Draft West Edinburgh Planning Framework

Planning Committee
22 February 2007

1 Purpose of report

1.1 To present for approval a proposed response to the draft West Edinburgh Planning Framework 2006.

2 Summary

2.1 The Scottish Executive has published a draft replacement West Edinburgh Planning Framework for comment. This proposes a significant expansion of Edinburgh Airport, the relocation of the Royal Highland Showground south of the A8, the release of green belt land between the A8 and the Airport for international business development, and a number of transport safeguards to the Airport. The Council can support the Framework but the report details some clarifications and improvements, including the need for new business development to be suspensive on the delivery of the tram and EARL projects. In addition, the Government is urged to carry out an early review of air passenger forecasts in the light of sustainable development and climate change policies. The Council will now need to lead in providing a more detailed development framework, ensuring that the benefits of growth extend to local communities and tie in with wider aspirations for the city, and in facilitating the effective implementation of the Framework vision.

3 Main report

Consultation Documents

3.1 The Draft West Edinburgh Planning Framework (DWEPF) was published on 29 November 2006 and its 12 week public consultation period runs until 21 February 2007. It has been prepared jointly by the Scottish Executive, this Council, Scottish Enterprise Edinburgh and Lothian, and West Lothian Council. It has been approved for consultation by Scottish Ministers but para 6 states that it has not yet been considered by the Council as planning authority and that this would take place during the consultation period.
3.2 The project partners are consulting widely on a suite of three documents: the Draft Framework itself, a Background Report, and a summarised non-technical Environmental Report (placed in Group Rooms).

3.3 The Background Report summarises six supporting documents and workstreams: an Economic and Property Market Update; BAA Edinburgh’s Airport Masterplan (July 2006); Royal Highland Centre Relocation; Transport Appraisal and Land Use/Transport Modelling; Sustainable Development Framework for the Gogar Burn catchment; and a Strategic Environmental Assessment (SEA) scoping report.

**Background and Council’s Previous Decisions**

3.4 The background to the WEPF is set out in Appendix 1 of this report. It includes a timeline back to the national air transport consultation in 2002, and recaps previous formal responses by this Committee and the CEC Executive to the Air Transport White Paper 2003 and BAA’s Draft Airport Masterplan 2005.

3.5 The DWEPF is the first review of the West Edinburgh Planning Framework 2003. It has been informed by the Air Transport White Paper 2003; BAA’s Edinburgh Airport Master Plan 2006; work on the feasibility of moving the Royal Highland Centre; the finalised routes and limits of deviation for tram and EARL; and new national planning policy statements on green belts and economic development.

**Strategic Planning Context**

3.6 National Planning Framework for Scotland (NPF): identifies West Edinburgh as the main gateway to Scotland’s capital and the West Edinburgh/South Fife area as a key economic development zone. Realising the opportunities for airport expansion is highlighted as a key challenge. Other issues include congestion, the integration of land use and transport, and the provision of modern transport infrastructure at a strategic location of national importance. It also highlights the unique opportunity that West Edinburgh offers as an international business location.

3.7 Stated objectives include realising the potential of the area for high quality economic development; providing a rail link to the airport; creating a high quality transport interchange at the airport; introducing a rapid transit tram service; and maintaining the strategic role of Edinburgh’s Green Belt. The NPF also confirms that the WEPF will be reviewed in the light of the proposals for the expansion of Edinburgh Airport contained in the Air Transport White Paper.

3.8 Edinburgh and the Lothians Structure Plan 2004 (ELSP): Policy ECON 5 confirms West Edinburgh has potential in the long term for economic development in the national interest. However, it states no Green Belt land should be released here during the plan period (to 2015), “for the reasons set out in the West Edinburgh Planning Framework”. Para 4.18 states any such release would require a structure plan alteration. Local plans should however safeguard land for the necessary strategic transport infrastructure and for airport expansion. On the transport side, the plan identifies the tram to the
Airport and Newbridge, a new heavy rail Airport link and station, and new Airport road links as key transport investment proposals.

3.9 The Council’s own Vision for Capital Growth 2020 – 2040 includes “West Edinburgh/A8 Corridor/expanded Airport/ Newbridge/Kirkliston” as a candidate strategic development corridor. EARL, Tram Line 2 (and extensions), Ingliston park & ride, bus corridor, new Newbridge rail station and an airport second runway are identified as existing and potential associated public transport improvements. World class business, airport uses and international gateway are identified as likely principal uses.

3.10 There is therefore clear support in principle from the Council for the growth of the airport and new business uses of national and international value. Development plan support for the latter is however conditional on the timing of any release.

The DWEPF and Planning Control

3.11 The West Edinburgh Planning Framework 2003 has the status of a Scottish Planning Policy (SPP). The current WEPF is capable of being a material consideration in development management decisions. Its draft replacement is too, but its weight will reflect its draft status. When finalised it will carry the force of national policy and will be a major input to the new Strategic Development Plan and the local plan alteration.

3.12 Most of the new developments supported by the Framework will need planning permission. Expanding the airport on land outwith its current local plan boundary will need consent, but BAA will generally be able to reconfigure operational uses within its existing boundary using its permitted development rights. This does not include hotels and, if ministers change the airport operator’s PD rights as proposed (see below), will not include car parks.

Continued elements from the existing WEPF 2003

3.13 Five elements are continued from the existing WEPF: Sighthill/South Gyle, Edinburgh Park, the Gyle, the Royal Bank’s HQ at Gogarburn, and Newbridge. Three of these would benefit from a slightly different treatment.

3.14 Gyle Centre. The shopping centre’s entry in Schedule 1 would benefit from a slightly amended wording. Further retail development at the Gyle would not currently accord with Policy Ret 3 of the Structure Plan as it would undermine strategic support for the City Centre. The EARNS study identifies a clear need to bring forward a significant level of new retail floorspace via a raft of city centre proposals. If and when proposals in the city centre come forward to meet this need, for example the St James Quarter, further development in other strategic centres like Gyle may then be supported.

