

# The City of Edinburgh Council

10.00am, Thursday, 30 May 2019

## Report of Pre-Determination Hearing – 2 Eastfield Road Edinburgh (At Land 160 Metres North Of) – referral from the Development Management Sub-Committee

Executive/routine  
Wards  
Council Commitments

### 1. For Decision/Action

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- 1.1 To consider the recommendation of the Development Management Sub-Committee on a planning application, which was the subject of a pre-determination hearing under the procedures set out in the Town and Country Planning (Development Management Procedures) (Scotland) Regulations 2008, to grant planning permission in principle for the reasons outlined in the report by the Chief Planning Officer, and to refer the decision to Scottish Ministers.

**Laurence Rockey**

Head of Strategy and Communications

Contact: Jamie Macrae, Committee Officer

E-mail: [jamie.macrae@edinburgh.gov.uk](mailto:jamie.macrae@edinburgh.gov.uk) | Tel: 0131 553 8242

# Referral Report

## Report of Pre-Determination Hearing – 2 Eastfield Road Edinburgh (At Land 160 Metres North Of) – referral from the Development Management Sub-Committee

### 2. Terms of Referral

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- 2.1 In December 2009, the Council approved procedures for dealing with planning applications requiring to be considered by means of a pre-determination hearing.
- 2.2 On 8 May 2019, the Development Management Sub-Committee conducted a pre-determination hearing in respect of an application for planning permission in principle for a proposed mixed use development at land 160 metres north of 2 Eastfield Road, Edinburgh.
- 2.3 The Sub-Committee received:
- a presentation on the report by the Chief Planning Officer (appendix 1)
  - a presentation by Alastair McKie (planning lawyer from Anderson Strathern) and Kevin Martin (transport consultant from Mott Macdonald) on behalf of Edinburgh Airport
  - a presentation by the applicants in support of the proposals

#### Report by the Chief Planning Officer

- 2.4 The Chief Planning Officer gave details of the application and the planning considerations involved for planning permission in principle.
- 2.5 The proposal for planning permission in principle was for a proposed business led, mixed use development as an initial phase of the Edinburgh International Gateway (IBG). A quantum of development for the site as whole comprising 211,511 metres square floor space was identified, with permission sought for the following mix of uses: Class 4 Business - 122,158 metres square (58%), Class 7 Hotel - 40,338 metres square (19%), Class 9 Residential and Sui Generis Flatted development - 43,574 metres square (21%). This would represent approximately 396 units including 25% affordable, Class 1, 2, 3, 10 and 11 - Ancillary Uses: - Retail, Financial and Professional and Services, Food and Drink, Assembly and Leisure (2%).

- 2.6 Two points of vehicular access would serve the proposed development. A signalised junction would be formed from Eastfield Road, at the location of the existing roundabout. This would form the western section of the proposed Gogar Link Road. To the south, the existing access serving the Park and Ride Site from the dumbbells junction would also be utilised. The existing northern access to the Park and Ride from Eastfield Road would be maintained and it is not envisaged that this would provide direct vehicular access into the IBG site at the current time.
- 2.7 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, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The general principle of the development of the site for an International Business Gateway was underpinned by National Planning Framework 3 (NPF3), the Strategic Development Plan (SDP) and Local Development Plan Policy Emp 6. LDP Policy Emp 6 outlines specific planning policy requirements in respect on the International Business Gateway. The purpose of this policy is to support the development of this internationally important economic development opportunity and ensured that proposals accorded with NPF3.
- 2.8 The Chief Planning Officer considered that, subject to the conclusion of a suitable legal agreement requiring contributions in relation to tram, the delivery of transport infrastructure to support the development of the site and other contributions in relation to affordable housing, education and healthcare the principle of the proposed development was acceptable, and recommended that the application be granted.

### **Presentation by Edinburgh Airport**

- 2.9 Alastair McKie (planning lawyer from Anderson Strathern) and Kevin Martin (transport consultant from Mott Macdonald) gave a presentation on behalf of Edinburgh Airport.
- 2.10 Edinburgh Airport did not oppose the principle of this development but argued that a compliant standalone transport assessment had not being carried out. Mr McKie stated that the main access to Edinburgh Airport was Eastfield Road which was already congested at peak times. The development's vehicular access was also from Eastfield Road. A compliant transport assessment was a requirement of adopted development plan, national guidance, and environmental impact assessment. Mr McKie stated that a comprehensive transport assessment must be submitted with planning applications for proposals generating significant amount of travel or in particular travel sensitive locations. Mr McKie argued the proposals would generate a significant amount of travel and was in a travel sensitive location. Weekly reports show delays are 45 minutes or more on Eastfield Road.
- 2.11 Mr McKie stated the indicative threshold for requiring a standalone transport assessment under national guidance was two and a half thousand square metres of business space. The proposed development was fifty times that size, at 122 thousand square metres. In similar applications in West Edinburgh, Mr McKie argued that the Council required standalone transport assessments.

2.12 Edinburgh Airport asked members to continue the application until such a time as the applicants provided as compliant and standalone transport assessment. Mr McKie requested the application be refused if the applicants did not provide a transport assessment or the Council did not require one on the basis that the application was contrary to local development plan, national guidance, and the environmental impact regulations 2017.

### **Presentation by Applicant**

2.13 Peter Carus (Avison Young), Martin Dalziel (New Ingliston Ltd), Ewan Anderson (7N Architects) Douglas Bisset (WSP Group) were heard in support of the application.

2.14 The International Business Gateway (IBG) was an important strategic site for Edinburgh and the national economy. Identified ten years ago in Scottish Government's West Edinburgh Planning Framework from 2008 and the City of Edinburgh Council's West Edinburgh Strategic Design Framework from 2010. The economic significance of the site was due to its proximity to Edinburgh airport.

2.15 The site was allocated in statutory planning documents, including the National Planning Framework 3 (NPF3) and the Local Development Plan. Mr Dalziel stated the site therefore had statutory planning support of the Scottish Government and City of Edinburgh Council.

2.16 The West Edinburgh Partnership Development Board, established in 2008, had representation from the City of Edinburgh Council, Scottish Government, Scottish Enterprise, Transport Scotland, the Royal Highland Society, Edinburgh Airport and other landowners. The Board was set up with the purpose of enhancing the holistic development of West Edinburgh, of which the IBG was an important part.

2.17 Mr Dalziel argued that the proposals would have a positive economic impact on the city. 122,158 square metres of office accommodation would create jobs in the construction phase and work space for 12 thousand staff, and there would be excellent tram links to the city and airport. 396 residential units would ensure that a community would form. 99 of these would be affordable homes. 57% of the site formed public realm and landscaping. Active Travel was an important element of the site, and there was a strong emphasis on pedestrian and cycle routes throughout.

2.18 Mr Dalziel clarified that the Park and Ride was owned solely by the Council. The applicants had provided an indicative layout, should the site be relocated to Newbridge, following the extension of the tram. Consent was not being sought as part of this application and any decision would be for the Council to make.

### **Deliberation by Sub-Committee Members**

2.19 Copies of representations received during the consultation period had been made available to members of the Sub-Committee for inspection.

2.20 Both parties were questioned on their presentations by members of the Sub-Committee.

## **Motion**

To grant planning permission in principle, subject to referral to Full Council and the conditions, reasons, informatives and a legal agreement, as set out in section 3 of the report by the Chief Planning Officer.

- moved by Councillor Gardiner, seconded by Councillor Child

## **Amendment**

To continue consideration of the application, to allow for a transport assessment to be undertaken.

- moved by Councillor Booth, seconded by Councillor Staniforth

## **Voting**

For the motion - 9 votes

(Councillors Child, Gardiner, Gordon, Griffiths, McLellan, Mitchell, Mowat, Munn and Osler)

For the amendment - 2 votes

(Councillors Booth and Staniforth)

## **Decision**

To grant planning permission in principle, subject to referral to Full Council and the conditions, reasons, informatives and a legal agreement, as set out in section 3 of the report by the Chief Planning Officer.

## **3. Background Reading/ External References**

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[Development Management Sub-Committee – 8 May 2019 – Webcast](#)

## **4. Appendices**

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Appendix 1 – report by the Chief Planning Officer

# Development Management Sub Committee

**Wednesday 8 May 2019**

## **Application for Planning Permission in Principle 15/05580/PPP**

**At Land 160 Metres North Of 2, Eastfield Road, Edinburgh  
Mixed use development inc. business + employment uses  
(class 4); hotels (class 7) + ancillary uses including retail  
(Class 1), financial + professional services (Class 2), food +  
drink (Class 3), residential (Class 9), non-residential  
institutions (Class 10), assembly + leisure (Class 11), sui  
generis flatted development; associated works inc. car  
parking, servicing, access + public realm. (As Amended)**

**Item number**

**Report number**

**Wards**

A01 - Almond (Pre May 2017)

## **Summary**

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The application represents a National Development proposal in West Edinburgh, situated within close proximity to the A8 Corridor and Edinburgh Airport.

The development of an International Business Gateway (IBG) to the west of Edinburgh is supported by the National Planning Policy NPF3, the SDP and the Development Plan with site design principles articulated through the Local Development Plan (LDP) and the West Edinburgh Strategic Design Framework (WESDF).

The proposed mix of land uses are considered appropriate to the development of an International Business Gateway - subject to a range of planning controls to ensure the primacy of business uses are maintained as the site is developed whilst also delivering a suitable mix of complementary uses as identified through LDP Policy Emp 6.

The proposed masterplan framework and parameters plans are considered to provide a suitable basis for planning conditions to guide the long term development of the IBG Phase 1 site, promoting high quality development, placemaking and site infrastructure befitting of the aspirations for the international business development.

Subject to the conclusion of a suitable legal agreement requiring contributions in relation to tram, the delivery of transport infrastructure to support the development of the site and other contributions in relation to affordable housing, education and healthcare the principle of the proposed development is considered acceptable.

## Links

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<a href="#"><u>Policies and guidance for this application</u></a>	LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES09, LDES11, LEN08, LEN09, LEN12, LEN16, LEN20, LEN21, LEN22, LEMP01, LEMP06, LEMP10, LHOU01, LHOU02, LHOU03, LHOU06, LHOU10, LRET06, LRET08, LTRA01, LTRA02, LTRA03, LTRA04, LTRA06, LTRA07, LTRA08, LTRA09, LTRA10, NSGD02, NSGSTR, NP01,
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# Report

## **Application for Planning Permission in Principle 15/05580/PPP**

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Mixed use development inc. business + employment uses  
(class 4); hotels (class 7) + ancillary uses including retail  
(Class 1), financial + professional services (Class 2), food +  
drink (Class 3), residential (Class 9), non-residential  
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generis flatted development; associated works inc. car  
parking, servicing, access + public realm. (As Amended)**

### **Recommendations**

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- 1.1 It is recommended that this application be Minded to grant - Scottish Ministers subject to the details below.

### **Background**

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#### **2.1 Site description**

The application site (36.7 hectares) is situated in West Edinburgh, approximately 12.4km to the west of Edinburgh City Centre.

This site is defined by Eastfield Road to the west, which connects with the A8 Glasgow Road that forms the southern edge of the site. A residential property with outbuildings lies to the southern site boundary, this being accessed from the A8 eastbound carriageway. Arable land and woodland occupies the area to the south of the A8 this designated as Green Belt with areas also safeguarded for the potential relocation of the Royal Highland Centre.

The northern edges of the site are bounded by a hotel and the Gogar Burn, with Edinburgh Airport occupying much of the area to the north. The Airport Terminal building lies approximately 1.2 km to the north.

The land lying immediately to the east of the site comprises open, uncultivated grassland. This extends eastwards towards the Gogar Burn and the Edinburgh Tram Depot.



The Ingliston Park and Ride site, managed by the Council, occupies the central and south western parts of the application site, this being accessed from Eastfield Road and the dumbbells junction to the south east. Originally opening in 2005, this now includes surface car parking for 1085 vehicles, a bus layby and hub building containing passenger facilities. The site edges are enclosed by maturing soft landscaping. A further area for the future expansion of the site lies to its eastern edge. Since 2014, the Park and Ride site has also been served by a tram stop, with the tram route (LDP Proposal T1) entering the application site from the north and east, to provide a high frequency public transport link between the Airport and Edinburgh City Centre. The tram stop also includes an electrical sub-station and dedicated parking area.

The remainder of the site to the north comprises open, uncultivated grassland, with land to the south and south west currently remaining in arable use. A number of hedgerows partially define the site edges and former field boundaries running across the site. A small pocket of mature trees are situated to the south western corner of the site, adjacent to the A8 dumbbells junction.

The prevailing land levels fall from 50 metres AOD to the southern edge of the site, reducing to approximately 32 metres AOD at the northern edges at the Gogar Burn. This results in an 18 metre level difference across the site.

The LDP identifies the north eastern part of the application site, adjacent to the Gogar Burn, as an Area of Importance for Flood Management. The application site is crossed by two drainage channels, these both entering the Gogar Burn. These include a drainage ditch to the eastern edge of site (referred to as the Ratho Channel) with a second watercourse (referred to as the Eastfield Road Tributary) flowing from the west, and crossing the northern part of the site. A SUDS detention basin is situated to the north of the Park & Ride Site, immediately to the west of the tram route.

A gas main crosses the western part of the site from north to south, this lying immediately to the west of the tram line before crossing the park and ride site. Building should not be located above this.

In terms of adjacent uses surrounding the application site, the nature of Eastfield Road is mixed in character. This includes the Royal Highland Showground and airport car parking to the west, these being interspersed by a small number of dwellings and former farmsteadings, some also operating as business premises. A number of hotels lie to the north and north east, including two recently developed sites at the Eastfield Road/Fairview Road roundabout.

The entirety of the application site is designated in the LDP as Special Economic Area. This designation embraces a number of the key strategic sites in West Edinburgh, including the International Business Gateway, Edinburgh Airport and the Royal Highland Centre. These sites are covered by specific planning policies, designed to help deliver the Council's Economic Strategy through promoting economic development in sustainable locations, with a particular focus on opportunities for office development and Edinburgh's special economic areas.

The area of land to the north west of the application site, situated to the east of the tram line is designated in the LDP as an Area of Importance for Flood Management. The WESDF also identifies the same area, to the south of the Gogar Burn, for potential future expansion of the Airport.

LDP Proposal GS6 identifies three areas of open space to be delivered within the extents of the application site. This includes two areas of open space - one crossing the northern part of the site and the second defining the eastern edge (these being referred to as the IBG Central Parkland). A further area of open space would define the southern edge of the site along the A8 corridor.

The alignment of a future tram route from Ingliston P&R tram stop to Newbridge is safeguarded (LDP Proposal T1) this forming a spur across the western part of the site from the tram stop towards Eastfield Road.

LDP Transport Proposal and Safeguard T8 - Eastfield Road and dumbbells junction, passes to the western edge of the site. Proposal and Safeguard T9 - Gogar Link Road crosses the northern part of the site to link Eastfield Road with land to the east and the Gogar roundabout.

## **2.2 Site History**

21 August 2000 - Planning permission refused to erect hotel with conference facilities. Appeal subsequently dismissed. (Application reference:- 00/01588/FUL).

02 June 2004 - Planning permission granted for Park and Ride facility comprising car park, terminus building and dedicated bus access (Application reference:- 04/00362/CEC).

05 October 2007 - Application withdrawn for hotel incorporating conference and leisure facilities, car parking and associated landscaping (Application reference:- 01/01769/OUT).

08 August 2008 - Prior Approval granted for the Ingliston Park and Ride Tram Stop (Application reference:- 08/02250/PA).

08 December 2010 - Prior Approval granted for NIL Tram Crossing No.2 - a future proofed road crossing over tram alignment (Application reference:- 10/03024/PA).

### **IBG Applications**

08 August 2013 - Proposal of Application Notice (PAN) submitted for IBG Phase 1 (34 hectares) this including land immediately to the east of Eastfield Road and the Ingliston Park + Ride site (Reference:- 13/03146/PAN).

21 January 2015 - Proposal of Application Notice (PAN) submitted by NIL Limited for IBG Phase East (75 hectares) this including land extending from the east of the Ingliston Park + Ride site to the Gogar Burn (Reference:- 15/00225/PAN).

29 February 2016 - Proposal of Application Notice (PAN) submitted by West Craigs Limited for land extending eastwards from the Gogar Burn towards the Tram Depot and Edinburgh Gateway (Reference:- 16/00927/PAN).

## **Main report**

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### **3.1 Description Of The Proposal**

#### Scheme 2

Planning Permission in Principle (PPP) is sought for proposed business led, mixed use development as an initial phase of the Edinburgh International Gateway (IBG). A quantum of development for the site as whole comprising 211,511 metres square floorspace is identified, with permission sought for the following mix of uses:-

- Class 4 Business - 122,158 metres square (58%).
- Class 7 Hotel - 40,338 metres square (19%).
- Class 9 Residential and Sui Generis Flatted development - 43,574 metres square (21%). This would represent approximately 396 units including 25% affordable.
- Class 1, 2, 3, 10 and 11 - Ancillary Uses:- Retail, Financial + Professional Services, Food and Drink, Assembly and Leisure (2%).

A Concept Masterplan, series of Plot Parameters Plans and Development Guidance have been prepared in support of the application, these establish a masterplan framework, a range of design parameters and detailed design guidance to be observed throughout the development of the site. The overarching masterplan principles and design approach have been outlined in a supporting Design and Access Statement.

The Concept Masterplan approach establishes a site structure, based around a rectilinear grid to form 18 development blocks or plots (16 plots if the Council owned Park & Ride site is excluded). The proposed masterplan framework also identifies access routes, estate infrastructure including strategic public realm, open space and landscape with specific details presented through a suite of masterplan documents:-

- Masterplan Overview
- Estate Infrastructure and Landscape
- Landscape Framework
- Plot Framework
- Movement and Access
- Mix of Uses
- SUDS Strategy
- District Heating
- Implementation Strategy

The Concept Masterplan has presented an illustrative approach for the possible future redevelopment of the Council owned Ingliston Park and Ride site, although this does not form part of the application.

A suite of Plot Parameters Plans define the following on a site wide basis:-

- Development Parameters (Build Zone, primary frontage, green edge and landscape buffers).
- Height parameters (Maximum building heights on a sub plot basis).
- Use parameters (Extents and location of business/hotel led development, residential led development, active ground floor zone for leisure and retail development).

Detailed Development Guidance has also been prepared for:-

- Public realm on a site wide basis, this including landscape and open space.
- Plot Principles will provide a flexible framework for development through the use of plot parameters.
- Park and Ride Site - illustrative approach for future development.

The proposed development would be served by two points of vehicular access. A signalised junction would be formed from Eastfield Road, at the location of the existing roundabout. This would form the western section of the proposed Gogar Link Road. To the south, the existing access serving the Park and Ride Site from the dumbells junction would also be utilised. The existing northern access to the Park and Ride from Eastfield Road would be maintained and it is not envisaged would provide direct vehicular access into the IBG site at the current time.

It is anticipated that the following matters would be approved to support a Planning Permission in Principle:-

- Proposed mix of uses and development quantum. Restrictions would apply in terms of maximum floorspace relating to Business, Hotels, Food & Leisure and Residential uses (where a maximum number of units would also apply).
- Concept Masterplan, as depicted through the Estate Infrastructure and Landscape Plan, this outlining strategic site infrastructure requirements. Masterplan framework suite of supporting plans including landscape and plot framework, access routes, strategic public realm and SUDS.
- Points of access, street hierarchy, strategic cycle and pedestrian network.
- Development Parameters relating to Plot Parameters, Height Parameters, Use Parameters. Controls relating to the form and layout of buildings would be controlled through development Plot Parameters plans.
- Development Guidance - Public Realm, Plot Principles, Park & Ride Principles.

### Scheme 1

Main scheme details as above, noting the following amendments:-

- Adjustment to the proposed level of development to the north eastern corner of the site to take account of flooding and drainage issues including SEPA objection.
- Change to maximum height of development blocks in two locations to take account of Airport height restrictions.

- Implementation Strategy submitted February 2019 following discussion with applicants.

Further public notification was undertaken in relation to the following:-

- Addendum to Transport Addendum (February 2018). The applicants subsequently prepared a Transport Technical Note (October 2018) to address a number of issues raised by the Council.
- Addendum to the EIA - Noise and Air Quality (March 2018), Ecology/Ecological Baseline Review (November 2018).

### Supporting information

EIA Screening ascertained that an Environmental Statement would be required in relation to the development of the site. An Environmental Statement has been lodged in support of the application and this has considered the following areas:-

- Outline description of the proposed development
- Approach to the EIA
- Ecology and Nature Conservation
- Historic Environment
- Ground conditions, hydrogeology & contamination
- Transport & Access
- Noise & Vibration
- Air Quality
- Cumulative Impacts
- Conclusions, Schedule of Mitigation and Residual Effects

EIA Addendum were prepared in relation to Ecology and Nature Conservation, Noise & Vibration and Air Quality.

Other documents:-

- Design and Access Statement
- Planning Statement
- Implementation Strategy
- West Edinburgh Transport Study (WETS)
- Transport Appraisal Addendum
- Transport Technical Note
- Newbridge Air Quality Study
- Pre-Application Consultation (PAC) Report
- Flood Risk Assessment
- Drainage Strategy
- Sustainability Appraisal

The supporting information is available to view on the Planning and Building 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 development is acceptable;
- b) The proposed masterplan concept and design parameters are acceptable and in accordance with the International Business Gateway LDP Development Principles and the West Edinburgh Strategic Design Framework;
- c) The proposals raise issues relating to transport and accessibility;
- d) There are requirements for other developer contributions;
- e) Other matters:- Strategic Landscape impact, Flooding, Air Quality, Contamination, Amenity, Archaeology; are addressed;
- f) Equalities and human rights; and
- g) Issues raised in representations have been addressed.

#### **a) Principle of Development**

##### Policy Context

The general principle of the development of the site for an International Business Gateway is underpinned by National Planning Framework 3 (NPF3), the Strategic Development Plan (SDP) and Local Development Plan Policy Emp 6.

NPF3 identifies the requirement for an international business gateway development, related to the Airport in West Edinburgh. NPF3 acknowledges that 'given Scotland's location in Europe and the importance of wider global markets, maintaining and enhancing air connectivity is essential. Scotland's major airports provide a gateway to Scotland and particularly to the cities network. The enhancement of Scotland's five main Airports is supported as national development. These gateways are important for inward investment'. The national development includes reconfiguration of land uses around Edinburgh Airport to accommodate future expansion, relocation of the Royal Highland Showground and support for the creation of an International Business Gateway (IBG) to the west of Edinburgh. Annex A, sets out the criteria for national development. This identifies Strategic Airport Enhancements including Edinburgh Airport and adjoining land identified for mixed, industrial and business use. Criterion c) refers to the construction of buildings for business, general industrial or storage and distribution requiring a near airport location where gross floorspace exceeds 10,000 metres or 2ha in area are identified for associated business development.

The Spatial Strategy contained within SESPlan, the Strategic Development Plan, identifies 13 Strategic Development Areas (SDA's) including West Edinburgh, these form the main focus for future growth. These are intended to maintain and develop the areas established role as the Regional Core and the Capital City.

The West Edinburgh SDA is an internationally recognised area of economic importance incorporating Edinburgh Airport. The SDP identifies the area as an attractive location for inward investment and as well as airport expansion proposals includes the development of a new multi-modal station at Gogar (Edinburgh Gateway), the relocation of the Royal Highland Centre and the creation of an International Business Gateway. Strategic infrastructure relating to the development of the site includes Edinburgh Tram Line 1A, the development of Gogar Intermodal Station and upgrades at the Newbridge interchange.

LDP Policy Emp 6 outlines specific planning policy requirements in respect on the International Business Gateway. The purpose of this policy is to support the development of this internationally important economic development opportunity and ensure that proposals accord with NPF3.

The policy states that proposals for the development of an IBG within the boundary defined on the Proposals Map will be supported. The following uses are supported in principle:

- International business development
- Hotel and conference facilities
- Uses ancillary to international business development, such as child nursery facilities, restaurants and health and sports clubs

All IBG proposals must accord with the IBG development principles and other relevant local development plan policies, with further planning guidance set out in the West Edinburgh Strategic Design Framework (WESDF).

The WESDF establishes the vision for West Edinburgh to become the most successful employment led city extension in Europe. Its success will be measured in terms of international investment, new jobs and quality of place. In relation to the IBG, the Framework identifies "a unique opportunity for international businesses to locate alongside a vibrant mix of ancillary uses in a high quality environment, close to the airport and excellent public transport links".

Compliance with the WESDF, the IBG Development Principles and other relevant local plan policies will ensure IBG proposals are acceptable in terms of scale and location, accessibility by public transport, pedestrians and cyclists, traffic generation and car parking, landscaping, sustainable buildings, drainage and flood management, habitat protection and enhancement, place-making and design and impact on setting and views including wider townscape impacts.

The proposed masterplan proposals have identified the following mix of uses which are assessed as follows:-

#### Business + employment uses (Class 4)

The application proposals identify the development of new buildings as part of mixed use development to accommodate Class 4 business and employment uses of up to 122,158 square metres. This would represent 58% of development quantum or floorspace and has been tested through a concept masterplan to inform a series of parameters plans and accompanying design principles.

Class 4 business and employment uses would enable:- a) use as an office; b) research and development of products and processes; c) for any industrial process which can be carried out in a residential area without detriment to amenity by reason of noise, vibration, smell and fumes.

The main purpose of the Edinburgh International Business Gateway is to attract inward investment and create new jobs for Scotland. International business development may take various forms, including the development of global/European/UK headquarters and accommodation supporting high-value corporate functions for international organisations.

LDP Policy Emp 6 supports proposals for the development of an International Business Gateway and international business development. The nature of the Class 4 business and employment use class would facilitate these objectives. The nature of the proposal would be further supported by part b) of LDP Policy Emp1 relating to Office Development. This states that high quality office developments, will be supported in other strategic business centres identified in the LDP including the International Business Gateway, preferably as part of business led mixed use proposals.

The proposed level of Class 4 business floorspace (58%) would represent the predominant use within the development and is considered to provide a suitable level of emphasis to the primary role of the site as an International Business Gateway.



The location of business led development across the site is defined through the Development Plots - Use Parameters Plan. All Approval of Matters Specified in Conditions (AMC) applications for these plots will be required to indicate how Class 4 business uses, and other uses, will be delivered to demonstrate that a minimum threshold of business floorspace will be achieved across the wider IBG development.

### Hotels (Class 7)

The application proposals identify hotel development of up to 40,388 square metres (or approximately 1150 rooms). This would represent 19% of the development quantum or floorspace which has been tested as part of the masterplan proposals.

LDP Policy Emp 6, International Business Gateway, states that the development of hotel and conference facilities will be supported in principle. This is further reinforced through LDP Policy Emp 10 b) which permits hotel development within the boundaries of Edinburgh Airport, the Royal Highland Centre and the International Business Gateway.

The proposed level of Class 7 hotel floorspace (19%) is considered to place an appropriate emphasis on hotel uses to support the development of the IBG, helping to create a mixed use place without undermining its primary business role and function. However, it is important that the overall level of hotel development is subject to planning controls to ensure that the primary business uses do not become diluted.

The location of hotel led development across the site is defined through the Development Plots - Use Parameters Plan. All AMC applications for these plots will be required to indicate how Class 7 hotel uses, and other uses, will be delivered to demonstrate that a maximum threshold of hotel floorspace will not be exceeded across the wider IBG development.

### Housing - Residential (Class 9), Sui Generis flatted development

The application proposals identify 43,576 square metres of residential development. This would represent 21% of the development quantum and equate to approximately 396 homes.

The principle of housing as a component of a business-led mixed use proposal is supported through LDP Policy Emp 6, this being subject to further consideration through the masterplan process, appropriate infrastructure provision and where consistent with the objectives of NPF3.

LDP Policy Hou 1, Housing Development, further states that priority will be given to the delivery of housing land supply through sites allocated in the LDP. The IBG site is identified within LDP Table 4 whereby housing development is supported in principle subject to further consideration through the masterplan process in terms of extent that this would contribute to placemaking and sustainable development objectives and the primary role of the site in supporting strategic airport enhancement and international business development. The masterplan process will demonstrate the relative balance of uses that will be appropriate. This also cross references the requirement for proposals to accord with the provisions of LDP Policy Emp 6.

The masterplanning process undertaken in relation to this application has demonstrated that up to 396 residential units could be accommodated as part of IBG Phase 1. Given the masterplan approach has advocated an overall mix of uses and development quantum for the site, and modelled this in three-dimensional form, the proposed level of residential development (396 units or 21% floorspace) is considered appropriate and address relevant LDP requirements. However, maximum levels of residential development should be restricted by condition to ensure that the residential component does not dilute the business led development of the site.

