you have not already done so, we recommend consulting CEC's own Access Officer, Martin Duncan. Additionally, as the new non-vehicular bridge link to EICA shown on the Masterplan drawing is labelled as a footbridge, it may be relevant to consider whether this is sufficient provision.

ScotWays further comment

The National Catalogue of Rights of Way shows LC35 may be affected by a proposed "new footbridge to EICA" shown on the Masterplan. LC35 is not recorded as a right of way, instead it is listed as an "other route". However, as LC35 is the Union Canal Towpath, it is a well-used and widely promoted recreational resource. The Forth-Clyde/Union Canal Towpath has been designated as one of Scotland's Great Trails by Scottish Natural Heritage and it also forms part of the National Cycle Network's route 754. For reference, in the vicinity of the site, LC35 (Union Canal Towpath) runs on the north side of the Union Canal which is itself marked on the Masterplan on the northern boundary of the site.

As there is no definitive record of rights of way in Scotland, there may be routes that meet the criteria to be rights of way but have not been recorded as they have not yet come to our notice.

You will no doubt be aware there may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. We strongly recommend the Core Paths Plan, prepared by the Council's own access team as part of their duties under this Act.

With reference to the Masterplan, we are concerned that the new link from the proposed development to the adjacent off-road network is labelled as a footbridge. Whilst this would appear to be a welcome link, as the bridge connects the proposed outdoor leisure complex (which includes a mountain bike skills track) to the National Cycle Network, it is seemingly an oversight that provision isn't being made for usage by cyclists, or indeed any non-vehicular access takers other than solely pedestrians. The Masterplan also appears to imply that the bridge is to be delivered by the City of Edinburgh Council rather than forming part of this application and being provided by the applicant. As such, we must submit a holding objection to this application on the grounds of apparent insufficient provision for non-vehicular access to the site.

If there is additional documentation available online regarding public access, in particular anything relevant to the above identified concern, we will be pleased to have this brought to our attention. We recommend that any proposed improvements to the local recreational access network are discussed with the Council's access officer. We further suggest that any agreed improvements are secured via a condition of planning consent.

As the planned development is adjacent to LC35 and may include a component directly affecting the route, the Society requests that LC35 remains open and free from obstruction before, during and after construction of the proposed development, if consented. Where temporary closure is deemed necessary for safety reasons, this should be for as short a period as possible and should be clearly signposted - an alternative route should also be made available where practicable. We anticipate that any necessary closures would take place through close liaison with the Council's access officer.

ScotWays further comment

Thank you for flagging up the additional and revised drawings submitted regarding planning application 17/02471/FUL. As these do not appear to address the concerns raised in our letter of 28/07/2017, we continue our holding objection.

Scotways further comment 27 March 2018

Thank you for the update regarding the Craigpark Quarry planning application. We'd be content to remove our objection provided the proposed non-vehicular access bridge is secured through a planning condition. This is to ensure that there is adequate non-vehicular access (including cyclists, wheelchair users, pushchairs etc) to the development. The connecting ramp from the Union Canal towpath is an integral part of any such provision. It is not clear whether the proposed bridge will be available to horse-riders, however we suggest that this should be a consideration as we understand there is equestrian use of the towpath.

SportScotland comment

We note that sportscotland is not a statutory consultee with regard to this proposal, and so any comments we offer are advisory only.

As noted at the pre-application stage, we recommend that the applicant engages with the relevant Governing Bodies to ensure that any development meets the needs of the sport.

HES comment

Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our advice on the current proposals

We note that the project comprises the elements as laid out in Figure 2-1 of the Environmental Statement. We are content that the proposals for the current stage of this project as shown in this figure are not likely to have significant impacts on our interests. We therefore do not object to the planning application.

Our advice on the future proposals

We note that design and access statement and masterplan documents identify future development along the scheduled monument known as Union Canal, Fountainbridge to River Almond (SM 11097). This includes 14 narrowboat moorings, and a bridge connection from the country park to the Edinburgh International Climbing Area and canal towpath.

These future proposals have the potential to have significant impacts on the scheduled monument, and its setting. We would need further, detailed information on both the proposed moorings and bridge to come to a view on the level of impact. We strongly recommend that pre-application consultation is undertaken with us before a formal planning application is submitted.

The proposed moorings, and potentially the bridge crossing, will have a direct impact on the scheduled area of the canal.

For information, these works would therefore require scheduled monument consent (SMC), separate to any planning permission. This consent is administered by Historic Environment Scotland. Works on scheduled monuments should normally be the minimum necessary to conserve the important features of a monument. The applicant should therefore seek pre-application advice from HES on this issue, using the following email address hmenquiries@hes.scot.

Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object. However, our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Environmental Assessment comment

The site is located to the west of the village of Ratho, west of Edinburgh. The site is bounded to the north by trees, shrubs and the Union Canal; to the west by agricultural land; to the south by Bonnington Quarry and to the east by Ratho village. The Edinburgh International Climbing Arena (EICA: Ratho) is located to the north, beyond the canal. The site is currently accessed from Wilkieston Road.

The Applicant plans to submit an application for an outdoor leisure complex including water sport and training facilities with ancillary Retail and Food and Drink uses and tourism accommodation facilities e.g. self-catering lodges and campsite, infrastructure, access (pedestrian and vehicular), landscaping and ancillary works. The indicative masterplan of the site includes up to 250 parking spaces, camping platforms, camping pods, camping facilities block, meadow areas, footpaths, viewpoints, water sports area (the cove), tower and viewing platform, the Hub and Wets buildings.

Noise

The applicant has identified the nearest sensitive receptors being the residential properties immediately to the east of the site boundary, Ratho Mains (660 m to the east of the Proposed Development). The applicant will need to assess the impacts on the newly constructed cala homes that are juxtapose the proposed development site.

The applicant will need to provide details on where all the proposed uses will be located including specific use classes. The noise impact assessment will need to take into consideration the worst-case scenarios for each use. For example, the outdoor leisure complex including water sports should include possible jet ski motorboat hoover craft noise. The noise impact assessment will need to demonstrate how noise will be inaudible with the neighbouring residential uses.

Details of the food and retail uses will need to be assessed with proposed hours of operation, operational noise, plant and servicing noise all assessed to ensure that its inaudible within the neighbouring residential properties.

Self-catering lodges and camping pods may be a cause for concern on a site like this as it is likely they would be used by large groups for example stag and hen parties. The noise impact assessment will need to consider this. The applicant should also be aware there is an active quarry to the west of the proposed site where blasting will regularly occur.

Construction phase noise will need to be carefully planned as blasting may be required, any noise impact assessment will need to detail where when and what blast techniques will be used during construction.

The noise impact assessment will need to provide specific details of any required mitigation measures. Locations of mitigation measures will need to be shown on plans submitted with drawing numbers.

Local Air Quality Impact Assessment

Due to the size scale and number of proposed car parking spaces the applicant must provide an air quality impact assessment. Any proposed energy centres must also be considered in the air quality impact assessment. The applicant should be advised that Environmental Protection shall not support the use of biomass. All these issues must be incorporated into the air quality impact assessment including nearby committed developments. The air quality impact assessment must be provided at the PPP stage if this is submitted. The provision of at least 1 Electric Vehicle (EV) "rapid charge" point per 10 car parking spaces of commercial floor space.

Where development such as this generates significant additional traffic, provision of a travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety.

Typical measures that may be considered to offset emissions include:

- o Support and promotion of car clubs EV chargers;*
- o Contributions to low emission vehicle refuelling infrastructure;*

- o *Provision of incentives for the uptake of low emission vehicles;*
- o *Provide rapid chargers specifically for Taxis*
- o *Improvements to cycling and walking infrastructure.*

We would advise using the air dispersion model ADMS-Roads for assessment purposes, it should be noted that we do not accept DMRB models. The model should consider current year and the year of opening both with and without development to ensure for all scenarios that the National Air Quality Objectives are met.

Use existing diffusion tube data to verify the model (we can provide this data if required). On request, we may also be able to provide you with the most up-to-date annual average NO2 concentration for this location for validation purposes.

Environmental Protection encourage the applicant to keep parking numbers to a minimum and make provisions for electric vehicle (EV) charging throughout the development. Environmental Protection also advised the applicant that any proposed energy centres must comply with the Clean Air Act 1993 and that Environmental Protection will not support the use of biomass.

