

# Development Management Sub Committee

Wednesday 6 June 2018

## Application for Planning Permission in Principle 16/05681/PPP

At Land 195 Metres South Of West Craigs Cottage 85, Craigs  
Road, Edinburgh

Residential development with associated transport  
infrastructure, landscaping and open space (scheme 2)

Item number	7.1
Report number	
Wards	A03 - Drum Brae/Gyle (Pre May 2017)

### Summary

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The principle of housing development is acceptable and in accordance with the Edinburgh Local Development Plan (LDP). A concept masterplan, development framework and landscape strategy illustrate how the proposed development would comply with the LDP Site Brief and Development Principles and form a suitable basis for detailed design proposals to be prepared at AMSC or FUL application stage. Subject to identified transport interventions being delivered in relation to the development, the proposals offer an acceptable level of connectivity to the existing settlement area, public transport and local facilities.

Planning obligations, as defined through the LDP Action Programme, require contributions to be secured through a Section 75 agreement in respect of transport infrastructure, Edinburgh Tram, educational provision, affordable housing and healthcare.

There are no other material considerations that outweigh this conclusion.

## Links

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### [Policies and guidance for this application](#)

LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES09, LEN07, LEN08, LEN09, LEN10, LEN12, LEN16, LEN20, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LTRA02, LTRA03, LTRA08, LTRA09, NSGD02, SGDC,

# Report

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### Recommendations

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

### Background

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#### 2.1 Site description

The application site lies on the western edge of Edinburgh to the west of Maybury Road (A902) and north of the Maybury Road/Glasgow Road junction.

The application site (12.6 hectares) includes Craigs Road to the north and the junction with Maybury Road (A902) and Cammo Walk to the north east. The West Craigs housing area and industrial estate are situated to the southern edges of the site. The western site boundary is defined by a fence, with arable land comprising the remainder of HSG19 LDP Housing Proposal lying beyond. The eastern site boundary is defined by Maybury Road including some mature trees and a rocky escarpment.

The site generally slopes southwards from the Craigs Road ridgeline to the north, but is undulating with some relatively steep slopes towards to southern and south western boundaries. The highest parts of the site occur at the eastern boundary with Maybury Road (69 metres AOD) and at the north western corner (65 metres AOD). The lowest areas lie to the south east and south west corners (53-55 metres AOD). The West Craigs Farm is situated within a localised dip.

West Craigs farmhouse and associated farm steading are situated within the northern part of the site, this being accessed via a private lane from Craigs Road. West Craigs Cottage, a single storey, dwelling lies adjacent to Craigs Road at the entrance to West Craigs Farm. A telecommunications mast is situated at the north western corner of the site. A water main and wayleave crosses the site between the south west and north east corner, to the junction with Craigs Road.

The site comprises mainly uncultivated grassland with rocky outcrops and small clusters of trees in the southern part of the site and in the vicinity of the dwellings. A mature hedgerow forms the boundary to Craigs Road with stone walls defining the lane and boundaries to West Craigs Farm.

The residential areas to the south and east of the site are generally characterised by low rise suburban and flatted development. The Cammo Park Estate, a Designed Landscape and Historic Garden Inventory Site, lies 440-490 metres to the north of Craigs Road. Cammo Walk, a country lane providing a connection from Cammo to Craigs Road/Maybury Road junction, enters the site at the north east corner.

The application site substantially reflects the north western extents of Housing Proposal HSG19 as defined in the Edinburgh Local Development Plan (LDP). The application boundary also includes areas of land (approximately 30-80 metres depth) to the north of Craigs Road this comprising part of the Edinburgh Green Belt. Proposed improvement to the Craigs Road/Maybury Road junction are identified as LDP Proposal T17.

## **2.2 Site History**

23 December 2013 - Proposal of application notice approved for erection of residential development with associated access, landscaping and open space (Application reference:- 13/05073/PAN).

23 April 2015 - Planning permission in principle refused for residential development with associated transport infrastructure, landscaping and open space. Reasons for refusal:-

- non-conforming use;
- air quality; and
- transport infrastructure delivery.
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Site area is similar to that of current Site application 16/00837/PAN but excluded areas to north of Craigs Rd and east of Maybury Rd. (Application reference:- 14/03502/PPP).

4 December 2015 - Appeal against refusal dismissed. Main reason for refusal: the second Proposed Local Development Plan being under examination by Ministers, the application was premature and would undermine plan-making process (DPEA reference:- PPA-230-2153).

13 April 2016 - Proposal of application notice approved for erection of residential development with associated access, landscaping and open space (Application reference:- 16/00837/PAN).

### Application Site and land to the West

30 October 2014 - Proposal of application notice approved for residential development and ancillary retail (Class 1), Class 2 (300sqm in total) including landscaping, access and services and all related ancillary development. This included extents of the current application (Application reference:- 14/04156/PAN).

19 April 2017 - Refusal of planning permission in principle for residential development, up to a maximum of 1400 units, and ancillary commercial (Class 1 retail and Class 2 financial and professional) including landscaping, access and services and all other ancillary development (Application reference:- 16/04738/PPP).