3.15 It could be argued that retail matters are beyond the focus of the WEPF, and this section could be removed altogether. However, if it is to remain, the following revised text is therefore suggested:
Retail development at Gyle Shopping Centre, if consistent with the development plan and in association with enhanced accessibility by public transport and a wider range of supporting leisure and community facilities.

3.16 RBS Gogarburn In the “Vision Map” the boundary shown for the Royal Bank’s Gogarburn site differs from both the area shown in the adopted local plan and the areas with planning permission. The FWEPF should show the area identified in the local plan; this includes an area set aside for potential future expansion and covered by the outline consent.

3.17 Newbridge The section on Newbridge could benefit from updating to reflect changes since the 2003 draft including the adoption of the Rural West Edinburgh Local Plan, and the commissioning by the Council of a Regeneration Study for Newbridge and Ratho Station. The DWEPF has changed the strategic context of and effectively superseded the study. The regeneration of Newbridge and Ratho Station is a priority for the Council. Potential approaches to regeneration will now be considered in the urban design framework for the corridor, which will provide an appropriate area wide focus and allow solutions to be compatible with the wider development plan strategy. This element could therefore be removed from the DWEPF altogether, or an amended wording inserted such as:

The regeneration of Newbridge and Ratho Station, through measures including the redevelopment of brownfield sites and the release of additional employment land, which will also meet regional needs for economic development land, as set out in the Rural West Edinburgh Local Plan.

Elements in the 2006 Framework

3.18 The 2006 DWEPF:
- relocates the Royal Highland Centre to a new site south of the A8, between 2013 and 2020
- allocates a specific area of land between the Airport and the A8 (together with that part of the current Royal Highland Centre not required by airport expansion) as economic development land, reserved for defined bespoke business uses (an “International Business Gateway”) and airport hotels; previously, it safeguarded this land for such development as a long term reserve.
- previous access options are now specified as a new eastern access road to the Airport from Gogar roundabout, and a western access from the A8 near Hallyards Road.
- rejects a direct road link from the Airport south of the M8 on a combination of environmental, engineering and traffic grounds.
- emphasises strongly the imperative of public transport access to the Airport and to the economic development proposals.
- supports proposals to improve the Gogar Burn through potential restoration and diversion.
- requires the development plan to remove over 1,000 hectares from the green belt to reflect the Framework and SPP21. This will effectively mean removing the Airport, the new RHC site, the Royal Bank of Scotland site,
and the proposed IBG economic development sites from the Edinburgh Green Belt.

- Illustrates its proposals on an ordnance survey base map.

**Proposed Council Response: Main Points**

3.19 This report invites the Committee to endorse the comments in Appendix 2 as its formal response to the consultation. Members can give general support to the DWEPF but some elements do need to be clarified, amended or updated. CEC representatives on the project's steering group will seek to ensure these issues are addressed in its finalisation. The main points, and issues to be picked up, are summarised below. The appendix contains the full response and includes a number of other points and suggestions for technical and presentational improvements.

3.20 **Implementing national policy** – the DWEPF implements established national policy on airport growth. It also reflects the national importance placed on the area by Government in the NPF. This is a prime location in Scotland which, once public transport infrastructure is in place, can present a world class “offer”, attractive to major inward investment opportunities. This will add a specialist niche to the capital’s overall offer and, if carefully phased and controlled to allow only clearly defined international class single-users, should not compete with other development areas in the city.

3.21 **International Business Gateway** - Supporting studies confirm the case for setting land aside for the kinds of uses envisaged for the International Business gateway (IBG).

3.22 **Principle of Airport expansion** – The principle driver of land use change in this area is the proposed expansion of Edinburgh Airport up to 26 million passengers per annum, and by over 400 ha. The land is to be safeguarded at this stage and will be developed in phases up to 2030. The response recommends that CEC reaffirms its support for airport expansion and its intention to safeguard the land needed for growth. However, it recommends urging the Government to carry out an early review of aviation passenger forecasts in the light of sustainable development and climate change policies. If appropriate, the WEPF should be reviewed to reflect new policy and/or forecasts.

3.23 **Moving the Showground** The principle of relocating the Showground to a site south of the A8, opposite its current site, is accepted. The feasibility work undertaken to date confirms that an operationally viable site could be created, with good public transport links. The footprint shown, with all permanent buildings north of the railway line, but temporary uses extending to the south of the rail line, is the maximum likely to be needed. The Council has seen no evidence that land to the south of the rail line is needed for permanent development. The amount of temporary and permanent car parking is a key factor in establishing the area needed and this in turn depends on the mode share assumptions and targets used. Work is continuing on these aspects in the second stage of the feasibility study and Council representatives will work with...
partners to identify a level of parking provision that is consistent with both the Showground's operational effectiveness and the Council's aspirations for sustainable mode share targets.

3.24 The indicative layouts used in the feasibility study show that a relocated RHC could operate in its new location but the Council is not able to endorse any particular design solution at this stage. An overall design framework for the whole corridor is needed first, which can guide the development of individual sites and the framing of masterplans. The Council will take the lead in developing that framework, prior to finalising the WEPF, and will continue to work closely with the RHASS on emerging design solutions.

3.25 **Timing & Phasing** - Timing and phasing will be crucial to delivering a sustainable, co-ordinated solution. Most crucially, the new public transport schemes need to be in place before the main developments go ahead. The FWEPF should clearly state that principle, and indicate how the main elements of the Framework will be linked to the provision of public transport improvements. In particular, the international business proposals should be suspensive on EARL and the west Edinburgh tram becoming operational. This is required to drive mode share change and deliver sustainable travel patterns.