The applicant will need to consider the impacts the construction phase will have on the neighbour residential properties. Mitigation measures will need to be detailed in the assessment.

Odours

The applicant will need to provide specific details on where the flues will be located serving the commercial cooking operations. The flue will need to terminate at roof level the system will need to be capable of achieving 30 air changes per hour. The applicant must provide plans and elevations showing exactly where the plant will be located.

Contaminated land

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable)

Environmental Assessment further comment

Environmental Protection provided the applicant with pre-planning advice regarding a proposed application for: the erection of an outdoor leisure complex including water sport and training facilities with ancillary (class one) retail and (class three) food and drink uses, tourism accommodation facilities (e.g. Self-catering lodges and campsite), infrastructure, access (pedestrian and vehicular), landscaping and ancillary works. Following on from this is this detailed planning application.

Environmental Protection advised that any detailed application would need to be supported with a detailed noise impact assessment and air quality impact assessment covering construction and operational phases. The applicant has provided details on the construction and operational phase noise and local air quality.

The site is located to the west of Ratho, within the former Craigpark Quarry. The land use surrounding the development site to the west and east is agricultural, with residential to the north-east mining to the south and the Edinburgh International Climbing Arena located directly to the north over the Union Canal.

The applicants noise impact assessment has advised that the proposed facility will be operational for only 9 months of the year with it being closed between December and February. The applicant has advised that the proposed hours of operation will be split between two seasons June to August 08:00 to 22:00 hours with the remaining operational months being open 10:00 to 20:00. The applicant has advised that they would be willing to accept a condition controlling the hours of operation. Therefore, Environmental Protection shall recommend a condition restricting the hours of use.

The applicant has highlighted that the main activity area proposed are mainly concentrated in the basin area of a former quarry, which is approximately 30m below the perimeter of the site. The majority of operational activities will take place in this area and nearest residential properties will be shielded from operational noise to a significant degree.

The applicants supporting noise impact assessment has provided detailed operation noise models for the proposed Zip Wire, plant used for wave machine and the surfing area activities. The assessment has included taking measurements from these actual activities taking place at other locations. The applicant has then modelled these events against the development site cumulatively. The model advises that no significant noise impacts are expected at the neighbouring sensitive receptors. The applicant advises that this is due to the distance between the receptors and any noise-generating activities, and the noise levels of equipment will also be minimal.

The applicant had originally provided a summary of events that they proposed being held on the site including:

- o Surf competitions*
- o Night surfing event*
- o Official launch of the new Olympic Team GB Surfers, Climbers and Ski and Snowboard teams ahead of Tokyo 2020*
- o Chilled live music*
- o Winter/Christmas markets*
- o Farmers markets*
- o Summer outdoor cinema nights*

These activities are likely to have an adverse impact on the residential amenity however the applicant has advised that they are willing to accept a condition to ensure only the activities covered in the noise assessment can be developed out until further supporting materials are produced to demonstrate that the other activities will not adversely impact local residential amenity.

The applicant has also recommended that a condition of permission could be that the applicant submits a management plan to the Council indicating measures to minimise the risk of disturbance. Such measures could include, time-limiting or banning the use of sound reproduction equipment or musical instruments in areas close to residents that will be used at night (e.g. the lodges). Signage requesting users to respect neighbours with regards to noise, especially evening and night-time. On site personnel available to address any disturbance or safety issues that could arise. A 24-hr phone number for residents to call in the event of any disturbance occurring. An action plan for steps to take following a complaint or notification regarding noise. Environmental Protection are not convinced that any of the above suggested recommendations will meet the tests of a planning condition. However, this related to the lodges uses and this is not a cause for concern for Environmental Protection.

The applicant has confirmed that the food and retail uses will be likely located over 30m from the nearest residential properties. However, details of the food and retail uses will need to be assessed with proposed hours of operation, operational noise, plant and servicing noise all assessed to ensure that its inaudible within the neighbouring residential properties.

Any future noise impact assessment needs to provide specific details of any required mitigation measures. Locations of mitigation measures need to be shown on plans submitted with drawing numbers. These are what planning conditions can be based upon.

Environmental Protection recommend that conditions are attached to any consent to ensure residential amenity is protected.

Local Air Quality

The applicant has submitted a supporting air quality impact assessment. This was requested due to the number of proposed car parking spaces exceeding one hundred. The applicant has identified that the development site is not located within or immediately adjacent to an Air Quality Management Area (AQMA). The closest AQMA is the Glasgow Road AQMA, located approximately over 1.5 km to the north of the development site.

The applicants supporting air quality impact assessment has demonstrated that the site will not have an adverse impact on local air quality.

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.

It is highlighted in Edinburgh's Local Transport Strategy 2014-2019 that the Council seeks to support increased use of low emission vehicles and support the extension of the network of Electric Vehicle (EV) charging points.

The new Edinburgh Design Guidance (October 2017) states that to ensure that the infrastructure required by the growing number of electric vehicles users is delivered, one of every six spaces should include a fully connected and ready to use electric vehicle charging point, in developments where ten or more car parking spaces are proposed. EV parking spaces should be counted as part of the overall car parking provision and not in addition to it.

The applicant has committed to installing electric vehicle charging points. The applicant has also provided detailed plans showing where some of the chargers will be located and it's been agreed that the detailed location of the remaining chargers will be highlighted when the details plans are submitted. Environmental Protection would be requiring electric vehicle charging points of various outputs to be provided throughout the proposed public car. Slower chargers for long stay purposes shall be served with 7kW or 22kW chargers with 70kW or 50kW (125 Amp) DC with 43kW (63 Amp) AC unit made available for at least 10% of your total proposed spaces. 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. It should also be noted that the taxi industry is moving towards plug-in taxis. The latest model of the London taxi is a plug-in electric taxi and with Edinburgh being the second biggest market for London taxis there will many of them on the roads in Edinburgh therefore locating chargers for taxis must be further considered.

Environmental Protection are pleased that the applicant has produced an outline of a Travel Plan which should incorporate the following measures to help mitigate traffic related air quality impacts;

- o Appointment of a Travel Plan co-ordinator to oversee the implementation of the Travel Plan and to engage with site employees;*
- o Provision of footpaths throughout the site that link with the existing pedestrian network and adequate signage within the Site to encourage walking, particularly for any employees living within Ratho to the east of the Site;*
- o Provision of secure cycle parking facilities for employees and, potentially, employee shower/washroom facilities, to encourage travel by bicycle;*
- o Provision of posters and leaflets to promote the health benefits of walking and/ cycling;*
- o Provision of a sustainable travel noticeboard, to include details of pedestrian and cycle routes, bus service routes and timetables; and*
- o Promotion of the benefits of car-sharing schemes for employees.*
- o In addition, it is understood that the following measures have been recommended for consideration by*
- o CEC for inclusion as part of a planning condition or informative:*
- o Developer contribution towards the provision of a pedestrian and cycle bridge over the Union Canal and link with the Union Canal Towpath (National Cycle Route 754);*
- o Development of a signing strategy on the primary road network to direct visitors to the Site to minimise travel via local routes and travel through more sensitive areas (such as the residential are of Ratho);*
- o Provision of a minimum of 58 cycle parking spaces (both visitor and employee spaces), although the*
- o requirement should be reviewed on a regular basis to ensure the provision meets demand;*

- o A parking management strategy to be developed and submitted to CEC for approval and monitored for a minimum period of 24 months from opening;*
- o Electric vehicle (EV) charging infrastructure to be provided at a rate of 1 in every 6 standard car parking spaces. CEC has suggested that slower chargers for long stay purposes should be served with 7kW chargers with 70 or 50kW (125 Amp) DC and with a 43kW (63 Amp) AC unit made available for at least 10% of the total spaces provided.*

With regards to the EV charging infrastructure, the exact specification will be confirmed at the detailed design stage.

Environmental Protection would support any recommendations by Transport Planning Officers with regards sustainable transport options.

It should be noted that grants may also be available for the installation of EV charge points more information can be found at;

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

Chimney Height Calculation may need to be submitted in accordance with the Clean Air Act 1993. We will need details on the proposed centralised energy centre serving the larger buildings, for example the proposed fuel and size (energy in/output). Environmental Protection will not support biomass. It is recommended that the applicant submits a chimney height calculation at the earliest possible stage to ensure planning are satisfied with any proposed chimney which may need to be sizable. The applicant has advised that this information is currently not available and will be submitted with any detailed planning application.