LDP Policy Hou 2, Housing Mix, outlines that the Council will seek a mix of house types and sizes where practical to meet a range of housing needs, including those of families, older people and people with special needs and having regard. Given the nature of the PPP application, the proposed mix of housing has not yet been confirmed, although the assumption is this would be predominantly of a flatted typology (Sui Generis) and have the ability to meet a range of housing needs.

The applicants have also confirmed that residential components of development would also include 25% on-site affordable provision as per the requirements of LDP Policy Hou 6, Affordable Housing. In relation to this, the Council's Affordable Housing team have commented that the specific type, location and distribution would still need to be determined through further discussions with the department at detailed application stage. They have also remarked that these should be delivered across at least two separate plots of land to ensure there is no concentration of housing in any one part of the site. The affordable homes should be well integrated and offer a representative mix of the style and size presented across the wider site.

Particular requirements relating to affordable housing would be secured through legal agreement.

In summary, Class 9 Housing and Sui Generis flatted development would be supported subject to addressing relevant design requirements at AMC stage. The location of proposed residential development within the site is defined through the Development Plots - Use Parameters Plan. The floorspace and number of units identified would represent a maximum threshold.

Ancillary uses - Class 1 - Retail, Class 2 - Financial + professional services, Class 3 - Food +drink, Class 10 – Non-residential institutions, Class 11 - Assembly and Leisure

The application proposals identify 5,439 square metres of ancillary uses, which would represent 2% of the overall development quantum.

LDP Policy Emp 6, International Business Gateway, states that uses ancillary to international business development including child nursery facilities, restaurants, health and sports clubs will be supported in principle. The development of such uses is also highlighted through WESDF Principle IBG8, stating that in order to create an attractive place in which to invest, work and visit, proposals should incorporate a mix of uses, with consideration given to creating active frontages at ground floor level and avoiding areas of mono-use.

The development of ancillary uses could help support both business and residential uses within the site, reinforcing a mixed use character to the development. They could also establish the site as a destination, particularly in the early years of development, and contribute to activity and vitality outside normal working hours.

In relation to Class 1 uses, LDP Policy Ret 6, Out of Centre Development, would support small scale convenience stores up to 250 square metres floorspace, to complement the role of the identified centres and it is not therefore necessary to demonstrate the sequential policy test. A representation has been received in relation to proposed retail impact and potential competition with established retail centres in both City of Edinburgh and adjacent local authority areas including West Lothian. However, the proposed retail uses are intended to be ancillary to the primary business, hotel and residential based uses and would not compete with existing retail centres. Any retail proposal exceeding 250 metres square would be required to demonstrate the sequential policy test through a separate planning consent process.

Similarly, it is suggested that floorspace of individual premises for Class 2, Financial + Professional Services and Class 3, Food + Drink do not exceed 250 square metres. This requirement would be stipulated through condition.

In relation to Class 10 uses, the applicants have identified the possibility of a Creche or Nursery. This type of facility would be supported through LDP Policy Emp 6 which makes explicit reference to uses ancillary to international business development, such as child nursery facilities. Class 10 would also allow for the development of other forms of non-residential institution, including the provision of education, galleries, museums, libraries, exhibition halls and religious institutions. Although no details have been provided as part of the application, the limited development of such uses may be appropriate in terms of creating a successful mixed use place.

Class 11, Assembly and Leisure uses have been proposed by the applicants to allow for the development of stand-alone gym facilities. The development of such a facility, including health and sports clubs, as ancillary uses to international business development, would be supported by LDP Policy Emp 6. In order to control such a use, it is suggested that the maximum size of such a facility should be restricted to a maximum 1500 metres square floorspace.

Class 11 uses could also comprise other entertainment, conference or community facilities. Such uses could further help reinforce a mixed use character and establish the IBG development as a destination. The IBG has been discussed as a potential location for an indoor performance arena, and this was considered with the applicants during the development of the masterplan proposals. Whilst no specific proposals have been included for such a facility as part of this application, the masterplan framework could allow for the development of this type of facility, possibly through combining some of the development plots.

The limited development of Class 10 and Class 11 uses as ancillary uses would be acceptable in principle, subject to gross floorspace not exceeding 1500 metres square. Should a larger facility be proposed, e.g. an indoor performance arena or conference centre, the impact would need to be subject to a separate planning consent process and assessed against relevant policy requirements.

It is recommended that the various ancillary uses including retail and leisure development (Classes 1, 2, 3, 10 and 11) do not exceed 5,439 metres square floorspace or 2% of the overall development quantum.

Each AMC submission relating to individual plots would need to demonstrate the breakdown of proposed ancillary uses by individual use class.

#### Associated works including car parking, servicing, access and public realm

The concept masterplan proposals establish a framework and thereby the principle for the future development of the site. Development Guidance relating to landscape, open space, public realm and plot principles has also been lodged as part of the application.

Given the nature of the PPP application, detailed proposals for associated works including car parking, servicing and public realm would be considered at AMC stage, these being informed by the approved Development Guidance.

It is anticipated that proposals for strategic open space, landscaping, public realm and road access would be considered as part of an initial AMC application, this being agreed prior to the submission of further AMC's relating to the development of individual plots.

#### Ingliston Park and Ride site

The Ingliston Park and Ride site does not form part of the application and the Council is not a named applicant. However, its potential redevelopment has been considered as part of the masterplanning undertaken with this application to ensure a coordinated approach to development. If the redevelopment of this facility were to be progressed, the principle of any proposed change of use would need to be considered as part of a separate planning application process.

The future status of the Park and Ride site is further discussed as part of sections relating to Masterplanning and Transport.

#### Summary

The proposed mix of land uses are considered appropriate to the development of an International Business Gateway. Subject to suitable planning controls to ensure that the primacy of business uses are maintained, the proposed mix of uses including the level of residential and ancillary uses are considered appropriate. The proposals would address the particular requirements of NPF3, LDP Policy Emp6 and LDP Development Principles.

All AMC applications relating to individual plots will be required to indicate how the approved mix of uses will be delivered.

Applications for Class 4 business uses, will require to demonstrate that a minimum threshold of such uses will be achieved across the site. All other uses will be subject to a maximum floorspace threshold.

## **b) Masterplan Concept and Proposed Design Parameters - including landscape and open space, phasing and proposed design controls**

### Introduction

In recognition, of its national significance and in order to realise its potential, the LDP Development Principles and the West Edinburgh Strategic Design Framework (WESDF) 2010 identify that the IBG should be master planned and developed in a phased manner. The WESDF establishes a detailed vision for the area.

The West Edinburgh Landscape Framework (WELF) was subsequently commissioned by the Council in 2011 to augment the WESDF, this focussing on the various development areas along the A8 Corridor. This has provided a series of key landscape design objectives for the study area, including the IBG site.

The LDP Development Principles set out key design principles to be followed in development of the site, including the need for masterplans to incorporate an appropriate mix of uses to support the main purpose as IBG as a location for international business development.

Early design proposals were presented to the Edinburgh Urban Design Panel in June 2011. A number of comments made regarding the principle of development and development of the tram line are now outdated. However, the Panel were supportive of comprehensive masterplanning and the proposed concept based around a grid street pattern. They also saw an opportunity to create a destination rather than a transient zone between the airport and city's urban edge and felt that buildings should aspire to the highest international quality. But concern was noted that the form and location of the Park & Ride site could negatively impact on the overall design.

A series of Design Forum workshops to discuss the emerging masterplan proposals took place with Architecture and Design Scotland (A+DS) during 2015, prior to the application being lodged. A+DS advice concluded that the proposals could be supported by them if specific matters were addressed including:-

- The proposed delivery model, including the need to consider expansion of the Park and Ride Site;
- Public realm and street design;
- Building massing related to Landscape and Visual impact;
- Design controls and phasing;
- Sustainable infrastructure; and
- Distinction between IBG Phases 1 and IBG East.

The design team subsequently considered a number of these issues prior to the submission of the application.

## Site and Contextual Analysis

LDP Policy Des 3 states that planning permission will be granted for development where it is demonstrated that existing site characteristics and features worthy of retention on the site, have been identified and incorporated through its design. WESDF Principle IBG6 also outlines that existing features of historic interest should be preserved or enhanced.

Comprehensive site analysis has been undertaken as part of the Design and Access Statement.

The site mostly comprises former agricultural land and surface parking for the Park & Ride, with little in the way of features within the site. A WW2 pill box to the north east corner of the site has been identified by the City Archaeological Officer as a feature of historic interest. A conservation plan for its preservation and enhancement would be secured through condition.

The site is surrounded by distinctive landscapes and landmarks, from expansive views to the Ochils and Pentland Hills, punctuated by views of the Forth Bridges to the north, Arthurs Seat and Corstorphine Hill to the east and the post-industrial Shale Bings to the west. Preserving and enhancing views from within and through the site were key drivers for the West Edinburgh Landscape Framework (WELF). Views out of the development have been considered as part of the masterplan development, with the position of the proposed distributor roads and avenues generally being aligned towards key views and features. The view along the tram corridor towards Corstorphine Hill and Arthur's Seat have also been safeguarded.

## Masterplan Design Concept

The West Edinburgh Strategic Design Framework (WESDF) sets out an indicative layout for IBG Phase 1, identifying that development should accord with a range of design principles, this supplemented by the LDP Development Principles. These have provided a basis for detailed masterplanning to be undertaken.

The masterplan concept for IBG Phase 1 has evolved over a several years following engagement with the Edinburgh Urban Design Panel and Architecture and Design Scotland (A+DS).

The masterplan approach has adopted the following key principles:-

- Create a mixed use, business led, environment with an urban character, using the buildings to define streets and public spaces.
- Establish a flexible framework for development within a coherent network of high quality public realm.
- Implement a range of public parks, landscape spaces and green edges that integrate with and enhance the urban business environment.
- Integrate pedestrian and cycle movement patterns within the site with connections to existing public transport connections, future developments and the surrounding area.
- Limit parking numbers and encourage public transport use through regulated parking ratios for both commercial and residential developments.

WESDF Principle IBG1 requires that road and other infrastructure should be designed in the form of a hierarchical grid which allows development to intensify over time. The masterplan concept has been developed around the use of such a grid, this establishing an overall structure for the IBG Phase 1 site. It will also enable the formation of active street spaces, these designed to prioritise pedestrians and cyclists with efficient vehicular movement.

The masterplan has been organised around a landscape framework intended to both structure development and embed within its setting. The proposed grid has enabled streets to be aligned with distant views to connect the place with its wider context and refine the relationship between topography and landscape.

WESDF Principle IBG7 identifies that a network of civic spaces should be provided at key nodes such as tram stops. IBG Phase 1, would incorporate a civic square at the location of the existing tram stop, this creating a focal point for the wider site. Particularly, the masterplan concept has sought to grow a new place around the tram infrastructure that will become the principal arrival point for business visitors. In terms of proposed densities, WESDF Principle IBG4 states that the density of development should be highest on sites located close to tram stops in order to maximise accessibility by public transport. Although precise densities would be subject to further design development, the masterplan framework has adhered to the principle, envisaging a greater height and density of development along the tram corridor, Eastfield Road and the Gogar Link Road. The majority of the site area will lie within a 5 minute walk (400 metres) of the tram stop.

The hierarchy of design information prepared in support of the application, has been structured to provide a mix of fixed and flexible development principles.

The plot parameters and development guidance, will define the location and extents of the development plots and common estate infrastructure, with specific parameters for each plot that govern the extent of development, use classes, building heights and frontage treatments. The development guidance provides specifications for the design of common estate areas, landscape and infrastructure. It is considered that the hierarchy of supporting information will set a quality benchmark for the scale, character and quality envisaged for the built development over the longer term and within the framework of parameters and development guidance.

The planning status of the various design information and documents for approval are further discussed in the proposed design controls section below.

The masterplan proposals are considered to address the requirements of LDP Policy Des 1, Design Quality and Context, in that they have been based upon an overall concept that draws upon positive characteristics of the surrounding area. The proposed masterplan framework and design parameters will provide the necessary ingredients to achieve a strong sense of place.

The proposals pay cognisance to the requirements of LDP Policy Des 7, Layout Design, and the Edinburgh Design Guidance, in so far as they are relevant to the current stage of design development. These will need to be closely adhered to at the all subsequent stages of detailed design.

## Building Heights and Massing

The LDP Development Principles state that the prevailing building height should be four storeys with some high landmark buildings and lower building heights adjacent to structural green spaces. Further guidance is set out within WESDF Principle IBG 11 which identifies that building heights should be designed to ensure a good quality townscape is created, and that reasonable levels of sunlight and daylight are achieved.

These requirements have informed the basis of the approach to massing of the masterplan. The height parameters plan has established a general development height across the site of 22 metres above adjacent ground level, this being equivalent to four storeys of commercial development. Frontages to primary spaces and routes, such as the Tram Corridor, Eastfield Road and the Gogar Link Road have then been structured to accommodate a maximum development height of 26-30 metres, which would equate to five or six storeys of commercial development. Key 'gateway' nodes at access points along Eastfield Road, to the south west corner of the site and plots adjacent to the Tram Square have been identified as possible site for buildings of up to a maximum of eight storeys or 38 metre height. Development addressing the peripheral parklands to the south and east may provide an opportunity to form a four to five storey zone, stepping the building height of the 'gateway' zones to blend into the parkland landscape adjacent.

This maximum building height scenario has been modelled as part of the Landscape Visual Impact Assessment (LVIA). Particular issues arising from the LVIA are discussed as part of Strategic Landscape Impacts.

In order to assess the acceptability of the proposed building heights in this context, it is necessary to consider LDP Policy Des 11, Tall Buildings. This states that permission will only be granted for development which rises above the building height prevailing generally in the surrounding area where; a) a landmark is created that enhances they skyline and surrounding townscape and is justified by the proposed use; b) the scale of building is appropriate in its context or c) there would be no adverse impact on important views of landmark buildings, the historic skyline, landscape features in the urban area and landscape setting of the city including the Firth of Forth.

Whilst the proposed building heights would be greater than the prevailing scale of built form in the immediate locality, these would be broadly comparable in scale and mass to the recently completed hotel developments on Eastfield Road to the north and larger buildings at the Airport. Given the proposed nature of the IBG and the desire to create a new urban place with a distinct identity, it is considered that the site could offer some potential for higher, landmark buildings. The positioning of taller buildings has been structured to reflect infrastructure nodes, highlight key access points and take advantage of site topography to create diverse townscape and a flexible framework for development.

Subject to further LVIA being undertaken at AMC stage to assess strategic visual impacts and detailed design implications relating to heights and massing, the proposed strategy in relation to building heights and massing is considered acceptable and address relevant requirements of LDP Policy Des 11 and WESDF.



The heights parameters plan would seek to establish and control maximum building heights across the site. However, in order to promote a degree of flexibility and address scenarios of potential under-build or over development, it is recommended that a height range be specified through condition. This would require that buildings are designed to achieve a range of heights from 4 storeys (12-22 metres AGL) to 8 storeys (24-38 metres AGL). Due to typical floor to floor heights employed in many residential and hotel developments, it is assumed these will generally be lower than the equivalent commercial building. The proposed wording of the condition would take in account the difference between domestic floor to floor heights and those found in many commercial buildings.

Conditions relating to building heights, will require that full regard be paid to LDP and WESDF requirements to ensure a good quality townscape is created, and that reasonable levels of sunlight and daylight are achieved, particularly to adjacent areas of public realm and open space. Building heights and the articulation of roofscape must also be carefully considered at detailed design stages.

### Landscape, Open Space and Public Realm

The West Edinburgh Landscape Framework (WELF) identified a range of strategic principles relating to landscape design and open space requirements for development areas along the A8 corridor. These included strengthening the identity of A8 road experience, Initiating green infrastructure elements to structure the evolving development, creating and supporting habitat connections and developing new pedestrian/cycle connections from Gogar to the airport within the IBG designed landscape. Proposals should also seek to build upon the existing Policy Landscape character in the surrounding area and where possible, improve the Gogar Burn landscape.

IBG Principle 5 identifies that early provision should be made for a landscape framework and open space network for recreation, active travel and biodiversity purposes and to create an attractive setting for development. A Landscape Framework has been prepared as an integral part of the conceptual masterplan approach. This has sought to develop the strategic landscape proposals included in the WELF, to establish an appropriate setting and character for the development.

The Landscape Framework comprises the following components:-

- A parkland frontage to the A8 corridor and to the east of the development, with fingers of parkland extending into the development pattern.
- A pattern of north-south and east-west green infrastructure features extending through the site.
- A sequence of public hard and green spaces of varying scale spread throughout the development.
- Public realm spaces related to the tram corridor and stop.
- A vehicular and pedestrian/cycle hierarchy defined by variations in floorspace treatments and plant selections.

The Development Guidance prepared in support of the Landscape Framework has provided specifications for the design of common estate areas, landscape and public realm.

Open Space 2021; Edinburgh's Open Space Strategy outlines planned large greenspace extensions to the Edinburgh's green network to improve connections across the city. This includes LDP Proposal GS6, IBG Open Space, which requires that three areas of parkland be implemented as key landscape elements across the International Business Gateway, including 1) the A8 corridor; 2) central parkland and 3) the archaeology park. These areas would form a setting for development, provide amenity and recreational benefits and facilitating the delivery of active travel routes.

LDP Policy Env 20, Open Space in New Development, requires that the Council will negotiate the provision of new publicly accessible and useable open space in new development when appropriate and justified by the scale of development proposed and the needs it gives rise to, in particular, the Council will seek the provision of extensions and/or improvements to the green network.

The masterplan proposals and landscape framework identify the A8 Corridor and Central Parkland as principal areas of open space. The Council's Open Space Strategy would require these areas to be designed as '2ha large greenspace standard'. These would be partially delivered through the application, the areas being sub-divided with IBG Phase 2 or East. In relation to the site, the central parkland comprises two distinct areas; that running north-south to the eastern edge of the site and an area of parkland running east-west which will form part of the alignment for the Gogar Link Road or IBG Main Street. LDP Development Principles state that the central parkland area of open space will be of particular importance in meeting the Council's large greenspace standard and should be designed and maintained accordingly.

Although the delivery of and arrangements for ongoing maintenance of open space and public realm have yet to be confirmed, the Council will be unable to adopt these areas. Maintenance will therefore need to be undertaken through a private factored arrangement with legal clauses to ensure public access. Given the importance that these areas will play in establishing the IBG, these should be laid out at an early stage of development to provide usable and accessible space. These aspects will be addressed through conditions and legal agreement as required.

The Council's 'large greenspace standard' would normally incorporate play provision of 'very good' play value to cater for local residents. However, given the limited residential element within IBG, a specific requirement to deliver play equipment as part of the open space will not be sought and it is recommended that this be delivered more integral to any residential development should this be required.

In summary, the proposed provision of strategic landscaping and open space would meet the requirements of the LDP Development Principles, relevant parts of LDP Policy Env 20, Open Space in New Development and LDP Policy Des 9, Urban Edge Development. However, further design development will need to be undertaken to satisfy the various requirements of LDP Policy Des 7, Layout Design and Des 8, Public Realm and Landscape Design and the Edinburgh Design Guidance. It is recommended that the Landscape Framework and Development Guidance, prepared by the applicants in relation to public realm and landscape be approved as part of this application, this forms the basis for the preparation of detailed design proposals at AMC stages. These requirements will be stipulated through condition both in relation to the design of strategic landscape infrastructure and individual development phases.

## Phasing of Development

The LDP Development Principles state that the IBG must be masterplanned and developed in a phased manner. The preferred location for initial phases of development is within 250 metres of tram stops, with a higher density of development and uses which attract high volumes of visitors being located close to a tram stop.

No phasing plan with timescales has been prepared as part of the PPP application, partly due to the existing pattern of site ownership, differing priorities amongst landowners and uncertainty to the eventual developers of the site. However, an Implementation Strategy has been prepared by the applicants. This identifies priorities for initial development which would include those plots fronting Eastfield Road, the Ingliston Park and Ride site and the proposed 'Tram Square'. Those plots situated to the north east and south east part of the application site would then form areas of secondary focus for development. This approach could help secure a critical mass and coherent sense of place to the site in the early years of development.

The Implementation Strategy has set out the following principles, which would be adhered to ensuring a level of certainty in terms of placemaking, quality, access and connectivity:-

1. Each development plot should have an operational vehicular connection to Eastfield Road prior to occupation.
2. Each development plot should have a useable pedestrian/cycle connection to the tram stop prior to occupation.
3. The surface water drainage for each development plot must be constructed in accordance with the SUDS strategy prior to occupation.
4. All landscape and public realm must be delivered in accordance with the design principles.
5. Common landscape and public realm immediately adjacent to each development plot must be completed prior to occupation.

The Implementation Strategy has made a distinction between strategic site infrastructure and plot infrastructure. Strategic site infrastructure would include areas for common SUDS and flood management, the central parkland, the Tram Square and the public realm link to Eastfield Road. Further infrastructure, including related plot access, primary access roads, other areas of public realm and landscape would then be delivered in association with individual plots.

It is recommended that the Implementation Strategy should form the basis for a detailed phasing plan, this being provided as part of an initial, site-wide AMC submission. This would include detail design proposals of strategic site infrastructure and supporting information. This application and masterplanning have been approached to ensure coordination with a further proposed masterplan for IBG Phase 2 (or East), although details for this development are still to be confirmed, with no application yet lodged. It is not considered that the IBG Phase 1 masterplan would not compromise the development of adjacent land, and would therefore address relevant requirements of LDP Policy Des 2, Co-ordinated Development.

## Ingliston Park and Ride Site - Masterplanning

WESDF Principle IBG10 refers to the potential relocation of the P&R facility in the longer term or re-provision of the spaces on the site in a different format may provide the opportunity for a high quality gateway development at the entrance of Eastfield Road.

In view of this position, the future role of the Park and Ride site has been discussed extensively as part of the masterplanning process, particularly the negative impact that large expanses of surface parking could have upon placemaking, the setting of adjacent development and establishing a high quality destination.

The Ingliston Park and Ride Site has therefore been included in the scope of the masterplan proposals, to provide a potential framework for future development. Discussions as part of the A+DS Design Forum series affirmed the importance of considering those plots situated adjacent to the Tram Square for potential development/redevelopment.

Illustrative guidance for the redevelopment has been prepared by the applicant, this presented as part of the Plot Parameters guidance.

### Proposed Design Controls

PAN 83 Master Planning outlines approaches that can be taken to embedding a masterplan in the planning system. This can be achieved through the adoption of the masterplan as supplementary planning guidance (SPG); endorsement as a material consideration or achieving planning consent and road construction consent (RCC).

In this instance, it is recommended that the concept masterplan (as depicted through the Estate Infrastructure and Landscape Plan), other relevant supporting masterplan documentation (e.g. Landscape Framework, Movement and Access and SUDS Strategy), plot parameters and development guidance be endorsed as material considerations and approved as part of the Planning Permission in Principle. This would allow the masterplan approach to be afforded the necessary planning status at this stage, thus informing future detailed proposals.

It is considered that the masterplan proposition would establish an appropriate structure and layout for the development including points of access, strategic access routes, public realm, open space and landscape infrastructure. The plot parameters and development guidance would provide a robust design framework, ensuring a continuity of approach through the long term development of the site.

However, the concept masterplan only presents built form on an indicative basis. Whilst the masterplan framework will establish the position of development plots, their layout and design of buildings will be subject to further detailed design development at AMC stages. Such proposals would be guided by the plot parameter plans, relating to land use, building heights and development parameters, and the development guidance. Conditions would require that detailed proposals are developed to be substantially in accordance with these approved plans and documentation.

An initial AMC package would require to be determined on a site-wide basis, prior to further AMC's being determined for component parts of the site. This would obtain the necessary approval for phasing and detailed design proposals for strategic site infrastructure - i.e. strategic access routes, public realm, open space and landscape infrastructure. This will establish a detailed framework for the long term development wider site and ensure that a high quality setting is provided at the early stages of development.

For subsequent AMC's relating to phased sub sections or individual plots, these must be submitted to demonstrate; a) the relationship with the approved masterplan context and planning permission in principle; b) where the development of a plot is proposed to be phased, design proposals should demonstrate the relationship with the context of the wider plot; and c) proposed disposition of uses within the plot, as relevant to the particular submission.

### Conclusion - Masterplanning

It is considered that the masterplan proposition, plot parameters and development guidance would provide a suitable design framework, to guide the long term development of the IBG Phase 1 site, ensuring a continuity of approach to the delivery of a major urban extension to Edinburgh.

The proposals address requirements of the LDP Development Principles and WESDF, contributing to the creation of a sustainable extension of the city based on a grid pattern with a focus on place-making, good public transport, active travel connections, parkland and a strong landscape structure.

### **c) Transport and Accessibility**

#### Strategic Transport Issues

The applicants originally submitted the West Edinburgh Transport Study (WETS) in support of their application in December 2015. The Roads Authority expressed concerns that this study did not adequately consider traffic impacts arising from airport growth, with a significant disparity in cost associated with transport mitigation. In view of this, the Roads Authority recommended that the application be continued in order to further examine the assumptions of the WETS study and the original WETA (West Edinburgh Transport Appraisal) Study prepared in 2010.

In response to this issue, the Council commissioned a refresh to the original WETA study, this being prepared by Jacobs during 2016. The technical working group steering group established by the Council saw the participation of Transport Scotland and a number of transport consultancy teams acting on behalf of respective developer interests in West Edinburgh, including those representing the applicants for IBG. Updated strategic traffic modelling was prepared as part of the study, this assessing two travel demand scenarios including:- a) demand model trip generation; b) Transport Assessment trip generation and mode share.

The WETA Refresh Study was approved by the Council in December 2016. The various transport mitigation measures identified as part of the study subsequently informed the interventions outlined in the LDP Action Programme and Supplementary Guidance. The total amount that developers will contribute towards transport infrastructure is based upon the AM/PM traffic peak generation and linked to the LDP Action Programme.

Further to the approval of the WETA Refresh Study, a Transportation Assessment Addendum was submitted by the applicant in February 2018. Whilst this Addendum acknowledged the general findings of the WETA Refresh Study, there were concerns that this did not adequately explain the transport mitigation to be delivered in conjunction with the development of the site. Following discussions with the Council, a Transport Technical Note, was submitted 30 October 2018. This has provided confirmation of the strategic transport package to be delivered as part of the development and a clear strategy relating to active travel.

The proposed transport infrastructure package is considered further in the section below.

### Movement and Access Principles

The LDP Development Principles for IBG outline the creation of a sustainable extension of the city based on a grid pattern with a focus on placemaking, good public transport, footpath and cycle connections.

The masterplan proposals identify a grid structure with a hierarchy of routes, streets and spaces and a dense cycle/footpath network throughout the site this serving all the proposed development plots.

The masterplan has been designed to be primarily pedestrian and cycle priority environment to facilitate active streets and public spaces, building on the existing transport infrastructure of the tram stop at Ingliston Park & Ride. The proposals have been developed to ensure all buildings are within 400 metres of public transport in accordance with Scottish Planning Policy.

The vehicle priority routes generally run east-west along distributor roads from the junctions on Eastfield Road, whilst avenues will form the primary north-south access routes. These will have a range of characters based around vehicle priority (on street parking, segregated cycle lanes and pedestrian pavements integrated with landscape), and pedestrian and cycle priority comprising a more informal variety of shared spaces with limited on street parking.

Detailed Development Guidance has been prepared in relation to public realm and streets, this addressing key spaces within the site.

The proposals have been developed in full cognisance with the principles defined in the Scottish Government's 'Designing Streets' guidance - recognising that street design must consider place before movement, with streets having important public realm functions beyond those relating to motor traffic. Edinburgh Street Design Guidance sets out more detailed guidance and this should be adhered to at detailed AMC stage.

The masterplan and supporting transport assessment identify that the site would be served by two vehicular access points. Firstly, a northern access would be formed at the location of the existing roundabout on Eastfield Road. The eastern arm would also form the initial phase of the proposed Gogar Link Road. To the south, the existing access serving the Park and Ride site would be utilised as the second point of access. The existing northern access to the Park and Ride from Eastfield Road would be maintained and it is not envisaged would provide direct vehicular access into the IBG site at the current time.

LDP Proposal T9 and WESDF Principle IBG2 refer to the Gogar Link Road proposal, which seeks to provide enhanced connectivity between Eastfield Road and the airport via IBG to the Gogar roundabout. The initial phase of the Gogar Link Road (also referred to as the IBG main street) has been identified as part of the masterplan proposals would also be delivered as part of the development of the site. A vehicular crossing point over the northern section of the tram line was implemented as part of the tram construction in anticipation of the adjacent land being developed. This crossing would be utilised to facilitate the delivery of the Gogar Link Road.