3.26 **Roads** – The Council can agree with the removal of support for a new M8 road link into the airport for the reasons set out in Appendix B. The new eastern and western access roads from Gogar roundabout and Ratho Station are supported in principle, subject to the modifications set out in Appendix B.

3.27 **Urban form and relationship to city** – the relationship between the Framework area and Edinburgh as a whole is crucial, both physically and functionally. The FWEPF will need to more clearly articulate this. The Council intends to lead on developing, with stakeholders, an area-wide design framework. This will produce key urban design principles for expression in the FWEPF, with the altered local plan building in the detailed guidance. A design workshop, involving the Framework partners, local community representatives and land owners is being arranged. This will provide a clear framework within which masterplans for the various developments can fit. Retaining and improving landscape context will be important as will density and maximising access to tram and EARL. This will be balanced by the need to provide an environment attractive to international business occupiers.

3.28 **The Council's Role** Following the finalisation of the WEPF, it will be for the Council to take on the leading role in co-ordinating development in west Edinburgh. Key processes will be the development of the design framework mentioned above, bringing the west Edinburgh proposals into the development plan (as discussed separately on this agenda), and the production of detailed masterplans. All these processes will require joint partnership working with local stakeholders including SEEL, BAA and local communities and landowners. Further consideration will need to be given to the internal structures required within the Council to manage this process.
3.29 **Newbridge** – The Framework as drafted changes the context for Newbridge and Ratho Station, and may indicate a new approach is required to the regeneration of these villages. For instance, Airport expansion may increase local exposure to aircraft noise; new public safety zones will prevent development in some areas; and the relocated Royal Highland Showground will have a much closer relationship with the village of Ratho Station. The Council commissioned a Regeneration Study of Newbridge and Ratho Station in 2005, but this was never completed and has now been overtaken by the DWEPF. There is a need to look again at the strategic role of economic development land in the Newbridge area, and examine ways of ensuring that local communities benefit from new development in the area and secure effective regeneration and environmental improvement. Potential approaches to regeneration will now be mainstreamed into the wider planning framework for the corridor, which will allow solutions to be compatible with the wider development plan strategy.

**Next Stages**

3.30 The consultation ends on 21 February, but the Scottish Executive have agreed to accept comments from this meeting. The Executive plans to finalise the Framework, with continuing joint working with CEC, and other project partners and stakeholders, in Autumn 2007.

3.31 The consultation responses and a proposed finalised framework will be presented to Committee for approval, and with time to build in any required changes, before the Framework is published. In the meantime, officers will continue to work with SEDD to finalise the Framework and establish how its provisions can best be carried into the development plan framework.

3.32 As the focus moves from the strategic to more detailed questions of implementation, CEC will lead on the main masterplanning exercises, putting in place a design framework, and altering the local plan. The Council will therefore establish and lead a group of partner agencies to implement the Framework.

3.33 Specific work packages will include concluding the RHS feasibility study and the Gogar Burn project, design workshops and developing a regeneration strategy for Newbridge and Ratho Station. The Council will ensure full community and stakeholder involvement. An action plan and a clear framework for masterplans will also be developed.

4 **Financial Implications**

4.1 The financial implications are currently unclear. They will depend on the mechanisms the Council chooses to carry this work forward, and the extent to which other bodies, including the Scottish Executive and SEEL, are prepared to contribute funding to different elements. However, west Edinburgh will be a major area of strategic development for many years to come, so a level of ongoing cost is to be expected. This will be reported to Committee as detailed become available.
5 Conclusions

5.1 The main elements of the draft framework can be supported in principle, subject to the comments in para 3.22 regarding air passenger forecasts. Officers now need to work with the project partners to clarify key issues and, in the light of consultation responses received, finalise the Framework. In particular, the finalised version needs to explicitly link new development with the prior provision of public transport infrastructure, primarily tram and EARL. It should also address how the Framework area integrates physically and functionally with the rest of the city and build in a robust mode share target regime. A clear framework to deliver good design and place-making is also needed.

5.2 The project partners also need to agree a clear project plan to identify roles and responsibilities for delivering co-ordinated development, and an action/phasing plan. This should explain the context and role of the individual masterplans and their relationship to the development plan. Clarity on infrastructure costs and how they are funded will also be required. The Council is in the best position to provide project leadership.

6 Recommendations

6.1 It is recommended that the Committee:

a) welcomes the publication of the consultative draft West Edinburgh Planning Framework;

b) approves the proposed response in Appendix 2 as this Committee’s response to the consultation;

c) authorises officers to work with project partners to finalise the Framework (including seeking further minor changes in content) and agree a clear plan for its implementation and delivery through the development plan and masterplans; and

d) refers this report to the Executive and the Development of the City Scrutiny Panel for their information.

Andrew M Holmes
Director of City Development
Appendices

Appendix 1: Background (including previous CEC decisions)

Appendix 2: DWEPF - Proposed CEC Response

Contact/tel

Ken Tippen – Group Leader, Strategy
Tel: (0131) 469 3613
Email: k.tippen@edinburgh.gov.uk

Wards affected

All. (Wards 3: Dalmeny/Kirkliston and 23: Gyle directly affected)

Background Papers

1 Consultative Draft West Edinburgh Planning Framework, Scottish Executive, Nov 2006

2 Draft WEPF: Background Report and summarised non-technical Environmental Report

3 West Edinburgh Planning Framework, Scottish Executive, March 2003

4 Draft West Edinburgh Planning Framework, Scottish Executive, CEC, SEEL, WLC, November 2006

5 BAA Edinburgh Airport Draft Master Plan, 2005

6 Finalised BAA Edinburgh Airport Master Plan July 2006

7 Strategic Environmental Assessment of West Edinburgh Planning Framework 2006

8 Report of West Edinburgh Planning Framework 2006 Transport Model

9 Report of Feasibility Study for relocation of Royal Highland Centre

10 Report of Gogar Burn Partnership

11 Future of Air Transport White Paper, Department for Transport/Scottish Executive

12 Report to CEC Executive on White paper, February 2004
APPENDIX 1

DRAFT WEST EDINBURGH PLANNING FRAMEWORK

BACKGROUND

A.1 This appendix presents a timeline for the background to the draft WEPF. It also sets out the formal responses of the Committee and the Executive of the Council to the DfT’s Future of Air Transport White Paper 2003 and BAA’s Draft Edinburgh Airport Masterplan 2005.