The applicant had indicated that they intend small wood burning stoves in the proposed lodges. The applicant has been advised that Edinburgh is a Smoke Control Area and any wood burning stove must be compliant with the Clean Air Act 1993. In Scotland, there is a list of exempt appliances published by the Department for Environment, Food & Rural Affairs. The applicant has agreed not to install wood burning stoves as it was highlighted that Environmental Protection would not support the application if it included a cluster of biomass/wood burning stoves.

Environmental Protection recommended that the applicant does not install a wood burning stove as it is likely to impact the neighbouring residential properties due to the low-level chimney and likelihood of fumes being trapped in the wider area.

Odours

The applicant has confirmed that it will provide specific details on where the flues will be located serving the commercial cooking operations at the detailed planning stage. The applicant has confirmed that all the likely locations for the flues will terminate at roof level with the capability of achieving 30 air changes per hour. The applicant has confirmed that the likely locations of the flues will be in excess of 30m from the existing residential properties.

Contaminated land

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable).

Therefore, Environmental Protection offer no objection subject to the following conditions;

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

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

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

ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

1. The use hereby permitted relates solely to the watersports facility, the zip wire, the ski and snowboard kicker, the tubing slides and the tourist accommodation facilities. Outwith the above no public events, unrelated to these activities, are permitted to be held without the prior written approval of the planning authority.

2. Detailed noise assessments will be required at the detailed planning stage, to assess noise and vibration impacts from the proposed development (Surf competitions, Night surfing event, Chilled live music, Winter/Christmas markets, Farmers markets, Summer outdoor cinema nights) from operational noise, on the proposed development and existing neighbouring sensitive receptors. This must identify appropriate mitigation measures.

3. The water sports facility, the zip wire, the ski and snowboard kicker and the tubing slides shall only operate between the hours of 8am and 8pm.

4. The hub building shall be open to visiting members of the public between the hours of 8am to 11pm.

5. No wood burning/biomass stoves are permitted as part of the development.

6. A minimum of thirty-eight 7Kw electric vehicle charging outlet (wall or ground mounted) shall be installed and operational prior to occupation. Two commercial space shall have a rapid electric vehicle charging point installed and operational prior to occupation. The rapid charger shall be of the following standard with specific specifications and locations provided at the detailed stage:

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.

Class 3 Uses

7. Cooking odour ventilation details should be provided at the approval of matters in conditions (AMC) stage. In this regard, details should be provided which confirm that the ventilation will meet the following criteria:

(i) The kitchen shall be ventilated by a system capable of achieving 30 air changes per hour, and cooking effluvia shall be ducted to roof level to ensure that no cooking odours escape or are exhausted into any neighbouring premises.

(ii) The ventilation system being designed and installed so that gases are expelled with a minimum upwards velocity of 15 metres per second.

(iii) The ventilation system shall be installed, tested and operational prior to the use hereby approved being taken up.

Informative

All proposed energy plant must comply with the Clean Air Act, details of required chimneys should be submitted at the detailed planning stage. Plant above 1Mw may require secondary abatement technology. Biomass is not appropriate for this site.

Construction Mitigation

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

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

c) Internal un-surfaced temporary roadways shall be sprayed with water at regular intervals as conditions require. The frequency of road spraying shall be recorded as part of documented site management procedures.

d) *Surfaced roads and the public road during all ground works shall be kept clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping shall be recorded as part of documented site management procedures.*

e) *All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.*

f) *Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.*

g) *This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.*

h) *No bonfires shall be permitted.*

Ratho + District Community Council comment

Ratho & District Community Council has no disagreement in principle with the concept of a country park incorporating water sport and training facilities (Wavegarden) at the above site but there are material issues in the submitted application brought to our attention by local residents and to which the Community Council objects.

The Community Council attended both public exhibitions at Planning Application Notice (PAN) stage in February 2017 and we have had some positive discussion with the Applicant about both conceptual design and operational matters. Whilst some matters raised by local residents and the Community Council have been addressed, residents have raised concerns over the number of added features that were not part of the PAN consultation process, and relating to which we object as follows:

NOISE

At PAN stage, the inclusion of a zip-wire was specifically discounted by the Directors of Tartan Leisure, and no mention was made at that time about the inclusion of luxury lodges, a kicker jump for snowboarder training, tubing slides, the MTB skill track, or a base for orienteering activities. It is considered these activities will generate excessive noise that, as noted further below, has not been considered in the Environmental Statement and will be a detriment to the local community.

TRAFFIC and ON STREET CAR PARKING

Whilst a traffic assessment has been completed, residents are concerned as to the potential increase in cars parking on residential streets in relation to local dog walkers and the like who will be attracted to the Country Park, and others from the local area visiting the leisure facilities. In particular this relates to the Hallcroft area, making use of the re-opening of the old gated access from Hallcroft Park, and the footpaths connecting with the Gala Craigpark development.

In addition concerns are raised associated with the anticipated increase in traffic accessing the facilities and the associated impact on "rush-hour" traffic through Ratho village seeking to avoid congestion on the B7030 and surrounding road network, together with the safety of the existing junction from the B7030 allowing access to the EICA, the scene of several accidents (including a fatality) in recent years.

LOSS OF EXPECTED AMENITY

The initial planning consent (05/01229)/FUL) generally allowed development of residential housing in a prime location on the basis of the provision of a Country Park for unfettered open public amenity. However it now appears that the original concept of a peaceful country park, allowing access in perpetuity to local residents during daylight hours, is in danger of being overtaken by a multi-faceted visitor holiday facility.

LIGHTING

The impact of necessary lighting is not considered to be adequately assessed in the application (as further noted below) and local residents have noted objection to the impact on background ambience resulting from potential flood lighting required for the safe operation of the facilities.

CANAL MOORINGS

At the suggestion of the Urban Design Panel new canal moorings have now been proposed adjacent to the site. We have been advised by the Seagull Trust that operates boats for the benefit of disabled people on this area of the canal that the excessive number of moorings proposed in this location will deny adequate space for passing vessels and as such is unacceptable.

SPECIAL EVENTS

The impact of holding "Special Events", introduced into the facility scenario since PAN is in indeterminate without further information, but raises increased concerns relating to noise, traffic congestion and parking, pollution, and security of the neighbouring residential properties.

In addition, the Community Council is aware of numerous anomalies and omissions within the documentation supporting the application all as noted below.

1 PLANNING HISTORY

Consent granted in August 2009 against application 05/01229/FUL authorised the infilling of the Craigpark quarry with inert waste to form a country park for the benefit of the community at large, together with housing development to the eastern part of the site.

Subsequently, consent granted in November 2014 against application 13/02527/FUL authorised a material variation to planning permission Ref; 05/01229/FUL to provide amended housing layout and substitution of house types and associated works.

It transpires that both consents were conditional upon Section 75 Legal agreements the second of which, drawn up without notice within the Planning Application and so without public knowledge or scrutiny, appears to relax some of the conditions of the first, insofar that:

- o *It provided that nothing in the Agreement should prohibit or limit the Proprietors right to operate commercial leisure interests and business in the Public Park or otherwise develop any part of the Public Park (subject to Planning Permission)*
- o *The Proprietors shall be obliged to complete the Public Park Works on or before 30 June 2018, contrary to original more stringent requirements related to the associated residential development*
- o *A total of £180,000 be paid by the Proprietor as contributions reduced from £210,000 previously required.*

At this time, two further applications (15/05021/FUL and 16/03437/FUL) relating the Craigpark Quarry remain listed since late last year as "awaiting decision" though it is noticed that the Council is minded to grant permission subject to Legal Agreements which should include inter alia:

- o *An agreed date for 100% completion of the park.*
- o *Agreement to secure full public access to the park during daylight hours.*
- o *Agreement to require the whole park to be kept in one ownership subject to the same provisions as the existing S75 agreement.*
- o *An obligation shall be made on the developer to ensure the maintenance of the park in perpetuity.*

These conditions are deemed significant insofar that it is perceived that the present application 17/02471/FUL may considerably impact these requirements. Consequently it is considered that until confirmation of these two outstanding consents and the full content of associated legal agreements is made known the Community Council is unable to properly scrutinise the application 17/02471/FUL and offer appropriate and fulsome comment on these matters.