09 April 2018 - Submission of planning permission in principle for residential development, up to a maximum of 1400 units, and ancillary commercial (Class 1 retail and Class 2 financial and professional) including landscaping, access and services and all other ancillary development. Red line extents as per application 16/04738/PPP. (Application reference:- 18/01393/PPP).

30 April 2018 - DPEA Reporter minded to allow appeal lodged against the above refusal of planning permission in principle, subject to 23 conditions following the signing or registering or recording of a planning obligation under a Section 75 or some suitable alternative arrangement (Application reference:- 16/04738/PPP, DPEA reference: PPA-230-2207).

## **Main report**

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

#### Scheme 2

Planning permission in principle is sought for residential development with associated access, landscaping and open space.

The applicant has submitted a concept masterplan with schematic layout, development framework and landscape strategy supported by an Environmental Statement which demonstrate how the site could be developed. This information identifies the site could deliver in the range of 225-250 housing units, with a mix of 2,3,4 and 5 bedroom houses and 1 and 2 bedroom apartments. Proposed development would be low rise in nature, comprising mainly 2 storey dwellings but also some 3 storey apartment blocks and 1.5 storey 'cottage' units.

Two principal areas of the site have been identified for residential development to the north west and south east, these being separated by a proposed green corridor and linear park running diagonally across the site from the north east to the south east. Landscape buffers are identified at all the principal site edges, with a 30 metre landscape buffer to the northern edge of the site with Craigs Road and the Edinburgh Green Belt.

The proposals identify that existing site levels would be significantly re-modelled through extensive cut and fill in order to create suitable development platforms. This would seek to echo the basic forms of the existing topography. Levels in the south eastern part of the site and area to the north east of West Craigs Farm would be reduced between 1 and 6 metres. Conversely land levels to the western and south east corner of the site would be raised by between 1 and 6 metres.

The site topography would inform the drainage strategy with SUDS detention basins identified at three locations, to the north east, south east and south west corners of the site, these being based around three drainage catchment zones.

A Landscape Strategy identifies eight landscape zones, these providing a new landscape structure for the site, comprising green corridor/linear park, landscape buffers and screening to the site edges, SUDS detention basins, usable open space provision and potential locations for streets trees and play equipment.

The principal change from Scheme 1 is the proposed retention of the West Craigs farmhouse within the north western part of the site. This would be retained and re-modelled as a single, large detached dwelling with new extension and garage. The West Craigs farmsteading is identified for removal but a new arrangement would seek to reflect the historic spatial character through courtyard development with one and a half storey cottage type units. The West Craigs Cottage, situated to the northern edge of the site is proposed for demolition.

The Concept masterplan has also been subject to amendment, with a flatted block at the southern edge of the site being positioned further west to minimise visual impact from Craigs Road. The width of internal pedestrian and cycle paths, including those at the eastern and northern boundaries and the green corridor has also been increased.

Two points for vehicular access are identified from Craigs Road via a re-modelled Craigs Road/Maybury Road junction (this being revised from the Scheme 1 proposal) featuring four way signals with pedestrian phase and enhanced provision for pedestrians and cyclists. Three potential vehicular routes are also identified to serve the adjacent parts of HSG19 to the western edge, including a local distributor running to the northern edge of the green corridor.

A strategic pedestrian/cycle route is identified within the proposed green corridor, this linking Cammo Walk to the south west corner of the site. A network of pedestrian accesses are identified across the site including links from Maybury and Craigs Roads to the western and south western edges of the site.

### Scheme 1

This formed the original framework masterplan proposal comprising a schematic development layout.

This proposed two principal development areas to the north west and south east bisected by a proposed green corridor of approximately 30 metres width.

The West Craigs farmhouse, farmsteading and West Craigs Cottage situated within the north western part of the site were all identified for potential removal. A 'village green' and square were identified at the former location of the farmhouse and farmsteading.

### Supporting information

EIA Screening ascertained that an Environmental Statement would be required in relation to the development of the site. An Environmental Statement including Addendum dated February 2018 has been lodged in support of the application.

Other documents:-

- Concept Masterplan - Revised;
- Development Framework Plan - Revised;
- Landscape Strategy;
- Design and Access Statement Addendum;
- Access, movement and circulation - Extract Statement;
- Planning Statement - Revised;

- Tree Survey and Arboricultural Implication Assessment;
- Flood Risk Assessment, Surface Water Management Plan and Self Certification;
- Ground Investigation Report;
- PAC Report; and
- Transport Assessment.

All supporting documentation 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 conceptual masterplan is acceptable and meets the requirements of the LDP Site Brief and Development Principles;
- c) The proposals raise issues relating to transport and accessibility;
- d) There are requirements for development contributions;
- e) Other key matters have been addressed;
- f) There are any impacts on equalities and human rights; and
- g) Issues raised in material representations have been addressed.

#### **a) Principle of development**

The application is for residential development with associated transport infrastructure, landscaping and open space.

The extents of the application site (12.6 hectares) represents 17% of the total HSG19 LDP allocation which has an estimated capacity of 1700-2000 units across a 75 hectare site.