A.2 Timeline

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
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<tr>
<td>Jul 2002</td>
<td>National Consultation on Future of Air Transport (DfT)</td>
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<td>Aug 2002</td>
<td>Draft West Edinburgh Planning Framework (WEPF)</td>
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<td>Sept 2002</td>
<td>CEC response to Draft West Edinburgh Planning Framework</td>
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<td>Dec 2002</td>
<td>CEC’s response to national consultation</td>
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<td>Mar 2003</td>
<td>Finalised WEPF</td>
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<td>Dec 2003</td>
<td>Future of Air Transport White Paper &amp; Article 17 Direction</td>
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<td>Feb 2004</td>
<td>CEC response to White Paper</td>
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<tr>
<td>Aug 2004</td>
<td>Interim Protocol for consideration of applications in vicinity of Edinburgh Airport and Showground approved</td>
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<tr>
<td>May 2005</td>
<td>Draft Edinburgh Airport Masterplan (BAA Edinburgh)</td>
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<td>Sep 2005</td>
<td>CEC Response to Draft Edinburgh Airport Masterplan</td>
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<td>Jun 2006</td>
<td>Rural West Edinburgh Local Plan adopted</td>
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<tr>
<td>Jul 2006</td>
<td>Finalised Edinburgh Airport Masterplan (BAA Edinburgh)</td>
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<tr>
<td>Nov 2006</td>
<td>Draft West Edinburgh Planning Framework (DWEFP) published for consultation</td>
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<tr>
<td>Dec 2006</td>
<td>Air Transport White Paper Progress Report (DfT)</td>
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<td>Feb 2007</td>
<td>Planning Committee response to DWEFP</td>
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<td></td>
<td>End of DWEFP consultation period</td>
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The Future of Air Transport White Paper 2003

A.3 The 'The Future of Air Transport' White Paper was published jointly by the DFT and SE in December 2003 and set out the Government’s strategic policy framework for the development of airport capacity in the United Kingdom over the next 30 years. It concluded that there was a strong case to expand Edinburgh Airport and presented an indicative, but detailed, plan for a new parallel runway to the north and major expansion to the south. It consequently identified the need for the Royal Highland Showground to relocate by 2013.

Planning Committee Decision 5 February 2004

1) To note the publication of the Future of Air Transport White Paper and its proposals for Edinburgh Airport.
2) To confirm the Council’s continuing support for the strategic growth of services and facilities at Edinburgh Airport.
3) To reaffirm the vital role of central government in investing in new surface transport infrastructure.
4) To authorise officials to work with the Scottish Executive to review the West Edinburgh Planning Framework.
5) To note that land to safeguard for Airport expansion and new transport links will be incorporated as proposed pre-inquiry modifications in the finalised Rural West Edinburgh Local Plan 2003.
6) To note that environmental issues will need to be rigorously assessed through environmental assessment when a planning application is submitted and a strategy for mitigation agreed to minimise the affects on noise and vibration, air quality, flooding and nature conservation.
7) To note that the Royal Highland Showground Core Area Masterplan 1999 has now been effectively superseded by the White Paper’s proposals and its status as a material consideration in development control is correspondingly reduced.
8) To authorise officials to work with the RHASS, the Scottish Executive and others to help facilitate the Showground’s relocation.
9) To request officers to clarify with the Scottish Executive if any change is proposed to the airport operator’s permitted development rights.
10) To request Edinburgh Airport to consider measures to mitigate the effects of the temporary increased use of the cross-wind runway on local residents.

Executive of the Council Decision 10 February 2004

1) To note the publication of the Future of Air Transport White Paper and its proposals for Edinburgh Airport
2) To confirm the Council’s continuing support for the strategic growth of services and facilities at Edinburgh Airport;

3) To reaffirm, the vital role of central government in investing in new surface transport infrastructure to deliver sustainable growth;

4) To note that the planning implications of the White Paper had been considered by the Planning Committee at its meeting on 5 February; and

5) To authorise officials to work with the RHASS, the Scottish executive and others to help facilitate the showground’s relocation.

Draft Airport Master Plan

A.4 The White Paper required individual masterplans to be drawn up for airports identified for expansion, including Edinburgh. BAA’s draft Edinburgh Airport Master Plan was published on May 2005. Committee considered it on 29 September 2005 and raised a number of concerns on the:

- new eastern access road to Gogar roundabout
- need for mode share targets linked to car parking levels and public transport
- commitment by BAA to contribute financially
- need to resolve flooding issues
- retention of land at south end of runway for airport use
- impact on “Grampian Foods” site at Newbridge
- location of a second runway and the implications of its new Public Safety Zones

Planning Committee Decision 29 September 2005

A.5 To agree that the report by the Director of City Development constitute the Council’s response to BAA’s consultative draft Airport Master Plan

To agree that concerns are raised regarding a new access road to Gogar Roundabout and the various issues around transport and flooding highlighted in the report by the Director of City Development.
APPENDIX 2
DRAFT WEST EDINBURGH PLANNING FRAMEWORK
PROPOSED CITY OF EDINBURGH COUNCIL RESPONSE

General Comments

A1 The Council welcomes the publication of the DWEPF as a positive step towards a co-ordinated planning solution for this important area of the city. The draft Framework implements established national policy on safeguarding expansion opportunities for Edinburgh Airport. It also presents a draft vision for realising the strategic potential of land in the A8 corridor, consistent with the area’s identification as a national asset in the National Planning Framework. This is a prime location in Scotland which, once public transport infrastructure is in place, can present a world class “offer” and attract major inward investment opportunities. But it is also an integral part of Edinburgh and its design has to take account of its physical and functional relationship with the capital.