The masterplan proposal would also address the requirements of WESDF Principle IBG3, in that it would allow for the development of an east - west bus corridor through the IBG, extending from Eastfield Road along the tram route and then the eastern section of the Gogar Link Road to the Gogar roundabout.

LDP Policy Tra 7 requires that the proposed alignment of the tram route linking Ingliston Park and Ride with Newbridge (as per LDP Proposal T1) which passes through the western part of the site be safeguarded from development. The masterplan proposal identifies that the alignment would be maintained within the proposed tram corridor - a linear area of public realm and active travel route linking Eastfield Road with the proposed Tram Square. This would be capable of being utilised for the purpose of a tram route in the future, should this be required.

The proposed arrangements in respect of site access and route safeguarding, would align with the WESDF principles and relevant requirements of the LDP, including Policy Tra 10 - New and Existing Roads, in that they would not prejudice the proposed new roads and network improvements. i.e. widening to Eastfield Road and an initial phase of the Gogar Link Road. These routes could include dedicated cycle provision and public transport priority where necessary.

### Public Transport - Tram and Bus

The Edinburgh Tram network runs through the site, with the Ingliston Park and Ride stop located within the site boundary. The presence of a fixed, high capacity transport link complemented by existing bus services will greatly promote connectivity and accessibility of the site from the outset of the development. A developer contribution will therefore be sought in relation to Tram Line 1A, as per the requirements of Supplementary Guidance - Developer Contributions and Infrastructure Delivery.

The masterplan concept acknowledges the importance of growing a new place around the tram infrastructure that will become a principal arrival point for business visitors.

The LDP Development Principles state that the preferred location for initial phases of development is within 250 metres of tram stops. The masterplan identifies that majority of the application site would lie within 400 metres or 5 minute walk from the tram stop.

WESDF Principle IBG 7 identifies that a network of civic spaces at key nodes such as tram stops should be provided. The existing Ingliston Park and Ride Tram Stop would form the location for the 'Tram Square' - a civic square and a focal point for the development as a whole. In order to deliver the Square it is anticipated that the nature of the area around the existing tram stop would be subject to change, including re-grading of adjacent land levels to create an accessible and usable space.

It is anticipated that the tram alignment within the eastern part of the site would remain largely unchanged by the development, this being defined by existing boundaries to the north and south.

It is recommended that an informative be applied as a note to advise the applicants of technical and operational requirements relating to the Tram. These criteria will need to be considered in conjunction with the tram operator as part of the development of detailed design proposals at AMC stages.

In terms of bus access, existing services currently serve the site via Eastfield Road and the Park & Ride site. It is anticipated that the proposed development will facilitate the development of bus services through the site, particularly via the Gogar Link Road. The Park & Ride site will also provide a focus for the future development of bus services in West Edinburgh and this is further discussed in the Park & Ride section below.

### Cycle and Pedestrian Network

The masterplan has sought to integrate pedestrian and cycle movement patterns within the site with connections to existing public transport, future developments and the surrounding area.

The proposed Implementation Strategy outlines that each plot would include infrastructure to connect with the pedestrian/cycle network. Outwith the network of dedicated cycle routes, other streets including access roads within plots and residential shared streets would feature pedestrian/cycle priority.

Although no specific cycle/footpath safeguards (as per LDP Policy Tra9, Cycle and Footpath Network) relate to the application site, the A8 'missing link' cycle route between Eastfield Road and the RBS Bridge, as outlined in the LDP Action Programme, would be delivered in conjunction with the IBG Phase 1 development. Other strategic routes would comprise dedicated pedestrian/cycle access to Eastfield Road, with an off-road route via the proposed central parkland to the eastern side of the site.



Full details of cycle and pedestrian access routes would be submitted at AMC stages, these being developed to be substantially in accordance with the concept masterplan proposals. Details of the strategic cycle network would need to form a fully integral part of the design approach for strategic landscape, public realm and infrastructure including the Eastfield Road upgrading.

### Proposed Transport Infrastructure

LDP Policy Tra 8, Provision of Transport Infrastructure, requires that development proposals relating to major development sites, and which would generate a significant amount of traffic, shall demonstrate through an appropriate transport assessment and proposed mitigation that:

- a) Identified local and city wide individual and cumulative transport impacts can be timeously addressed in so far as this is relevant and necessary for the proposal.
- b) Any required transport infrastructure in Table 9 and in general and site specific principles have been addressed as relevant to the proposals.
- c) In order to minimise private car use, support air quality objectives and promote active travel, it is critical that supporting transport infrastructure is implemented.

Whilst the applicant has not undertaken further traffic modelling as part of the Transport Assessment Addendum, in this instance strategic traffic modelling had already been prepared as part of the WETA Refresh Study. Given the proposed long term build-out of the IBG site, it is not possible to fully predict the transport impacts associated with the development.

However, to address the requirements of this policy the applicant has identified the following mitigation measures as part of their Transport Technical Note:-

- 1) Walking/cycling infrastructure - completing the missing link from IBG to the RBS junction.
- 2) Public transport infrastructure - dedicated bus lanes around the Eastfield Road dumbells.
- 3) Road infrastructure - dualling of Eastfield Road to the IBG Northern Access, improvements to the dumbells and westbound off-slip.
- 4) Intelligent transport systems - MOVA is a strategy for the control of traffic light systems, proposed to be implemented at Newbridge, Eastfield Road dumbells, Gogar + Maybury in addition to Eastfield Road dualling works.

LDP Development Principles for IBG state that any necessary road infrastructure should be identified, taking into account the general development principles for West Edinburgh and the relevant transport proposals listed in LDP Table 9. In relation to the application site, specific measures include:- T1 - Edinburgh Tram, T8, Eastfield Road and dumbells junction, T9 - Gogar Link Road and T11 - Improvements to the Newbridge Roundabout.

Following discussions, it has been agreed that a package of specific targeted infrastructure improvements as described in the LDP Supplementary Guidance - Developer Contributions and Infrastructure Delivery, would be delivered in conjunction with the development of IBG Phase 1, these being funded through developer contributions, and implemented by the applicant.

These would include the upgrading of Eastfield Road and dumbbells roundabout as it relates to the application site. Works would comprise an additional carriageway to be provided on land to the east of the existing road, bus priority measures and segregated cycle/pedestrian provision. The existing dumbbells and approaches are to be upgraded and signalised giving bus priority.

It is also expected that the A8 North side cycle route would be delivered between the Eastfield Road dumbbells junction and RBS Gogarburn, this promoting active travel from the outset of development. This will represent a strategic cycle route linking IBG and destinations to the western edge of the city with the Gyle, Edinburgh Park and the City Centre. In order to ensure this route effectively serves the IBG site, it is recommended that an off-road cycle route be secured through the Central Parkland to the eastern edge of the site in the early stages of development, this providing more direct access between the proposed, the A8 cycle route and destinations to the east. This should be addressed through the legal agreement.

It is considered that the proposed elements of transport infrastructure would provide benefits to the operation of the local road network and also contribute to the sustainable transport options for the IBG development. It would be expected that full costs of site specific access measures and other internal transport networks that do not have wider traffic or public transport functions, would be funded through the specific developer(s).

The various measures identified in LDP Table 9, including the Gogar Link Road, would be delivered in conjunction with the development, these helping to mitigate the adverse traffic impacts. The various proposed infrastructure measures are considered to satisfactorily address the requirements of LDP Policy Tra 8, Provision of Transport Infrastructure, in so far as they are relevant and necessary to the proposal.

In terms of transport contributions, the total capital value of West Edinburgh LDP Action Programme items is £86.16 million - this figure being derived from the WETA Refresh Study. IBG Phase 1 will contribute 9.77% of the total AM and PM peak period trip generation of the developments in West Edinburgh. The IBG Phase 1 development would make a proportionate contribution.

The proposed package of transport interventions are considered appropriate to the scale of the IBG Phase 1 development and are welcomed by the Council. A level of highway work will be required to open up the IBG site for development and coordination of these works with the upgrading of Eastfield Road will achieve a coordinated approach. It is considered that the enhancement of Eastfield Road would create an appropriate setting for that of an international business gateway. The works will also secure access improvements to the principal route leading to Edinburgh Airport, to complement the proposed development of the Gogar Link Road.

The delivery of transport infrastructure would be secured through legal agreement, with conditions to secure delivery prior to occupation of the first building on the site.

### Parking

The site is identified in the Council's current 2017 parking standards as Zone 2.

The LDP Development Principles state that car parking provision for all uses should be set at levels which helps achieve sustainable transport objectives in the context of LDP Policy Tra 2.

For the purposes of determining the maximum permissible level of parking for the development, the Council have calculated maximum aggregate figures based upon the proposed use classes and floorspace. For car parking, this would equate to 3299 spaces across the site. Cycle and motorcycle parking provision would require a minimum of 2387 spaces and 460 spaces respectively.

Given the phased approach to the construction of development over an extended timeframe, it is recommended that all parking provision (for car, cycle and motorcycle and any related Car Club spaces) is a reserved matter. Parking levels would be assessed and agreed for each individual AMC application as submitted, taking cognisance of the relevant Council standards applicable at the time or an agreed alternative developed specifically for West Edinburgh or the IBG development, whichever is lower. For AMC applications submitted where the Edinburgh Design Guidance (October 2017) parking standards apply, and in the absence of an agreed alternative, justification for the quantity of car, cycle and motorcycle parking being sought by the applicant will be required for each individual application irrespective of the agreed maximum provision for the land use or combinations thereof, in accordance with the Edinburgh Design Guidance. This approach will give overall control to the Council as individual AMC's are submitted.

It is considered that the use of Car Club spaces could play a significant role in reducing reliance upon private cars and overall parking provision within the development. Provision of Car Club spaces should be considered at AMC stage, as part of the overall assessment of parking levels. Contributions would be required for the promotion and introduction of the necessary orders for Car Club spaces and these would be secured by way of legal agreement.

### Ingliston Park & Ride Site - Transport

WESDF, Principle IBG10 states that the potential relocation of the Ingliston Park & Ride facility in the longer term or re-provision of the spaces on the site in a different format may provide the opportunity for a high quality gateway development at the entrance of Eastfield Road.

The importance of the Ingliston site as a Park & Ride facility is recognised by the Council, particularly by virtue of its location on the tram route. Its current function would therefore be maintained for the foreseeable future, but it is anticipated the role as a Park & Ride facility would evolve. The WETA Study identifies the potential for an upgraded Park & Ride facility for bus and tram at Ingliston - this being a medium term intervention incorporating improvements to facilitate bus to bus interchange as well as the quality of bus and tram waiting facilities (including improved shelter) by 2027. The development of the IBG would complement this objective - serving both as an interchange and destination in its own right. Commercial development opportunities could also allow new parking facilities to be created, e.g. deck or multi-storey car parking thereby allowing existing surface parking to be reconfigured and/or redeveloped to provide a high quality setting for the development proposed as part of this application.

The management of parking on the Park & Ride site would also need to be further considered by the Council, to ensure objectives to both minimise and control parking levels through the IBG development are not undermined. Appropriate parking controls would therefore need to be introduced on the Park & Ride facility in response to build-out rates.

### Conclusion - Transport

In relation to transport matters, the applicants have demonstrated, in accordance with the requirements of LDP Policy Tra 1, Location of Major Travel Generating Development that the proposed location is suitable with regards to access by walking, cycling and public transport and that measures will be taken to mitigate any adverse effects on networks and bring accessibility by and use of non-car modes up to acceptable measures of necessary.

The IBG Phase 1 site enjoys excellent connectivity, being well served by public transport by virtue of the Edinburgh Tram which passes through the site, and establishes a fixed link to the Airport and City Centre. Effective active travel links would be implemented from the outset of development, including the A8 missing link, providing access towards the city.

Conditions will require that the street network should be developed in accordance with the Concept Masterplan - Movement and Access and the principles contained in the Public Realm guidance.

It will be expected that further supporting transport information will be prepared at AMC stage, this acknowledging the context of the Planning Permission in Principle and the requirements arising including on-site transport issues including infrastructure delivery and proposed parking levels. Informatives would highlight and range of matters to be addressed at AMC including a quality audit for street design, street naming and numbering, traffic regulation orders, maintenance schedule for SUDS, etc.

### **d) Other Developer Contributions**

The LDP Action Programme, 23 January 2019 and Supplementary Guidance, 'Developer Contributions and Infrastructure Delivery' coordinates development proposals with the infrastructure and services needed to support them.

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

The following developer contributions are applicable to the IBG Phase 1 site and will need to be included as part of any future S.75 legal agreement:-

Affordable Housing

The applicant is seeking planning permission in principle for mixed use business led development, which would include an element of residential use to a maximum of 396 units. The masterplan proposals envisage that a majority would be flatted accommodation. Given the nature of the PPP application, discussions have not commenced regarding the delivery mechanism for affordable housing. However, in accordance with the AHP guidelines, the Council will seek homes of approved affordable housing tenures that meet an identified need.

Should consent be granted a minimum 25% of the total units (99 homes) should be secured on-site as approved affordable housing tenures through legal agreement. The applicant is in agreement to this requirement. This aspect of the proposal would address the requirements of LDP Policy Hou 6, Affordable Housing.

Education

The Council has assessed the impact of the proposed development (396 residential units) against the identified education infrastructure actions and current delivery programme. The site boundary includes part of the catchment area of Hillwood Primary School and Corstorphine Primary School, although the 'development zones' fall within the Hillwood catchment. The catchment high school is Craigmount High School. The site falls within Sub-Area W1 of the 'West Edinburgh Contribution Zone'.

The education infrastructure actions that are identified are appropriate to mitigate the cumulative impact of development that would be anticipated if the proposal progressed. The proposed development is therefore required to make a contribution towards the delivery of these actions. The required contribution should be based on established 'per house' and 'per flat' contribution figures set out below and secured through legal agreement:-

Flats	£3,216 (infrastructure)	£476 (land)
Houses	£16,186 (infrastructure)	£2,042 (land)

The infrastructure contribution element will be index linked and the land contribution will not.

Transport

The application is located within the West Edinburgh Transport Contribution Zone.

A developer contribution is to be secured by way of suitable legal agreement for specific targeted infrastructure contributions associated with, or as part of, the development proposals for wider strategic infrastructure improvements in West Edinburgh as described in the LDP Supplementary Guidance - Developer Contributions & Infrastructure Delivery.

### Edinburgh Tram

Tram line 1 passes through the site and is served by the existing Ingliston Park and Ride Stop.

Transport have requested that a contribution to the Edinburgh Tram be sought in line with the LDP Supplementary Guidance. The calculated sum based on the current development proposals is **£13,172,090**.

The sum is to be indexed as appropriate and the use period to be 10 years from the date of final payment.

### Health Care

The site lies within the West Edinburgh Health Care Contribution Zone. LDP Policy Hou 10 - Community Facilities states that permission for housing development will only be granted where there are associated proposals to provide any necessary health and other community facilities relative to the impact and scale of development proposed.

The Supplementary Guidance identifies new practice accommodation as part of a Health Centre to mitigate impact of new residential development in West Edinburgh (this includes Maybury, South Gyle, Edinburgh Park and IBG).

A sum of £1,050 per dwelling (£4m/8,000 = £500 per patient) will be payable in relation to the residential development.

### Conclusion

This application will deliver the initial phase of Edinburgh's International Business Gateway, this representing a major strategic development project for both West Edinburgh and the City.

The proposed package of infrastructure and developer contributions, including those relating to transport, Edinburgh Tram, affordable housing, education and healthcare are considered commensurate with the proposed scale of development and address requirements of LDP Policy Del 1, Developer Contributions and Infrastructure Delivery, Supplementary Guidance and the LDP Action Programme.

**e) Other matters:- Strategic Landscape Impact, Drainage and Flood Risk, Air Quality Management, Noise, Archaeology, Airport Safeguarding, Ecology and Protected Species, Trees, Amenity of Neighbours and future occupiers**

## Strategic Landscape Impact

The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Statement. This outlines the visual impact of the proposed development from seven strategic viewpoints looking towards the site. Modelling has been based upon maximum building heights in block form, this excluding landscape mitigation.

The LVIA methodology is considered to be sound and comprehensive in terms of viewpoint location and visualisations, with the LVIA findings informing the development of the proposed masterplan and landscape framework.

The West Edinburgh Landscape Framework (WELF), WESDF and LDP establish guiding principles for the development of the site, laying foundations for a strong landscape structure to support development in this part of Edinburgh. In relation to IBG, WESDF Principle 5 refers to early provision being made for a Landscape Framework, to create an attractive setting for development, this being further supported by LDP Policy GS6, IBG Open Space.

The proposed masterplan and landscape framework have sought to build upon policy landscape character in surrounding areas, and establish the identity of the A8 road experience to provide a coherent and positive image of arrival to Edinburgh.

The landscape framework stresses the importance of landscape edges in helping to assimilate the development into the landscape setting of the city and the Edinburgh Green Belt to the south. Specifically, that a structural landscape corridor should be provided to the north of the A8 (approximately 85 metres depth), to achieve a robust and attractive landscape setting for the development. These principles have been tested through the LVIA from both key approach routes to the site and within the site to the existing landscape beyond.

In relation to the setting of development, Scottish Natural Heritage (SNH) have remarked on the proposed building heights, these raising issues in respect of landscape impact and mitigation of large scale buildings within the context and the height parameters outlined in the LDP and guidance. Specific issues arising from the proposed height of development are further considered in section 3.3 b) masterplanning. However, the landscape framework has sought to punctuate and penetrate the scale of the development through a series of openings/spaces between buildings, which reduces the extent and appearance of the development within the wider landscape context. The built profile to the development is also varied in height, comprising a diverse roofline profile which assists in breaking the overall scale of development.

Following detailed assessment, it is recognised that the proposed scale of some of the larger blocks may result in limited impacts to strategic views, particularly towards the Pentlands from the north and Forth Bridge UNESCO World Heritage Site from the south and east (the date of this designation pre-dated the original EIA scoping exercise undertaken in 2015). The nature of the LVIA modelling has also suggested that some of the higher blocks could appear blocky and unarticulated. The design and appearance of subsequent AMC applications may also give rise to new visual impacts that were not assessed through the principle consent by virtue of materials, colour, modulation, glare etc.

To address these matters, conditions would require that further LVIA be undertaken in relation to individual AMC's. This would allow for modelling of individual blocks to be influenced at a detailed design stage.

In summary, whilst the development of the site will result in a significant change of character, creating a major urban extension and new district of the city, it is considered that the development will nestle into the overall landscape pattern, to provide a coherent and positive image of arrival to Edinburgh. The landscape framework proposals would address requirements of LDP Policy Des 4, Development Design - Impact on Setting, in that they have sought to demonstrate a positive impact on their surroundings, including the character of the wider townscape and landscape, and impact on existing views. This would be achieved through the provision of suitable landscape buffers and high quality open spaces, to mitigate the impact of development on the surrounding context, through diverse massing and the preservation of significant sightlines.

The proposals would also address LDP Policy Des 9, Urban Edge Development, part a) in that they would conserve and enhance the landscape setting and special character of the city and part c) would include landscape improvements that will strengthen the green belt boundary and contribute to multi-functional green networks by improving amenity.

### Drainage and Flood Risk

The LDP Development Principles for IBG state that a flood risk assessment shall be carried out in order to inform the capacity, design and layout of development proposals.

A Flood Risk Assessment, which includes hydraulic modelling of the Gogar Burn and Drainage Strategy been submitted as part of the application. A Sustainable Urban Drainage Strategy (SUDS) has been considered as part of the masterplan, developing on the recommendations of the West Edinburgh Landscape Framework (WELF).

The north eastern part of the application site, lying adjacent to the Gogar Burn is identified in the LDP as an Area of Importance for Flood Management, with the SEPA Flood Map indicating a risk of flooding from the burn along the northern edge of the site. The application site is crossed by two drainage channels - the Ratho Channel and Eastfield Road Tributary these both discharging into the Gogar Burn to the north. The application outlines that the existing watercourses on the site are to be maintained as part of the development and incorporated as landscape features.



A SUDS Strategy has been presented as part of the conceptual masterplan information. This outlines site control features to manage runoff including the proposed use of porous or permeable surface drainage to hard surfaced areas with bio-retention measures including landscape swales, linear swales and detention beds. Treated and attenuated runoff from these features will be discharged into existing watercourses. Airport safeguarding restrictions relating to bird strike have informed SUDS approach.

In relation to flood risk, SEPA initially placed an objection to the application and further information was requested regarding predicted flood levels on the Gogar Burn and proposed mitigation measures to address flood risk. In response to these issues, the applicants have confirmed that restrictions would be placed on the forms of development within Plots 2 and 4 to the north east corner of the site. SEPA have now confirmed that they are satisfied with the design flows to estimate flood levels within the extents of the application site with no likely negative flood risk impacts elsewhere. There are no proposals to develop within the 1:200 functional floodplain on the east side of the tramline and it is recommended that this area should be landscaped to provide additional storage for floodwater to reduce the volume of water passing under the tramline to west. This area would also be retained for common SUDS and water management.

CEC Flood Prevention have remarked that details of surface water flow paths, both existing and proposed, would be required to understand if there is any significant re-direction of surface water flows to surrounding land and secondly identify if surface water will flow towards property entrances. However, it is not possible to confirm surface water flow paths at this stage as the layout of built form relating to individual plots has yet to be developed. Similarly, finalised site levels would also need to be confirmed as part of detailed design development.

The information provided by the applicant is considered sufficient information to establish flood risk for the purposes of a PPP application. The proposed development would not result in increased flood risk for the site or elsewhere, and would satisfactorily address the requirements of LDP policy Env 21 part a) in that the development will not be at risk of flooding itself, and part b) would not impede the flow of flood water or deprive a river system of flood water storage with areas identified as areas of importance for flood management.

However, several conditions have been requested by SEPA and CEC Flood Prevention, these relate to detailed design matters and where necessary would remain in perpetuity throughout the development of the site.

Detailed SUDS arrangements will still be subject to further design development. A condition will require that details of drainage, surface water management and site levels be prepared as part of an initial AMC submission for the entire site. This should demonstrate compliance with the Edinburgh Design Guidance 2018, be designed to accommodate 1:30 and 1:200 year flooding events and be easily maintained by a private factor.

During the course of assessing the application, the presence of a SUDS detention basin to the north of the Park and Ride Site has been confirmed, this lying immediately to the west of the tram route. This provides SUDS attenuation for the Council owned Park and Ride site and is due to be relocated to land within the control of the Council.

This matter would need to be satisfactorily addressed prior to the development of Plot 08. It is recommended that this matter be highlighted through informative.

The potential re-meandering of existing watercourses on the site has been identified as part of the assessment of the landscape proposals. Such a move, could seek to develop these as landscape features and maximise their potential as linear wetland. Whilst the presence of badger setts in certain parts of the site, may pose a constraint, it is still suggested that the potential re-meandering of watercourse is further explored as part of the detailed landscape design.

### Air Quality Management

LDP Policy Env22, Pollution, Air, Water and Soil Quality identifies that planning permission will only be granted for development where there will be no significant adverse effects for health, the environment and amenity; and that there should be no significant adverse effect on air. The application site lies approximately 1.8km east of the closest Air Quality Management Area (AQMA) at Glasgow Road to the east of the Newbridge junction. A further AQMA is situated at St John's Road, Corstorphine approximately 4.0 km from the site.

The Council's Air Quality Action Plan contains measures to reduce vehicle emissions in these areas. Notwithstanding the proximity of the development to the tram route, Environmental Protection are concerned with regards to the cumulative impact of the large developments committed in this area, many of which include a considerable number of car parking spaces.

The applicant submitted an Air Quality Assessment as part of the EIA. Initial comments received from Environmental Protection in 2016 raised the following matters:-

- Air quality assessment work that adopts information from the Transportation Assessment (TA) is updated to reflect revised flow data adopted from the model prepared as part of the West Edinburgh Transport Appraisal (WETA) refresh (December 2016) and modelling should utilise the latest emission factors, tools and guidance.
- Air quality assessment work and modelling should utilise the latest emission factors, tools and guidance.

This request resulted in an addendum to the Environmental Statement being prepared in March 2018. The revised assessment included consideration to potential impacts during both site preparation/construction and operational phases of development. The work included appraisal of the following potentially significant effects:

- Potential increase in dust and particulate matter generated by on-site activities during the construction phase;
- Increase in pollutant concentrations as a result of exhaust emissions arising from construction traffic and plant; and
- Increase in pollutant concentrations as a result of exhaust emissions arising from traffic generated by the Proposed Development once operational.

The updated assessment concludes that the application will result in annual NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> objectives likely to be exceeded at 5 sensitive receptors. The report advises that the predicted changes of annual mean concentrations are all either 1% or less relative to the relevant AQAL level and the predicted concentrations are all below 90% of the AQAL. It concludes that as such impacts at all receptors are considered to be negligible.

SEPA also provided comment in respect of air quality in May 2018. Whilst they have no objection to the proposal, they have provided advice in relation to air quality, noting there is likely to be a direct, permanent, long-term effect on local air quality at the location of sensitive human receptors of moderate negative to minor negative significance.

At this stage the development proposals include a range of measures designed to encourage sustainable travel such as the proposed active travel routes and the dispersal of electric car parking charge points. However, as this is a PPP application the applicant will be required to submit further details in subsequent applications. Environmental Protection has advised that the submitted air quality impact is a strategic air quality assessment. Further consideration will be required to consider the potential adverse impact on local air quality as a consequence of vehicle exhaust emissions from road traffic generated by any of the forthcoming proposed detailed developments. This would also need to consider the possibility of air quality affecting the actual development site and future residents.

Environmental Protection advise that the following measures are included in future applications to help mitigate traffic related air quality impacts:

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

The proposals are considered to address LDP Policy Env22, Pollution, Air, Water and Soil Quality, part c) in that appropriate mitigation can be achieved to minimise adverse effects arising from the development. A series of conditions are recommended to address air quality matters in future AMC applications.

### Noise

LDP Policy Des 5, Development Design - Amenity identifies that planning permission will only be granted for development where there will be no significant adverse effects on the amenity of neighbouring developments and that future occupiers have acceptable levels of amenity in relation to noise.

The application site is in close proximity to both Edinburgh Airport and the A8 Glasgow Road which imposes challenging environmental constraints on the site in terms of noise.

A Noise Assessment was prepared by the applicant as part of the EIA, with a further addendum prepared in March 2018. Environmental Protection advise that whilst the airport is in close proximity to the site, the application proposed is not located inside the airport noise contours due to the current orientation of the runway. Nevertheless, it was requested that the noise assessment still considered aircraft noise. This was done by the applicant and considered in the applicant's noise contour map and shows the aircraft impacts are limited. The Noise and Vibration assessment is included in the original Environmental Assessment and considered potential impacts during both site preparation, construction and operational phases of development.

Since the original noise assessment was carried out Edinburgh Airport updated its Masterplan for the period 2016-2040. The future baseline for noise was therefore explored given the possibility of a second runway at the airport during the period 2020-2040. A potential second runway would require land to the north of the existing runway; whilst this is currently safeguarded, the airport currently consider that the future growth of the airport can be sustained by the current main runway only.

With regards to aircraft noise the report concludes that internal noise level criteria specified by BS8233 and the WHO guidelines could be achieved during daytime and night time periods with commonly used building fabric mitigation measures such as double glazing and trickle ventilation acoustic rated where required.

The noise assessment concludes that no significant impact has been identified to the proposed development from industrial/commercial or fixed plant noise.

An assessment of noise from development generated road traffic was also undertaken. The results of these predictions have been compared to determine noise level changes associated with the Proposed Development in isolation and the proposed development and committed developments combined. It was identified that the noise level increases as a result of the proposed development range from 0 to +0.8dB at worst, corresponding to a significance of effect between None and Negligible at worst. Such effects would be Long Term, Direct and Local.

The layout of the proposed commercial aspects of the development within the masterplan takes cognisance of acoustic mitigation at a strategic level and is designed to be sufficiently flexible to allow for acoustic considerations to be incorporated into the layout design during the detailed design stages. However, it is recommended that further noise assessment be undertaken for any proposed residential development within the site.

Environmental Protection advise that once the detailed nature of future uses is confirmed, if considered necessary noise from any related operations can be reconsidered and an appropriate noise mitigation scheme devised and incorporated into the proposed development design.

Due to the site size and the potential for a long construction phase Environmental Protection have recommended that a Construction Environmental Plan be submitted at the detailed application stage to protect neighbouring receptors from construction noise level on the site.

Suitable conditions are recommended to address the various issues relating to noise.

## Archaeology

The City Archaeological Officer has commented in relation to the application proposals and the EIA which has considered matters relating to the historic environment. There are no objections to the proposals subject to conditions requiring a programme of investigation to be undertaken prior to detailed (AMC/FUL) applications. A programme of archaeological work is required to secure the preservation and conservation of the former RAF Turnhouse WWII era pill box to the north east boundary of the site.