LDP Policy Hou 1 states that priority will be given to the delivery of housing and relevant infrastructure through sites allocated in the plan. The application site falls within the HSG19 Maybury allocation, as identified in LDP Table 4, New Housing Proposals. The principle of housing development is therefore acceptable in principle, subject to compliance with other relevant policies in the LDP.

This would be subject to the necessary Environmental Impact Assessment (EIA) being undertaken to inform environmental obligations and mitigation as they relate to the site. The acceptability of the proposal would also be subject to adherence with the LDP Site Brief and delivery of necessary infrastructure.

The application boundary also includes areas of land (approximately 30-80 metres depth) to the north of Craigs Road which is part of the Edinburgh Green Belt. The applicant has confirmed that this land was included in the application boundary to facilitate the upgrading of the Craigs Road/Maybury Road junction. Following further design development for the junction proposal, this has established that minimal land will be required to the north of Craigs Road to deliver the junction and no other development is proposed. In view of this, the proposal would be considered a minor infringement of green belt policy Env 10 and is acceptable taking cognisance of the benefits of delivering housing on the remainder of the application site. However, for avoidance of doubt, it is recommended that a legal obligation be applied to this permission to restrict development to that which is required for junction improvements only.

#### **b) The Masterplan Concept meets the requirements of the LDP Site Brief and Development Principles**

The LDP Site Brief for HSG19 Maybury/West Craigs sets out key design principles and structural design elements from which detailed masterplanning can be further developed.

##### Masterplan concept and urban design approach

Initial proposals for the site were presented by the applicant to the Edinburgh Urban Design Panel at pre-application stage in March 2014. The Panel offered a range of advice including:-

- The need to consider the masterplanning of the wider Maybury housing allocation as a whole, including closer collaboration with the neighbouring landowner's design team or the Council taking leadership of the masterplanning process;
- The potential to retain the historic farm buildings and existing mature trees within the site;
- The need to create a distinct character for the development using its topography, existing buildings, layout, building forms, landscape and views;
- Green space that is integrated into the design with housing facing onto green spaces;
- The need to consider how the western boundary of the site will interface with adjacent future housing on the neighbouring site, to ensure that when both are built out they are seen as a single place rather than two separate developments;



- Views towards the application site, with care taken to ensure that visual impacts are positive;
- Connections to the wider area, to nearby neighbourhoods, services and public transport are necessary to ensure the development is not isolated.

The LDP Site Brief states that comprehensive masterplanning and phasing of development will be required for the wider HSG19 site, these drawing upon place-making and street design principles to create distinctive and sustainable communities at the gateway to the City.

To advance these objectives, proposals for the HSG19 site were subject to initial scoping meetings involving Architecture + Design Scotland (A+DS), the Council, the applicant and adjacent landowners during March-May 2016 with a view to progressing an A+DS Design Forum workshop series to develop a comprehensive masterplan approach for the wider HSG19 site. This was not progressed as the majority landowner was unwilling to participate.

The applicant therefore progressed a site masterplan for their respective part of the HSG19 allocation, this being lodged in support of the application. This approach has sought to respond to the requirements of the LDP Site Brief as they relate to the application site and address the original advice provided by the Edinburgh Urban Design Panel.

Specifically, the preparation of a conceptual masterplan, development framework and landscape strategy have resulted in a detailed masterplan proposition for land in the control of the applicant, these being informed by detailed analysis of the site and context.

The Development Framework has identified a proposed structure for the site including development zones situated to the north western and south eastern part of the site, relative densities, building frontages, feature buildings, a street hierarchy and pathway network, the location of landscape screening and SUDS attenuation basins. The West Craigs farmhouse would serve as a focal point for development in the north western part of the site.

The proposals have also made provision for a green network as per the LDP Site Brief including a 30 metre landscape buffer to the northern edge of the site and green corridor link providing a connection from Cammo Walk to the south west corner of the site.

The Landscape Strategy has identified a landscape structure for the site based around a series of landscape zones, including the distribution, function and types of open space.

The LDP Site Brief also identifies the opportunity for high density development within 400 metres of the pedestrian/cycle bridge to Edinburgh Gateway. Whilst a small area within the south eastern part of the application site falls within this 400 metre threshold, detailed site design considerations would require this area for SUDS attenuation. Relative densities of development would generally increase towards the south western part of the application site - that closest to Maybury junction and Edinburgh Gateway.

The nature of the proposals are considered to provide an appropriate design response to the site context and address the various requirements of the LDP Site Brief, as they relate to the application site.

Site layout principles and requirements of the LDP Site Brief have been subject to design testing and feasibility as part of masterplanning undertaken by the applicant. This has demonstrated that the application site could potentially support housing development in the range of 225-250 units with associated landscaping, open space and access. The concept masterplan has also identified the West Craigs farmhouse as being retained and incorporated into the layout.