2 DEFICIENCIES WITHIN THE PLANNING APPLICATION

Examination of documentation supporting the application reveals, inter alia, the following errors, anomalies and omissions:

PLANNING SUPPORTING STATEMENT

Refers to landholdings of Tartan Leisure Ltd at Craigpark whereas we understand Craigpark Quarry is wholly owned by Alex Brewster & Sons.

States the "site is heavily treed to the south", whereas there is only nominal tree growth in that area.

Refers to vehicle and pedestrian access to the site from Wilkieston Road, whereas there is no public pedestrian access from Wilkieston Road

States "buildings will be the subject of a design competition later this year, .These buildings include the maintenance building for the onsite staff". We consider that the visual impact of the buildings will be significant and building details should be included for consideration within the present application. We are unable to identify the "maintenance building" referred to, unless it is a reference to the "Agricultural Building" already constructed to serve the Public Park under consent 14/02128/FUL.

Refers to the "SUDs pond attracting and supporting wildlife", whereas the SUDS pond is a fundamental requirement of the existing consent for residential housing and is essentially not a part of this application.

States , "alterations have been made to the proposed scheme" in relation to "noise concerns during pre-application discussions in relation to previously proposed 'wild camping", whereas no reference is made to the introduction (since PAN) of the zip wire, MTB pump track, kicker jump and tubing slides all of which will encourage additional noise.

States "Public access will be marginally reduced from 19.58ha to 18.66ha from the approved plans for the country park", whereas in relation to approved plans additional proposed car parking exceeds 1ha, the areas set aside for luxury lodges is in the region of 1.25ha to say nothing of the MTB track, glamping pods and fire pit area, and space taken up with the kicker jump, zip wire, buildings and other attractions.

States "14 moorings have been added to the masterplan, which provides scope for boats as an additional mode of transport to access the site". It is considered that a significant length of canal bank, (up to 140 metres) will be required for this number of moorings. Moored boats over such a length without adjacent widening of the canal will impede passing vessels insofar that the canal has insufficient width to accommodate two vessels passing in opposite directions alongside moored boats.

TRANSPORT ASSESSMENT

States "The Union Canal path is designated as Sustrans Regional Route 754, providing traffic-free access (for Cyclists) directly from the site" whereas the canal path lies on the north side of the canal, requiring cyclists to climb 7m to access the EICA before crossing the canal via the access road bridge.

Clauses 2.3.2 and 2.3.3 (Facilities for Cyclists) are self-contradictory. The B7030 is the only part of the local road network providing cycle access to the site entrance and is subject to frequent heavy goods traffic to and from the Newbridge Industrial estates in addition to heavy peak time commuting traffic. It does not provide, as stated "a favourable cycling environment".

States "Edinburgh Park Station which is approximately 5.5km to the west of the site", whereas this station is to the east of the site.

States "The results of the (isochrones) assessment are illustrated in Figure 3-2". We find fig 3-2 to be misleading insofar that agricultural land with no public access immediately to the west and south of the site are shown as within 0 - 15 minutes walking distance. Generally the diagram does not appear to take into full account areas of restricted entry for public access on foot that surround the site and the extended routes required to accommodate same.

States "the extensive network of cycle facilities within the vicinity of the site will encourage .travel to and from the site by cycle, and provides good opportunity for users to journey to the site using multi-modal travel." We consider the "extensive network within the vicinity of the site" to be limited to the Union Canal Towpath offering only limited opportunity for "multi-modal" travel.

States: "It is expected that the Proposed Development will periodically hold special events which will likely require additional parking to that provided for general day to day operation. It is proposed that an overspill car park will be provided either on-site or on land under control of Tartan Leisure." We consider this to be a matter of concern insofar that we understand that Tartan Leisure has no land under their control. We further consider the full intention and nature of potential proposed "events" should be determined at this stage so that adequate consideration may be given to the provision of additional facilities, if any, required both on and off site so as to allow a complete assessment of this application.

States "The site is reasonably well located to facilitate access by sustainable modes. With the potential rerouting of the number 20 bus service, this will be further enhanced and the site will have an excellent opportunity for access by cycle and multi-modal journeys" We consider access by bus will inevitably require multi modal journeys that will be least attractive to visitors. We consider that in reality the facility will be only reasonably be accessed by car and a proportion of cyclists, and it is disingenuous to suggest otherwise.

States 225 spaces will be provided for car parking: It is noted from the Planning Supporting Statement that "Gator' vehicles will be the only other form of vehicle permitted within the country park, outside of the car park", and that visitors accessing the Luxury Lodges and Camping Pods will be transferred to their accommodation from the car park. The car parking assessment does not appear to address the situation of a possible total of 91 accommodation units in use at peak times, with all these residential visitors' vehicles parked in the car park in excess of those of normal daily visitors.

States "After considering the access requirements the TA has estimated the vehicular traffic flows ... has found that the impact of the increase in traffic resulting from the Proposed Development will be negligible. The Proposed Development is not predicted to result in a significant detriment to existing users of the transport network."

The report indicates (Appendix E) that at peak times during high season traffic on the B7030 approaches from the north and south will increase by approximately 16% and 35% respectively. Traffic on the EICA access road will increase by approximately 70%. These figures are hardly "negligible" but are recognised as probably being within the capacity of the existing B7030 saving improvements required to junctions and signage. It is noted that the B7030 between Wilkieston Road and Bonnington road is in poor condition and is too narrow to accommodate two passing heavy goods vehicles requiring accommodation works to render it safe.

Similarly it is questioned whether the existing EICA access road, initially constructed as a private road, meets relevant current design standards for potential intended use both in construction and operation phases in conjunction with ongoing use to access the EICA facility.

ENVIRONMENTAL STATEMENT

States "The noise environment at the Study Area is influenced by quarry activity (at the adjacent Bonnington Quarry)" whereas Bonnington Quarry has been dormant for several years.

States "There are no known electricity transmission cables, gas mains or underground telecommunications services situated within the Study Area", whereas there is a power supply to the existing agricultural/maintenance building accessed from Wilkieston Road.

States "Potentially Sensitive Receptors within and adjacent to the Study Area are identified in Figure 1-6 below." It is noted that potential sensitive receptors to noise, dust and air pollution at Bonnington Mains Farm, and the community of Bonnington Cottages have been excluded in the assessments. It is considered the assessment should be reviewed with these receptors included.

States "The scale of the Proposed Development will result in a negligible increase in the number of vehicle movements across the study network", whereas, the Transport Assessment concludes that vehicle movements on the B7030 will increase by up to 35%, and up to 70% on the EICA access road.

States "The type of development proposed will generate significantly less HGV traffic during the construction and operational phases than that of the original use of the site", This statement is considered meaningless as traffic associated with the original use of the site ceased many years ago, though the ongoing infilling to form the country park has resulted in continuing HGV traffic on Wilkieston Road over the past several years. It is noted that access for construction of the proposed facility will be from the B7030 via the EICA access road. This being the case, whilst it is considered there will be little change to traffic on the B7030, traffic on Wilkieston Road will be reduced, and will be welcomed by the Community Council.

States: "As such, there is no potential for significant environmental impacts in relation to Accidents and Safety" whereas the traffic assessment has considers the accident record at the junction of the B7030 and EICA access road and recommended material improvements related to safety.

States: "there is no potential for significant environmental impacts on nearby sensitive receptors in relation to waste. Therefore, further consideration of Waste is scoped out from the EIA", whereas Cove water will be continually treated to "swimming bath standards". There is no consideration of potential overspill of treated water or treatment chemicals etc., into the natural drainage and Union Canal which we believe should be included in the assessments.

States: "effects related to lighting are not considered to be significant", whereas operating hours over the full season will include 117 days in which sunset will occur prior to closure of the facility, with a maximum period of up to 3½ between sunset and closure. We consider that extensive floodlighting will be obligatory in order for the facility to function safely and as such an important assessment of the impact of this is missing from the application.

States: all operational phase traffic will be directed to use the B7030, which does not run through any residential areas (and therefore avoids receptors sensitive to pollutant emissions), before dispersing onto the M8, M9, A8, A89 and A71). It is noted that the B7030 (as Bonnington Road) runs through the residential area of Wilkieston passing residential property and a day nursery, and also passes immediately adjacent properties, namely Wilkieston Manse, 17 Bonnington, and Bonnington Cottage, in addition to being in close proximity to the hamlet of Bonnington Cottages. As such the Environmental Statement is lacking in a full assessment of air quality impact.