Subject to conditions, the proposals address the requirements of LDP Policy Env 8, Protection of Important Remains and LDP Policy Env 9, Development of Sites of Archaeological Significance.

## Airport Safeguarding

Edinburgh Airport has been consulted in relation to the application given the sites proximity to the airport and flight paths. Following initial comments from the Airport, maximum building heights to the western side of the site (Plots 05 and 07) have been reduced by the applicant to address their concerns. The Airport have confirmed these amendments to be acceptable, subject to no building on the application site exceeding a maximum height of 75.2 metres AOD.

Public realm and landscape guidance prepared by the applicant identifies plant species which are compliant with Airport Safeguarding requirements. This must be adhered to in the development of detailed landscape design proposals and this can be stipulated through condition.

Edinburgh Airport has no further safeguarding objection to the proposals, subject to conditions being applied in relation to building heights, the submission of a Bird Hazard Management Plan, finalised details of landscaping and SUDS and informatives relating to cranes and lighting.

## Ecology and Protected Species

WESDF IBG Principle 5 states that early provision should be made for a landscape framework and open space network for recreation, active travel and biodiversity purposes and to create an attractive setting for development.

The applicants have submitted ecological and habitat surveys as part of the Environmental Statement. An EIA addendum was subsequently prepared for Ecology and Nature Conservation in November 2018, this as a consequence of original survey information becoming outdated since the submission of the application.

Scottish Natural Heritage (SNH) have commented on the presence of protected species in and around the site including Badger, Otter, Bats and Birds.

The EIA suggests a Badger Protection Plan (BPP) be prepared and SNH have confirmed that licences will be required prior to development proceeding. SNH advise that Otter are active in the area, including the Gogar Burn to the northern edge of the site, however, no direct disturbance is identified as a consequence of development. In relation to Bats, on the basis of the survey information supplied, no bat licences will be required to allow development to proceed. The requirement for detailed bird surveys were ruled out at EIA scoping stage, with habitats supporting widespread species typical of open agricultural habitat.

SNH have advised that impacts on protected species are generally focused on the various watercourses and ditches which run through and beside the development area. In view of this, habitats should be maintained as landscaped corridors within the proposed development, enhanced with planting where appropriate. Such measures will help mitigate against impacts on species in the longer term, helping ensure that foraging and commuting routes, as well as suitable habitat will remain.

It is noted that maintenance of enhancement of watercourses and drains as part of green infrastructure should retain their function as quiet routes. Other standard mitigation for protecting mammals on construction site is proposed.

It is considered that the various matters relating to protected species, including a Badger Protection Plan, can be adequately dealt with through a Construction and Environmental Management Plan (CEMP). Given the proposed long term timescales for development, it is considered that a CEMP will provide the necessary level of control. All work will require periodic updating to ensure industry good practice and legislative compliance. This information can be secured through condition.

The CEMP should include mitigation as detailed in the Environmental Statement, Chapter 4 and updates as appropriate. It should also clearly link into relevant elements of the proposed landscaping plans, which forms part of the proposed landscape mitigation.

Each subsequent individual phase of development will need to refer to the whole site CEMP and ecological survey updates as appropriate to ensure compliance in relation to protected species and habitats legislation.

In summary, the ecological survey information submitted as part of the EIA provides a comprehensive assessment of ecology and protected species within the site. Subject to conditions and necessary mitigation, the proposals would address requirements of LDP Policy Env16, Species Protection, and would not have an adverse impact on species protected under European or UK law. The landscape framework and open space network would provide a suitable network for biodiversity purposes as identified through WESDF Principle 5.

## Trees

The application site contains minimal trees, these mainly associated with hedgerows related to former field boundaries with landscaping in the vicinity of the Park and Ride Site and tram route. A small number of mature trees also occupy the area of elevated ground to the south west corner of the site.

It is not considered that the proposed development would impact upon trees or woodland of value and worthy retention. A new site landscape structure is proposed as part of development and levels of planting envisaged to offset the loss of any trees. However, a tree survey should be prepared on a site wide basis prior to the commencement of development. This information should be used to inform the development of detailed landscaping proposals, with any trees of value being retained where possible. These various requirements would be stipulated through condition.

The proposed development would therefore address the requirements of LDP Policy, Env 12, Trees, in that, the development would not have a damaging impact on trees or woodland worthy of retention. It should be noted that trees and landscaping within the confines of the Park and Ride site and along the tram route should be considered for retention as far as possible, however, these fall within land controlled by the Council rather than applicants and matters such as tree removal would therefore need to be addressed as part of a separate planning consent process.

The proposed establishment of a new landscape structure for the application site, as identified as part of the Landscape Framework and landscaping guidance, would provide an appropriate level of tree replacement and mitigation.

#### Amenity of Neighbours and Future Occupiers

A small number of residential properties are situated in the vicinity of the site, these fronting Eastfield Road with a single dwelling situated at the southern edge of the site on Glasgow Road.

Representations have expressed concern regarding potential overshadowing and loss of privacy arising from the proposed scale of development with the building heights being unsympathetic to the surroundings. It has also been remarked that proposed landscape measures to southern boundary should comprise mature tree planting rather than wild flower meadow, with concern that the proposed development may have a bearing on the future redevelopment of a neighbouring residential property.

In response to these issues, the conceptual masterplan layout is not considered to present any particular issues in respect of neighbour amenity. The existing character of the locality is not predominantly residential in nature, with residential uses on Eastfield Road interspersed with various business uses associated with the airport, including car parking and hotels. Whilst the development of the site will result in a significant change to the character of the area, it is considered that the overall scale of development and strategic landscape design proposals will achieve effective integration with the site context. The proposed nature of open space (Proposal GS6) to the southern edge of the site will form a substantial landscape buffer and acceptable level of separation with the adjacent residential property. It is not considered that the proposal would be prejudicial to the future redevelopment of any neighbouring residential property.

The masterplan proposals have identified three separate locations within the site for residential led development - these situated within the northern and eastern parts of the site. Individual AMC submissions, including those with a residential component, will be required to demonstrate effective mitigation in terms of noise attenuation and air quality.

To ensure that the high levels of residential amenity are achieved for future occupiers, detailed design development would need to address requirements of LDP Policy Des 5, Development Design - Amenity, and relevant requirements of the Edinburgh Design Guidance. WESDF Principle IBG11 also requires proposals to demonstrate that siting, height and mass of buildings will not result in adverse impact to daylighting and sunlighting levels, particularly amenity space and areas of public realm. The layout of any residential elements would need to demonstrate compliance with LDP Policy Hou 3 - Private Green Space in Housing Development to ensure adequate levels of greenspace are provided to meet the needs of future residents, including communal provision. A minimum 20% of total site area should comprise usable greenspace.

These various matters can be adequately addressed through conditions and dealt with at AMC stage.

Given the longstanding agricultural nature of the site, there are no known sources of significant land contamination. However, Environmental Protection has advised that 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.

Issues relating to land contamination are considered to satisfy relevant LDP Policy requirements, including Env22, Pollution, Air, Water and Soil Quality, in so far as they are relevant to a Planning Permission in Principle and the current stage of design development. A suitable condition is therefore recommended with initial site-wide assessment followed by detailed investigation on a per plot basis. The applicant will be required to submit a site investigation and evaluation in line with current technical guidelines suitable for its intended new use/s.

#### **f) Equalities and Human Rights**

A full impact assessment of the proposal in relation to equalities and human rights would be considered at subsequent detailed application stage.

#### **g) Issues raised in representations**

The application was advertised on 18 December 2015, with a 28 day period for comments to take account of the accompanying Environmental Statement. A total of four letters of representation were received including two letters of objections and two general representations - one of these being a detailed response from Edinburgh Airport.

The application was re-advertised on 30 March 2018 following submission of EIA Addendum relating to Air Quality and Noise and Transport Assessment Addendum. This prompted two further letters of representation from Edinburgh Airport Limited.

The application was further re-advertised 28 November 2018 following submission of an EIA Addendum relating to Ecology and Nature Conservation.



## Scheme 2

Following the submission of EIA Addendum relating to Air Quality and Noise and Transport Assessment Addendum, further comments were received from Edinburgh Airport Limited, 27 April and 24 September 2018. Comments were also made regarding design amendments relating to flooding and drainage.

In summary, Edinburgh Airport offers support to the concept of IBG development and have expressed a desire to work in partnership with the developers of the West Edinburgh area. Through all their correspondence since the application was lodged with the Council, Edinburgh Airport has expressed concern that the proposal has fundamentally ignored the principles agreed by the West Edinburgh Partnership with respect to delivering infrastructure in advance of further development in the area. They are concerned that the proposal is at risk of undermining work of the West Edinburgh Partnership.

Edinburgh Airport call for a detailed Transport Assessment on IBG Phase 1, as required by WETA and the LDP. If not carried out, Edinburgh Airport will object to the application.

The key areas of concern set out Edinburgh Airport's response received 27 April 2018 relate to the following:

### Transport Assessment Addendum dated February 2018

- The application only focuses on phase 1 of the IBG masterplan leaving ambiguity regarding future land uses for phase 2, and is thus contrary to LDP policy Emp 6 - assessed in section 3.3 b) - the extents of the application for IBG have largely been determined by land ownerships with the extents of IBG phase 1 is also considered a distinct entity in its own right.
- The Transport Assessment fails to assess the impact of development on the Eastfield Road corridor or the A8 Glasgow Road interchange. The application is not supported by information that models traffic impacts on the local road network (i.e. Eastfield Road) and is therefore contrary to the LDP - assessed in section 3.3 c).
- Edinburgh Airport are concerned regarding the impact of the development upon the Eastfield Road corridor which represents the one and only existing major traffic artery for the airport. The proposed development could place a material level of additional traffic onto the corridor which risks the operational efficiency and performance of nationally important infrastructure asset - assessed in section 3.3 c) - Eastfield Road and the dumbells junction would be subject to upgrading in conjunction with the development of IBG Phase 1.
- The WETA Refresh Study identifies the need for significant infrastructure to be in-situ to support further development in West Edinburgh, it includes a package of infrastructure targeted at all modes of transport, a Transport Assessment is required to inform site specific measures for the development - assessed in section 3.3 c) - these matters have been addressed through the Transport Technical Note prepared by the applicant, dated October 2018.

- The City Deal funding for West Edinburgh is limited, therefore Edinburgh Airport are concerned regarding the funding mechanism in WETA - assessed in section 3.3 c) and d) - costs for required transport infrastructure will be secured through legal agreement, this being separate to projects which may eventually be funded through City Deal.
- No road infrastructure mitigation is proposed associated with the planning application - assessed in section 3.3 c) - Not correct, road infrastructure mitigation will be delivered as part of the application.
- No public transport infrastructure or service improvement are being provided - assessed in section 3.3 c) - It should be noted that tram infrastructure is already in place. The WETA study also recommends that bus infrastructure is further upgraded at Ingliston P&R.

### Noise and supporting information

- The ES fails to input noise measurement data collected by Edinburgh Airport in relation to the baseline measurements - assessed in section 3.3 e).
- The ES excludes the existing transportation and commercial noise on proposed residential development, therefore the suitability of the site for residential development is not properly tested - assessed in section 3.3 e).
- The introduction of a sensitive receptor of up to 396 residential units into phase 1 next to the airport should require a more robust Noise and Vibration Assessment - assessed in section 3.3 e) - the Noise Assessment Addendum is considered to be adequate. Further assessment will be undertaken in relation noise impacts at AMC application stage, particularly to demonstrate adequate noise mitigation.
- The Noise and Vibration Assessment fails to include consultation with CEC Environmental Health - assessed in section 3.3 c) - CEC Environmental Protection subsequently provided consultee response.
- Ecology and nature conservation information.
- This requires a consolidated assessment of both phase 1 and phase 2 of IBG - assessed in section 3.3 c).
- Lack of consideration of appropriate species within the Environmental Statement including Great Crested Newts, poor timings of surveys - assessed in section 3.3 e) - updated surveys undertaken as part of EIA Addendum.
- The habitat survey ES identifies four species currently classified on red listed species under Birds of Conservation concern 4 criteria but ES fails to assess this, a programme of breeding bird surveys is required - assessed in section 3.3 e).
- The ES does not include a Bat Survey - assessed in section 3.3 e).
- The ES does not include reference to otter holt protection - assessed in section 3.3 e).

### Flood Risk and Drainage

This includes the ES chapter on Ground conditions, Hydrology and contamination, Flood Risk Assessment and Drainage Strategy

- The assessment should include cumulative effect of phase 1 and 2 and developments within the airport boundary, given the proximity to the Gogar Burn and flood areas to the east of the site - assessed in section 3.3 e) - the Flood Risk Assessment undertaken in relation to IBG phase 1 has been assessed by relevant consultees and is considered adequate.
- The modelling in the Flood Risk Assessment should follow the advice of SEPA and include modelling of the 3 additional bridges - assessed in section 3.3 e) - SEPA advice reflected and issue will need to be taken into consideration at AMC stage.

### Scheme 1

The application was advertised on 18 December 2015. Four letters of representation have been received these including two letters of objection and two general representations - one these being a detailed response from Edinburgh Airport. These raise the following material issues:-

- Implications of proposed development for infrastructure provision in West Edinburgh - assessed in sections 3.3 c) and d).
- Lack of consideration of development of the wider site as a material consideration and concerns over reviewing Phase 1 and 2 in isolation - assessed in section 3.3 b) - Phasing of Development.
- Concerns in respect of the information provided and content of the Environmental Statement in relation to traffic, ecology and nature conservation, flood risk and noise information - assessed in sections 3.3 c) and e).
- Concern re. dates of notification to residents over the holiday period - consultation undertaken in accordance with statutory requirements.
- Impact of development on the surrounding roads network, particularly at peak times and air quality pollution - assessed in sections 3.3 c) and e).
- Insufficient parking provided as part of development, issues relating to commuter use of the Park & Ride by RBS staff - assessed in section 3.3 c).
- Concern re. proposed building heights and scale of development unsympathetic to the surroundings and would contrast poorly with the sensitive approach taken at RBS - assessed in section 3.3 b).
- Concern re. overshadowing and loss of privacy arising from the proposed scale of development - assessed in section 3.3 e).
- Concern re. noise disturbance from proposed development - assessed in section 3.3 e).
- Landscape measures to southern boundary should comprise mature tree planting rather than wild flower meadow - assessed in section 3.3 b).
- Future bearing that the proposed development may have on a neighbouring residential property, e.g. redevelopment - assessed in section 3.3 e).
- Impact to protected species, possible disturbance to habitats and whether impacts could be mitigated through design changes to the proposed masterplan - assessed in section 3.3 e).
- Concern re. the proposed retail element of the application, limited information provided on what is being proposed and that large stand-alone retail development will be allowed as part of the proposals - assessed in section 3.3 a).

- Supportive of small ancillary retail development within the masterplan site, but this should be restricted to a limited amount of retail floorspace that does not impact upon existing town centres – assessed in section 3.3 a).

### Non-material

- Noise and disturbance during the construction stage.
- Access and sewer connection issues relating to a neighbouring residential property.

### Duration of Consent- Formal Direction

Under Section 59 of the Town and Country Planning (Scotland) Act 1997 the following direction is promoted in relation to the duration of the planning permission. This direction is made in the recognition of the scale of the site and the phased approach to the development.

- A (i) Application for the approval of matters specified in conditions relating to strategic site infrastructure and plots for initial development fronting Eastfield Road and the Ingliston Park and Ride Site (Plots 01, 03, 05, 07, 08, 09, 11, 12, and 16 as defined through the Concept Masterplan and Implementation Strategy) shall be made before the expiration of 5 years from the date of the grant of planning permission in principle, unless an earlier application for such approval has been refused or an appeal against such refusal has been dismissed, in which case application for the approval of all outstanding matters specified in conditions must be made within 6 months of the date of such refusal or dismissal.
- A (ii) The approved development shall be commenced not later than the expiration of 5 years from the date of grant of planning permission in principle or 2 years from the final approval of matters specified in conditions, whichever is later.
- B (i) Application for the approval of matters specified in conditions relating to plots for later development (Plots 02, 04, 06, 10, 13, 14 and 15 as defined through the Concept Masterplan and Implementation Strategy) shall be made before the expiration of 10 years from the date of the grant of planning permission in principle, unless an earlier application for such approval has been refused or an appeal against such refusal has been dismissed, in which case application for the approval of all outstanding matters specified in conditions must be made within 6 months of the date of such refusal or dismissal.
- B (ii) The approved development shall be commenced not later than the expiration of 5 years from the date of grant of planning permission in principle or 2 years from the final approval of matters specified in conditions, whichever is later.

The site falls within a wider area that is subject to a Direction issued by the Scottish Ministers in March 2016. This Direction requires the notification of applications for major housing developments to the Scottish Ministers where the Council is minded to grant planning permission and prohibits the grant of planning permission for a period of 28 days.

The Direction is given in view of the national importance of West Edinburgh, which is identified in the National Planning Framework 3 as a significant location for investment, with Edinburgh Airport, the National Showground and the International Business Gateway.

The site falls within a wider area that is subject to a Direction issued by the Scottish Ministers in March 2016. This Direction requires the notification of applications for major housing developments to the Scottish Ministers where the Council is minded to grant planning permission and prohibits the grant of planning permission for a period of 28 days.

## **Conclusion**

The application represents a National Development proposal in West Edinburgh, situated within close proximity to the A8 Corridor and Edinburgh Airport. Due to the status of the proposals as a National Development the proposals will require to be referred to Full Council for consideration and then referred to Scottish Ministers.

The development of an International Business Gateway (IBG) to the west of Edinburgh is supported by the National Planning Policy NPF3, the SDP and the Local Development Plan (LDP) with site design principles articulated through the LDP and the West Edinburgh Strategic Design Framework (WESDF).

The proposed mix of land uses are considered appropriate to the development of an International Business Gateway - subject to a range of planning controls to ensure the primacy of business uses are maintained as the site is developed whilst also delivering a suitable mix of complementary uses as identified through LDP Policy Emp 6.

The proposed masterplan framework and parameters plans are considered to provide a suitable basis for planning conditions to guide the long term development of the IBG Phase 1 site, promoting high quality development, placemaking and site infrastructure befitting of the aspirations for the international business development.

It is recommended that this application be Minded to grant - Scottish Ministers subject to the details below.

### **3.4 Conditions/reasons/informatives**

#### **Conditions:-**

1. Following this grant of planning permission in principle the first application for the approval of matters specified in conditions submitted to the Council, shall obtain approval for all strategic site infrastructure including:
  - Open Space and Landscaping outwith the Development Plots;
  - Public Realm (Tram Square and Link to Eastfield Road);
  - Site Access (Details of all access points, the upgrading of Eastfield Road and the A8 dumbbells junction);
  - Primary Access Roads (including the Gogar Link Road);
  - Strategic Cycle Routes (to north of A8, to the eastern edge of the site within the Central Parkland and Eastfield Road); and
  - Common SUDS and Flood Management Infrastructure.

These details shall include all matters relating to the setting out, formation, layout and implementation and shall be substantially in accordance with the principles established through the following plans and documents, as approved as part of the planning permission in principle:-

- Plan 02 - Estate Infrastructure;
- Plan 08 - Conceptual Masterplan - Landscape Framework;
- Plan 10 - Conceptual Masterplan - Movement and Access;
- Plan 12 - Conceptual Masterplan - SUDS Strategy;
- Plan 14 - Conceptual Masterplan - Estate Infrastructure and Landscape;
- IBG Phase 1 Masterplan, Development Guidance February 2019;
- IBG Phase 1 Masterplan, Plot Principles, March 2019; and
- IBG Phase 1 Masterplan, Implementation Strategy, February 2019.

The submission of details for the Strategic Site Infrastructure as outlined in condition 1 above shall be accompanied by a detailed Phasing and Implementation Plan, this shall be substantially based upon the principles established through the Implementation Strategy. This information shall include:

- Finalised Site Levels;
  - Site Wide Tree Survey and Tree Constraints Plan;
  - Flooding and Drainage Information; and
  - Land Contamination.
2. No development shall be undertaken on sites, and no applications for the approval of matters specified in conditions (as required by condition 8 below) shall be submitted, until the matters outlined in condition one have been submitted. Any subsequent applications for the approval of matters specified in condition shall be submitted in accordance with the detailed strategic matters and phasing approved under condition one.
3. Any application for approval of matters specified in conditions (AMC application) made to the Council for any subsequent plot, or plots, within the planning permission in principle application (PPP application) site shall include a suitably updated version of the masterplan [implementation strategy] that identifies all previous AMC application consents and maintains the primacy of the class 4 business uses across the entirety of the application site.

All AMC applications shall be substantially in accordance with the requirements of the following approved documents:-

- Plan 02 - Estate Infrastructure;
- Plan 03B - Plot Parameters - Development Parameters;
- Plan 04B - Plot Parameters - Maximum Building Heights;
- Plan 05A - Plot Parameters – Uses;
- Plan 08 - Conceptual Masterplan - Landscape Framework;
- Plan 10 - Concept Masterplan - Movement and Access;
- Plan 12 - Conceptual Masterplan - SUDS Strategy;
- Plan 14 - Conceptual Masterplan - Estate Infrastructure and Landscape;
- IBG Phase 1 Masterplan, Development Guidance, February 2019;

- IBG Phase 1 Masterplan, Plot Principles, March 2019; and
  - IBG Phase 1 Masterplan, Implementation Strategy, February 2019.
4. All further applications for approval of matters specified in conditions (AMC application) shall ensure that the overall development of the site shall be comprised of:
- a minimum overall floorspace of class 4, 'business' uses of 58% of that development;
  - a maximum floorspace of class 7, 'hotel' uses of 40,388 square metres;
  - a maximum of 396 residential units comprised of either, townhouses (class 9 residential) or flatted residential units (*sui-generis* use); and
  - other ancillary uses comprised of: class 1, 'retail'; class 2, 'financial and professional services'; class 3, 'food and drink'; class 10, 'non-residential institution'; and class 11, 'assembly and leisure'; of a maximum of 5,439 square metres or 2% of the overall development of the site.
5. Any proposed development of classes 1, 2 or 3 shall be limited to a maximum individual unit size of 250 square metres. Any proposals in excess of this size shall be required to demonstrate compliance with the retail policies of the relevant Local Development Plan, through the submission of supporting information.
6. Any proposed individual unit for use within classes 10 or 11 shall be limited in size to 1,500 square metres.
7. Each AMC relating to phased sub sections or individual plots, must be submitted to demonstrate; a) the relationship with the approved masterplan context and planning permission in principle; b) where the development plot is proposed to be phased, design proposals should demonstrate the relationship with the context of the wider plot; and c) proposed disposition of uses within the plot, as relevant to the particular submission.
8. Prior to the commencement of works on each site for each phases of development, the details of under-noted matters shall be submitted to and approved in writing by the Planning Authority, in the form of a detailed layout of that phase of the site and include detailed plans, sections and elevations of the buildings and all other structures, including finished site levels. Each application for the development for phased sub sections or individual plots shall be supported by an updated Landscape and Visual Impact Assessment (LVIA) and shall demonstrate a range of building heights as per the principles outlined in the LDP and WESDF.

No building or structure shall exceed the maximum heights as depicted in Plan 04B - Plot Parameters - Maximum Building Heights. Buildings should be designed to achieve a range of heights from 4 storeys (12-22 metres AGL) to 8 storeys (24-38 metres AGL) to ensure a good quality townscape is created and that reasonable levels of sunlight and daylight are achieved, particularly to adjacent areas of public realm and open space. Visual impacts arising from building heights and the articulation of roofscape must also be considered.

## Approval of Matters:

- (a) details of the siting, design and height of development, including design of all external features and glazing specifications (including acoustic capabilities);
  - (b) design and configuration of public and open spaces, all external materials and finishes, and details of the play equipment associated with residential;
  - (c) car, motorcycle and cycle parking, access, road layouts and alignment, including a Stage 2 Quality Audit, classification of streets, servicing areas, street lighting and electric charging points, further transport information;
  - (d) footpaths and cycle routes, including proposed multi-use paths and the signage of pedestrian and cycle access links, including lighting details;
  - (e) waste management and recycling facilities;
  - (f) surface water management plan and Sustainable Drainage Scheme (SuDS);
  - (g) site investigation/decontamination arrangements;
  - (h) full details of sustainability measures in accordance with Edinburgh Standards for Sustainable Building;
  - (i) hard and soft landscaping details, including:
    - (i) boundary treatments (overall site and individual plots);
    - (ii) walls, fences, gates and any other boundary treatments;
    - (iii) the location of new trees, shrubs and hedges;
    - (iv) a schedule of plants to comprise species, plant size and proposed number/density;
    - (v) programme of completion and subsequent maintenance;
    - (vi) existing and proposed services such as cables, pipelines, substations;
    - (vii) other artefacts and structures such as street furniture, including lighting columns and fittings, and play equipment;
    - (viii) details of phasing of these works; and
    - (ix) existing and finished ground levels in relation to Ordnance Datum.
9. No demolition or any other form of development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (including excavation, reporting and analysis, publication, interpretation, public engagement) in accordance with a written scheme of investigation which has first been submitted to and approved by the Planning Authority.
10. No development shall take place on the site until the applicant has secured the preservation and/or conservation of the former RAF Turnhouse, World War II era pill box in accordance with a conservation design which has first been submitted to and approved by the Planning Authority.
11. No development shall take place until:
  - (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.



Any required remedial and/or protective measures, identified by the site survey, 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, before the commencement of any construction works on the site.

12. No development shall commence on any residential plot until an acoustic scheme for the protection of the proposed residential development from transport and commercial noise (proposed and existing) has been submitted to and approved in writing by the Planning Authority. That acoustic scheme shall include full details of any proposed acoustic glazing or barrier(s) and, thereafter, all works, which form part of the approved acoustic scheme, shall be completed on site to the satisfaction of the Planning Authority before any part of the residential development is first occupied.
13. The applicant must prepare and identify all existing and proposed Surface Water Flow Paths on drawings, based upon the findings of the Flood Risk Assessment, including updated proposed site levels. By taking the post-development arrangement include runoff from outwith the site, from unpaved areas within the site, and from paved areas in events which would exceed the capacity of the drainage system.

The drainage strategy shall be designed in accordance with the following standards:-

- The construction industry research and information association (CIRIA), 'Sustainable Drainage System Manual', C753;
  - Scottish Water's, Sewers for Scotland, version 4; in terms of specification for the design, construction and vesting of new sewerage infrastructure assets; and
  - Micro drainage calculations to support the site showing no flooding during the 1:200 year, plus a 30% climate change event, when calculating attenuation storage on the site.
14. No development shall take place on the site until a Construction Environmental Management Plan: Biodiversity & Landscape (CEMP), has been submitted to and approved by the Planning Authority. The CEMP should include mitigation as detailed in the Environmental Statement, Chapter 4. (Table 4-7 Summary of Effects Table Ecology and Nature Conservation) and including updates as appropriate, from the report: "Edinburgh International Business Gateway, Ecological Baseline Review, WSP, v2.0 November 2018". It should also clearly link to the relevant elements of the proposed landscaping plans, which forms part of the proposed ecological mitigation. Thereafter, the CEMP shall be adhered to in full throughout the duration the construction phase of the proposed development.
  15. All further applications for approval of matters specified in conditions (AMC application) shall comply with the provisions as set out associated in the Air Quality Assessment report (as amended) (March 2018) and to provide further plot specific details in order to suitably reduce air quality assessment levels changes to a minimum in accordance with the Council's Air Quality Action Plan.

16. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by Edinburgh Airport and the Planning Authority. The submitted plan shall include details of:
- Monitoring of any standing water within the site temporary or permanent; Sustainable Drainage Schemes (SuDS) - Such schemes shall comply with Advice Note 3 'Wildlife Hazards' (available at: <http://.aoa.org.uk/policy-campaigns/operations-safety/>);
  - Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice note 3 'Wildlife Hazards'.
  - Reinstatement of grass areas;
  - Maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow;
  - Which waste material can be brought onto 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; and
  - Signs deterring people from feeding the birds.

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

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

- (i) any earthworks;
- (ii) grassed areas;
- (iii) the species, number and spacing of trees and shrubs;
- (iv) details of any water features;
- (v) drainage details including Sustainable Drainage Schemes (SuDS) - Such schemes must comply with Advice Note 6 'Potential Bird Hazards from SuDS' (available at: <http://www.aoa.org.uk/policy-safeguarding.htm>); and
- (vi) others that the applicant or the Planning Authority may specify and having regard to Advice Note 3: Potential Bird Hazards from Amenity Landscaping and Building Design and Note 6 on SuDS].