A2 The Council remains committed to working with partners and stakeholders to finalise the Framework and co-ordinate the delivery of nationally important infrastructure and development.

Strategic Policy Context

A3 Paragraph 8 of the DWEPF notes that it will be appropriate to take account of sustainable development and climate change policies when air passenger forecasts at Edinburgh and other Scottish airports are next calculated. If appropriate, that may lead in turn to the need to review the Framework to reflect any changes in the air passenger forecasts.

A4 The recent Stern report, and the review of UK transport strategy by Rod Eddington, have contributed to the debate over the long-term sustainability of continued rapid growth in air travel. In this context, the recognition in the ‘Strategic Policy Context’ section of the need to review aviation policy is welcome.

A5 Around two thirds (65% in 2005) of Edinburgh airport passengers fly to or from mainland UK airports, with 43% flying to/from the London airports and a further 12% to/from Birmingham, East Midlands and Manchester. An alternative national approach to Anglo-Scottish inter-city travel, seeking to actively encourage rail as an alternative to domestic air travel, is possible. The recently published National Transport Strategy for Scotland supports implementation of Scotland to London high-speed rail services, subject to feasibility studies.

A6 The Council therefore urges the UK Government to carry out a review of air passenger forecasts in the context of its own sustainable development and climate change policies. If the forecasts materially change, the Council would support the early review of the Framework.
West Edinburgh – a National Asset

A7 The Council fully supports the focus on west Edinburgh as a nationally important gateway with unique competitive advantages. But its development must recognise that it is also physically and functionally part of the capital. The FWEPF should address this (see below).

A8 Para 18 refers to the need to improve public transport accessibility but needs to make a clear statement that the major developments proposed can only operate sustainably if Tram and EARL are in place first. The Council will not support major growth in advance of the necessary public transport infrastructure.

The Vision for West Edinburgh

Elements continued from WEPF 2003

The Gyle Centre

A9 Major new retail development at the Gyle, for example on the scale currently promoted by its owners, would be contrary to Policy Ret 3 of the Structure Plan as it would undermine the city centre’s strategic role as the regional shopping centre. The Edinburgh Area Retail Needs Study identified a clear need to improve the city centre’s vitality and viability by bringing forward a significant level of new city centre retail floorspace via a raft of new proposals, for example the St James Quarter. Only after proposals in the city centre have come forward to meet this need will the accommodation of any further emerging retail needs be reviewed. This review will take place in the context of the retail policies of the development plan, and include the potential role of the Gyle.

A10 It could be argued that retail matters are beyond the focus of the WEPF, and this section could be removed altogether. However, if it is to remain, the following revised text is suggested:

“Retail development at Gyle Shopping Centre, if consistent with the development plan and in association with enhanced accessibility by public transport and a wider range of supporting leisure and community facilities.”

RBS Gogarburn

A11 The Council fully supports the continuing success of the RBS at its campus site at Gogarburn. However, in the Vision Map, the boundary of the Gogarburn site is significantly larger than both the ECON 9 allocation shown in the adopted local plan and the outline planning consent boundary. The area shown in the Vision Map for “further intensification” covers the Gogar Park Area of Outstanding Landscape Quality (AOLQ) to the east and abuts the Millburn Tower AOLQ/Designed Landscape to the south east. It may be based on the Bank’s ownership boundary rather than the functional boundary of the existing or consented uses. In the absence of any evidence that another boundary is appropriate, the
FWEPF’s Vision Map should reflect the site boundary identified for the facility in the adopted local plan’s Proposals Map. This area already includes an area set aside for potential future expansion.

**Newbridge (Ratho Station)**

A12 The Council commissioned a Newbridge and Ratho Station Study following a decision by the Council Executive in 2004, requesting the Director of City Development to bring forward a study into “the potential development and regeneration of the Newbridge area”. Consultants were appointed with the remit of identifying opportunities for development, regeneration and environmental improvements to underpin and strengthen the existing settlements of Newbridge and Ratho Station, their communities and their overall viability. Specifically, the Council asked consultants to recommend how it could use its land resources creatively to catalyse improvements.

A13 The study was to identify short-term initiatives but also recommend how the villages might restructure in the longer term. It was expected the majority of recommendations emerging could be accommodated within the existing development plan framework while any strategic level changes proposed and endorsed would inform the WEPF review and/or the local plan alteration, depending on their nature.

A14 The DWEPF has changed the strategic context of and effectively superseded the study by including the Council-owned land to the east of Ratho Station as part of the relocated Showground site. There is a need to look again at the strategic role of the Newbridge/Ratho Station area in light of the Showground’s land needs and other recent information. This includes the land use impacts of the likely public safety zones associated with a new parallel runway.

A15 For these reasons the study has not been concluded. The balance of advantage now lies with addressing potential approaches to regeneration within the proposed urban design framework for the corridor (see para A48). This will provide a more appropriate, area wide focus and allow solutions to be compatible with the wider development plan strategy.