States: "There are no residential properties located to the north, west or south of the Site" which ignores the existence of Bonnington Mains Farm and Lodge, Bonnington Cottage (on the B7030) and the hamlet of Bonnington.

The Design Statement notes that "Craigpark Quarry is an uncontaminated brownfield site". Significant quantities of material have been imported to the site over the past several years under seemingly ad hoc arrangements, and whereas bulk filling may appear to have been carried out with inert waste from other quarry activities in the area, tipping from skip hire wagons has been noted on occasion together with the early morning burning of waste. In respect of the Environmental Statement we consider it pertinent that the potential risk of pollution from contaminates be at least considered in the assessment.

In addition we note the supporting documentation appears silent on the following issues:

WATER and POWER SUPPLIES

From a preliminary estimate based on evaporation rates from standing open water, exacerbated by frequent wave disturbance, it is believed that the facility will place a high demand on water supplies to maintain operational status. The site has no natural water source other than rain water run-off, yet we find it disturbing that the application makes no reference to this vital service requirement, or the potential impact on local supplies.

Furthermore, the power input required to "move over 30 tonnes of waterat over 6 metres per second. .every 8 seconds" must be substantial, yet again there is no reference to this requirement in the supporting documentation. We consider that both these issues should be included in an amended Environmental Impact Assessment for completeness of the application, in particular in relation to associated carbon footprint and sustainable energy sources.

In passing, and noting seemingly favourable comparisons elsewhere with Surf Snowdonia, that facility's power is supplied by a dedicated hydro-electric station which also provides a unique water supply that is supported by a fall back supply from Welsh Water via a dedicated pipeline from a local pumping station.

ECONOMIC INCOME ASSESSMENT

States: "It will generate +155,000 additional tourism trips and +£8.821 million annual on and off site tourism expenditure. Whilst this assessment is based on anticipated income of £5.15m at the facility and a further £3.67m from additional tourism in Edinburgh, it is noted that these figures appear to represent gross turnover. True benefit to the local economy may only be represented by increased tax revenues directly to the local Authorities. Whilst a significant portion of the gross turnover may attract VAT, this is payable directly to HMRC, and any income or corporation tax on the net profits does not directly benefit the local economy. As potential local customers only have so much to spend there can be no assessment of how much of the assessed income will actually be diverted from other recreational pursuits, and the only true benefit to the economy will be spending by incoming tourists visiting solely to use the facility giving rise to a much reduced, and indeterminate figure at this time.

SUMMARY

As noted previously, Ratho & District Community Council has no disagreement in principle with the concept of a country park incorporating water sport and training facilities but has noted objections in relation to

- o Omission of Full Intended Scope at PAN Consultation,*
- o Noise,*
- o Traffic,*
- o Off-site car parking,*
- o Loss of Expected Amenity.*
- o Lighting,*
- o Proposed canal moorings, and*
- o Special events*

We have outlined anomalies and perceived omissions within the supporting documentation that we consider need to be addressed.

Furthermore, in order to mitigate the impact of the proposed facility upon the local Community we consider that should the Council be minded to grant consent to these proposals, the Community Council would wish to be satisfied that the following obligations are placed upon the developer.

- o The maintenance in perpetuity of all pre-existing conditions associated with consents associated with the Public Park together with an embargo on any further expansion of the leisure facility, saving by permission of the City of Edinburgh Council and further planning consent.*
- o Given that Tartan Leisure, being in existence only since 2014, and appearing to have no significant assets, together with the historic financial collapse of the similar leisure venture that is now the Edinburgh International Climbing Arena, then a requirement should be placed upon the developer in the form of a bond or other such instrument, covering all costs associated with reinstatement of the areas of the Public Park should the venture collapse.*
- o The junction of the existing access to the EICA from the B7030 should be improved as recommended within the Transport Assessment.*

- o Given the perceived increase in traffic on the B7030 then a Section 75 contribution should be sought for the whole costs associated with improving the B7030 between Wilkieston Road and Wilkieston, namely increasing the carriageway to a safe working width, together with resurfacing the carriageway that is presently in a wholly unsatisfactory condition.
- o Saving immediate access to the Site Managers Office/Residence and the adjacent "Agricultural" building, there shall be no public vehicular or pedestrian access from the Wilkieston Road. We consider that a failure to address this concern will inevitably lead to car parking along the Wilkieston Road by dog walkers and the like to access the Public Park.
- o All special events should require, on an individual basis, licence from the City of Edinburgh Council such that the Council and the local residents may be sure of no adverse impact in terms of noise, car parking and pollution ensues.

In view of the complexity of these issues, together with concerns relating to outstanding Consents outlined above we would be pleased, should you so wish, to meet with you to discuss these further with a view to a clearer understanding of the application.

Ratho + District Community Council further comment

We refer to your letter of 20th November 2017 notifying an additional period for comment on the application referenced above and in relation to additional information provided by the Proposer since the initial application in May of this year, namely the proposer's letter of 10th November 2017 - "Justification for Lodge Accommodation" together with modified and additional new drawings.

As stated previously in our letter of 19 July 2017, Ratho & District Community Council has no disagreement in principle with the concept of a country park incorporating water sport and training facilities (Wavegarden) at the above site, but the material issues in the submitted application together with our objections so brought to your attention at that time remain.

Ratho and District Community Council convened a Public Meeting held on 4th December 2017 attended by 42 persons, and as a result has the following objections and comments in respect of new information arising since the Application:

Justification for Lodge Accommodation:

As previously noted the concept of Luxury Lodge Accommodation was not included for consultation at PAN stage early in 2017 but only appeared within the full application in May 2017. Our understanding from this document of "Justification", and as confirmed by Tartan Leisure during the open meeting of 4th December 2017, is that the lodges will be offered for private sale and/or lease arrangements.

Such a position is indicated by statements within the document as quoted here:

- o *"always viewed them as an organic addition to our business plan"*
- o *"now clear that they are a an integral foundation for our success"*
- o *"The provision of lodges onsite has now become an important part of our business plan..."*

o *"The foundations for these alternative social, sporting and economic plans have taken years to create and will fall apart of lodges are not now included. This was not the case twelve months ago, but is now."*

This being the case we consider that the overriding reasoning for justification is based wholly on commercial gain and has no basis for acceptance for planning consent. Furthermore present Conditions governing the development of the Public Park under consented applications prohibit the sale or lease of any part of the Public Park area without the specific consent of the City of Edinburgh Council.

Drawing Ref: 17_02471_FUL-21__PROPOSED_PHASING-3774575

It is noted the drawing indicates two stages of construction for the proposals, namely:

Phase 1 indicating the "Country Park" to be constructed to the currently consented scheme, and open to the public in 2018, with "Alterations/enhancements to the phase 1 areas, proposed in this application, ...implemented within the operational constraints of public access to these areas", and:

Phase 2 indicating the "Area of construction works to facilitate this application and Wavegarden operational footprint."

It is noted that the Phase 1 works include fourteen mooring berths on the Union Canal though the proposals appear devoid of any information as to what will be provided and remain silent as to whether berths would be provided for seasonal use and/or live aboard as presently promoted across the whole lowland canal system by Scottish Canals. We are advised that significant works would be required to provide berths at this location to say nothing of ancillary facilities required to provide fresh water, power, and disposal points for grey and black water necessary at useful berths.

Secondly, the areas shown within the Phase 1 zone and designated for the provision of luxury lodges (for which full planning permission is not requested at this time) will require significant additional works to provide foundations, together with access roads, and water, drainage and power services. This will inevitably lead to significant further disruption of the completed Public Park.

As such it is considered that these areas of proposed development will necessarily need to be incorporated into Phase 2.

It is noted that at this time:

o *The existing consent for the Public Park (13/02527/FUL), itself a material variation to planning permission Ref; 05/01229/FUL, requires under Legal Agreement that the Proprietors shall be obliged to complete the Public Park Works in full and to the reasonable satisfaction of the Council on or before 30 June 2018.*

o *A further application for a material variation (15/05021/FUL - Re-shaping of slope profiles and water bodies, alterations to proposed footpath network and proposed landscape scheme - material variation to consent 05/01229/FUL) as yet remains to be granted, pending a Legal Agreement, more than two years since the application was lodged.*

o Whilst the latter application refers to "re-shaping profiles" in essence the proposed general layout of footpaths within the Public Park remain as consented against 05/01229/FUL.

o Drawing 17_02471_FUL-21__PROPOSED_PHASING-3774575 indicates extensive additional footpaths within "Phase 1" of the Public Park Layout, together with access ways to proposed lodge accommodation that are not a part of the presently consented works to the Public Park that are to be completed by June 2018.