The proposed number of units would meet expectations in terms of the estimated capacity of the site whilst allowing necessary site infrastructure to be provided as per LDP Site Brief requirements. On the basis on the extents of the site within the LDP allocation (11.29 hectares) the proposal for 225-250 units would realise a density of 20-22 dwellings per hectare. The general assumption for densities on a greenfield site of this nature would be 25-35 dwellings per hectare.

The relative lower density can be explained by the LDP Site Brief requirements for a landscape buffer to the northern edge of the site and the green corridor within the centre of the site. The site topography, requirements for SUDS and further landscape mitigation, airport height restrictions and retention of the West Craigs farmhouse also have a bearing on the developable area and densities which can be achieved. However, relative densities as they relate to particular plots would be greater (these ranging from 30 to 150 dwellings per hectare). The proposals are therefore considered to meet the requirements of LDP Policy Hou 4 a), in that the proposal would achieve an appropriate density of development having regard to the characteristics of the site and surrounding area.

It is not possible to agree exact unit numbers at Planning Permission in Principle (PPP) stage as detailed matters relating to site access arrangements, SUDS design, noise attenuation, land contamination and archaeology have yet to be fully confirmed. This matter can only be determined following further detailed masterplanning for the site. However, given the design testing which has been undertaken by the applicant, it is suggested that the site should deliver a minimum of 225 units and not exceed 250 units.

Although these proposals do not represent comprehensive masterplanning or phasing of the wider HSG19 site as identified in the LDP Site Brief, this application only represents 17% of the total HSG19 allocation. It is also considered that this part of the site represents a discrete first phase of development, relating closely to the existing settlement area.

The supporting Development Framework Plan and Landscape Strategy would establish an appropriate structure and layout for the development and clear design principles in taking the proposals forward. It is recommended that these plans are approved as part of this Planning Permission in Principle - these providing a suitable basis for the development of a detailed site masterplan and layout at AMC stage. Future proposals should therefore be developed to be substantially in accordance with these approved plans.

However, the conceptual masterplan layout has not yet fully embraced principles contained in the Scottish Government's Designing Streets, requirements of the Council's latest parking standards or the Edinburgh Design Guidance in respect of street design and the integration of parking. The requirement for a finalised masterplan/site layout to be agreed at AMC stage, would allow these aspects to be further developed.

This approach would also allow for further discussion on emerging masterplan proposals for the wider HSG19 site, including potential engagement with A+DS as part of a Design Forum workshop series particularly to secure effective integration between the application site and its adjacent part of HSG19 to the west.

### Site Features

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.

An analysis of the site, the local and strategic context has been prepared as part of the Design and Access Statement Addendum. This has considered geotechnical issues and topography, with an analysis of opportunities and constraints as they affect the site.

The principal built feature of the site is the West Craigs Farm and Steading. Following discussions with the applicant the West Craigs farmhouse is now identified for retention as part of the masterplan proposals. This matter and the proposed demolition of other structures on the site is further considered in section 3.3 e) Archaeology.

The existing topography is also a defining characteristic of the site. Although the proposed development will require a significant re-grading of levels within the site, this would seek to echo the basic form of the existing site topography, this also informing a SUDS strategy for the development. It is recommended that confirmation of the finalised site levels be stipulated through condition, these not exceeding the levels presented as part of the Landscape Visual Impact Assessment.

The removal and retention of trees as part of the development is further discussed in section 3.3 e).

### Landscape Design and Open Space

A Landscape Strategy has been prepared by the applicant as part of the amended masterplan proposal. This has defined a series of eight landscape zones which would serve a range of functions. These include landscape buffer planting at all the principal edges of the site, parks, usable open space and areas of landscape associated with the proposed SUDS attenuation features.

Of a developable site area of 11.29 hectares, 4 hectares of open space is identified which represents 35%. The breakdown of types of open space is as follows:-

- Woodland and other buffers - 12,907 metres square
- Open spaces and local parks - 20, 504 metres square

- SUDS detention areas - 7,344 metres square

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

The LDP Site Brief has identified that two large greenspaces should be provided within the HSG19 allocation, as required by the Open Space Strategy. However, in the absence of comprehensive masterplanning for the HSG19 site it is not possible to establish how such open space will be apportioned across the wider allocation.

In relation to the application site, a network of smaller open spaces are proposed, the extents, nature and usability of which are considered acceptable and meet the requirements of LDP Policy Env 20.

The approach outlined in the Landscape Strategy would meet relevant requirements of the LDP Site Brief in that it would provide a new, strategic, green network link through the central part of the site and a new woodland and grassland habitat (30 metres depth) to the northern edge of the site, this serving as a new green belt boundary.

In terms of usable spaces, the proposed green corridor would serve as a linear park, this also forming a connection with the wider green network. This would be further complemented by a series of green and street spaces including a village park area to provide a setting for the retained West Craigs farmhouse. Three play spaces are also identified with areas of buffer planting to the site edges, being publicly accessible.

However, the Council will be unable to adopt areas of public open space within the application site and these will need to be maintained by a private factor. Legal clauses will therefore be required as part of the permission to main future public access.

With regard to detailed landscape design matters, an outline species mix has been provided as part of the Landscape Strategy, this being prepared to comply with Airport planting restrictions.