A16 Schedule 1 should be amended to clarify that the potential longer-term strategic role of the Newbridge/Ratho Station area. The text should also be clarified to reflect the fact that the adopted local plan has already allocated land for 1,000 houses in this structure plan core development area. A suggested wording is:

“The regeneration of Newbridge and Ratho Station, through measures including the redevelopment of brownfield sites and the release of additional employment land, which will also meet regional needs for economic development land, as set out in the Rural West Edinburgh Local Plan.”
New Elements of the Vision

Airport Expansion and BAA’s Masterplan

A17 The capital, its region and the national economy needs a fully effective 21st century airport. Passenger numbers continue to grow. 8.4m passengers flew to and from 130 international destinations in 2005, up from 7.5m in 2003. It is now Scotland’s busiest air freight hub, handling 30,000 tonnes last year, up 20% on 2003 levels.

A18 At the same time there is a growing concern about the environmental impacts of the growth of aviation. The two aims of increasing connectivity and economic growth, and protecting the environment, appear to be starkly opposed. In practice, there may be a middle way based around maintaining or increasing the Airport’s role for international business flights, while investing in alternatives for domestic routes where practical and more sustainable alternatives such as rail exist.

A19 The White Paper required airport operators to draw up individual masterplans for airports earmarked for expansion, including Edinburgh. BAA published their draft Edinburgh Airport Master Plan in May 2005. The Planning Committee considered it on 29 September 2005 and raised a number of concerns regarding:

- the new eastern access road to Gogar roundabout;
- the need for mode share targets linked to car parking levels and public transport;
- the commitment by BAA to contribute financially;
- the need to solve flooding problems;
- the retention of land at south end of runway for airport use;
- the impact in particular on the “Grampian Foods” site at Newbridge; and
- the location of a second runway and the implications of its new Public Safety Zones

BAA addressed some of the Council’s concerns but the changes made were limited.

A20 In December 2006, the DIT published the Air Transport White Paper Progress Report. It notes that Edinburgh Airport has concluded that a new runway is unlikely to be needed before 2020, but has nevertheless made progress in a number of areas, including building the new control tower and parallel taxiway and launching a noise and flight-path monitoring system. The Report did not signal a major change in Government’s approach to aviation growth.

A21 There is scope for the draft Framework to give greater prominence to the issues thrown up by airport expansion. Schedule 2 should refer to the required safeguarding for a new runway. There also needs to be a general statement on how the very significant impacts of a new runway could be mitigated. For example, the impacts on Kirkliston and
Newbridge, and broad options for dealing with the River Almond which flows through the safeguarded area and raises flooding, biodiversity and other issues.

**Relocation of Royal Highland Showground**

A22 The White Paper was clear that by 2013 airport expansion will require the Showground to move to a new site. A study commissioned by the Scottish Executive and SEEL concluded that land south of the A8, opposite the current site, offered the best opportunity to accommodate the showground. A subsequent feasibility study is looking at the detail of how such a move could work, both physically and financially. The draft Framework reflects the output of the feasibility study's first phase. The Council therefore accepts the principle of relocating the Showground to a site south of the A8, opposite its current site.

A23 The Council supports the proposal to restrict permanent showground development to land north of the railway, and retain the area south of the railway in the green belt. The possible temporary use of land south of the railway for the duration of the Royal Highland Show would not require planning consent provided this was for less than 28 days a year. Therefore, to remove any ambiguity the finalised Framework should remove the hatched area shown on the Vision Map, and amend the text to note that that land could be used for temporary showground uses.

A24 The finalised feasibility study will inform the development of a masterplan for the new showground site. Council officers will work closely with the Society on this exercise. The masterplan should conform to forthcoming overall design guidance for the whole corridor, and build in robust mode share targets, given the site's proximity to tram, main bus routes and a new airport rail station. The amount of car parking to be provided is a key factor in establishing the overall land-take required and in achieving mode share change. The masterplanning exercise should therefore rigorously assess parking provision. The minimum amount of parking, consistent with the functioning of the site, should be provided.

A25 The indicative layouts used in the feasibility study show that a relocated Showground could operate in its new location, but the Council is not able to endorse any particular design solution at this stage. An overall design framework for the whole corridor is needed first, which can guide the development of individual sites and the framing of masterplans. The Council will take the lead in developing that framework, prior to the finalisation the WEPF, and will continue to work closely with the RHASS on emerging design solutions.

A26 The closeness of the proposed relocated Showground site to homes at Ratho Station could have a significant impact in terms of noise and quality of life. There may also be opportunities for positive impacts such as local use of any new facilities. This should be taken into account in finalising the Framework and should inform the layout and nature of uses at the new showground. The Framework should recognise the importance of this
issue and refer to the need to minimise and where possible design out noise impacts.

**International Business Gateway**

A27 The Council supports the principle of allocating the bulk of the land between the airport and the A8 for bespoke international business development. The West Edinburgh Property Market Update 2006 supporting document confirms this kind of development is needed in the Edinburgh area. But clarity is needed on how these uses will be defined and controlled and their release phased with public transport provision.

A28 The DWEPF aims to attract a specific, defined type of business use. The aspiration is for high quality, high value, campus style, single user development. Legal agreements would seek to control their character for at least 10 years. The Council supports this aim but more work is needed on how the type of development sought could be controlled in practice, and on the format of the built developments.

A29 On controls, the Use Classes Order does not differentiate Class 4 uses by country of origin, quality, ownership or format. Also, the Town and Country Planning (Scotland) Act 1997 has recently been amended to empower a party to seek modification of a planning obligation, imposed by agreement with the planning authority. If the planning authority determines that the obligation is to continue to have effect without modification, parties may appeal to the Scottish Ministers. “Personal consents” have been used in very special circumstances, as an alternative to a planning agreement and this may be an option here. However, Annex A of Circular 4/1998 advises that permission personal to a company is generally inappropriate. In practice therefore, the characteristics identified in the draft Framework, such as quality, output and presence of an HQ function, could be hard to define and control through the planning system. In finalising the Framework, more robust definitions are needed to avoid varying interpretations and potential appeals.