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

18. Development shall not commence until details of the Sustainable 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 SuDS'. The submitted Plan shall include details of:
  - (i) attenuation times;
  - (ii) profiles & dimensions of water bodies; and
  - (iii) 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.

19. No development shall take place on the site until a Construction Environmental Management Plan (CEMP): relating to Noise, has been submitted to and approved by the Planning Authority. Thereafter, the CEMP shall be adhered to in full throughout the duration the construction phase of the proposed development.

**Reasons:-**

1. In order to enable the planning authority to consider this/these matter/s in detail.
2. In order to enable the planning authority to consider this/these matter/s in detail.
3. In order to enable the planning authority to consider this/these matter/s in detail.
4. In order to allow the planning authority to suitably control the future development of the site ensuring a primacy of class 4, 'business' uses.
5. In order to allow the planning authority to suitably control the future development of the site ensuring a primacy of class 4, 'business' uses.
6. In order to enable the Head of Planning to consider this/these matter/s in detail.
7. In order to enable the planning authority to consider this/these matter/s in detail.
8. In order to enable the Head of Planning to consider this/these matter/s in detail.
9. In order to accord with the statutory requirements of the Town and Country Planning (Scotland) Act 1997 and to enable the Planning Authority to consider these matters in detail.
10. In order to safeguard the interests of archaeological heritage.
11. In order to safeguard the interests of archaeological heritage.
12. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
13. In order to safeguard the amenity of neighbouring residents and other occupiers.

14. To ensure sustainable flood risk management is adopted in the long term development of the site, so as to identify and prevent any significant re-direction of surface flows to surrounding land and surface water flow towards neighbouring property entrances.
15. In order to ensure that the construction and development phases of the site works are undertaken in so as to mitigate its impact on and to protect the existing biodiversity and landscape of the site and its immediate surroundings.
16. In order to suitably address air quality matters resulting from the proposed development, specifically on sensitive receptors and to reduce emissions generated by traffic generated by the development of the site.
17. 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.
18. 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 site.
19. In order to safeguard the amenity of neighbouring residents and other occupiers.

## **Informatives**

It should be noted that:

1. 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.
2. As soon as practicable upon the completion of each phase 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.
3. A legal agreement is required to cover the following matters:

A minimum 25% of the total units (99 homes) should be secured on-site as approved affordable housing tenures through legal agreement. The applicant is in agreement to this requirement. This aspect of the proposal would address the requirements of LDP Policy Hou 6, Affordable Housing.

### Education

The required contribution should be based on established 'per house' and 'per flat' contribution figures set out below and secured through legal agreement:-

Flats	£3,216 (infrastructure)	£476 (land)
Houses	£16,186 (infrastructure)	£2,042 (land)

The infrastructure contribution element will be index linked and the land contribution will not.

### Transport

The application is located within the West Edinburgh Transport Contribution Zone- the following mitigation measures to be delivered by the applicant:

- 1) Walking/cycling infrastructure - completing the missing link from IBG to the RBS junction;
- 2) Public transport infrastructure - dedicated bus lanes around the Eastfield Road dumbbells;
- 3) Road infrastructure - dualling of Eastfield Road to the IBG Northern Access, improvements to the dumbbells and westbound off-slip; and
- 4) Intelligent transport systems - MOVA is a strategy for the control of traffic light systems, proposed to be implemented at Newbridge, Eastfield Road dumbbells, Gogar + Maybury in addition to Eastfield Road dualling works.

### Edinburgh Tram

Transport have requested that a contribution to the Edinburgh Tram be sought in line with the LDP Supplementary Guidance. The calculated sum based on the current development proposals is £13,172,090.

The sum is to be indexed as appropriate and the use period to be 10 years from the date of final payment.

### Health Care

The Supplementary Guidance identifies new practice accommodation as part of a Health Centre to mitigate impact of new residential development in West Edinburgh (this includes Maybury, South Gyle, Edinburgh Park and IBG).

A sum of £1,050 per dwelling ( $\text{£}4\text{m}/8,000 = \text{£}500$  per patient) will be payable in relation to the residential development.

4. Should the applicant wish to construct greater than 1,000 car parking spaces then a 'Controlled Activities Regulation (CAR) Authorisation' will be required from the Scottish Environmental Protection Authority (SEPA). The applicant should seek the necessary authorisation at an appropriate time in the design process in order to accommodate SEPA's comments and potential requirements.
5. All car parking, where not controlled private off-street parking, will be subject to control as part of the West Edinburgh Controlled Parking Zone (CPZ). Suitable Traffic Order(s) will require to be promoted and implemented at no cost to the Council.

6. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be 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. The Council will expect to adopt any road constructed under a road construction consent.
7. The applicant must be informed that any proposed on-street parking spaces cannot be allocated to individual properties, nor can they be subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents.
8. All disabled persons parking bays should comply with the Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under legislation. A contribution of £2,000 will be required to progress each 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 of British Standards 8300:2009 as approved.
9. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities to be readily accommodated in the future. For residential land uses, passive provision to be provided as a minimum, including ducting and infrastructure such that charging points can be readily accommodated in the future.
10. The proposed site is on or adjacent to the operational Edinburgh Tram. Therefore, the applicant shall consult with Edinburgh Trams regarding construction timing. This is due to the potential access implications of construction/delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site. Tram power lines are over 5 metres above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with Edinburgh Trams and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:
  - Any work where part of the site such as tools, materials, machines, suspended loads of where people could enter the Edinburgh Tram

Hazard Zone. For example, window cleaning or other work involving the use of ladders;

- Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
- Piling, using a crane, excavating more than 2 metres or erecting and dismantling scaffolding within 4 metres of the Edinburgh Tram Hazard Zone (depending upon the extent of the proposed works, a separate Asset Protection Agreement may be required to be agreed);
- Any excavation within 3 metres of any pole supporting overhead lines;
- Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when equipment is in use;
- The Council and Edinburgh Trams has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line. See the full guidance on how to get permission to work near a tram way:  
<http://edinburghtrams.com/information/working-around-trams>

11. 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/>)
12. 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.
13. The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs, ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Edinburgh Airport Airside Operations staff. In some instances it may be necessary to contact Edinburgh Airport Airside Operations staff before the bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.
14. (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 the 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 the 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 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 procedure.
  - (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) The 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.
15. Applicant's attention is drawn to the EIA Noise Assessment report (sections 3.7.12 and 3.7.13) - regard shall be had to noise in the development of the residential layout - to ensure that noise issues are satisfactorily addressed. Noise assessment should be prepared on a per plot basis, this being prepared to take cognisance of the EIA findings. Regard shall be ad to noise issues in the development of layouts for residential development. The applicants attention is drawn to - Refer to EIA Addendum - Supplementary Environmental Information - Noise, March 2018 - 3.7.12 and 3.7.13) - Where such screening measures are incorporated, they will need to be imperforate, continuous, sealed at the base and selected to be compliant with B2 specification (or better) as defined within BS EN1793-2:2012: Road traffic noise reducing devices. Test Method for determining the acoustic performance. Intrinsic characteristics of airborne sound insulation under diffuse under sound field conditions.
16. No development shall take place in relation to Plot 8 until the Sustainable urban Drainage Scheme (SuDS) pond, situated to the north of the Park and Ride Site (also serving the Park and Ride Site), has been relocated at a position to be agreed with the Council. This is to ensure that the capacity of the existing SuDS scheme is maintained in a suitable location.

## **Financial impact**

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### **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**

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

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

## **Sustainability impact**

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### **7.1 The sustainability impact has been assessed as follows:**

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

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

A Proposal of Application Notice (13/03146/PAN) was submitted to City of Edinburgh Council on 08 August 2013. The development anticipates a city extension that is urban in character and in two distinct parts including Phase 1 to the west and Phase 2 to the east. Phase 1 is planned as a business led mixed-use development, with a business district focus, comprising:

- Business and employment uses (Classes 4 & 6);
- Hotels; and
- Ancillary uses including retail (Class 1), financial and professional services (Class 2), food and drink (Class 3), residential institutions (Class 8), non-residential institutions (Class 10), assembly and leisure (Class 11), sui-generis development and other related works including car parking, servicing, access arrangements and public realm.

The PAN was considered by the Council's Development Management Sub-Committee on 06 November 2013, and subsequently as part of the reporting for the PAN for IBG Phase 2 on 23 September 2015. The Committee noted the key issues at this stage in the process.

The PAN set out a proposed programme of pre-application consultation. A copy was sent to the Community Councils, Neighbourhood Partnership and Local Ward Members.

Public consultation events for IBG Phase 1 took place on 04 and 27 September 2013 at the Hilton Hotel, near Edinburgh Airport. The project team also met and presented proposals to the Ratho & District Community Council on 09 October 2013. The results of the community consultation have been submitted as part of the Pre-application Consultation Report.

Early design proposals were considered at pre-application stage by the Edinburgh Urban Design Panel (EUDP) on 29 June 2011. These were further considered through an Architecture + Design Scotland (A+DS) Design Forum series, with workshops taking place on 27 March, 19 June and 19 October 2015. Summary responses from the EUDP and A+DS Design Forum series are contained in the report appendices.

## **8.2 Publicity summary of representations and Community Council comments**

The application was advertised on 18 December 2015, with a 28 day period for comments to take account of the accompanying Environmental Statement. A total of four letters of representation were received including two letters of objection and two general representations - one these being a detailed response from Edinburgh Airport.

The application was re-advertised on 30 March 2016 following submission of EIA Addendum relating to Air Quality and Noise and Transport Assessment Addendum. This prompted two further letters of representation from Edinburgh Airport Limited.

The application was further re-advertised 28 November 2018 following submission of an EIA Addendum relating to Ecology and Nature Conservation.

Following on from initial comment in early 2016, Edinburgh Airport reviewed the supplementary information received dated February 2018, including the Transport Assessment Addendum. Their response to these matters was dated 27 April 2018 and 24 September 2018.

## **Background reading/external references**

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- 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 predominantly allocated as Special Economic Area (Emp 6 - International Business Gateway) in the adopted Edinburgh Local Development Plan 2016. Other proposals and safeguards affecting the site include:- Green Space Proposal (GS 6) - corridors extending from Eastfield Road to the eastern edge of the application site, the eastern and southern peripheries. An Area of Importance for Flood Management (Env 21) is situated to the north east corner of the site.

Transport Proposals and Safeguards relating to the site include:- (T1) - Edinburgh Tram, (T8) - Eastfield Road and dumbbells junction, (T9) - Gogar Link Road.

National and Strategic Policy:-

National Planning Framework 3 (NPF3)  
SESPlan 2013

Other relevant guidance:-

West Edinburgh Strategic Design Framework, May 2010

Finalised Supplementary Guidance: Developer Contributions and infrastructure Delivery, August 2018  
Edinburgh Local Development Plan Action Programme, January 2019

Open Space 2021, Edinburgh's Open Space Strategy 2016

Other documents for approval:-

IBG Phase 1 Masterplan - Development Guidance, February 2019

Plot Principles, March 2019

Implementation Strategy, February 2019

<b>Date registered</b>	7 December 2015
<b>Drawing numbers/Scheme</b>	01, 02, 03B, 04A, 05A, 08, 10, 12, 14,  Scheme 2

**David R. Leslie**  
Chief Planning Officer  
PLACE  
The City of Edinburgh Council

Contact: Francis Newton, Senior Planning Officer  
E-mail:francis.newton@edinburgh.gov.uk Tel:0131 529 6435

## **Links - Policies**

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### **Relevant Policies:**

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

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

LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

LDP Policy Emp 1 (Office Development) identifies locations and circumstances in which office development will be permitted.

LDP Policy Emp 6 (International Business Gateway) sets out uses that will be supported in principle for the development of an International Business Gateway within the boundary defined on the Proposals Map.

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

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

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

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

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

LDP Policy Hou 10 (Community Facilities) requires housing developments to provide the necessary provision of health and other community facilities and protects against valuable health or community facilities.

LDP Policy Ret 6 (Out-of-Centre Development) identifies the circumstances in which out-of-centre retail development will be permitted.

LDP Policy Ret 8 (Entertainment and Leisure Developments - Other Locations) sets out the circumstances in which entertainment and leisure developments will be permitted outwith the identified preferred locations.

LDP Policy Tra 1 (Location of Major Travel Generating Development) supports major development in the City Centre and sets criteria for assessing major travel generating development elsewhere.

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

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

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

LDP Policy Tra 6 (Park and Ride) sets out the circumstances park and ride facilities will be permitted.

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

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

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

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

**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.

**Non-statutory guidelines - EDINBURGH STREET DESIGN GUIDANCE -** Edinburgh Street Design Guidance supports proposals that create better places through the delivery of vibrant, safe, attractive, effective and enjoyable streets in Edinburgh. It sets out the Council's expectations for the design of streets and public realm.

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

# Appendix 1

## **Application for Planning Permission in Principle 15/05580/PPP**

**At Land 160 Metres North Of 2, Eastfield Road, Edinburgh  
Mixed use development inc. business + employment uses  
(class 4); hotels (class 7) + ancillary uses including retail  
(Class 1), financial + professional services (Class 2), food +  
drink (Class 3), residential (Class 9), non-residential  
institutions (Class 10), assembly + leisure (Class 11), sui  
generis flatted development; associated works inc. car  
parking, servicing, access + public realm. (As Amended)**

### **Consultations**

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#### **Edinburgh Urban Design Panel**

##### *Introduction*

*This report relates to the phase 1 masterplan for the EIBG. This is the first time that the proposals have been reviewed.*

*It was noted that the Panel had not reviewed the draft West Edinburgh Strategic Design Framework (WESDF) as the consultation on this document was carried out prior to the Panel's inception, but that this has been reviewed by A+DS.*

*Charles Strang advised he had been involved with the West Edinburgh Planning Framework SEA. This was not considered problematic with regard to Charles Strang's involvement on the review. No declarations of interest were made by any panel members in relation to this scheme.*

*This report should be read in conjunction with the pre meeting papers which provide an overview, context, concept, plans, sections and 3D visualisations of the scheme and a Planning Issues Paper.*

*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.*

*The Panel's views on the principle of development.*

*In part, the Panel is concerned about the development of the area designated in planning policy (including the local plan of the Rural West Edinburgh Local Plan and its Alteration adopted June 2011) and guidance for the International Business Gateway and the proposed associated ancillary uses and the consequent development of green belt and loss of agricultural land.*

*The use of the term 'gateway' is of concern in trying to interpret the sense of place to be created either as a destination or as a transient zone between the airport and the city's urban edge.*

*A strong case will require to be demonstrated that the location proposed in the masterplan is the best location within the city area for the proposed arena.*



*The design proposal for the masterplan is based on the tram line being delivered. If the tram is not delivered, this will result in the main transport access to the site being by road. This would therefore require a re-evaluation of the appropriateness of developing this site and following this, if it remains as a development site, then a strategic redesign of the proposals along with a comprehensive re-evaluation of the transport infrastructure would be required.*

#### *The Panel's views on the masterplan approach*

*The Panel are supportive of the development of a masterplan for this strategic area as this will encourage a comprehensive and not piecemeal approach to development. Disparate development of hotels and other uses is occurring within the area and therefore the masterplan will be an important mechanism to help mitigate the adverse effects of this.*

*For the site to be an International Business Gateway it is important that international businesses and HQs are sought and that the buildings delivered of the highest international design quality. There should be no question of this being "just another business park".*

*The Panel recognises the importance of ensuring that the masterplan for this site is not developed in isolation but considered and developed to take account of the wider context within the WESDF area. The Panel finds it particularly disappointing that the masterplan does not extend to the airport as this could provide a physical link, benefiting airport users. The Panel therefore encourages the team to engage in further discussion with Edinburgh Airport and other land owners about the potential for this.*

*A landscape framework is currently being developed. The Panel welcomes this and considers this document to be critical in the design development of this and adjacent sites.*

#### *The Panel's views on the design*

*While there is some degree of reservation about the proposed use of an arena on this site (as expressed in 2.3 above) the Panel sees an opportunity to create a 'destination' towards the end of the tram line from the city and encourages the design team to consider this within their design. In addition to buildings there will be an opportunity to allow people easy access to the areas beyond.*

*Care will be required to ensure that the spaces within the development contribute to the sense of place. Consideration should be given to the microclimate (particularly around the west and south-west of the arena and the linking area to the park and ride facility), the numbers of people using the spaces, the scale of streets and the interfaces between surrounding uses such as the showground. The logic of spaces around the arena needs to be carefully thought through as they will require to accommodate large volumes of people as well as dealing with the design issue of maintaining a reserve area for the tram corridor. The spaces around the arena and transport hub will be pivotal in the creation of place.*

*There is a danger that the flexibility of the grid may be used to facilitate development of an inappropriate standard. If this is the case, the use of a grid layout is questioned as an appropriate design approach. If the grid concept is taken forward, in refining the proposal as it is developed, continued considerations will be the relationship the grid will form with the site landscape, topography and other features.*

*There is a significant likelihood that the retention of the park and ride facility in its current location will have a negative impact on the design. This is because of the adverse visual effects resulting from the expanse of hard surfacing that the facility has. The masterplan should demonstrate how such effects can be mitigated. Its long term and short term impacts should be fully considered.*

*The layout of the development should allow views to key city features to be protected and incorporated into the design of this area as far as possible to help link the development into the city and its surroundings as a place. Such features include Arthur's Seat, the Pentlands, the Forth bridges, the bings etc. Historic features such as Gogar Fort and the listed buildings should be protected. Protecting these features and buildings may be of greater significance in later phases of development which will come closer to them.*

*The Panel encourages the enhancement of Eastfield Road.*

*The Panel's views of movement and infrastructure*

*If the park and ride is retained, for it to function effectively in reducing modal share of private vehicular transport in to the city then a robust control mechanism will be required to ensure that it does not become a car park for the EIBG.*

*The Panel suggests that a fully integrated transport strategy is key to the successful development of the area. This should include the integration and improvement of the existing cycle network.*

*Pedestrian and cycle links to neighbouring areas need to be integrated into the proposals.*

*The design team is encouraged to progress with the development of their sustainable urban drainage strategy.*

*Summary*

*The Panel recognises the significant challenges facing the team in delivering a design which will provide a strong sense of place with quality spaces - for example the resolution of the space in and around the tram, park and ride and arena. However it should be a fundamental aim to create a special place - a destination which people would want to visit in itself - and not just a high quality business park with an arena.*

### **Building Standards (Contaminated) comment**

*The only recorded possible contaminated land is on the boundary of this site with the Airport. As there is the possibility of made ground on the site in connection with the tramway park ride site, Building Standards would request a Geo-environmental assessment for the site.*

## **Archaeology comment**

*The site lies on the south-western limits of the former RAF Turnhouse which forms the eastern half of the present day airport. The RAF base was open in 1915 and continued in service through the Cold War Period until 1966. Evidence for the base survives today on site in the form of a WW II pillbox recorded by GUARD as part of the Edinburgh Tram project.*

*Archaeological excavations by GUARD (see plan site 1 & 1A) along the route of the Edinburgh Tram have demonstrated that area has been extensively occupied since early prehistory. These excavations by GUARD immediately to the east of the site produced evidence for a complex sequence of occupation dating back to the start of the Neolithic Period (4000 BC) and which included two phases of Bronze Age settlement, an Iron Age Palisade enclosure and significantly Dark Age (British/Anglian) corn drying kilns dating to the 6th-8th centuries AD. In addition to the sites prehistoric and early medieval archaeology this site also occurs within an area associated with the 17th century Civil War battle known as the Field of Flashes.*

*This application must be considered under terms of the Scottish Government's Scottish Planning Policy (SPP), PAN2/2011 and Scottish Historic Environment Policy (SHEP) and also CEC's Edinburgh City Local Plan 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.*

### *Historic Building; RAF Turnhouse Pillbox*

*The site contains the upstanding remains of a WW II era pillbox associated with the former RAF Turnhouse Airfield on its NE boundary. This structure is one of the last remaining elements of this important RAF base and is considered to be of local archaeological significance. Accordingly it is recommended that this structure is not only persevered in situ within the landscaping associated within this development but that an associated interpretation scheme is undertaken describing its function and the role of RAF Turnhouse.*

*It is recommended that these programme of works be secured using a condition based upon the model condition stated in PAN 42 Planning and Archaeology (para 34), as follows;*

*'No development shall take place on the site until the applicant has secured the preservation / conservation of the former RAF Turnhouse World War II era pill box in accordance with a conservation design which has been submitted by the applicant and approved by the Planning Authority.'*

## *Buried Archaeology*

*Given the potential significant archaeological outlined earlier, it is essential that an archaeological mitigation strategy is undertaken prior to submission of any further detailed (FUL/AMC) applications and development. In essence this strategy will require the undertaking of a phased programme of archaeological investigation, the first phase of which will be the undertaking of an archaeological evaluation (min 10%) linked to metal detecting surveys. The results from this initial phase of work will allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording of any surviving archaeological remains prior to construction commencing is undertaken.*

## *Interpretation*

*In addition to the interpretation / preservation of the Pillbox discussed above, the site has the potential for unearthing important archaeological remains. Accordingly it is essential that the archaeological mitigation strategy contain provision for public/community engagement (e.g. site open days, viewing points, temporary interpretation boards), the scope of which will be agreed with CECAS.*

*It is recommended that these programmes of work be secured using a condition based upon the model condition stated in PAN 42 Planning and Archaeology (para 34), as follows;*

*'No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Excavation, reporting and analysis, publication, interpretation, public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'*

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

## **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 site in question is a 36.7 hectare of land bounded by Glasgow Road to the south; Eastfield Road to the west; the Hilton Edinburgh Hotel and Gogar Burn to the north; and farmland to the east. The Edinburgh tram line bisects the site, as does the route of the safeguarded Gogar Link Road.*

*Approximately 5 hectares of land to the west of the site is occupied by the Ingliston Park and Ride, which provides 1,085 parking places. The application does not propose any changes to the Park and Ride.*

*Approximately 9 hectares of land to the south of the site is arable land most recently used for the growing of cereal crops. Per the 'Economic Report on Scottish Agriculture 2015', in 2014, cereal farms in Scotland supported, on average, a farm gate value of £620 per hectare per annum and a standard labour requirement of 0.01 jobs per hectare. This indicates that the arable land could be expected to support a total farm gate value of £5,580 per annum and a negligible level of employment.*

*The remainder of the site is primarily unused open land.*

#### *Commentary on proposed uses*

##### *Class 1/3 - Shops/Food and drink*

*The development as proposed would deliver 3,652m<sup>2</sup> of class 1/3 space. Based on average employment densities, this could be expected to directly support 192-203 full-time equivalent jobs. Based on average gross value added per worker for workers in the retail and hospitality sectors, this could be expected to directly support annual gross value added of between £2.54 million and £5.37 million (2013 prices).*

##### *Class 4 - Business*

*The development as proposed would deliver 122,158m<sup>2</sup> of class 4 space. Based on average employment densities, this could be expected to directly support approximately 12,200 full-time equivalent jobs if fully-let. Based on an average gross value added per worker of £80,800 per annum for workers in the financial and business services sector, this could be expected to support annual gross value added of approximately £987.37 million (2013 prices).*

##### *Class 7 - Hotels and hostels*

*The development as proposed would deliver 1,415 hotel bedrooms. Based on average employment densities, this could be expected to directly support 472-1,132 full-time equivalent jobs. Based on average gross value added per worker for workers in the accommodation sector (£26,900), this could be expected to directly support annual gross value added of between £13.95 million and £33.47 million (2013 prices).*

*Given average occupancy rates in Edinburgh of 80.5% (as of 2014) and average daily spend for overnight visitors of £81.00 (as of 2009/10), this could be expected to represent 415,762 visitor bed-nights in Edinburgh per annum.*

##### *Class 9 - Houses*

*The development as proposed would deliver 396 residential units. The mean household size in Edinburgh as of 2014 was 2.06, indicating that the 396 new residential units could, once fully built and occupied, be expected to support approximately 816 residents.*

*The residential elements of the scheme can be expected to support jobs in the area via household expenditure. Based on data on the average expenditure of households in Scotland derived from the Office for National Statistics' Living Costs and Food Survey, the combined expenditure of the 396 new households within the development is projected to total approximately £9.25 million per annum. This includes areas of expenditure that could reasonably be expected to largely be made within the local economy, such as food and drink (£1.44 million); recreation and culture (£1.12 million); catering (£0.63 million); household goods and services (£0.55 million); clothing and footwear (£0.47 million); and personal care (£0.22 million). This £4.43 million of expenditure could be expected to directly support approximately 61 jobs as businesses expanded their workforces to enable them to meet increased demand, primarily in the retail and hospitality sectors, representing approximately £1.62 million of gross value added (2013 prices).*

#### *Class 11 - Assembly and leisure*

*The development as proposed would deliver up to 1,787m<sup>2</sup> of class 11 space. Based on average employment densities, this could be expected to directly support 15-60 full-time equivalent jobs. Based on average gross value added per worker for workers in the accommodation sector (£44,700), this could be expected to directly support annual gross value added of between £0.67 million and £2.68 million (2013 prices).*

#### **SUMMARY RESPONSE TO CONSULTATION**

*It is estimated that the development as proposed could, once fully-built and fully-let, directly support approximately 12,900 to 13,700 full-time equivalent jobs and support gross value added of £1,006 million to £1,031 million per annum.*

#### **Police Scotland comment**

*We recommended that the architect and client meet with a Police Architectural Liaison Officer to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.*

#### **Scottish Natural Heritage comment**

##### *Summary*

*This is an important site in the expansion of the city westwards towards the airport. Together with the adjacent phase 2 part of the IBG site, this site will be strategically important in delivering the vision for expansion in this part of Edinburgh. We advise that although the proposal is to be commended on its design principles and good integration of green infrastructure, there will be some significant impacts on landscape and protected species. Further advice is provided below together with recommendations for future phases of development, mitigation and licence requirements. It will be for the planning authority to determine, within the context of its own policies, whether conditions are necessary to secure any recommendations.*

### *Appraisal*

*Several documents such as the West Edinburgh Landscape Framework, West Edinburgh Strategic Design Framework and Local Development Plan (LDP) 2 provide guiding principles for development of the IBG site, laying the foundations of a strong landscape structure to support and accommodate development in this part of Edinburgh. This application has sought to expand on these principles, set parameters for the site and provide further detailed guidance to ensure that a well designed development is delivered. While we generally welcome these aspects of the proposal, particularly the aspects relating to the integration of green infrastructure, we note the general overall increase in the height of the proposed buildings from that which was set out in the West Edinburgh Strategic Design Framework and LDP2. The current proposal therefore does raise issues relating to landscape impact and the accommodation.*

### *Landscape and Visual Impacts*

*Policy B3 of the West Edinburgh Strategic Design Framework (WESDF) states: 'Buildings should take advantage of existing features and infrastructure. The building layout should respond to the site context, topography and micro-climate and take advantage of these. The prevailing building height should be 4 storeys. Where buildings are adjacent to structural green spaces, it is expected that the building heights will be lower in order that they can be successfully integrated into the landscape.'*

*This principle has been further explained in the development principles for the complete IBG site as set out in LDP2:*

- o The prevailing building height should be four storeys with some higher landmark buildings and lower building heights adjacent to structural green spaces.*

*We note the submitted parameter plans relating to building height are stated in terms of height above ground level rather than number of storeys as required by the WESDF and LDP. It is therefore unclear from the submitted parameter plans how the development will address the requirements for buildings of 3 storeys next to structural green spaces nor whether the overall mix of built development proposed will meet the requirements for a "prevailing building height" of four storeys across the site.*

*We do however note that the landscape and visual impact assessment, ZTV drawing and the supporting visualisations are based on the height and development plot parameters submitted. From this information it is evident that the likely scale and extent of the proposed development (as set out within these submitted parameters) could result in a wide range of landscape and visual impacts within 2 kilometres, with the overall mass and extent of development prominent in wider views, including those out to and beyond 5km. The scale and extent of these effects are likely to be combined cumulatively with those arising from the proposed IBG phase 2 (recently submitted for EIA scoping) to create an overall combined form of development that is dominant to the local landscape character and of notable prominence from areas surrounding the development, including the A8 corridor approaching the City of Edinburgh.*

*Of particular note with regards the landscape and visual impacts of the phase 1 proposal is the location of a building, or buildings, up to 36m high on an elevated part of the site near the east bound A8 roundabout (as illustrated by wireline 4 on page 45 of the Design and Access Statement). The submitted information notes this as a "gateway" node' and while there is little definition to this aspect of the proposal we highlight the overall height and footprint of this aspect of the project. Due to its likely prominence, we consider a proposal of this size would have significant impact on the local landscape character and visual amenity of the area, potentially redefining the nature of this important approach to the City of Edinburgh.*