In terms of play provision, two Local Areas for Play (LAP), one Local Equipped Area for Play (LEAP) and a Multi-Use Games Area (MUGA) within the linear park/green corridor have been identified. This range of play provision would be considered acceptable for a residential scheme of this size and nature, and provision should be secured through planning obligation with finalised details subject to condition.

It is recommended that all landscape details, including species mix, hard works, boundary treatments, the location of benches and lighting within the landscape be provided. SUDS attenuation ponds should also be detailed to form part of a parkland setting.

The LDP Site Brief identifies the potential to create local green space on the high point of the site next to Maybury Road. In relation to this, existing landforms will be significantly re-graded to create usable development platforms. A proposed landscape buffer to the eastern edge of the site with Maybury Road would seek to absorb the development platform edges and rock escarpment through tree planting, the use of grassland habitats and shrub planting.

In summary, the proposals for landscaping and open space, as defined through the Landscape Strategy are acceptable in principle, these defining strategic design principles and placemaking elements.

The proposals have addressed the requirements of LDP Policies Des 7 - Layout Design, parts a) and f) and LDP Policy Des 9 - Urban Edge Development, part c) in that the proposals will strengthen the green belt boundary and contribute to multi-functional green networks by improving amenity and enhancing biodiversity.

It is recommended that plans contained within the Landscape Strategy be approved as part of this application, this establishing the extents, type and form of open space within the site and forming a basis for future AMC applications. Detailed landscape proposals should therefore be developed to be substantially in accordance with those plans.

### Phasing of Development

The LDP Site Brief states that development should start in the eastern part of the HSG19 site to form an extension of the existing built up area.

This application proposal relates to the north eastern part of the HSG19 site which is situated closest to the existing built up area. As such, it is considered to represent a discrete first phase of development of the wider HSG19 site and granting of planning permission in principle would not be prejudicial to the future masterplanning and development for the remainder of the HSG19 allocation.

It is recommended that a phasing plan for the development of the application site be stipulated through condition at AMC stage.

### **c) Transport**

The HSG19 site represents the development of a major strategic housing site in west Edinburgh. In order to promote active travel, minimise private car use and support air quality objectives, it is critical that supporting transport infrastructure is implemented in conjunction with the development of this site. This is to ensure effective connectivity with the existing settlement, particularly local facilities, public transport and the wider transport network.

The LDP and Site Brief highlight a range of transport measures which should be pursued in relation to the development of this part of the HSG19 site. These include improvements to the Craigs Road/Maybury Road junction, the widening of Craigs Road on the southern edge to facilitate all vehicle movements and the development of a 30 metre wide green corridor link to connect Cammo Walk with Edinburgh Gateway via a new pedestrian/cycle overbridge to the south west of the application site. The LDP Site Brief also identifies the requirements for bus infrastructure on Maybury Road and for high quality pedestrian and cycle routes within the application site, these including the formation of new links between Maybury Road and the western parts of the wider HSG19 site.

The LDP Site Brief also refers to other transport related objectives within the wider HSG19 site, these including enhancements to pedestrian/cycle access along Turnhouse Road and the formation of a bus route linking Craigs Road with Turnhouse Road.

These objectives are supported by a range of interventions in the LDP Action Programme.

The Conceptual masterplan proposals and Development Framework identify two vehicular access points from Craigs Road. Whilst the principle of vehicular access in these general locations is considered acceptable, these details would need to be subject to further design testing by the applicant and fully integrated with both the finalised masterplan and new layout for the Craigs Road/Maybury Road junction. The details of site access would therefore need to be confirmed at AMC stage.

The Development Framework also identifies four potential vehicle connections from the application site with adjacent parts of HSG19 to the west. This includes a local distributor type road to provide connection from Craigs Road. Given the absence of comprehensive masterplanning at this stage it has not been possible to confirm whether such links would provide adequate capacity.

An indicative design proposal for the upgrading of Craigs Road/Maybury Road junction (LDP Proposal T17) has been prepared by the applicant, this being subject to discussion with Planning and Transport. This identifies a signal controlled junction with Craigs Road as being widened to the south. The proposed layout has sought to promote design principles to enhance accessibility for pedestrians and cyclists - such facilities being largely absent in the existing junction layout and these considered essential to promote active travel modes. The proposal would enhance pedestrian movement from the site to the east and facilitate the development of an off-road pedestrian/cycle corridor through the application site, this connecting Cammo Walk to the north with Turnhouse Road and Edinburgh Gateway to the south west.

The finalised junction design would need to be subject to traffic modelling, the approach being agreed with the Council in its capacities as both Planning and Roads Authority. It is also recommended that the design approach should generally be in accordance with the principles established through the indicative design proposal. The upgrading of the junction should be substantially complete prior to the occupation of development. These requirements would be stipulated through condition and obligation as appropriate.

The LDP Site Brief also requires that Craigs Road be widened along its southern edge to facilitate all vehicle movements. This must be secured through planning obligation as this relates to the application site and implemented in conjunction with the re-modelling of the adjacent junction.