A30 Timing is key if these developments are not to have unacceptable impacts on transport and other infrastructure systems. The finalised Framework needs to clarify that the major developments proposed will not operate in advance of the necessary transport and other infrastructure being in place, in particular the tram line and EARL.

A31 Another matter to be addressed at the detailed design stage is the proximity of the airport to high quality international business development. This could have an impact in terms of noise, which would require appropriate mitigation measures. The IBG masterplan will need to address this issue.

**Eastfield Road**

A32 The Council supports the identification of land in the Eastfield Road corridor for airport-related hotels, subject to the conditions identified.
However, the finalised Framework should clarify that this land would be unlikely to be developed exclusively for hotel use. A masterplan is proposed for this “quality hotel gateway”, and the Council intends to commission a study into airport hotels to inform this on need, supply, market demand and locational characteristics.

A33 There needs to be clarity as to whether the level of land released for hotel development in this corridor should reflect need (as the Council believes, and as the Framework states at para 19), or demand (as stated at in Schedule 2).

A34 The Vision Map should also be changed to show the boundary of the Council’s extended Inglisston park and ride facility, currently indicated by two symbols either side of the tram line.

**The Gogar Burn and the River Almond**

A35 Development in the Gogar Burn’s catchment has worsened water quality and damaged habitat. The burn is prone to periodic flooding which constrains the development potential of some land between the airport and the A8. Active, sustainable flood management is the key to ensuring flood risk is not increased in the future.

A36 The Gogar Burn Partnership Group (GBPG) exists to take an overall approach to drainage, flood management and environmental quality in the area. The group is made up of members from a number of environmental organisations, councils and private companies. The GBPG commissioned consultants to study the burn’s catchment and prepare a Sustainable Development Framework. This has identified ten potential improvements to address environmental and development impact problems. One potential component is to realign the burn to the east of the airport. This would remove flooding risk affecting some land to the north of the A8, including the airport and EARL. Removing the current need to protect against flooding problems could provide the means to fund implementation of the diversion scheme. Further work is now being commissioned to define the feasibility of these improvement components and optimum combination of components. The feasibility of realigning the burn must be established in sufficient time for tie to be able to divert funding currently set aside for flood mitigation in the construction of EARL towards the implementation of the realignment.

A37 The finalised framework and SEA should explain in general terms the impact of the second runway on the River Almond. The area identified for an airport extension to the north includes a three to four kilometre stretch of the river from the edge of Kirkliston to the Edinburgh-Fife railway line. The finalised Framework should specifically address the feasibility of culverting or diverting the river, the environmental effects, and possible mitigation measures. The Framework Environmental Report strongly recommends the development of a Sustainable Development Framework for the River Almond and notes that the draft Framework does not include this requirement. The finalised Framework should commit the project
partners to work with SEPA and other interests to prepare a Sustainable Development Framework for the river.

**Transport Overview**

A38 The draft Framework sets out an integrated package of transport proposals for the area. The key projects are EARL and the West Edinburgh Tram. The framework also shows lines for two new roads. Both would link to the airport terminal, one from the A8 in the Ratho Station area, and one from Gogar roundabout. The two roads also have a significant function as access roads both to airport ancillary functions and to potential future major developments.

A39 The Council supports the surface transport elements of the framework. The draft Framework properly emphasises the importance of maximising the role of public transport for travel to the area. Its support for both EARL and the tram connection to the airport is very welcome. The airport is not currently accessible by rail; EARL will transform this situation, providing direct rail services to all of Scotland’s cities. The tram will provide excellent local public transport access to the airport, serving the Royal Bank and Edinburgh Park as well as the city centre and Leith. These new public transport projects address genuine gaps in current accessibility and will encourage a far higher share of airport users to leave their cars at home in future. This will contribute significantly to the Council’s sustainable transport objectives for access to the airport.

**M8 Airport Link**

A40 The framework shows a line for a direct road link from the M8 to the airport, but does not support the provision of this link, describing it as a Potential New Road Link (Not supported). Not providing this major new road link is fully consistent with the Council’s approach to transport investment which promotes more sustainable means of travel to and from the airport. There is currently no significant problem in accessing the airport quickly by car from the motorway network. It takes around five minutes to drive from Newbridge roundabout to the airport at most times. Bespoke modelling work for the West Edinburgh Planning Framework shows that the congestion relief provided by a motorway link road could be exceeded by a rigorous approach to maximising public transport mode share and car-sharing for travel to the area.

A41 Congestion though is only one factor. Costs would be high and there are technical difficulties in creating an adequate junction on the M8 (the Vision Map portrayal significantly understates the extent of land needed for the junction geometry). Given relative levels in the area, the road’s junctions and structures would be likely to be visually very intrusive. It would also be likely to have major severance/sterilisation effects on the site identified for the Showground’s relocation and the ‘Quality Hotel Gateway’. An eastern alignment in the area shown on the draft WEPF vision map would remove a large part of the Ingliston Park and Ride site and sever the site from the tram stop due to be constructed to serve it. The other road
proposals in the framework are likely to provide a better environmental and transport solution, when combined with a rigorous, area-wide public transport mode-share regime.

A42 Notwithstanding the above, it should be noted that the draft WEPF appears to understate the potential congestion reduction impact of the M8 link in the scenario that significant new development takes place in the area over and above airport growth. In the light of this, it is understood that the Scottish Executive have agreed to carry out some further assessment of the potential place of the M8 link in the final West Edinburgh Planning Framework, looking at transport and other issues. Council officials will participate in this further work.