*While acknowledging that there is a lack of detailed design information and impact assessment for this important aspect of the proposal, at this stage in our understanding of the proposal, we query whether such a prominent building in this specific location would be an appropriate feature to define the gateway and approach to the City.*

#### *Green Infrastructure and development layout*

*Notwithstanding the issues raised above we do strongly welcome the proposals made for the green infrastructure to support this development. We consider the proposals, as outlined in the Design and Access Statement, are well integrated within and around the proposed development thereby positively supporting the overall place-making approach for the site. In particular, we consider that the variety of landscape design typologies proposed, the potential integration of SUDs and active travel measures within the green spaces and streets, and the broad layout of such features in forms which permeate the development and support the proposed street and building layout, has the potential to be a highly successful aspect of the scheme.*

*We highlight however the constraints that can be imposed on aspects of planting and SUDS development, through the requirements of the Civil Aviation Authority for Aerodrome Safeguarding. We advise that it would be prudent to establish any limitations on the current proposals, or modifications that may be required to current design proposals, prior to any approval of outline consent.*

*We also advise that, in securing and taking forward the positive intent and content of the proposed public realm and green infrastructure aspects of the application, there is likely to be merit in defining these issues in further detail and in standalone documents and layout plans. Such an approach if properly defined could set clear guidance and parameters, supporting the co-ordination and design quality between phases or for any future detailed applications for the area.*

*Similarly, we welcome the analysis and statements of importance on page 89 of the Design and Access Statement with regards the necessary role of landscape management to successfully establish planting and to maintain a good appearance for the development in the longer term. We recommend that a clear approach, specifications and funding proposals for these matters are secured.*

#### *Ecology*

*The surveys and assessment of impacts on protected species is thorough and clear, and to be commended. We would agree with assessment findings and recommendations, including licence recommendations, and these are discussed further in the Annex.*



*In general, impacts on species are focused on the various watercourses and ditches which run through and beside the development area. These habitats are used by various species for foraging and commuting, with some species also residing there. There will be some direct impacts on those species which reside in these areas particularly during the construction process, and this is discussed further in the Annex. However, these habitats will be maintained as landscaped corridors within the proposed development, enhanced with planting where appropriate. Therefore the retention of these corridors, alongside the additional planting, will help mitigate against impacts on species in the longer term, as foraging and commuting routes, as well as suitable habitat, will remain. Directional lighting, as proposed within the ES, will also be effective mitigation in reducing impacts on species in these areas.*

#### *Access and recreation*

*We support the creation of a new pedestrian and cycle link alongside the A8, as part of the green infrastructure proposals along the south of the site, which will form a much needed active travel corridor between Edinburgh and the west.*

#### *Annex*

*Potentially significant impacts on species are summarised in section 4.2.7, with section 4.5 detailing the assessment of effects on habitats and species as well as mitigation measures.*

#### *Badger*

*Survey results show significant badger presence and activity in the area with 24 setts identified and 2 clans, the Gogar Drain clan and the Castle Gogar clan.*

*Significant impacts are identified on the Gogar Drain setts, and possibly longer term to the clan. These impacts would be through disturbance, exclusion, loss of setts or abandonment, and are summarised below:*

- o 4 setts have been identified for exclusion and loss, due to road and footpath construction: GD3, 6, 9 and 15. This will require a licence.*
- o Another sett is to be excluded for footpath construction, GD10, but re-instated after construction. This will require a licence.*
- o There is a recommended exclusion and destruction of another sett, GD8, to prevent badgers using this sett as new main sett. This would also need a licence.*
- o Licences for all work with 30m or piling within 100m*
- o Possibility of licences (for disturbance) for landscaping/planting along the Gogar Drain*

*It is noted that there is a possibility of retention of some of the above setts, which will be determined at construction stage, although temporary exclusion would still require a licence.*

*Mitigation (section 4.5.27-4.5.39) proposed includes:*

- o 30m exclusion buffer*
- o maintenance of Gogar Ditch as a foraging and commuting corridor with extra planting*
- o badger fencing and exclusion buffers at road and footpath junctions*
- o access pipes beneath roads and footpaths*
- o directional lighting*

- o *standard good practice methods during construction, such as escape ramps etc*

*The EIA recommends that a Badger Protection Plan (BPP) is produced, outlining all the sett exclusions, licence requirements, mitigation and monitoring measures, and we would strongly recommend this as a practical and iterative way of addressing the complex situation at this site which may evolve and change over the development timescale. It would also help support any licence application. Our website has some advice on preparing BPPs: <http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/badgers-and-licensing/dev/>*

*Potential abandonment of the drain area by the clan is raised, as a result of ongoing disturbance and traffic once the area is fully developed. The EIA states that there is suitable setting habitat along the Gogar Burn and to the east for the badgers to move into but this land to the east forms Phase 2 of the IBG site and therefore may not be available in the long term. This potential constraint to any future badger movement is not acknowledged within the EIA and is perhaps something that future phases might have to consider in more detail. The EIA does recommend monitoring for 5 years to inform future mitigation or enhancements needed for this clan's long term future and we would recommend that this forms part of the BPP.*

*Our advice is therefore that if you approve this application, and with the mitigation set out in the EIA, a licence from SNH will be required by the applicant before they can proceed with the development. If you are minded to approve this application, you must satisfy yourself that the tests for a species licence under the relevant protected species legislation are likely to be met. If not, you could risk the applicant being unable to make practical use of the planning permission or committing an offence.*

*Based on the information currently available to us, it is likely that the tests would be met and therefore that a licence would be granted. Please note that this advice is given without prejudice to any later consideration of an application for a licence. Information on licensing tests can be found here ([www.snh.gov.uk/docs/B876258.pdf](http://www.snh.gov.uk/docs/B876258.pdf)) and how to apply for a licence here (<http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/>)*

#### *Otter*

*Survey results show that otters are active in the area, in particular on the Gogar Burn. No direct disturbance to holts on the Gogar Burn is identified, although disturbance and potential displacement is raised as an impact in the longer term. The maintenance and enhancement of the watercourses and drains, as part of the scheme's green infrastructure, should retain their function as quiet commuting routes, thereby reducing these impacts. Other standard mitigation working measures are proposed during construction such as escape ramps etc and pollution prevention controls will be in place to avoid spills to the watercourses. Based on the information in the ES, and with the stated mitigation in place, no licence will be required before development can proceed. With the timescales of development proposed over several years, further surveys will be required at future stages to assess any changes in otter distribution or holt locations, and therefore any changes to licence requirements.*

## **Bats**

*Impacts are likely to be confined to foraging and commuting routes, in particular the linear burns and ditches. However mitigation in the form of maintenance and enhanced landscaping of these routes, together with directional lighting, should minimise these impacts in the longer term. Based on the information in the ES, no licence will be required before development can proceed.*

## **Historic Environment Scotland comment**

*We do not wish to object to the above proposed development. We attach our comments on the adequacy of the ES and our views on the application as an appendix to this covering letter.*

### *Historic Environment Scotland's advice*

*If you have not already done so, we recommend that you consult your council's archaeological and conservation advisors, who may also wish to comment on potential historic environment impacts.*

## **Annex**

### **Background**

*We understand that the proposal is for a mixed use development (known as the International Business Gateway Phase I) consisting of business and employment uses, hotels, retail, financial and professional services, food and drink, residential uses, non-residential institutions, assembly and leisure, sui generis flatted development and associated works including access and public realm at land 160m North of 2 Eastfield Road, Edinburgh. The proposal is at a masterplan stage and the submitted masterplan framework sets out general parameters to be observed in the proposed development. The environmental statement that has been prepared is based on these parameters.*

### *Historic Environment Scotland's Interest*

*Our key interest in this proposal lies in the potential impact on the site and settings of the following heritage assets covered by our remit:*

- o Gogar Mains, fort, palisaded enclosure and field system 850m SSE of (Scheduled Monument, Index No. 4573)*

*At scoping stage we highlighted the fact that the scheduled monument: Gogar Mains, fort, palisaded enclosure and field system 850m SSE of (Index no. 4573) was located within the proposed site boundary and that direct impacts should be avoided. We are content that the proposed development at Phase One will not have any direct impacts on this scheduled site. We would also agree with the conclusions of the Environmental Statement that the impact of the proposal on the setting of Gogar Mains is unlikely to be significantly adverse.*

*However, I would reiterate our previous advice that in addition to the avoidance of direct impacts, it will be important that consideration of the future management of the monument is given at an early stage of planning the next phases of the proposed development.*

- o Category A-listed Castle Gogar with cottage, gate house, stables, outbuildings, gate and gatepiers, Glasgow Road (HB No. 27092)*

*The category A-listed tower-house at Gogar was built in 1625, with the original Gogar House dating back to c1300. This three-storey baronial mansion was probably designed by William Ayton and it was extended to the west circa 1700, and again in the 19th century. The castle was restored around 2005.*

*The castle lies in an area of rapid change, between the trunk road to the south and the Edinburgh Airport to the north and north-west. The building's vicinity has been heavily impacted by the existing and new infrastructure, including the new tram line that crosses its tree-lined drive. The enabling development for the restoration of the castle has also been completed in recent years. The large detached houses, which have been erected within the curtilage of this listed building have impacted considerably on its setting. As a result, Castle Gogar no longer dominates its immediate surrounds.*

*We note that the application site of the current proposal is in close proximity to this A-listed building (approximately 900m to its west). The historic environment assessment contained in the submitted Environmental Statement concludes that while the proposed development will not have an effect on the overall understanding and appreciation of the significance of the asset, there will be a slight change in its setting. In paragraph 5.5.21 the assessment also states that 'there is likely to be a direct, temporary, medium-term effect on the monument of minor negligible negative significance prior to the implementation of mitigation measures' (p.66). This conclusion is not very clear, as it is not explained in the methodology of assessment of chapter 5 what the 'negligible negative significance' means. We also consider that this chapter would benefit from a more thorough assessment of the main characteristics that contribute to the Castle's setting.*

*We note that the proposed development, due to its scale and close proximity to this A-listed building is likely to be visible in the outward views from the upper floors of the castle. However, the proposal would be located beyond the existing detached houses that form part of the enabling development and that have already impacted on the castle's immediate setting. Therefore, while we consider that the proposed development and its associated infrastructure is likely to have an impact upon the setting of the Castle, we do not consider that this impact would be of such a severity or significance as to raise issues of national importance. Given the above, Historic Environment Scotland does not object to this application.*

*However, it should be ensured that in planning the next phases of the proposed development, the setting of the castle is taken into account and appropriate mitigation measures are considered.*

#### **Summary**

*We are content that there is enough information in the ES to come to a conclusion on the application, and we do not wish to object to the proposed development.*

#### **SEPA comment**

*We object to this planning application on the grounds of lack of information. We will review this objection when the issues detailed in Sections 1.0, 2.5 and 2.11 below are adequately addressed. Please also see our advice in other sections.*

## *Advice for the planning authority*

### *1. Flood Risk*

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

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

*1.3 Review of the information provided indicates the site, or parts thereof, lies within the 0.5% annual probability (AP) flood extent of the SEPA Flood Map and is potentially at medium to high risk of flooding. The source of this flood risk is the Gogar Burn and surface water although there are also two small watercourses within the site which have not been included within the modelling for the SEPA Flood Map.*

*1.4 A Flood Risk Assessment (FRA) has been provided in support of this application. We previously agreed the methodology and design flows within the hydrological assessment. A 1D/2D model has been produced in Infoworks ICM with the Gogar Burn and Ratho Burn channels being modelled in 1D and floodplain in 2D which is an acceptable methodology. We note, however, that the Eastfield Road tributary has not been explicitly included within the model as a 1D channel and as such it is unclear how flood risk has been assessed from this source. Information on how the channel has been captured should be provided as LiDAR information would not be sufficiently accurate to represent the channel. It is noted that a capacity assessment of the culvert under the tram lines on this watercourse have been included but no information on any impact of backing up from the Gogar Burn is provided.*

*1.5 The FRA includes a sensitivity analysis for blockage of the Eastfield Avenue bridge downstream of the site. During the 0.5% AP, including climate change impacts, event and a 50% blockage of the bridge, the report states that water will overtop the Gogar Burn and flow through the pipework under the tram lines flooding the northwest part of the site. The report states that as this is an unlikely event they do not deem it necessary to consider flood protection works for the site. We do not agree with this assessment of flood risk and whilst the site may not be considered functional floodplain it should be designed to be protected against flood risk in the event of a bridge blockage. Details of the level of risk to the site and proposed mitigation measures should be provided.*

*1.6 It is noted that the model does not include some of the structures downstream of the site and it is indicated that as they are located some distance downstream of the site and a blockage scenario of the Eastfield Avenue culvert has been considered then these additional structures would not impact on flood risk. Whilst this may be the case, should any of these structures have a capacity less than 50% of the Eastfield Avenue culvert then they may pose a greater restriction to flow. Details of these structures should be provided to show that they will not pose a greater capacity restriction than the Eastfield Avenue culvert and therefore why they should not be included within the model.*

1.7 SEPA has previously been consulted on applications in this area for the Edinburgh Airport Rail Link project. The FRA in this instance was carried out by Halcrow in 2004 (now CH2MHill) who used a model constructed by Black and Veatch (2004) to determine the combined risk to the airport from the Gogar Burn and River Almond. This model used slightly lower flows for the Gogar Burn and downstream level for the River Almond: the predicted flood levels on the Gogar Burn at the culvert under the runway (section g545), however, are higher. 0.5% AP flood level in the current FRA at g545 predicted to be 30.29mAOD and in the Halcrow FRA is predicted to be 30.96mAOD, which is a significant difference. The model used within the Halcrow FRA included proposed flood protection works for the airport from the River Almond as this was considered more conservative and representative of the future scenario. We have no information to indicate whether these works were carried out or are still proposed. We recommend, however, that further consideration is given to the predicted levels within the current model as we would advise a conservative approach should be taken in determining the flood risk to the site.

#### Summary

In summary, the site has been shown to be at flood risk and further clarification is required on aspects of the FRA. The following information is required before we can review our objection to the proposed development.

- o Information should be provided showing how the Eastfield Road tributary has been included within the 1D/2D model.
- o Details of the flood risk and proposed mitigation measures for the flood risk due to a blockage of the Eastfield Avenue culvert.
- o Details of the structures downstream of the Eastfield Avenue culvert to support the position that these have not been included within the model.
- o Further consideration of the predicted flood levels on the Gogar Burn following review of previous FRAs carried out on the Gogar Burn at Edinburgh airport.

#### Caveats & Additional Information

1.8 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland.

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

*Continued'*

1.10 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process.

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

1.12 *The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to the City of Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities outlines the transitional changes to the basis of our advice in line with the phases of this legislation.*

## *2. Drainage*

### *Proximity to Watercourses*

2.1 *The documents supporting this application indicate two surface waters within the development boundary. These are referred to as drainage channels in the Environmental Statement and as watercourses in the Drainage Strategy.*

2.2 *The Environmental Statement (Section 4, Environmental Effects of the Proposed Development) is not clear on the effects of development on the surface waters but states "A corridor along the Gogar Ditch has been identified as not suitable for development due to its relative importance to wildlife." We assume that this refers to the surface water channel running south to north where it joins the Gogar Burn. There appears to be no mention of the smaller surface water within the development boundary. Unlike the Gogar Ditch, there is no commitment to keeping it free from development.*

2.3 *The Illustrative Masterplan appears to show these areas left undeveloped but with crossing points and development close by. The Conceptual Foul and Surface Runoff plan (refer to Drainage Strategy) appears to show that development for drainage lies very close to the watercourses in question.*

2.4 *The applicants' attention should be drawn to SEPA's LUPS Guidance Note 7 "Buffer strip requirements" as well as the general guidance in the CAR Practical Guide.*

2.5 *Clarification is required on the position and the proximity of development including foul and surface drainage to the two surface waters on the development site, taking into account buffer strip requirements.*

2.6 *The Gogar Burn flows along part of the northern boundary and there appears to be no development in the vicinity, which is acceptable.*

### *Sustainable urban Drainage Systems (SuDS)*

2.7 *The Drainage Strategy covers the principles of SuDS and illustrates the positions of some SuDS features.*

2.8 *The Drainage Strategy conclusions include contradictory statements in relation to whether discharges will fall under General Binding Rules or will require an application for a licence. The applicants should identify which is necessary and make the appropriate application. If it is unclear which application is appropriate the applicants should contact SEPA's local team.*

2.9 *It is not possible to assess at this stage and from the information provided if the appropriate scale of SuDS has been planned for in this development. Nor is it clear that SUDs are situated outwith areas prone to flooding. These aspects of the proposal will be assessed by SEPA at a detailed design stage and as part of a licence application if necessary. A commitment to 2 levels of SUDs is acceptable in principle, however, as this meets current SEPA guidance. Early discussion with SEPA's local team, however, is recommended. In addition, attenuation requirements should be assessed by the planning authority.*

#### *Foul Drainage*

2.10 *The Drainage Strategy: "The report will also identify capacity constraints and discharge points for the foul drainage and surface water drainage. This element of work is reliant on information being made available by Scottish Water within the reporting timescales."*

2.11 *In principle, connection to Scottish Water network is acceptable and in line with SEPA expectations. There is no indication, however, that this is achievable and Scottish Water comments are necessary. No information (i.e. Scottish Water comments) has been provided that will allow SEPA to assess potential impacts on the water environment from foul drainage from the proposed development.*

#### *3. River Basin Management Plan. The Gogar Burn.*

3.1 *We note this planning application does not mention any alterations to the Gogar Burn.*

3.2 *SEPA would like to encourage any opportunity this proposed development provides for restoration of the Gogar Burn. With or without restoration, however, any proposed development should not lead to the deterioration of the neighbouring waterbodies or increase flood risk: please see Sections 1 and 2 above.*

3.3 *The River Basin Management Plan for Scotland published December 2015, classifies the Gogar Burn (Union Canal to River Almond) as being at bad ecological potential due to man-made barriers to fish migration, modifications to physical condition and water quality (urban diffuse pollution). The measures to improve these pressures are to be implemented 2016 - 2021. This information is available on the SEPA website - <http://www.sepa.org.uk/data-visualisation/water-environment-hub/>*

3.4 *Given this commitment in the River Basin Management Plan, any developments which include improvements to these pressures would be strongly encouraged. As there are a number of applications in this area, this restoration would ideally be addressed in a strategic manner along the whole burn. In summary, these developments provide an opportunity to restore the burn towards good ecological potential and as such would be strongly encouraged by SEPA.*

#### *4. Air Quality and Greenhouse Gas Emissions*

##### *Air quality*

4.1 *The proposed development will be in an area that is currently not affected by poor air quality. An air quality modelling assessment has been undertaken and the findings are reported. We note and welcome the decision to use ADMS Roads to assess the impact of traffic on local air quality. The modelling assessment has shown that the completed development is unlikely to have a significant impact on local air quality.*



### *Greenhouse gas emissions*

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

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

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

### *Cumulative effects of development*

4.5 When considered in isolation, a single development will appear to have a negligible impact on local air quality. When the same development is considered alongside other developments in the area, however, the cumulative impact could be more significant, particularly along main commuter routes. SEStran has warned "the allocation of extensive new land for development underlines the importance of integrating land-use and transport planning in the SEStran area, building these links into the forthcoming City Region plan and other development plans. Failure to do so will lead to further significant increases in car use", and " It has been demonstrated that the SEStran area faces particular challenges in catering for the travel volumes and patterns resulting from the anticipated growth in population and employment in the area. In addition to the forecast increase in the number of jobs, the trend of dispersal of jobs, services and homes will, if it continues, bring further pressure to bear on the transport network." Transport Scotland advise "With several proposals in close proximity, a more detailed Transport Assessment of the cumulative impact of the proposals may be more appropriate than one for each proposal in isolation".

4.6 It is important, therefore, that the City of Edinburgh Council is satisfied that the assessment has considered the cumulative impact of all development that will add traffic to the road network- particularly along main commuter routes. 'Land-Use Planning and Development Control: Planning for Air Quality' (Produced by Environmental Protection UK and Institute of Air Quality Management, 2015) explains how a cumulative impact should be undertaken.

## 5. Ecology

5.1 No Groundwater Dependent Terrestrial Ecosystems were identified within the Development Site.

5.2 Non-native Invasive Species are mentioned (e.g. Giant Hogweed) but no mitigation measures to avoid their spreading are described. Developers have a legal responsibility to prevent the spread of invasive species. Guidance on measures and techniques for achieving this can be found on the UK government website: <https://www.gov.uk/japanese-knotweed-giant-hogweed-and-other-invasive-plants>. SEPA encourages the applicants to follow the guidance and include it in their application and Construction and Environmental Management Plan.

### SEPA further comment

We previously objected to this application on the grounds of lack of information on flood risk and drainage on 27 January 2016 (our reference PCS/144200).

We are in a position to withdraw our objection on the grounds of lack of information on flood risk should conditions (set out in Section 1) be attached to any planning consent.

We must maintain our objection on the grounds of lack of information on drainage. Please see Section 2.

#### 1. Flood Risk

1.1 We are now in a position to remove our objection to the proposed development on flood risk grounds provided that, should the Planning Authority be minded to approve this application, the following planning conditions are imposed:

- o There should no raising of existing ground levels below the 0.5% AP (1:200) flood level.
- o There should be no built development within the 0.5% AP (1:200) floodplain.
- o Finished floor levels should include an allowance for climate change impacts and 600mm freeboard allowance.

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

1.3 Notwithstanding the removal of our objection subject to the above conditions, we expect the City of Edinburgh Council to undertake its responsibilities as the Flood Prevention Authority.

1.4 WSP has undertaken a flood risk assessment (FRA), which includes hydraulic modelling of the Gogar Burn, for the Phase 1 of the proposed Edinburgh International Business Gateway (IBG) to support the application for planning permission in principle. SEPA previously objected to the application on the basis of insufficient information to assess the potential risk of flooding to the development and elsewhere. SEPA previously responded to consultations in January and March 2016.

1.5 The consultant has assumed that any replacement crossings of watercourses in the 36.7ha site will be of equivalent size or larger to ensure that they do not create flow restrictions within and around the site. The SEPA Flood Map indicates a risk of flooding from the Gogar Burn along the north edge of the Phase 1 site. It should be noted that the SEPA Flood Map does not show any flood risk from the small tributaries of the Gogar Burn as these fall into the category of draining less than 3 km<sup>2</sup> catchments and are therefore excluded. This does not mean that there is no risk of flooding from these smaller watercourses.

1.6 In addition to the Gogar Burn there is the Ratho Channel which enters the site via a culvert under the A8 to the south of the site and flows north-west across the site before discharging to the Gogar Burn. There is also the Eastfield Road tributary which emerges from two culverts under Eastfield Road before flowing north-west to discharge to the Gogar Burn. The Gogar Burn flows north-west from this point before entering a culvert, approximately 400m long under the Edinburgh Airport runway before discharging to the River Almond.

1.7 The City of Edinburgh Council supplied the consultant with an ISIS 1D hydraulic model of the Gogar Burn. WSP has taken this model and produced a 1D/2D hydraulic model in Infoworks ICM. The Gogar Burn, the Ratho Channel and the small tributary emerging from under Eastfield Road are modelled in 1D while out of bank flows are modelled in 2D. The Gogar Burn gauging station at Turnhouse is set as the upstream boundary and the confluence with the River Almond is set as the downstream boundary. WSP has removed glass walls and added cross-sectional detail to the 1D model to improve it. The 2D ground model is an irregular triangular mesh element constructed using a combination of topographical survey and LiDAR data.

1.8 A stage hydrograph has been used as the downstream boundary to represent the backing up effect of the River Almond on the Gogar Burn at this location. It is noted that the water level rises gradually by 100 mm between the 2% AP (1:50) and 1% AP (1:100) floods and then by 2,450 mm between the 1% AP (1:100) and 0.5% AP (1:200) flood levels. It is assumed that this significant rise above the 1% AP (1:100) water level is not attributed solely to flood flows in the River Almond but also the limited capacity of the culvert under the airport runway.

1.9 Of note there are eight bridge/culvert structures in the model. Two of these bridge structures on the Gogar Burn, downstream of the site, have not had their openings surveyed and have been assumed, however these are large openings. The consultant has undertaken blockage scenario run on the two culverts g790 and g710 and at the Eastfield Bridge at the recommendation of SEPA and City of Edinburgh Council. Additional runs were also undertaken to investigate potential impact of flap valves on circular pipes to simulate the pipework beneath the tramlines.

1.10 The FRA is based on the hydrological assessments undertaken in 2015 and agreed with SEPA in an email dated 3 July 2015. We confirm that we remain satisfied with the design flows used to estimate flood levels and extents at the application site. In terms of design hydrographs for the purpose of the hydraulic model the consultant has applied ReFH hydrographs. Since 2015 when the hydrological assessment was undertaken ReFH has been replaced by ReFH2. We suggested in our July 2015 communication that the design hydrographs be based on observed floods at Turnhouse gauging station. The observed data for the Turnhouse gauging station could have been used to check that the hydrograph shape produced by theoretical methods was appropriate.

1.11 The model output suggests that at the 2% AP (1:50) flood and more extreme events floodwater will be conveyed through the dry culverts under the tramline embankment and into the north-west part of the site. The FRA advises that approximately 4,000 m<sup>3</sup> of water will pond in this area up to a depth of 950 mm during a 0.5% AP (1:200) flood, including climate change. High water levels in the Gogar Burn prevent the flap valves on the Ratho Channel and Eastfield tributary from opening which results in waters backing up in the tributaries and spilling out over right and left banks during 2% AP (1:50) floods and greater. The SEPA flood Map extents for the 10% AP (1:10), 0.5% AP (1:200) and 0.1% AP (1:1,000) floods on the application site are similar to size and shape to the 0.5% AP (1:200) plus climate change flood extents presented in the FRA.

1.12 The consultant has undertaken blockage scenarios on a number of culverts as requested. A 10% blockage scenario at the culvert at the end of Eastfield Avenue will not impact on the site but a 25% and 50% blockage will result in raising flood levels by 30 mm and 120 mm respectively for a 0.5% AP (1:200) flood including climate change allowance. A 50% blockage at the Eastfield culvert under the tramline during a 0.5% AP (1:200) flood, including climate change allowance, will not result in water overtopping onto the site according to the FRA.

1.13 Model runs were also carried out to investigate 50% blockage scenarios at bridge structures g710 and g790. These are large structures and the model runs indicated that the blockage scenarios did not result in out of bank flows at the locations or result in increased flood extents at the application site for the 0.5% AP (1:200) flood including climate change.

1.14 A sensitivity analysis has been undertaken on the Manning's 'n' roughness coefficient only. This indicates that for a 20% variation in Manning's 'n' there is up to a 240 mm variance in Gogar Burn estimated flood levels and similar on the Eastfield tributary and 50 mm on the Ratho Channel. We would consider the results for the Gogar Burn and Eastfield tributary to be sensitive to the choice of Manning's 'n' but within the 600 mm freeboard allowance generally applied to new development. No similar sensitivity analysis has been undertaken for the flows or downstream boundary.

1.15 The consultant has considered the incorporation of flap valves on the drains under the tramline so that water could not flow westwards from the Gogar Burn. This scenario has been modelled to determine the potential impact. The model output for a 0.5% AP (1:200) flood, including climate change allowance, indicates that approximately 9,900 m<sup>3</sup> would be stored immediately upstream of this location on the floodplain at a depth of up to about 1.2 m.

1.16 There is a drawing entitled "Development Parameters", drawing number L(PA)03 rev01, that indicates the proposed development layout. It indicates no proposal to develop within the 0.5% AP (1:200) floodplain on the east side of the tramline. The FRA recommends that this area should be landscaped to provide additional storage for floodwater and reduce the volume of water passing under the tramline to the west. There are no model results presented to demonstrate if this would be successful. Digging a hole in the floodplain will perhaps only provide a slight delay to the onset of flooding to land on the west side of the tramline. Once it has filled up by medium sized flood events there will be no storage volume left to attenuate the larger events. It is unlikely to provide benefit during a 0.5% AP (1:200) flood but it would require hydraulic modelling to confirm if this might be the case. However we can confirm that we are satisfied that there is no new development proposed on the functional floodplain in this area and no likely negative flood risk impacts elsewhere.

1.17 On the west side of the tramline the area identified as the 0.5% AP (1:200) floodplain is proposed as non-building development. Its uses would be limited to such things as landscaping, vehicle access and parking. We are concerned by the suggestion that avoidance of built development in this area may only be a temporary measure with flood mitigation measures to be proposed in the future. It is unknown if this refers to the proposal to provide additional storage on the east side of the tramline or something else. We would highlight that avoidance is the cornerstone of sustainable flood risk management.