The Development Framework has identified a range of pedestrian/cycle links across the site. These include a strategic pedestrian and cycle route (4 metres in width) via the proposed green corridor, which provides an off-road link to Edinburgh Gateway and adjacent parts of HSG19, which include a proposed primary school, health centre and community focal point on Turnhouse Road. In order to facilitate the delivery of this route, a financial contribution towards the costs of the pedestrian/cycle overbridge to Edinburgh Gateway and upgrading of connecting cycle routes serving the Gyle and Edinburgh Park to the south and IBG to the west will be required as per LDP Action Programme requirements.

The LDP Site Brief also identifies a requirement for two pedestrian/cycle routes between Maybury Road, the West Craigs Industrial Estate and western part of HSG19. Following discussion with the applicant, the Development Framework proposals have been amended to provide a more direct pedestrian/cycle link from the south east corner to the western edge of the site. This route could also provide a future connection into West Craigs Industrial Estate.

The applicant has also identified a pedestrian (toucan) crossing on Maybury Road to the south east corner of the application site. Although not identified as part of the LDP Action Programme, this would facilitate pedestrian and cycle movements from the south eastern corner of the site to the eastern side of Maybury Road and East Craigs Rigg. It is therefore recommended that a financial contribution to deliver this facility be secured as part of the S.75 legal agreement. The Roads Authority have indicated that the provision of such a facility in this location would be acceptable in principle.

The Roads Authority has also requested various financial contributions are secured in respect of City Car Club and various Traffic Regulation Orders (TRO's). All proposed contributions and obligations as they relate to Transport are further outlined in section 3.3 d).

Parking provision has been shown indicatively as part of the concept masterplan proposal. However, this would appear to exceed requirements of the Council Parking Standards 2017 and detailed design proposals would need to be developed in accordance with Zone 3 of the current standards. The design of proposed parking must also pay full cognisance to the Scottish Governments 'Designing Streets' policy, the Edinburgh Design Guidance 2017 and Edinburgh Street Design Guidance.

The finalised layout of all roads, streets, pedestrian/cycle routes and proposed parking levels would need to be confirmed at AMC stage.

LDP Policy Tra 8 - Provision of Transport Infrastructure, states that development proposals relating to major housing or other development sites and which would generate significant amounts of traffic shall demonstrate through an appropriate transport assessment and proposed mitigation that local and cumulative transport impacts can be timeously addressed in so far as this is relevant and necessary for the proposal. Any required transport infrastructure as identified in the LDP must be addressed as relevant to the proposal.

The Roads Authority has confirmed that the Transport Assessment submitted by the applicant has been assessed and is considered to be generally reflective of the existing and future traffic patterns in the area.

Transport Scotland has no objection to the proposal, on the understanding that the traffic generated by the application site has been incorporated as part of the traffic modelling undertaken for the Council's WETA Refresh Study 2016, and its associated traffic impact on the trunk road network has therefore been taken into consideration in this case.

In summary, subject to necessary transport interventions being secured through legal agreement and delivered in relation to the development of the HSG19 site, the proposals would satisfy the requirements of LDP Policy Tra 8, Provision of Transport Infrastructure.

Site specific development principles as they relate to transport infrastructure have also been addressed as part of the conceptual masterplan and proposed development framework. The proposals would provide a suitable level of connectivity with the exiting settlement area, local facilities and the wider transport network and promote active travel modes.

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

The updated LDP Action Programme, is now supported by Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance. The LDP Action Programme and Supplementary Guidance coordinates development proposals with the infrastructure and services needed to support them.

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

The following developer contributions are applicable to HSG19 and will need to be included as part of any future S.75 legal agreement:-

#### Affordable Housing

The applicant is seeking planning permission for residential development. Should consent be granted a minimum 25% of these homes should be secured as approved affordable housing tenures through legal agreement. The applicant is in agreement with this requirement.



This aspect of the proposal would address the requirements of LDP Policy Hou 6, Affordable Housing.

### Education

The site falls within Sub-Area of the W1 Education Contribution Zone - this includes provision for both primary and secondary education:-

A new 21 class primary school and 120 space nursery identified for Maybury with safeguarded site identified at Turnhouse Road, this is located within the HSG19 allocation to the south west of the application site.

Requirement for a new Secondary School to mitigate the cumulative impact of development in west Edinburgh. A proposed facility for this has yet to be established.

To support the delivery of these the following contributions would be required:-

### Infrastructure

£3, 480 per flat  
£17,783 per house

All infrastructure contributions shall be index linked.

### Land

£760 per flat  
£3,930 per house

### Transport

Maybury/Barnton Transport Contribution Zone:-

This requires upgrades to Maybury junction (T17), Craigs Road junction (T18) and Barnton junction (T19) as per the LDP Action Programme, January 2018.

The application site represents 17.019% land area of the overall HSG19 allocation. Thereby the £2,867,219 contribution required by the LDP Action Programme and Supplementary Guidance would result in a proportional contribution of £487,972 for 250 units.

Contribution in respect of the redesign and construction of Maybury junction to facilitate improved cycling and walking throughout the junction - see estimated costs below.