This being the case it would appear that the proposals are at variance with the understanding that the Public Park would be open in its entirety to unfettered Public access during daylight hours from June 2018 insofar that considerable disruption to the Public Park will occur beyond the required completion date of June 2018.

Furthermore it is noted that the provision of the Public Park and its subsequent maintenance in perpetuity is incumbent upon the "Proprietor", namely Alex Brewster and Sons, and is not within the remit of Tartan Leisure to whom, under the present Consent Agreements, the entire Public Park will be required to be conveyed either by lease or sale and with the consent of the City of Edinburgh Council should this application be granted. It is further noted that in so passing to Tartan Leisure obligations for maintenance in perpetuity will pass to a body of limited liability.

It is noted that the initial Planning Permission (05/01229/FUL) eventually consented in August 2009 allowed for housing development on a limited area of the whole quarry lands on the basis of the restoration of the redundant quarry to provide a Public Park for unfettered use by the community and public at large during daylight hours, to be maintained in perpetuity by the Developer, Alex Brewster and Sons. At that time this consent raised the prospect of the Park being available to the community within a reasonable period, given the significant restrictions on house building conditional upon the completion of the Public Park.

Should permission now be granted for the proposed application 17/0247/FUL, it is considered that a further significant delay in access for the community to the Public Park will be incurred, whilst at the same time house building approaches completion, in total conflict with the basic principles of the original consent.

Further Information

Access

A further drawing has been posted in the Public Domain on social media by the Proposer, namely Tartan Leisure Drawing 14048_L_107 "Area Breakdown" as amended on 5th December 2017 following the Public meeting on the previous day. The drawing indicates five annotated areas, with percentage areas quoted as parts of the overall park, these being:

- | | | |
|---|---|-------|
| o | The Total Country Park Boundary | 100% |
| o | Country Park with free public access dawn - dusk | 77.6% |
| o | Free entry area during Wavegarden Operational Hours | 9.7% |
| o | Facilities with Paid use/entry | 11.1% |
| o | Maintenance Facility | 1.6% |

The following points are noted as requiring clarification:

- o Both sets of camping pods are located in the area designated for "free entry area during Wavegarden Operational Hours".*
- o The luxury lodges are annotated individually as "Facilities with Paid use/entry", but are wholly surrounded by the "Country Park with free public access dawn - dusk".*
- o Operational hours for the Wavegarden have been proposed as from 10 a.m. till 9.00 p.m., extending beyond dusk for a significant part of the year.*
- o It is understood that other than access from the EICA Access road to and from the carpark NO vehicular access will be permitted within the WHOLE facility.*
- o Consequently it would appear that visitors resident in the camping pods, luxury lodges or canal side berths will be unable to access the carpark to leave or return to the facilities after dusk when access to the Country Park is not permitted.*

Irrespective of the above, the issue of access to the Public Park and the WaveGarden facilities was raised by local residents at the open meeting of 4th December 2017. On the basis of responses from representatives of Tartan Leisure it is understood that other than limited access from the Wilkieston Road to the "Maintenance Facility" (consisting solely of an Agricultural Building and Manager's Residence and annotated on drawing 14048_L_107 referenced above) there will be NO vehicular access to the Public Park and all associated facilities both during and after construction, other than from the EICA access road.

It is further understood that access within the Public Park and all associated facilities will be suitable for the disabled.

Loss of Amenity

With respect to quoted percentage areas it is inferred that 77.6% of the whole will remain as Country Park. However it is believed that in quoting this figure no consideration has been given to the loss of general amenity and access that will occur in areas surrounding accommodation and other facilities for the Wave Garden. Consequently, from information to hand we challenge the validity of this statement insofar that the entire area of the Public Park as originally planned will be reduced further by approximately 15% to 62% as follows:

- o 4% taken with additional car parking*
- o 1.7% dedicated to the proposed mountain bike track*
- o 1.5% taken with proposed tubes and snowboard jump*
- o 2.7% taken with proposed camping pods*
- o 5% taken with luxury lodges*

Drawing 17_02471_FUL-19__HYBRID_DEFINITION (FUL/PPP)-3774578

The drawing indicates significant parts of the proposed development, including all buildings, the proposed zip wire, snowboard kicker jump, tubes, camping pods and luxury lodges are submitted for Permission in Principle only.

Given the significant additions to the proposal since PAN stage, together with the Proposers statement that "The whole project has been a moving feast from day 1" (page 2 of Justification for Lodge Accommodation) it is considered that the proposals as they stand are insufficient as a whole to allow adequate appraisal and consideration for consent. It is a significant concern that should consent be granted at this time without confirmation of full scope and details, then the community at large will be unable to comment on the development as a whole, given the overall impact on the expectations of the originally proposed and consented Public Park.

Furthermore the application remains silent on fundamental key issues including:

- o Noise - apparently dis-regarded at this time with the view that noise impact will be assessed at some later stage of development,*
- o Lighting pollution - implied as of no significance on the assumption of limited low level pathway lighting that clearly has not been considered in relation to health and safety of proposed waterborne activities during hours of darkness,*
- o Supporting technical data relating in particular to perceived significant demands for power and water supplies which are not considered within the Environmental Impact Assessment, and, as noted at the Public Meeting of 4th December 2017*
- o Landscape and Habitat Management, particularly in respect of the impact on existing wildlife within the reservation of much of the total area within a fenced zone for the Phase 2 Area of Construction.*

It is therefore our position that it is in the public interest that the Proposer should re-consider the application and submit all relevant information as necessary under a new application to allow full consideration of the whole development at this time.

In view of the complexity of these issues, together with concerns relating to outstanding Consents outlined above we would be pleased, should you so wish, to meet with you to discuss these further with a view to a clearer understanding of the application.

Edinburgh Airport comment

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

Submission of a Bird Hazard Management Plan

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

- o monitoring of any standing water within the site temporary or permanent*
- o sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>).*
- o management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached*
- o reinstatement of grass areas*

- o maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow
- o which waste materials can be brought on to the site/what if any exceptions e.g. green waste
- o monitoring of waste imports (although this may be covered by the site licence)
- o physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
- o signs deterring people from feeding the birds.

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

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

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

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

Submission of SUDS Details

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

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

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

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

We would also make the following observations:

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.

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/>)

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

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

Edinburgh Airport further comment

Edinburgh Airport has no objections to the revised drawings (09/11 and 15/11), however our conditions remain the same on our previous response (EDI2649).

SEPA comment

Advice for the planning authority

We have no objection to this planning application, but please note the advice provided below.

We responded on 29 May 2017 (our reference PCS/152967) to consultation on the scope of the EIA. The advice in this letter on groundwater, drainage and waste arisings should be taken into account in consideration of this letter. Below is our detailed advice on flood risk.

1. Flood Risk

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

1.2 The application is for a large outdoor leisure complex which includes tourism accommodation, retail and food and drink facilities at Craigpark Quarry in Ratho.

1.3 Review of the SEPA flood hazard map shows that parts of the development site are at risk of surface water flooding during the 0.5% annual probability flood event. This is due to the low lying nature of old mine workings. The surface water flood map also shows flood risk along the small watercourse which is present along the northern boundary. Due to the small catchment area of this small watercourse, the associated fluvial flood risk has not been modelled within the SEPA flood hazard maps: the surface water map, however, provides a proxy of the risk of fluvial flooding.

1.4 The small unnamed watercourse risk of flooding has been assessed using the manning's equation. It has been estimated to have a carrying capacity of 1.77m³/s which is in excess of the 0.5% AP flow which is 1.2m³/s. We would highlight that no information has been provided on the culvert into which the small unnamed watercourse enters. Culverts can be a source of increased flood risk due to limited capacity and also in the event that the culvert became blocked. A review of the masterplan, however, identifies that no built or habitable accommodation is proposed within the vicinity of the culvert and that this area will solely be used for car parking. As a result, we do not object to the proposed development.