1.18 The FRA refers to the proposed Gogar Burn diversion which would divert the Gogar Burn to the east of the airport runways and away from the application site. The diversion would have significant environmental and water quality benefits. (Please see Section 2.5.) While the diversion of the Gogar Burn would not directly impact on the application site there has to be some consideration of the flows currently discharging to the Gogar Burn via the application site. These include flows conveyed by the Ratho Channel and the Easterfield Road tributary. These flows would either need to discharge to the existing Gogar Burn channel and discharge to the River Almond as occurs at present or they would need to be directed through the site to link with the realigned channel. The upstream extent of the proposed Gogar Burn diversion is close to the 40 mAOD contour so it is unlikely that the flows could be linked to that location and any connection downstream would require culverting below an airport runway.

1.19 In summary the FRA has identified the areas of the application site that are at risk of flooding from a 0.5% AP (1:200) flood. We are satisfied that there is no proposal to locate built development within the functional floodplain and accept that areas currently at risk from a 2% AP (1:50) and greater floods may be suitable for landscaping and temporary car parking. We are therefore now in a position to withdraw our objection to the planning application. Limited sensitivity analysis indicates that the hydraulic model used to determine the flood levels and extent is sensitive to some blockage of the culvert at the end of Eastfield Avenue and to the selection of Manning's 'n' roughness coefficient. As such it is important that appropriate freeboard allowance in addition to a climate change allowance is incorporated in development levels. We recommend a minimum freeboard allowance of 600 mm and advise that there should be no land raising permitted within the defined 0.5%.

## Summary

In summary, we are now in a position to remove our objection to the proposed development on flood risk grounds, subject to the following planning conditions being imposed:

- o There should no raising of existing ground levels below the 0.5% AP (1:200) flood level.
- o There should be no built development within the 0.5% AP (1:200) floodplain.
- o Finished floor levels should include an allowance for climate change impacts and 600mm freeboard allowance.

## Caveats & Additional Information for Applicant

1.20 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit <http://www.sepa.org.uk/environment/water/flooding/flood-maps/>.

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

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

## 2. Drainage

2.1 In our response of 27 January 2016 we expressed concerns about (section 2.5) proximity to watercourses and (2.11) foul drainage. The additional information that has been submitted in support of this application includes an update note which refers to an updated "Parameters Plan and update of the corresponding D and A sections."

### Proximity to watercourses

2.2 We identified the need for clarification on the position and proximity of development (including foul and surface drainage) to surface water, taking into account buffer strip requirements.

2.3 The updated parameters plan indicates that there is an apparently undeveloped area adjacent to stretches of watercourses lying outwith the marked development zones. However, this is at odds with the Design and Access Statement revision 1 Oct 2016 which shows SUDS drainage features of swales and bioretention beds built in the area outwith the development zones shown in the parameters plan adjacent to the watercourses and without evidence of a buffer strip. Further clarification is required.

### *Foul Drainage*

2.4 *It is possible that we have overlooked some document or documents but we cannot find any additional information on proposals for foul drainage, such as confirmation that foul drainage will go to the Scottish Water foul sewer.*

### *Gogar Burn*

2.5 *The Design and Access Statement indicates the proposed diversion of the Gogar Burn. We are uncertain if this indicates the intention that this improvement will be delivered by this development. This point should be clarified.*

## **SEPA further comment**

*There is no flood risk assessment (FRA) to review. What we have been sent is an independent review of the FRA and a self-certification of this document. SEPA does not comment on self-certification. We will provide comment on the FRA or a draft of the FRA when it is produced.*

## **SEPA comment - Supplementary Environmental Information + Transport Assessment Addendum**

### *Advice for the planning authority*

*From SEPA's perspective, the issue of relevance in this additional information is impacts on air quality and our advice on this follows at Section 1.*

#### *1. Air Quality*

1.1 *The City of Edinburgh Council (CEC) currently has six Air Quality Management Areas (AQMA) due to exceedances of NO<sub>2</sub> and PM<sub>10</sub> objectives. Five of these AQMAs are due to transport emissions. The application site lies approximately 1.8km east of the closest AQMA (Glasgow Road 2013), designated due to exceedances of the objectives for NO<sub>2</sub>. Annual mean NO<sub>2</sub> concentrations have approached or exceeded the AQ objective of 40 µg/m<sup>3</sup> at four monitoring locations in the vicinity of the proposed development during recent years.*

1.2 *In agreement with CEC air quality monitoring, the dispersion model used as part of the air quality impact assessment for the proposed development indicates that the NO<sub>2</sub> and PM concentrations are above the objective levels within the vicinity of this development in the baseline year (2016) and are expected to remain in breach of the objectives by 2027.*

1.3 *This highlights that poor air quality is an issue in the CEC area and in the vicinity of the area of proposed development. Studies have shown that 88% of all NO<sub>x</sub> in Edinburgh originates from road vehicles. For this reason SEPA strongly recommends that good practice to reduce emissions and exposure is incorporated into all developments.*

1.4 *It is SEPA's preference that air quality assessments use the same emission factors for the baseline and the future year scenario, which provides a worst-case assessment. In doing this a sufficient level of confidence can be placed within the predicted pollution concentrations, as no assumption has been made regarding future improvement in vehicle emissions.*

1.5 We recommend, therefore, that CEC focuses on the results of the 2027 sensitivity test as this is a worst-case scenario where emissions and background concentrations have been held at the baseline year of 2016, and no assumptions regarding future improvement to air quality have been made.

1.6 The results of the 2027 sensitivity test indicates that the annual NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> objectives are likely to be exceeded at 5 sensitive receptor locations. Considering this, there is likely to be a direct, permanent, long-term effect on local air quality at the location of sensitive human receptors of moderate negative to minor negative significance.

1.7 Mitigation measures, therefore, must be incorporated into the design of the development. EPUK and IAQM guidance; Land Use Planning and Development Control Planning for Air Quality provides a section on 'Principles of Good Practice'. The section outlines examples of good practice for air quality mitigation in the design and operational phases of development.

1.8 The air quality statement comments that "improvements in air quality will be achieved through the promotion of more sustainable modes of transport, for example walking, cycling and public transport which will help reduce the number of private car journeys associated with the Proposed Development". The applicants should be encouraged, therefore, to link the site with active travel routes planned for the West of Edinburgh or provide a contribution towards proposed measures. We would also encourage the applicants to commit to installing electric vehicle 7Kw chargers to support the uptake of low emission vehicle use and ensure there are appropriate facilities for cyclists and pedestrians accessing the site.

### **Environmental Assessment interim comment**

We would advise using the air dispersion model ADMS-Roads for assessment purposes (using the most up to date emission factors), 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. This may be a little bit more complicated for this proposal due to the extent of this development extended period of development time required.

Use the most up-to-date annual average NO<sub>2</sub> concentration for this location for verification purposes. The airport do also have a number of PSD in the area, you should be able to obtain data from them [richard\\_townsend@edinburghairport.com](mailto:richard_townsend@edinburghairport.com) . We can provide this data if required or click on the following link;  
[http://www.edinburgh.gov.uk/downloads/download/117/local\\_air\\_quality\\_management\\_reports](http://www.edinburgh.gov.uk/downloads/download/117/local_air_quality_management_reports)

Maps showing the road links must be provided that consider A8 between the Gogar roundabout and the Newbridge junction on the M9 as mentioned and furthermore the following road links:

- o Eastfield Road
- o Fairview Road
- o Ingliston Road



*The following parameters should be input into the ADMS - Roads model interface:-*

- o Background NO<sub>2</sub>, PM<sub>10</sub> and NO<sub>x</sub> concentrations can be obtained from the Scottish Air Quality website for the relevant modelled years;*
- o Meteorological Data from the Edinburgh Gogarbank monitoring station is appropriate; and*
- o Annual Average Daily Traffic data including speeds calculated to the form 'vehicles per hour' for diurnal traffic flows.*
- o Monin Obukhov length can be determined through the verification process.*

*The submitted AQIA must clearly show all the data used for each site used for verification purposes.*

*To assess the potential for impacts on local air quality from traffic emissions and construction phase impacts we advise that you use the criteria defined in Environmental Protection UK's document, Development Control: Planning for Air Quality (2010 Update).*

*All energy centres must also be taken into account, and must ensure that they comply with the Clean Air Act. We will not support the use of biomass. No other industrial sources are in close proximity as far as I'm aware.*

*We will also be pushing to ensure that sustainable green transport modes are fully incorporated with car parking numbers are kept to a minimum and Electric Vehicle charging facilities provided throughout.*

*It's been made clear that one of the main issues Environmental Assessment has about this proposal is the adverse impacts it will have on local air quality along with the introduction on new residential properties into areas of poor air quality. There have been many studies and reports carried out to assess transport impacts in this area. Environmental Assessment would need assurance that all these assessments complement each other and ensure that a worst case scenario is assessed with adequate mitigation measures are fully implemented.*

*It is my understanding that the Transport Infrastructure Study for West Edinburgh, Phase 1 (TISWEP) identifies the least cost infrastructure interventions needed to service the additional travel demand associated with the revised level of development in 2021, along with the infrastructure requirements for the new interim development levels in 2013 and 2017. This study area has only included the major junctions of Newbridge roundabout, Gogar roundabout and the A8 Dumbbells at Eastfield Road. The impact of the developments on the wider area was not considered. Any proposed development should take into account the Cammo, Maybury and Edinburgh Park/South Gyle proposed developments as well as other smaller committed developments in the area.*

*The TISWEP concluded that development could be supported if a range of transport mitigation measures were introduced. These interventions are due to the proposed level of development and it is therefore reasonable to expect the proposed developments to fund these interventions. However, it is understood that at the level of development expected beyond 2017, the Newbridge roundabout junction ceases to operate successfully and there is no 'low cost' solution to resolve this. There are plans to upgrade the signals on this roundabout which is discussed later in this email.*

*The TISWEP makes the following recommendations:*

- o That the infrastructure interventions be implemented as detailed in the report (improvements to Gogar Roundabout, Newbridge Roundabout and the dumbbells roundabout underneath the A8 at the south of Eastfield Road);*
- o That sufficient bus service subsidy is applied and a Travel Planning Coordinator appointed to assist in the delivery of the Mode Share Target;*
- o That a performance monitoring tool is established to permit the impact of development traffic to be mapped against predictions, to inform traffic management strategy and assist decision making; and*
- o That the performance of Newbridge roundabout is reviewed when the quantum of development exceeds the levels considered by the report for 2017.*

*It would be helpful to have a basic table highlighting the trigger points associated with the above recommendations and how this compares with what is currently being proposed under this phase of the development. It was my understanding that the quantum of development proposed under this phase would trigger all the transport mitigations measures as recommended in TISWEP.*

*TISWEP also comments on providing funding for local air quality monitoring, it highlights an inappropriate pollutant for monitoring and it should now be noted that the City of Edinburgh Council has already installed a air quality monitoring station so another station would not be required.*

*Transport Scotland prepared the Forth Replacement Crossing Refreshed Public Transport Strategy (1 August 2012) to assess the combined new and existing Forth crossings on the network. This work was carried out in partnership with SEStran and relevant local authorities, including the City of Edinburgh Council. The strategy seeks to ensure public transport integration and encourage modal shift from cars to public transport. To this end it includes a number of projects, including "Park & Choose" facilities at Halbeath and Rosyth (this has been completed), improvements to Newbridge interchange to prioritise buses and bus priority on the A8/A89. This Public Transport Strategy has stated that it will complement the impact of the IBG, this must be carried forward.*

*It should be noted that the proposed development site is located in very close proximity to an existing Air Quality Management Area which was declared on 26/04/2013 after TISWEP was concluded. The current area of concern is part length of A8, between Newbridge Roundabout and Ratho Station, to the depth of the building facades for NO2, see map below.*

*The City of Edinburgh Councils Air Quality Progress Report 2014 has commented on specific issues regarding the Newbridge roundabout. For example The traffic signalling which controls Newbridge roundabout is a 'non cable linked fixed time' system. It operates a fixed green time for each of the links of the junction. This system is very inflexible and is unable to respond to fluctuations in the volume of traffic on each approach, which results in losing time under low flow conditions and causing congestion under heavy flow conditions.*

As mentioned earlier the local authority secured funding from the Scottish Government Air Quality Action Plan Grant Scheme to undertake a feasibility modelling study which considered three options for Newbridge Roundabout to reduce congestion on the A8 approach. The options were as follows:

- o Option 1 - Optimisation of Signal Timings
- o Option 2 - Implementation of Microprocessor Optimised Vehicle Actuation (MOVA)
- o Option 3 - Road Widening on A8 approach to 3 lanes.

All three options were evaluated with respect to reduction in emissions of NO<sub>x</sub>, PM<sub>10</sub>, total carbon and traffic queue lengths for the PM period on the A8 approach. The modelling study showed significant emission reductions and reduced vehicle queue lengths for all three options. It is my understanding that the Council has now evaluated all three proposals with respect to cost and benefit, and a decision has been made to progress option 2.

Environmental Assessment would like confirmation that there is synergy between the above mention reports and the proposed development. Clearly a detailed air quality impact assessment will be required this must be linked in to what is agreed by transport and take into account the above mentioned developments in the local plan (Maybury, Cammo etcetera), it will also need to comment on committed developments in West Lothian. Details of the proposed energy plants must also be assessed, including the cumulative impacts of small boilers. It should be noted that Biomass will not be supported by Environmental Assessment. This air quality impact assessment must be submitted along with any PPP application.

Environmental Assessment do stress that parking numbers must be kept to a minimum and bold bespoke plans to integrate electric vehicle charging infrastructure throughout the development must be included. This should also include the provision of electric vehicle charging infrastructure for passenger buses. Agreements should also be made in regards to service vehicles meeting tight emissions standards.

Environmental Assessment would recommend that a basic noise impact assessment is carried out across the site in order to get an understanding of the existing background noise levels. This should be submitted with any PPP application. Further more detailed noise impact assessments can then be submitted when the detailed applications are submitted.

Other issues which can be addressed by condition for any PPP application are contaminated land, floodlighting and odours.

### **Environmental Assessment comment**

The applicant has submitted a basic air quality impact assessment which Environmental Assessment would require a number of areas and assumptions clarified. However one of the most import aspects of the air quality model is the traffic data that is used. It is my understand that a review of the WETA is currently begin carried out.

*The air quality impact assessment will need to be updated to take this review into account. It should be noted that a new traffic management system (MOVA) has just been installed on the Newbridge roundabout and has only now began operating optimally. I have attached a copy of the Newbridge Air Quality Improvement Study March 2014. Environmental Assessment would always be looking for a worst case scenario air quality impact assessment. Can we please be kept up-to-date with Transport issues as they evolve.*

#### *General Comments on AQIA;*

- o On-site real time monitoring should be considered for the duration of the construction phase.*
- o Edinburgh Airport traffic numbers and projections must be accurate*
- o Predicting 30 years into the future is going to adversely impact the model output*
- o The AQIA states that no energy centre are proposed, this cannot be accurate any proposals with energy demands greater than 366Kw should be considered. We will not support Biomass.*
- o Construction Phase mitigation is basic, something bespoke must be developed looking at the detailed proposed phasing of the development over the 30 years construction period.*
- o We would question the method used when considering baseline traffic contributions*
- o We will need our Transport Planning Officers to fully agree with the traffic data being used.*
- o The scope may need to be increased and take into account St Johns Road Air Quality Management Area, we have issues with both annual and hourly mean NO2 levels in this AQMA*
- o There are no details of the proposed mitigation measures for the operational phase, I understand that the site will have a low number of parking provisions, but this is not mentioned in the AQIA. The site is well served by the Tram and there is no mention of electric vehicle charging facilities.*
- o WETA update should take into account new traffic management system installed on Newbridge roundabout.*

#### **Affordable Housing comment**

*Services for Communities have developed a methodology for assessing housing requirements by tenure, which supports an Affordable Housing Policy (AHP) for the city.*

- o The AHP makes the provision of affordable housing a planning condition for sites over a particular size. The proportion of affordable housing required is set at 25% (of total units) for all proposals of 12 units or more.*
- o This is consistent with Policy Hou 7 Affordable Housing in the Edinburgh City Local Plan.*

## 2. Affordable Housing Requirement

*This application for a mixed use development is to include 396 residential units integrated within the site and as such the AHP will apply and a contribution for 25% of the total units (99 homes) should be provided. The applicant has mentioned that it is the developer's intention to provide affordable housing provision amounting to the 25% requirement onsite and this is welcomed by this department. However the specific type, location and distribution of the homes are still to be determined through discussions with this department.*

*In accordance with the AHP guidelines, the Council will seek homes of approved affordable housing tenures that meet an identified need. These should be delivered across at least two separate plots of land to ensure there is no concentration of affordable housing in any one corner of the site. Affordable homes should be well integrated and offer a representative mix of the style and size present across the wider site.*

*This department would request that the developer enter into early dialogue with the Council regarding the most suitable delivery mechanism for the affordable housing requirement.*

*The developer will be required to enter into a Section 75 legal agreement to secure these affordable homes.*

### **Flood Prevention comment**

*Even though the applicant has not provided the certificate A1 or B1 covering the Surface Water Management Plan we have reviewed this application. Here are our other comments regarding outstanding information.*

*The applicant must provide a certificate Appendix A1 and B1 covering the Surface Water Management Plan. The Certificates provided for the Flood Risk Assessment have been received.*

*We are aware that the drainage strategy document has been written in November 2015. There are a number of design standards that have moved on since then. As a result we would request that the applicant confirms that they will design the site going forward in accordance with the following standards;*

*C753 The SuDS Manual instead of C697 The SuDS Manual  
Sewers for Scotland Version 3 instead of Sewers for Scotland version 2*

*The applicant must identify existing and proposed surface water flow paths on drawings. This can be achieved by taking the existing site survey and over-marking arrows to denote falls and then completing the same with the post-development arrangement. This should include runoff from outwith the site, from unpaved areas within the site, and from paved areas in events which exceed the capacity of the drainage system. The purpose of these drawings is twofold. Firstly to understand if there is any significant re-direction of surface flows to surrounding land and secondly to identify if surface water will flow towards property entrances.*

*The allowance for climate change has been revised to be 30% when calculating attenuation storage. As a result please can the applicant submit updated Microdamage calculations to support the site showing no flooding during the 1:200 year + 30%cc event.*

*Should the applicant wish to construct >1000 car parking spaces then a CAR Authorisation will be required from SEPA. Upon planning determination a condition should be applied to this affect so that this authorisation is obtained at the appropriate time the design process so as to accommodate SEPA's comments and potential requirements.*

### **Active Travel Team comment - ES Supplementary Doc+Addendum**

*Firstly, it may be worth noting that there are improvements in the pipeline for the A8 - more info can be found here:*

*[http://www.edinburgh.gov.uk/info/20087/cycling\\_and\\_walking/1391/a8\\_route](http://www.edinburgh.gov.uk/info/20087/cycling_and_walking/1391/a8_route)*

*Additionally, you may be aware that we won a bid for a significant improvement to active travel provision in the West of Edinburgh. It's not planned to extend quite as far as this site, but obviously it would be great if all of these developments tied in to provide cohesive routes or provided developer contributions:*

*[http://www.edinburgh.gov.uk/download/downloads/id/10053/west\\_edinburgh\\_active\\_travel\\_network.pdf](http://www.edinburgh.gov.uk/download/downloads/id/10053/west_edinburgh_active_travel_network.pdf)*

*I've also noted a few things below in response to the documents available on the planning portal:*

- o The blue lines below would be required to be built to Edinburgh Street Design Guidance (factsheets now available online)*
- o I see a discrepancy between this and map and the illustrative masterplan in the Masterplan Implementation Strategy, which doesn't have any indication of shared footways, or even footpaths along the east side or Eastfield Road on the west.*
- o The paving along the frontages of the buildings along Eastfield Road don't seem to be connected by one continuous footpath - it's all a bit fragmented. Ideally any cycle paths would be direct, convenient, and safe.*
- o We should be promoting high active travel modeshare throughout, and take into account the new parking standards.*
- o Within the site, all buildings are to connect into the cycle paths. Convenient and secure cycle parking should be in every building and accessible directly from the routes. Entrances to buildings should consider pedestrians arriving from footpaths, and be located with this priority in mind.*
- o Ped crossings should be toucan crossings (at grade and single stage ideally) if connecting with segregation/shared footway.*
- o Showers, changing, lockers and clothes drying facilities will be provided in each office development building. Within the site, all buildings are to connect into the cycle paths directly, particularly for convenient and easy access to the internal secure cycle parking.*
- o Consideration needed for cyclists crossing tram tracks - should always be at >45 degrees, ideally at a right angle.*

## **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 condition 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 Edinburgh Airport and the Planning Authority.*

*The submitted plan shall include details of:*

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

*No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Planning Authority.*

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

*The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season.*

*Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Edinburgh Airport Airside Operations staff. In some instances it may be necessary to contact Edinburgh Airport Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.*

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

*We would also make the following observations.*

#### *Cranes*

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

#### *Lighting*

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

*The change in building heights within the development have been review and is accepted, as the maximum height does not exceed 75.2m AOD.*

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

*As the application is for planning permission in principle, it is important that Edinburgh Airport is consulted on all applications for approval of matters specified in conditions to siting and design, external appearance (including lighting) and landscaping.*

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

#### **Architecture and Design Scotland comment**

*Further to your recent request (11th January 2019) this letter provides a summary of the outcome of our earlier involvement in the masterplanning process for IBG phase 1 at a preapplication stage.*

*This letter summarises our view of the pre-application masterplan proposal as reviewed at the conclusion of a series of advisory workshops led by Architecture & Design Scotland in 2015. It should be noted therefore that subsequent developments in procurement intent, masterplan design or planning submissions have not been taken into account in this advice.*



### *Scope of Advice*

*Our advice in 2015 related to the following aspects of place policy and deliverability:*

*The proposed delivery model*

*Public realm and street design*

*Building massing related to landscape and visual impact*

*Design controls and phasing*

*Sustainable infrastructure*

*Nature of IBG phase 1 in relation to current and future context*

### *Issues*

*Our advice concluded that the proposals could be supported by A&DS if specific matters were addressed including procurement strategy, design proposals and supporting analysis.*

*These matters included:*

#### *Delivery Model*

*Improved commitments to early delivery of the designed and planned qualities of public realm, particularly at the key hub space around the tram stop. Deliverability of public realm proposals in this area to be more fully tested with tram operator and the council.*

*Commitment to remove P&R car park expansion area to allow the realisation of the masterplan proposals and consistency with the parameters drawings.*

*Commitment to early delivery of the proposed civic building.*

#### *Public Realm and Street Design*

*Preference for a more integral bus route south of P&R car park.*

*Further work to manage or remove the impact of 'back court' car parking on residents and office users. Including re-balance towards less off-street parking.*

*Further steps to reduce car dominance, improve pedestrian vibrancy and activate streets through stronger prioritisation of active frontage uses.*

*Mechanism for securing the local shops and amenities required to support a new resident community more fully defined and firmly established.*

*Better defined residential frontage and threshold along park edges and eastern edge.*

#### *Building Massing Related to Landscape and Visual Impact*

*Strengthen soft landscape structure proposals linked to local character.*

*Develop built form and landscape proposals to address findings of Landscape and Visual Impact Assessment.*

#### *Design Controls and Phasing*

*Stronger definition of critical qualities of place expected and design controls that prioritise delivery of these qualities.*

#### *Sustainable Infrastructure*

*Consolidate and embed planned innovations in sustainable infrastructure.*

#### *Distinction between IBG phases 1 and IBG East*

*Clearer distinction sought between relative role and characteristics of Phase 1 local centre/hub and the adjoining centre/hub planned for IBG east.*

*Stronger definition of uses required to achieve 'centre of gravity' at phase 1 centre/hub.*

*Improved 'High Street' route and east - west integration with IBG east across burn corridor/parkland. To facilitate resident use of planned future facilities located in IBG east.*

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#### *Summary*

*(The proposals were assessed by A&DS in relation to the question: "Have the building/s and the environs been successfully considered in terms of the needs of users and the wider community?" Levels of support: level 1- potential exemplar, level 2 - well considered, level 3 - with potential but unsupported, level 4 - outcome at risk and unsupported.)*

*Overall the panel found the developed proposals for IBG phase 1 positive and potentially exciting. The direction of travel in working closely with the City Council is excellent and it is clear that the level of ambition for both the project team and the council is very high. There is a need to keep the precedents in mind and to extract the lessons as the masterplan and quality controls documents are pulled together. There are potential steps back in some respects since the second workshop and there is a need to establish commitments related to the council's corporate role. Establishing greater clarity on sub-phasing and the early delivery elements is also essential. There is great potential for a high quality of development, however to secure the standards expected there is a need to extend the scope and content of design controls to secure delivery by third party developers. Furthermore there is a need to develop aspects of the masterplan in relation to the: park-and-ride (P&R) car park, location of parking, commercial block layouts, housing layout, the link with IBG East and the bus route.*

*Work on sustainable infrastructure and to reflect learning from the outcome of ongoing Landscape and Visual Impact work (which is ongoing and which was not presented to the panel) is also required.*

*We recognise and applaud the ambition for the project, however we feel that a significant amount of work is still required to ensure that the intended qualities are clearly defined or that suitable design controls or delivery mechanisms are in place to secure the intended quality of outcome. We therefore consider that the project is capable of reaching the standard of well-considered (level 2). However this level of support is subject to the conditions indicated under each topic below being fully addressed either by the Project Team or, in some cases, by the City of Edinburgh Council (CEC).*

*Recognising the ambition alongside the significant amount of work still required the project is supported as well-considered (level 2). However this support is subject to important and substantial conditions relating to issues that remained to be addressed either by the Project Team or, in some cases, by the City of Edinburgh Council (CEC). The conditional elements are indicated below each topic in the next section.*

### *Topic Appraisal and Conditions*

*(This section indicates a concluding analysis and appraisal of the proposals in terms of the topics discussed during the Design Forum workshop series. Conditions of A&DS support are included as a footnote to each topic)*

#### *Delivery Model: Establishing Quality and Attracting Investment*

##### *Appraisal on this topic:*

*The direction of travel and intent are promising, however the critical strategic commitments indicated at workshop 2 remain to be secured. The panel emphasised the importance of certainty with regard to taking forward commitments to public realm delivery by the council (see (1) below), and the incorporation in the masterplan of land designated for the eastern expansion of the P&R car park (see (2) below). There is a need for a clear definition of subphasing, in particular what is to be delivered early around the tram stop (see (3) below). The potential for delivery of the civic buildings should be tested (see (4) below). Further work to consolidate the means of integrating the tram into the public realm (see (5) below) is also required.*

*(1) In relation to the delivery of public realm: the mechanism for delivery (e.g. via S75 contributions), the delivery sequence and the adoptability of the public realm as designed remain to be established with transportation officers and other relevant parties at CEC. The intent for the council to deliver the public realm was welcomed by A&DS when this was suggested at the second workshop. The city's early delivery of the quality of streetscape intended is seen as critical in ensuring a benchmark is set at an early stage for the quality aspired to across the site. However the form and scope of the streetscape and public realm to be adopted by the city remains to be endorsed by officers, including important details on the adoptability of what has been drawn and illustrated to date. If the masterplan and design controls need to be modified to meet adoptable standards then any modifications should meet the level of ambition and quality of design for these critical element as currently shown. Phasing proposals should be included that establish the need for up-front delivery of public realm at the hub space around the tram stop.*

*(2) The P&R eastern expansion area needs to be incorporated into the development to avoid phase 1 being reduced to a thin ribbon of sites that does not appropriately define the 'hub' space. The panel considered that the new development needs a minimum necessary depth of two blocks east-west between the linear park and the P&R to establish place qualities and to limit the short-term impact of retention of P&R surface car parking. It was noted that the parameters drawings conflict with the masterplan in showing differing extents of development; these should be revised to be consistent with one another. The panel encouraged urgent work to establish the council's corporate commitment to re-locate the P&R eastern expansion area to permit a necessary increase in the critical mass of masterplanned development in the short term [recognising that the tram extension to Newbridge and the relocation of the P&R are unlikely to be realised in the foreseeable future]. Adjustments to the documents need to reflect clarity and provide certainty on this important issue, allowing consistent masterplan and design control documents.*

*(3) Early delivery of the proposed civic building should be prioritised as a key benchmark. This use is currently identified in the masterplan on the P&R eastern expansion area.*

*Delivery of a key civic building in this location would help create a stronger place whilst implementation to the highest design standards would set a valuable quality benchmark for phase 1 as a whole.*

*(4) A more substantial critical mass of development needs to be defined in the masterplan and design controls. And an early sub-phase needs to be implemented at the outset, built up around the proposed hub at the tram stop. A phasing plan should be included for sub-phases within phase 1. See also 'parameters' topic in relation to sub-phasing.*