## Maybury (HSG19) Transport Actions:-

Provision of Strategic Green Corridor with pedestrian/cycleway from Cammo Walk to Edinburgh Gateway to be formed as part of the new development layout, as it relates to the application site. It would also be desirable that a through link be secured from the application site to Turnhouse Road and Edinburgh Gateway through the adjacent parts of HSG19. A proportional contribution of 17.019% to be made by the applicant towards the cost of providing a pedestrian/cycle overbridge to Edinburgh Gateway to the south west of the site. The bridge to be provided in full by a third party or by CEC.

Requirement for the provision of various cycle paths to link the development to the wider area. Route to Gyle (600m) (and underpass of A8), A8 (300m) and to Gogar Link Road (500m). Route continues from completed underpass via shopping centre car park to shared use footway by tram stop. Total estimated cost is £480,200. Based on a proportional split of the overall HSG19 site area (17.019%) this would require a contribution of £81,725 for 250 units.

Contribute a sum towards the provision of a shared use cycleway or on-road segregated cycleway along Turnhouse Road (1.5 km length). Estimated total cost £517,000 (including design costs). Based on a proportional split of the overall HSG19 site area (17.019%) this would require a contribution of £88,872.

Contribution in respect of the redesign and construction of Maybury junction to facilitate improved cycling and walking throughout the junction. Total costs of £126,788. The proposed development of this site would require a contribution per dwelling of £86.31. On the basis of 250 units, this would equate to £21,577.

### Other Transport:

Contribute the sum of £2000 to progress a suitable order to introduce a lower speed limit along Turnhouse Road. Amount payable will be proportional based on overall HSG19 site area;

Contribute the sum of £2000 to progress a suitable order to re-determine sections of footway and carriageway as necessary for the development;

Contribute the sum of £2000 to progress a suitable order to introduce waiting and loading restrictions as necessary;

Contribute the sum of £2000 to promote a suitable order to introduce a 20mph speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council;

In support of the Council's LTS Cars 1 policy, the applicant should contribute the sum of £18,000 (£5,500 per vehicle + £1,500 per order) towards the provision of Car Club vehicles. Based upon 1 Car Club vehicle per 100 dwellings this would require 3 spaces for this site.

In addition to LDP Action Programme requirements, the requirement for a signalised pedestrian/cycle crossing on Maybury Road linking the south east corner of the site to routes beyond. This should be implemented as part of the development and installed prior to the occupation of the south eastern part of the site (Estimated costs - £50,000).

Total Transport contribution (based upon 250 units):- £756,146 (+ costs of contribution towards pedestrian/cycle bridge to Edinburgh Gateway).

### Edinburgh Tram

The application site is located within Tram Contribution Zone 3 as per the Council's Tram Line Developer Contributions report. This is based upon the shortest walking distance from the site to the tramline, via the proposed green corridor and footbridge to Edinburgh Gateway.

On the basis of 250 units, equating to an individual unit cost of £749, this would require a total contribution of £187,250.

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

### Healthcare

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

The Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance, identify the requirement for a new medical practice to mitigate the impact of new residential development in West Edinburgh, this potentially being co-located with the new Maybury Road Primary School, located to the south west of the application site.

Developers will be expected to contribute to the development of this facility. The proposed development of this site would require a contribution per dwelling of £1,050. On the basis of 250 units, this would equate to £262,500.

### Greenspace

Costs for the implementation of play spaces and equipment within the application site are to be borne by the developer.

DPEA Reporters have recently taken a decision (Appeal reference: PPA-230-2207) relating to the northern part of the application site and adjacent parts of HSG19 allocation lying to the west. The Reporters have queried the Council's approach in relation to some of the developer contributions set out in the Council's Draft Supplementary Guidance. The Council have now considered the Reporters decision and consider there is sufficient evidence to justify the approach taken in the Supplementary Guidance and LDP Action Programme.

Therefore it is considered the Draft Supplementary Guidance should continue to be given significant weight as a material consideration in the determination of this application.

In summary, the developer contributions as outlined above would meet the requirements of LDP Policy Del 1 - Developer Contributions and Infrastructure Delivery in that the proposals would contribute to infrastructure where relevant and necessary to mitigate any negative additional impact, either on an individual or cumulative basis and where commensurate to the scale of the proposed development.

The proposed contributions also address the requirements of the Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance and LDP Action Programme as they relate to the application site. The applicant has also indicated their willingness to comply with the provisions of the Draft Supplementary Guidance.

#### **e) Other matters**

##### Strategic Landscape Impacts

An updated Landscape Visual Impact Assessment (LVIA) has been prepared as part of the Addendum to the Environmental Statement.

The LVIA has included wire frame visualisations from a range of viewpoints around the site including Cammo Park Estate to the north, Craigs Road to the west and Turnhouse Road to the south west. More restricted, localised views have also been prepared to demonstrate the visual impact of development from Maybury Road as will be perceived from the north east and south east corners of the site. These have included the visual effect of the proposed development blocks (based on 2 and 3 storey building heights) and 3D landform profile - both on completion of development and that 15 years after completion of development, once landscaping has become established.