New Road Links

A43 The Council also supports in principle the proposed new eastern and western roads in the framework area, but we note that technical details such as junction arrangements have still to be developed. It is, however, undesirable for the new eastern access to completely replace Eastfield Road as the main strategic access to the airport from the east, because:

- the eastern road has a relatively indirect alignment, designed to facilitate future use as a development access, and  
- Eastfield Road has a dedicated grade separated junction off the A8. This would be extremely expensive and intrusive to replicate at Gogar for the new eastern access.

The new roads will also access the proposed strategic developments to the north of the A8. The Council expects that the design, development and construction of the new roads would be funded by developers, including BAA.

Mode Share

A44 On mode share, paragraph 15 notes that 'maintaining efficient surface access to the airport with greater focus on public transport mode share is of prime strategic importance.' The Council fully supports this statement. However, the Framework could usefully set out what new developments would need to do to achieve this aspiration.

A45 The Council suggests two modifications. Firstly to paragraph 18, which summarises actions that 'need to happen if the area is to realise its full potential...'. In pursuing the mode share aim discussed above, the first bullet of paragraph 18 should be modified and split as follows:

- improved public transport accessibility  
- management of road congestion, primarily through a comprehensive planned approach to minimising the number of motorised vehicle movements generated by development in West Edinburgh, and maximising public transport mode share
A46 The second amendment suggested to strengthen the position of the Framework on mode share is the addition of an item referring to mode share to Schedule 2. The suggested wording is as follows:

**Travel to new development in the WEPF area:** Travel to developments is primarily influenced by the availability of car parking and the quality of access to the developments by public transport and other alternatives to the car. In recognition of this, development in the WEPF area (including at Edinburgh Airport) should:

- conform to maximum parking standards aimed at reducing the share of employees arriving as car drivers to 33% or below (or other lower figure to be specified by the planning authority), and minimising the number of other motorised vehicle movements generated by developments;

- be required to present effective travel plans, and/or access strategies aimed at minimising the number of motorised vehicle movements generated by developments, by achieving ratios of development employees/users to motorised traffic generation to be specified as necessary by the planning authority.

A47 Indications of current car driver mode share at the Royal Bank of Scotland suggest that, given the major improvements in public transport access planned for the WEPF area, a 33% target is realistic.

A48 A planned approach to access is essential if road traffic generation is to be minimised. Some development in the WEPF area, notably the airport and the Royal Highland Showground, generates very large volumes of non-employee travel. The ratio of development employees/users to overall motorised traffic generation gives a good overall indication of the effectiveness of travel plans in meeting their primary objective. Appropriate ratios will vary depending on the development being considered.

A49 Addition of this item would allow deletion of the text on mode share in the item of schedule 2 referring specifically to Edinburgh Airport.

**Permitted Development Rights for Car Parking**

A50 The Council strongly supports the proposal to remove the permitted development rights enjoyed by Edinburgh Airport, specifically in respect of car parking. This is a crucial part of a transport package which seeks to take a managed, holistic approach to travel to and from the airport area. The Council has been working with BAA to develop an Airport Surface Access Strategy. This will continue, but the significant income derived from parking by BAA can create tensions in working towards sustainable transport objectives. Particularly in this context, it is appropriate for the Council to have planning control over parking.
Design and Relationship to City

A51 There is a real opportunity to create an exciting new planned urban extension to the city in the Framework area, taking full advantage of its future superb multi-modal public transport accessibility. The Framework should set out basic design principles to guide individual masterplans. These principles should consider: how this area relates to rest of city, both physically and functionally; improving landscape context; and how to maximise the benefits of nearness to tram and EARL. This will be balanced by the need to provide an environment attractive to international business occupiers.

A52 The Council will lead on developing an Urban Design Framework for the Framework area. This will evolve through working with partners, the communities, landowners and stakeholders and the FWEPF should reflect its main principles. The Council will therefore establish and lead a group of partner agencies to implement the Framework.

Air Quality & Noise

A53 The finalised WEPF should refer to the St Johns Road, Corstorphine Air Quality Management Area (AQMA). The Council declared this on 31 December 2006 due to a failure to meet annual air quality standards. Despite the expected increase in public transport use once the new schemes are in place, additional overall traffic levels associated with proposed growth in the A8 corridor are inevitable. This will worsen existing problems and make it more difficult to improve air quality in urban west Edinburgh.

A54 The Framework should also address more fully the likely noise impact of the substantial growth in air traffic movements at the airport, particularly the increased use of the cross runway in the medium term, and the geography of increased noise associated with a new runway to the north post 2020.

A55 The finalised SEA should also assess both these issues and indicate appropriate mitigation measures.

Action Required - Delivery

A56 The Council intends to lead on the Urban Design Framework and masterplanning the new developments. The Urban Design Framework will be contained within the local plan alteration, and its broad principles should be included in the FWEPF. We expect SEEL to lead on preparing an implementation plan, which should address, among other matters, how new infrastructure will be funded.

Timing and Phasing

A57 Timing and phasing will be crucial to delivering a sustainable, co-ordinated development. Most crucially, the key new public transport schemes need
to be in place before the main developments go ahead. The Framework should clearly state that principle, and in its action plan indicate the likely phasing of public transport schemes, the IBG etc. The new public transport infrastructure must be in place before the development proposals go ahead in order to drive mode share change and deliver sustainable travel patterns. A clear suspensive statement to that effect must be included in the Framework.

**Vision Map**

A58 The Vision Map should be redrawn to:

- show and annotate the South Gyle/Sighthill area (if this element is to remain in the Framework);
- remove the statement that boundaries are indicative only and not meant to be definitive this suggests an unhelpful level of uncertainty around some boundaries which are clearly set, such as the tram depot site, airport boundary and RBS site;
- delineate the expanded park & ride site boundary, rather than show as two symbols;
- reflect the adopted local plan's boundary for the RBS HQ complex at Gogarburn.