*(5) The handling of tram crossings has developed. Continuing efforts to work with the tram operator and council ahead of the application are welcomed as an important step in clarifying deliverability and integration of the tram line into the early public realm to be delivered by the council. The tram crossing and associated public realm proposals need to be established as acceptable and deliverable early by the council. Any modifications resulting need to maintain the current ambitions and intent as indicated for public realm generally (see (1) above).*

*Conditions of Support: Our support is conditional on these five matters being clearly established and defined in both the masterplan and parameters documents.*

## *Public Realm and Urban Grain:*

### *Appraisal on this topic:*

*The panel consider that there is now a clearer hierarchy and a better balance with greater emphasis on the east-west routes. There is an effective transition down the north-south routes from urban form to a landscape-edge form. There is a strong linkage north across the tram line towards the Hilton Hotel helping to bind-in the northwest part of the site. However the bus route has yet to be determined and the panel considered that this would be stronger and better integrated if located south of the P&R car park.*

*Conditions of Support: Our support is conditional on an integrated bus route.*

## *Street Design: Place Qualities and Parking:*

### *Appraisal on this topic:*

*The intent to achieve an urban environment as against a suburban campus approach is strongly supported by the panel. The limited imagery of the quality of places intended is convincing, and the direction of travel towards pedestrian priority, on-street parking and shared space streets was welcomed. However there were continuing concerns that the potential for innovative block formats, parking and distinctive place qualities could be more strongly pursued, learning from the models cited. Concerns remain that the local facilities and amenities to be provided may prove too limited under the parameters model or too inaccessible to support residential population*

*The panel were not convinced by the environmental quality of residential development proposed in phase 1. Whilst the workshop 2 advice on this topic remains to be fully addressed the relationship with the linear park and IBG East also needs to be looked at. The residential format as it meets parkland edges, and the linear park in particular should be more fundamentally re-considered. The aim should be to create a more united proposition for buildings along the parkland corridor, considering the relative relationship of each phase to the park. Within Phase 1, it is necessary to look at the design and layout of housing and commercial uses and how these relate to the opposite facing frontages of IBG East.*

*Proposals should also define how the threshold is to be handled between private or shared garden space and public structural parkland.*

*Car parking is not working yet and a re-balancing is needed with less off-street parking. The re-balancing between on-street and in-curtilage parking in both residential and commercial blocks has yet to be fully resolved. There is a perceived risk to vitality and vibrancy; of streets being inactive with little footfall due to parking being located away from the street front. The location of office entrances at the street front and the extent of public transport use anticipated will help mitigate this risk. However it was suggested that layouts for the design of typical blocks should be developed with parking formats more closely integrated with the street to strengthen on-street patterns of use and create fully activated street environments.*

*Similarly removing parking from the centre of commercial courts would create a more positive experience for workers within each block - i.e not just overlooking parking. The cited exemplars such as Accordia should be inquired into further to strengthen the linkage between innovative parking, streetscape and housing formats.*

*Further thinking is required about the local facilities needed for both resident and working populations alongside consideration of how to secure this provision. A recommendation was made to designate additional commercial ground floor uses south of the P&R and to be more specific in terms of use in the local centre.*

*The lack of multi-storey parking is disappointing given the intent to move away from suburban campus formats.*

*Conditions of Support: Our support is conditional on the further design development and documentation of: typical residential and commercial block formats highlighting critical qualities sought for placemaking; increased integration of parking into the streetscape generally; reduced centre-block car parking in commercial buildings with office entrances along main street frontages activating streets; improvement to the housing format to secure quality of life for residents in streets, semi-public and private amenity spaces, without parking impacting on private space; improvement to the housing format to create a coherent built edge to the linear park; and of the identification of non-negotiable locations for critical local facilities agreed with the council.*

*Massing, Landscape Structure and LVIA work:*

*Appraisal on this topic:*

*The panel welcomed the landscape skills brought in to address issues highlighted at the earlier workshops. However issues could not be discussed in depth at the workshop without the project landscape architect being present to provide an update on the proposals for landscape structure. The panel were satisfied that many aspects of earlier advice were in the process of being addressed if not yet fully demonstrated or articulated. However the panel were not yet persuaded that the intent for larger landscape structure has been fully tested, that planned views out from the site would be secured, or that the tree planting shown would be allowed in terms of airport restrictions. The need for built form, scale and massing proposals to be informed by and respond to the outcomes of the ongoing Landscape and Visual Impact Assessment (LVIA) was re-emphasised. The questions regarding adoptability, by the council and Scottish Water, of proposed soft planting/streetscape elements also requires to be addressed.*

*There is a need to look at typical boundary treatments and how these should be handled between public and private spaces e.g. ha-ha between private outdoor space and adjoining parkland to the south and east.*

*The following detailed point raised in earlier workshops remain to be demonstrated or articulated:*

*The approach to landscape form needs to consider the interaction between building massing, the characteristics of the site and the wider setting. The EIA process currently underway should inform the approach as it emerges.*

*The site is windswept, as evidenced by the tilted trees in recent planting schemes. There are also high levels of noise pollution that will need to be mitigated through landscape if the spaces and fringes of the development are to be pleasant environments to occupy.*

*The design of a viable and coherent landscape proposition will therefore be key to the establishment of a place.*

*The landscape treatment at the edges and the big landscape compositional elements of tree belts and avenues need to be strengthened. Also needing to be developed is the way in which the long distance views will be safeguarded and integrated as intended.*

*The scale of trees used to form the intended avenues needs to be tested, as does the impact of airport authority restrictions on species and the concept of 'wild' planting. The interaction between the present rural form of landscape and the intended urban character needs to be developed.*

*The space required for a large scale framing and environmentally enhancing landscape needs to be tested, if this is needed.*

*The means of integration of, for example, open space and playgrounds needs to be tested including pedestrian links across the tramline (see below)*

*The handling of these important considerations should influence the layout, built form and masterplan.*

*Conditions of Support: Our support is conditional on strengthening the soft landscape structure proposals and demonstrating that proposals respond to and/or benefit from the local landscape character, site constraints, the wider landscape context and views etc as set out above. Our support is also conditional on built form and landscape structure proposals that are responsive to the outcomes of the LVIA.*

*Design Controls and Phasing:*

*Appraisal on this topic:*

*The documentation needs to define both what type of place is to be achieved and what mechanisms will be in place to implement and achieve that, including phasing. The council has asked for a definition of "Phasing of development including delivery of off-site infrastructure to realise placemaking objectives. This would include the elements both within each phase as identified to date and between the individual phases."*

*The panel consider that the parameters approach and guidance intended are not enough to secure the intended qualities from third party developers, without more detail and a degree of coding. The documentation needs to set out a broader range of 'non-negotiable' elements critical for place quality such as: key marker buildings, phasing and delivery sequence required for parks, structure landscape and the central public square; and the location of critical elements for the community such as grocer's shop and bus stops. The document needs to set benchmarks critical for place quality for each use type - whilst housing was discussed this would also apply to commercial uses. For example, the type of garden boundary required alongside the eastern edge of the linear parkland needs to be set out to manage 3rd party developer expectations e.g. to secure the open aspect intended as opposed to close-boarded boundary fencing.*

*The document needs to set out sub-phases within IBG Phase 1 to clarify a planned sequence of development and infrastructure establishment. The document needs to set out the minimum heights required to form the type of place intended as well as the maximum heights.*

*Conditions of Support: Our support is conditional on the setting out of phasing plans and strong design controls that define first what the critical planned place qualities intended are then how these are to be secured and delivered, as noted above. A further more detailed development of design control documents is needed, articulated in sufficient detail to secure from 3rd party developers specific qualities and spatial criteria for buildings and spaces that are critical to secure the ambitions place qualities intended.*

*Sustainable Infrastructure:*

*Appraisal on this topic:*

*The additional skills appointed were welcomed and important as is the on-going work to embed the innovative forms of infrastructure intended. There is a need to continue to ensure that all skills are working effectively with one another.*

*Conditions of Support: Our support is conditional on the following-through of discussions and the planned infrastructure discussed at workshop 2. The extended ambitions in respect of SUDS, bio-retention, wetland, heatways, energy centres etc are particularly welcomed and should be maintained. The planned discussions with S Gov and with SE are helpful and should be pursued. An exploration of innovative water/waste and re-cycling infrastructure was previously encouraged and should be pursued, including the potential to extend CEC use of below ground waste storage.*

*Distinctiveness of IBG Ph1 relative to IBG East [Phase 2]:*

*Appraisal on this topic:*

*We have previously indicated that the role of the separate hubs must be clearly established. What are the differing demands and provision that each is serving in their differing context and their proximities to different adjoining centres - the airport and Ingliston to the west and South Gyle/ Maybury to the east? There is a need for distinct functions and identities, for each to serve a different purpose to avoid mutual dilution and to ensure they are each vibrant and commercially viable.*

*The distinctions between the business-led phase 1 and the housing-led IBG East phases have now been more clearly defined with the articulation of differing mixes and block structures between phase 1 and IBG East. However the location of core community facilities for IBG phase 1 residents within IBG East relies on strong integration east-west between the phases.*

*Stronger linkages are needed both across the intervening burn corridor/linear parkland and along the High Street. This needs to address restricted space for pedestrian access at the High Street tram/burn crossing. This point links to advice on housing format and the linear park as above.*

*The panel considered that the identity of the phase 1 centre required further strengthening through firmer definition of key uses planned in this local centre.*

*Conditions of Support:*

*Our support is conditional on a strengthened identity for the phase 1 local centre; strengthened linkages across the burn; and along the High Street.*



## **Communities and Families comment**

*The Council has assessed the impact of the growth set out in the LDP through an Education Appraisal (August 2018), taking account of school roll projections. To do this, an assumption has been made as to the amount of new housing development which will come forward ('housing output'). This takes account of new housing sites allocated in the LDP and other land within the urban area.*

*In areas where additional infrastructure will be required to accommodate the cumulative number of additional pupils, education infrastructure 'actions' have been identified. The infrastructure requirements and estimated delivery dates are set out in the Council's Action Programme (January 2019).*

*Residential development is required to contribute towards the cost of delivering these education infrastructure actions to ensure that the cumulative impact of development can be mitigated. In order that the total delivery cost is shared proportionally and fairly between developments, Education Contribution Zones have been identified and 'per house' and 'per flat' contribution rates established. These are set out in the finalised Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery' (August 2018).*

### *Assessment and Contribution Requirements*

*Assessment based on: 396 Flats*

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

*The Council has assessed the impact of the proposed development on the identified education infrastructure actions and current delivery programme.*

*The education infrastructure actions that are identified are appropriate to mitigate the cumulative impact of development that would be anticipated if this proposal progressed.*

*The proposed development is therefore required to make a contribution towards the delivery of these actions. The application is for planning permission in principle. The required contribution should be based on the established 'per house' and 'per flat' contribution figures set out below and secured through a legal agreement*

*If the appropriate infrastructure and land contribution is provided by the developer, as set out below, Communities and Families does not object to the application.*

*Per unit infrastructure contribution requirement:*

*Per Flat - £3,216*

*Per House - £16,186*

*Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.*

*Per unit land contribution requirement:*

*Per Flat - £476*

*Per House - £2,042*

*Note - no indexation to be applied to land contribution.*

## Roads Authority Issues

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

1. The applicant will be required to contribute the sum of £7,137,383 (see Note B) to the West Edinburgh Transport Contribution Zone for the following works (see Note A):
  - a. A8 North Side Missing Link - Active travel link between A8 Glasgow Road/Eastfield Road Dumbbell and the Royal Bank of Scotland Gogarburn access junction (illustrated by WSP Drg.Ref.70008635-SK101-Revision B, reproduced in Appendix E of the West Edinburgh Transport Appraisal Refresh report December 2016);
  - b. Dumbbells to IBG, Phase 1 - Eastfield Road upgrading to dual carriageway between the A8 Glasgow Road/Eastfield Road dumbbell junction and the new IBG northern access junction (illustrated by WSP Drg.Ref.70008635-8635 SK002-Revision C, contained in Appendix D of the West Edinburgh Transport Study report September 2015);
  - c. Dumbbells Roundabout Improvement - Junction layout amendments to provide a priority bus lane as set out in the West Edinburgh Transport Appraisal Refresh report December 2016 (Table 9.1);
  - d. Dumbbells Westbound Offslip Signals as set out in the West Edinburgh Transport Appraisal Refresh report December 2016 Table 9.1); and
  - e. Improvements at Newbridge / Dumbbells / Gogar/Maybury;

This contribution is to be secured by way of delivery by the developer of specific targeted infrastructure improvements associated with, or as part of, the development proposals and financial contributions for wider strategic infrastructure improvements in West Edinburgh as described in the Local Development Plan Supplementary Guidance "Developer Contributions & Infrastructure Delivery" by way of a suitable legal agreement. All works require to be carried out by the developer(s) within 12 months of first occupation of any part of the development, and at no cost to the Council. Full design details of the proposed infrastructure must be submitted for approval. Subsequently, all works to be carried out at no cost to the Council. The sum of any financial contribution to be indexed as appropriate and the use period to be 10 years from the date of payment;
2. Contribute a sum to the Edinburgh Tram in line with the approved Tram Line Developer Contributions report. The calculated sum, based on the current development proposals, is £13,172,090 (see Note C). The sum to be indexed as appropriate and the use period to be 10 years from the date of final payment;
3. Contribute the cost required to progress suitable orders to redetermine sections of footway and carriageway; to introduce waiting and loading restrictions as necessary including controlled parking zones, and: to introduce or amend speed limits within the development. The applicant should be advised that the successful progression of this Order is subject to statutory consultation and advertisement and cannot be guaranteed;
4. Carry out works at no cost to the Council to install all necessary signs and markings in relation to the orders set out in 3. above;

5. *In support of the Council's LTS Cars1 policy, consideration to be given to the provision of Car Club spaces and vehicles as part of the development proposal in order to reduce the reliance on the use of private cars and car ownership. Contributions would be required for the promotion and introduction of the necessary order (typically £1,500 - £2,000 per order) and Car Club vehicle(s) (typically £5,500 per car). To be secured by way of a suitable legal agreement;*

6. *All on-site movement and access infrastructure to be generally in accordance with an approved implementation strategy and the masterplan drawings submitted for approval as part of this application:*

*i. Masterplan Concept; and*

*ii. Masterplan Concept - Movement and Access;*

*a. The vehicle access points to the development site as part of the Eastfield upgrading works to consist of the upgrading of the existing motor vehicle Dumbbell access to the Ingliston Park and Ride; forming a new motor vehicle access at the replacement signals approximately 230m north of the Dumbbell Roundabout; and forming a pedestrian and cycle access at the northern boundary of the Ingliston Park and Ride;*

*b. The onsite movement network to include Phase 1 of the IBG Main Street, i.e. Gogar link road;*

*c. The Ingliston Park and Ride facilities to be retained in the vicinity of the current site;*

*d. Appropriate parking controls to be introduced throughout the site and including at the Ingliston Park and Ride site as required in response to the build out of the site; Full design details of the proposed infrastructure must be submitted for approval, and all subsequently approved works to be carried out at no cost to the Council;*

7. *Reserved matters:*

*a. Provision for car parking, inclusive of a proportion suitable for use by disabled drivers, and dedicated spaces for electric vehicle charging, including charging infrastructure. This will be assessed and agreed for each individual application for matters specified in conditions (AMC) as submitted, taking cognisance of the relevant Council parking standard applicable at the time or an agreed alternative developed specifically for West Edinburgh or the IBG development, whichever is lower, as a mechanism to restrict single occupancy car journeys and to encourage the use of alternative modes of transport. For applications for matters specified in conditions submitted where the Edinburgh Design Guidance (October 2017) parking standards apply, and in the absence of an agreed alternative, justification for the quantity of car parking being sought by the applicant will be required for each individual AMC application irrespective of the agreed maximum provision for the land use or combinations thereof, in accordance with the Edinburgh Design Guidance (see Note D). All on-road car parking will be subject to control as part of a West Edinburgh controlled parking zone;*

*b. Provision for cycle parking. This will be assessed and agreed for each individual AMC application as submitted, taking cognisance of the relevant Council standard applicable at the time or an agreed alternative developed specifically for West Edinburgh or the IBG development, whichever is greater, as a mechanism used in conjunction with restricted car parking provision to discourage single occupancy car journeys and to encourage the use of alternative modes of transport (see Note E);*

c. *Provision for motor cycle parking. This will be assessed and agreed for each individual AMC application as submitted, taking cognisance of the relevant Council standard applicable at the time or an agreed alternative developed specifically for West Edinburgh or the IBG development, whichever is greater, as a mechanism used in conjunction with restricted car parking provision to discourage single occupancy car journeys to/from the site, and to encourage the use of alternative modes of transport (see Note F);*

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. The Council will expect to adopt any road constructed under a road construction consent;*

9. *A Quality Audit, as set out in Designing Streets, to be submitted prior to and in relation the grant of each individual Road Construction Consent;*

10. *The applicant should be aware of the potential impact of the proposed development on the Edinburgh Tram and Building Fixing Agreements. Further discussions with the Tram Team will be required;*

11. *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;*

12. *The applicant should note that new road names will be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity;*

13. *The applicant must be informed that any proposed on-street car parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents;*

14. *All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress each 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;*

15. *Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future. For the residential land uses, passive provision to be provided as a minimum, including ducting and infrastructure such that charging points can be readily accommodated in the future;*

16. *The developer must submit a maintenance schedule for the SUDS infrastructure for the approval of the planning authority. Agreements, including those under Section 7 of the Sewerage (Scotland) Act 1968, will be required.*

*Note:*

A. *Much discussion has taken place in regard to the application of the West Edinburgh Transport Contribution Zone in respect of this and other (future) planning applications. Specifically, the requirement for an applicant to undertake a standalone transport assessment in order to address site specific issues (e.g. new or upgraded accesses and internal access infrastructure) within the wider strategic context set by the West Edinburgh Transport Appraisal (WETA) Refresh Study.*

*It was a recommendation of the WETA study that a combination approach be taken to infrastructure delivery - a core A8 Glasgow Road and active travel package of infrastructure measures which all parties contribute to, combined with specific attribution of other measures. This was accepted by the parties involved in the WETA Refresh Study, Transportation Technical Working Group - specifically the consultancy teams acting on behalf of the respective developers with interests in West Edinburgh.*

*The WETA Refresh Study report stated that, "It would be expected that the full costs of site specific access measures and other internal transport networks that do not have wider traffic or public transport functions, would be funded through the specific developer(s)." Determination of this would be supported by the specific development information. Constructive dialogue has taken place with the International Business Gateway (IBG) Stakeholders and their consultants in this regard following a number of meetings during which Transportation set out its position for the applicant's agents to provide additional information in the form of a standalone development specific Transport Assessment.*

*A Transport Technical Note has been submitted which states the intent of the applicant to deliver specific West Edinburgh Transport Action items set out in the LDP Supplementary Guidance "Developer Contributions & Infrastructure Delivery". These are reasonably considered a priority, given their relationship to the IBG Development.*

*Upgrading works have already taken place at Newbridge Roundabout with the installation of MOVA control. It is unlikely that further improvements could be gained by through MOVA. With the upgrading works to the A8 / Eastfield Road dumbbell junction and Eastfield Road dualling Phase 1 which will include new and altered signal installations it is considered more appropriate that this contribution should be targeted at linking the signals;*

B. *West Edinburgh Transport Contributions (WETC):*

i. *Developer contributions to be as per the protocol set out in the "West Edinburgh Transport Appraisal Refresh - Final Report December 2016" (WETA Refresh);*

ii. Calculation assumes zero City Region Deal contributions or other Capital Funding streams;

iii. Total capital value of the West Edinburgh Action Programme items is £86,162,550 as detailed in the LDP Supplementary Guidance document "Developer Contributions & Infrastructure Delivery";

iv. IBG Phase 1 contributes 9.77% of the total AM and PM peak period trip generation of the developments in West Edinburgh. A full list of the developments in West Edinburgh considered as part of the WETC Zone is contained in the WETA Refresh report;

v. Capital cost for the Eastern (Gogar) Link Road is excluded from the calculation of developer contributions;

vi. Total Contribution for IBG Phase 1 = £7,137,383

This contribution is to be secured by way of delivery by the developer of specific targeted infrastructure improvements associated with, or as part of, the development proposals and financial contributions for wider strategic infrastructure improvements in West Edinburgh as described in the Local Development Plan Supplementary Guidance "Developer Contributions & Infrastructure Delivery" by way of a suitable legal agreement;

C. Tram contribution based on the following information supplied by the applicant for the proposed land uses located in Contribution Zone 1:

Type	Scale	Contribution
1	Class 1 Retail / Class 3 Pub-Restaurant / Class 11 Assembly & Leisure**	5,439m <sup>2</sup> GFA* £683,299
2	Class 4 Business	122,158m <sup>2</sup> GFA £8,453,334
3	Class 6 Storage and Distribution	Unknown** Unknown
4	Class 7 Hotel	1,150 rooms / 40,338m <sup>2</sup> GFA £3,467,000
5	Class 9 Housing / Flats (Sui Generis)	396 units / 43,576m <sup>2</sup> £568,457
6	Class 10 Non-residential institution	Unknown** Unknown
Total	-	£13,172,000

The applicant has not provided details on the split of the total area allocated to these individual uses. Therefore, the Tram contribution is based on a 50:50 split of Class 1 and Class 3 uses, to be secured by way of a suitable legal agreement;

The applicant has not provided an indication of the scale of Class 11, Class 6 or Class 10 development;

D. Car parking - The Council's current 2017 parking standards for Zone 2 permit the following maximum car parking provision for the proposed use classes:

Use Class	Scale	Parking level	Maximum No.spaces
Class 1 Retail	> 500m <sup>2</sup>	5,439m <sup>2</sup> total 1 space per 35m <sup>2</sup>	155 spaces
Class 3 Food & Drink		5,439m <sup>2</sup> total 1 space per 14m <sup>2</sup>	389 spaces
Class 4 Business	122,158m <sup>2</sup>	1 space per 63m <sup>2</sup>	1,939 spaces
Class 6 Storage or Distribution		Unknown 1 space per 385m <sup>2</sup>	Unknown
Class 7 Hotels	1,150 rooms / 40,338m <sup>2</sup>	1 space per 2 rooms	575 spaces
Class 9 Housing & Sui Generis flats	396 units / 43,576m <sup>2</sup>	1 space per unit	396 spaces
Class 10 Non-residential		Unknown Varies	Unknown

Class 11 Assembly & Leisure 5,439m<sup>2</sup> total 1 space per 60m<sup>2</sup> 91 spaces

The proposed Classes 1, 3, and 11 uses will have a combined total of 5,439m<sup>2</sup>. However, the submitted documents supporting the planning application do not identify how this total floor space will be apportioned to each use class nor specific proposals of a quantum of parking for these uses. The transport technical paper indicates that these uses will be ancillary to other main uses proposed and therefore there will not be a specific requirement for car parking and that a nominal provision may suffice. However, for the purposes of determining the maximum permissible level of parking, a maximum aggregate value has been calculated. This equates to 3,299 spaces, made up of the following:

Use Class	Scale	Maximum no.spaces
Class 1 Retail / Class 3 Food & Drink / Class 11 Assembly & Leisure / Class 1 Retail > 500m <sup>2</sup>	5,439m <sup>2</sup>	389 spaces
Class 4 Business	122,158m <sup>2</sup>	1,939 spaces
Class 7 Hotels	1,150 rooms / 40,388m <sup>2</sup>	575 spaces
Class 9 Housing & Sui Generis Flats	396 flats / 43,576m <sup>2</sup>	396 spaces

N.B. no information provided for Class 6 or Class 10.

Disabled parking - Spaces for disabled users must be provided at the following ratios of the total respective parking provision:

- o Class 1/Class 3/Class 7/Class 9/Class 11 @ 8% = 119 spaces;
- o Class 4 @ 6% = 41 spaces; and
- o Class 6 and Class 10 - no information provided.

To comply with current parking standards, 1 in every 6 parking spaces should be provided with an electric vehicle charging point with dedicated parking space.

Given the phased approach to the construction of the development over an extended timeframe, it is recommended that parking provision should be assessed and agreed for each individual AMC application as submitted, taking cognisance of the relevant Council standard applicable at the time or an agreed alternative developed specifically for West Edinburgh or the IBG development, whichever is lower. For AMC applications submitted where the Edinburgh Design Guidance (October 2017) parking standards apply, and in the absence of an agreed alternative, justification for the quantity of car parking being sought by the applicant will be required for each individual AMC application irrespective of the agreed maximum provision for the land use or combinations thereof, in accordance with the Edinburgh Design Guidance. All car parking, where not controlled private off-street parking, will be subject to control as part of a West Edinburgh CPZ. Suitable Traffic Order(s) will require to be promoted and implemented at no cost to the Council;

E. Cycle parking - The application has been assessed under the currently applicable 2017 parking standards for Zone 2. These require a minimum of 2,387 cycle parking spaces for the proposed use classes:

Use Class	Scale	Parking level Minimum no.spaces
Class 1 Retail > 500m <sup>2</sup>	5,439m <sup>2</sup> total 1 space per 500m <sup>2</sup> (customers) & 1 space per 250m <sup>2</sup>	33 spaces

	(employee)			
Class 3 Food & Drink	5,439m <sup>2</sup> total	1 space per 75m <sup>2</sup>	73 spaces	
	(customers & employee)			
Class 4 Business	122,158m <sup>2</sup>	1 space per 1,000m <sup>2</sup>	937 spaces	
	(customers) & 1 Space per 150m <sup>2</sup>			
	(employee)			
Class 6 Storage or Distribution	Unknown	1 space per 6,000m <sup>2</sup>	Unknown	
	(customers)			
	1 space per 900m <sup>2</sup>			
	(employees)			
Class 7 Hotels	1,150 rooms / 40,338m <sup>2</sup>	1 space per 10 rooms	115 spaces	
Class 9 Housing & Sui Generis flats	396 units / 43,576m <sup>2</sup>	2 spaces per unit	792 spaces	
Class 10 Non-residential	Unknown	Varies	Unknown	
Class 11 Assembly & Leisure	5,439m <sup>2</sup> total	1 space per 60m <sup>2</sup>	544 spaces	

This has been based on a maximum aggregate total as the percentage split of 5,439m<sup>2</sup> to the Class 1, 3 and 11 uses has not been specified by the applicant. These uses are considered to be ancillary to the principal uses and are therefore are only likely to require a nominal provision.

The phased approach to parking provision referred to in D. above applies to cycle parking, whichever is the greater;

F. Motorcycle parking - The application has been assessed under the currently applicable 2017 parking standards for Zone 2. These require a minimum of 460 motorcycle spaces for the proposed use classes:

Use Class	Scale	Parking level	Minimum	
			no.spaces	
Class 1 Retail > 500m <sup>2</sup>	5,439m <sup>2</sup> total	1 space per 1,000m <sup>2</sup>	8	spaces
	(customers) & 1 space per 2,000m <sup>2</sup>	(employee)		
Class 3 Food & Drink	5,439m <sup>2</sup> total	1 space per 20	19 spaces	parking spaces
	(customers & employee)			
Class 4 Business	122,158m <sup>2</sup>	1 space per 4,000m <sup>2</sup>	172 spaces	(customers) & 1 space per 1,000m <sup>2</sup> (employee)
Class 6 Storage or Distribution	Unknown	1 space per 16,000m <sup>2</sup>	Unknown	
	(customers)	1 space per 6,000m <sup>2</sup> (employees)		
Class 7 Hotels	1,150 rooms / 40,338m <sup>2</sup>	1 space per 20	19	spaces
	parking spaces			
Class 9 Housing & Sui Generis Flats	396 units / 43,576m <sup>2</sup>	1 space per 25 units		15 spaces
Class 10 Non-residential	Unknown	Varies	Unknown	
Class 11 Assembly & Leisure	5,439m <sup>2</sup> total	1 space per 20	272 spaces	parking spaces.



*This has been based on a maximum aggregate total as the percentage split of 5,439m<sup>2</sup> to the Class 1, 3 and 11 uses has not been specified by the applicant. These uses are to all intents and purposes ancillary to the principal uses and therefore are only likely to require a nominal provision.*

*The phased approach to parking provision referred to in D. above applies to motorcycle parking, whichever is the greater;*

**G. TRAMS - Important Note:**

*The proposed site is on or adjacent to the operational Edinburgh Tram. An advisory note should be added to the decision notice, if permission is granted, noting that it would be desirable for the applicant to consult with Edinburgh Trams regarding construction timing. This is due to the potential access implications of construction / delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Edinburgh Trams and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:*

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

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

## Location Plan

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