1.5 When producing more detailed design of the wavegarden, the applicant has to ensure groundwater levels are fully understood to inform design. If continuous pumping of groundwater is required as part of this development, the discharge of the ground water should be taken into account when determining runoff rates. One important aspect of this development is to ensure that runoff rates from the development are controlled and released at greenfield rates. We note that the surface water will be discharged into the Union Canal and agreement has to be sought with Scottish Canals on the appropriate discharge rate.

1.6 For information, the FRA makes reference to PAN 69. This was superseded by the "Online Planning Advice on Flood Risk" in June 2015 (<http://www.gov.scot/Topics/Built-Environment/planning/Policy/Subject-Policies/natural-resilient-place/Flood-Drainage/Floodrisk-advice>)

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/flooding/flood_maps.aspx.

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.

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 www.sepa.org.uk/planning/flood_risk.aspx.

Roads Authority Issues

We would request that the application should be continued in order for the applicant to provide further information/justification.

Reasons:

1. The applicant's Transport Assessment makes the following statements:

At Paragraph 3.2.2, "The Union Canal path borders the northern boundary of the site providing traffic-free access to the village of Ratho and many destinations beyond. It is proposed to provide a connection to the canal path, providing a direct link from within the site via an internal traffic free footpath network."

At Paragraph 3.2.5, "There are existing plans in place, to upgrade the existing facilities for crossing the Union Canal in the vicinity of the Proposed Development and the EICA. The proposals for the bridge are currently being assessed by an independent external consultancy in conjunction with the CEC. Although the bridge proposals are separate from the Wavegarden planning application, Tartan Leisure consider this essential for providing cross visitation opportunities for both developments and improved access to the wider Ratho area."

These are contradictory and we would therefore seek clarification on what the applicant's intentions are in regard to providing a connection with the Union Canal Towpath (NCN 754)

2. We seek clarification in regard to the conclusion (or otherwise) of discussions with Lothian Buses and CEC Public Transport team in respect of the alteration/extension of the Service 20 route. However, we note from the email correspondence that the Service 20 may potentially be extended into the CALA Craigpark development site. Notwithstanding this, the delivery of the proposed footpath links within the development site and the adjoining residential development will be key in achieving the walking distances to PT services reported in the Transport Assessment.

3. We acknowledge correct reference to CEC, "Parking Standards for Development Management, December 2009." The proposed development uses require the parking provision to be "assessed individually." The Transport Assessment report states that Table 3-1 of said report, "summarises the car parking and cycle parking standards which will be appropriate for the Proposed Development," yet at Table 3-2 only provides a summary of the proposed vehicular parking provision. We would therefore seek confirmation of the proposed cycle parking provision.

Furthermore, paragraph 3.6.5 states, "in line with the above standards, the parking provision for the Proposed Development has been based on information provided following the site specific feasibility study undertaken by Colliers International and parking provision from other inland surf facilities in the UK." The proposed vehicular parking provision consists of 225 car (which will include 5% suitable for disabled use), 5 coach and 9 mini-bus parking spaces, as summarised in Table 3-2 of the report.

The Colliers' Planning Supporting Statement report states (Section 4.3.3), "due to the unique nature of the proposal, it is necessary that it is assessed individually for its requirements. The applicant has assessed the level of parking provided based upon the experience of Surf Snowdonia. Justification for the number of car parking space is contained within the Transport Assessment." No such justification is provided in Transport Assessment. In a later part of the Colliers' Statement report it states (Section 5.5), "The level of car parking proposed has taken cognisance of CEC's Parking Standards and has been based on information provided following the site specific feasibility study undertaken and parking provision from other inland surf facilities in the UK." However, no further information is provided.

Consequently the proposed parking provision cannot be adequately assessed or commented upon.

4. The development trip generation uses information from the Colliers' feasibility study in regard to the expected visitor numbers using the various uses on site. This appears to be a reasonable methodology.

It is noted that the development is unlikely to operate during the winter months of December to February, inclusive and therefore usage is concentrated over 9 months of the year and split into two business seasons - Mid and High. According to the Transport Assessment during the mid-season there are 111 weekdays (non-holiday Monday - Friday), and 72 weekends (Saturday - Sunday) and holidays (public holiday Monday, assumed). During high-season there are 31 weekdays (non-holiday Monday - Friday), and 61 weekends (Saturday - Sunday) and holidays (public holiday Monday, assumed).

Apportionment of the expected visitor numbers by the number of day types in each season does not replicate the summary Table 4-2 of the Transport Assessment where the visitor numbers for this type of development a clearly weighted towards weekends and holidays as may reasonably be expected. We would however request additional information from the applicant in this regard.

We note that trips to the proposed development are expected to be made outwith the weekday morning commuting peak. It is stated that there is the potential for a "significant" number of pass-by type trips (i.e. not "new") during the evening peak, although not quantified. Travel to and from the site is expected to be governed by a large number of visitors to the proposed development being family groups or part of other pre-booked groups; with larger groups travelling by mini-bus or coaches, and will therefore reduce the number of vehicle movements.

The predicted vehicle trips calculated from the data presented is on the basis of the methodology used by others for the Transport Statement supporting the planning application for what is now Surf Snowdonia, which assumes that visitors travel by car with an average vehicle occupancy of 2 people. A sensitivity test using an average car occupancy of 1.5 people is also provided. We note it is stated that this scenario is highly unlikely to occur in practice given the large number of pre-booked groups. The calculation of an average hourly vehicle trip arrival departure is arithmetically correct. However, it would be useful to understand from experience at Surf Snowdonia - visitor profiles, activities booked at different parts of the day (e.g. free surf, instructed groups and other activities) etc to build up a potential trip profile aligned to the scale of proposed development at Craigpark for comparison. We would anticipate the busiest period for this type of development would potentially be the evening commuter peak or early evening in the lead up to closing time which is not reflected by the use of an average hour.

Roads Authority Issues

The application should be approved subject to the following being included as conditions or informatives as appropriate:

1. The applicant will be required to:

a. Contribute the sum of £444,698 towards the provision of a pedestrian and cycle bridge over the Union Canal and link with the Union Canal Towpath (National Cycle Route 754). The sum to be indexed as appropriate and the use period to be 10 years from date of payment;

b. Contribute the sum of £2,000 (per order) to progress a suitable order to introduce waiting and loading restrictions as necessary;

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. A signing strategy to be developed and submitted for approval by the Council in respect to the public road network to ensure the use of the main strategic/principal road network is exploited for access to the development to minimise use of more sensitive local routes through Ratho and Wilkieston. Separate approvals will be required from the trunk road authority. All costs associated with the implementation of an approved signing strategy to be met by the applicant;

4. Parking to be provided generally in accordance with the approved planning drawings inclusive of disabled spaces which will constitute 8% of the total provision - 239 car parking spaces, 9 minibus parking spaces and 5 coach parking spaces. No overspill parking onto the public road network will be permitted;

5. Parking for a minimum of 58 cyclists (inclusive of both employees and visitors) to be provided. This requirement should be reviewed on a regular basis or as part of ongoing monitoring and review of the development's Travel Plan with additional parking provided to cater for demand. General cycle storage (short stay) should be covered and secure, located adjacent to the main entrances of the public buildings. Cycle parking for employees (long stay) should comprise secure, covered cycle storage situated close to the building(s) but preferably out of sight of the general public;

6. A parking management strategy to be developed and submitted for approval by the Council. In association with this a proposal for monitoring the use of the car park to be developed and submitted to the Council for approval. The approved monitoring regime to be implemented for a period of 24 months from the opening of the development. All costs associated with the implementation of the management and monitoring of the car park to be met by the applicant;

7. The layout of the access to the proposed development to be generally in accordance with the approved planning drawings;

8. 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. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;

9. Access to the lodge accommodation from Wilkieston Road to be limited to maintenance and service vehicles only;

10. Footpath and cyclepath connections from the development to the external networks to be provided generally in accordance with the approved planning drawings with specific connections to Hallcroft Park and the Cala Craigpark development where existing public transport connections are available;

11. 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;

12. *Electric vehicle charging infrastructure to be provided at a rate of 1 in every 6 standard car parking spaces. Slower chargers for long stay purposes should be served with 7Kw chargers with 70 or 50kW (125 Amp) DC with 43kW (63 Amp) AC unit made available for at least 10% of the total spaces provided. 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.*

Note:

1. *Whilst the applicant argues that the Craigpark site is accessible by all modes there are recognisable deficiencies. For example, barrier free access to the NCR754 Union Canal Towpath for cyclists is at present 1 mile away via Clifton Road or 2.5 miles via Ratho Village and the Bridge Inn, with the latter distance potentially reduced by the internal path network proposed as part of the development. It is noted that the applicant proposes to link their internal foot and cycle path network to the existing 1.5m wide footway on the eastern side of the bridge crossing of the canal to the EICA facility - this is not considered acceptable. Monies were secured, by way of s75 Agreement, as part of the original consent for a country park and [Cala] residential development on this site for the provision of a bridge connection and wheel ramp to the NCR754. A significant proportion (78%) of the new development proposals remains as country park use but the updated proposals are an intensification of use. This connection is considered as absolutely necessary to ensure that the proposed development site is accessible by all modes. Further work into the alignment, design and costs associated with the construction of this crossing and connection to the existing canal towpath has been carried out by the CEC and this has been used to inform the relevant condition above. Estimated cost: £544,698. Contribution from consent of 05/01229/FUL £100,000. Remaining balance £444,698;*

2. *The Council's current parking standards do not provide clear guidance on non-standard (sui generis) development land uses such as those proposed. The applicant has used the experiences of a similar development - Surf Snowdonia, Dolgarrog, Conwy, North Wales - which is now operational. It is noted that Dolgarrog lies on the edge of the Snowdonia National Park area. In respect to the proposals, there are differences between the two developments. The Craigpark proposals include an open country park which constitutes approximately 78% of the site, by the applicant's own measure, and there is provision of overnight accommodation which exceeds that at the Surf Snowdonia site. Surf Snowdonia's approved planning drawings show 275 car parking spaces associated with the surf centre, ancillary retail, soft play, water obstacle course, camping pods / pitches, and food and beverage offer; with an adjacent hardstanding area within the site for overflow/ event parking. The overnight accommodation which fronts the surf lagoon at Surf Snowdonia is served by a separate access and car parking area;*

3. The applicant's transport consultant has stated that the "the [Surf Snowdonia] operators have confirmed that the site can accommodate 200+ cars, and have advised that this level of parking is sufficient for the number of visitors to the development." It is argued by the applicant's consultant that the differences between the two developments in terms of leisure/ancillary offer and additionally given poorer sustainable transport links, and the location of Surf Snowdonia in respect to the National Park mean that the visitor profiles are quite different with passing inquisitive tourists adding to the visitor numbers. However, no quantitative data has been provided by the applicant as it is advised that this would be commercially sensitive;

4. The development proposal for Craigpark Quarry provides a lower level of parking provision than at Surf Snowdonia, and has no such on-site overspill "buffer." It is understood that the applicant is considering 3 potential off-site locations for overspill parking, the specific locations of which is commercially sensitive and therefore cannot be divulged. However, it has been indicated that the sites are within the control of the applicant. No preferred option has been identified. Irrespective of the chosen site, the off-site nature will make it necessary to provide for visitor transfer to the main site;

5. The proposed 225 car spaces comprises the following allocations: 157 spaces for the surf lagoon, 68 spaces for general use of the country park both inclusive of disabled spaces. In addition to this, 5 coach spaces and 9 minibus spaces, 3 motorhome spaces and 4 campervan pitches are proposed. It is considered by the applicant that the proposed provision is deemed appropriate. Unfortunately, no quantitative data has been provided as justification. It is also considered by the applicant that overspill parking will only be required to cater for special events. In response to consultation responses the applicant has committed to remove the proposed motorhome spaces and campervan pitches, with 14 additional car parking spaces being generated. Resulting is a total of 239 car parking spaces. No specific parking provision has been proposed for the overnight accommodation component of the development;

6. As noted, the proposed development is considered *sui generis* in terms of the council's current parking standards with no specific development user class attributable to the proposed use. This council is not alone in this respect. Consequently, it is difficult to determine with certainty a quantity of car parking which would strike the correct balance between prevention of antisocial parking on the external road network and encouraging the use of more sustainable modes of travel to the site. On balance it is considered that the proposed provision is acceptable on condition of an approved parking management strategy and associated monitoring programme;

7. A staff travel plan framework has been submitted as part of the Transport Assessment report which contains initiatives and measures to promote travel to and from the development by modes other than the private car;

8. Vehicle trip generation by the proposed development has been based on the predicted visitors used in the applicant's business/economic case for their proposals. This is considered a reasonable approach given its unique nature. The nature of the development means that peak arrivals/departures will not in general coincide with the external road network commuter peaks. Any coincidence will be limited to the evening peak. The main peak activity will be isolated to weekends when external road network traffic flows are lower. During peak season activity - school, and in particular, summer holidays - the external road network traffic flows are also typically lower than at other times of the year. Access to the surf facilities is understood to be predominantly facilitated by pre-booked sessions, either as large group, multiple smaller groups or individuals. Therefore, access with exception of the ancillary uses can be controlled to a certain degree. The assessment of the external road network junctions predicted to be impacted by the trips generated by the proposals are still expected to operate within their practical capacity with no appreciable erosion in capacity or increase in delay;

9. The applicant's transport consultant has prepared an indicative access signing strategy as part of the TA report. It is noted that the indicative signing strategy includes the use of the A71 through Wilkieston village and Bonnington Road/Cliftonhall Road. It is expected that this route will be used by visitors from the local areas e.g. Currie, Balerno, Livingston, (The) Calder etc. It should not be signposted as a suitable route from the much wider catchment or arrivals from the strategic road network such as the M8 / M9 or A720 Edinburgh City Bypass. Consequently, this outline strategy is not approved;

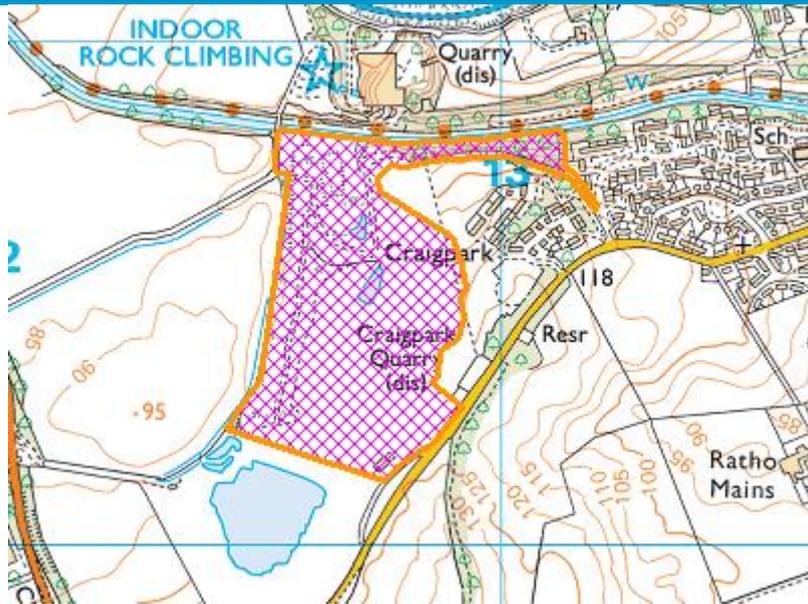
10. Access to the development is proposed from the road serving Edinburgh International Climbing Arena by formalising what is currently a gated access to the quarry site as an access junction. Whilst not adopted the access is classed as a road under the R(S)A 1980. This will provide access to the main car park serving all of the proposed facilities including overnight accommodation. Refuse collection for the whole development will be undertaken from the main access and carpark. The applicant has confirmed that a 12m long Refuse Collection Vehicle would be able to negotiate the internal layout and collect the refuse in forward gear;

11. It has been advised by the applicant's consultant that the existing access on Wilkieston Road serving a consented development for an agricultural storage building and manager's office (14/02128/FUL) associated with the extant consent for a country park and housing development (05/01229/FUL) will be provide access to the former buildings. Vehicles using this access will be limited to service vehicles including, "cleaning / laundry vans etc. and park maintenance vehicles." Furthermore, "access will not be permitted at this location for any visitors to the Proposed Development, or those people staying on-site in the lodges or camping pods." However, it is not clear from the applicant's submission how this will be controlled nor whether it can be effectively controlled.

Transport Scotland

No concern about potential impact of the proposed development on the trunk road, no statutory requirement for Transport Scotland to be consulted on the application.

Location Plan



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