The LVIA has informed the Landscape Strategy for the development. This has identified that the proposed urban form would be set within new landscape structure including landscape buffers comprising screening to all the principal site edges. The proposed remodelling of site levels would effectively lower the higher parts of the site, thus reducing the visual impact of development to the Craigs Road ridge and making the existing slopes within the site less pronounced.

The Landscape Strategy has identified provision for a new woodland and grassland habitat (30m depth) adjoining Craigs Road along the northern edge of the site. This would enable a robust landscape edge to be established at the green belt boundary, thereby addressing requirements of the LDP Site Brief and LDP Policy Des 9 - Urban Edge Development, in that it will provide landscape improvements that will strengthen the green belt boundary and conserve and enhance the landscape setting and special character of the city.

The findings of the LVIA and proposed mitigation as outlined in the Landscape Strategy are considered satisfactory. The LVIA has concluded that there will be no significant adverse effects/impact over the period of construction for the development or the longer term. Although the visual effect of development will be pronounced immediately following completion, this will gradually reduce once landscape screening matures with the proposed landscape structure providing satisfactory mitigation.

The visual impact of the development as perceived from the west and south west, is likely to be significantly affected by the development of the western part of HSG19. It is recommended that landscape screening be implemented to the western edge of the site in order to soften the visual effect of development at the Craigs Road ridge and provide an interim level of screening.

The proposed landscape mitigation would minimise any adverse visual impact to the setting of the Cammo Park Designed Landscape situated to the north east of the site and address the requirements of LDP Policy Env 7 - Historic Gardens and Designed Landscapes.

It is recommended that detailed landscape proposals be secured through condition at AMC stage, these being in accordance with the Landscape Strategy approved as part of this permission.

### Air Quality

Issues relating to air quality and traffic generation have been highlighted in a significant number of representations, particularly the impact of development on the local road network and the proximity of the site to the Air Quality Management Area (AQMA) at St John's Road, Corstorphine. CEC Environmental Protection note that traffic generated by the development will add to the existing high traffic flows on Maybury Road, Glasgow Road and Queensferry Road.

An Air Quality Impact Assessment (AQIA) has been prepared by the applicant as part of the Environmental Statement, this being based on 250 units being developed within the application site.

The AQIA has considered the potential impacts of emissions of traffic generated by the proposed development once operational, the cumulative impact of emissions of traffic generated by the development and other planned development in the local area that is likely to impact on traffic flow on the same routes. It has also considered the potential impacts from construction activity at the proposed site and the presence of the composting site on Craigs Road, situated approximately 350 metres from the application site.

The AQIA has noted that a significant amount of development is already planned/committed in west Edinburgh and additional pressure will further increase pressure on the local road network. In terms of cumulative effects, it is noted that should the various committed developments within West Edinburgh, particularly the A8 corridor be fully developed out, this may adversely impact on other air quality receptor locations. It is also anticipated that air quality may be affected during the construction phase of the development by dust emission from earth moving and materials handling.

Environmental Protection has concluded that the proposed development on its own will not have an adverse impact on local air quality with any impacts being limited in nature. SEPA do not object to the development on air quality grounds, but strongly support good practice to reduce emissions and exposure.

Environmental Protection has noted that when the development is completed the primary impact on air quality will result from traffic emissions and the extent of that impact will be dependent on the travel behaviour of its resident population. However, the site is well-situated in relation to the existing transport network, with a series of pedestrian and cycle links in the surrounding area offering connections with the wider network. The site is also well served by public transport including local bus services, with both heavy rail and tram services at Edinburgh Gateway.

Environmental Protection also encourage the developer to work with the Council to produce an up-to-date Green Travel Plan which should incorporate the following measures to help mitigate traffic related air quality impacts;-

- Keep car parking levels to a minimum;
- Incorporate Car Club facilities (electric and/or low emission vehicles);
- Provision of rapid electric vehicle charging facilities including 7Kw chargers being installed for individual dwellings with a driveway or garage;
- Public transport incentives for residents; and
- Improved cycle/pedestrian facilities and links.

Given the proximity of air quality management areas, Environmental Protection recommend that electric vehicle charging points (7kw) are fully installed and operational prior to occupation, these serving 100% of the spaces. It is also recommended that low NOX boilers are installed to the residential properties.

Environmental Protection have also advised that informatives be applied in relation to construction mitigation. Matters relating to the composting site on Craigs Road are further considered in section 3.3 e) Amenity of neighbours and future residents.

It is considered that matters relating to air quality satisfactorily address requirements of LDP Policy Env 22 - Pollution and Air, Water and Soil Quality, in that there will be no significant effects for health, the environment and amenity with appropriate mitigation to minimise any adverse effects.

### Flooding and Drainage

LDP Policy Env 21 states that planning permission will not be granted for development that would increase flood risk or be at the risk of flooding itself. Edinburgh Design Guidance 2017 also sets out detailed requirements in respect of SUDS design.

The LDP Site Brief states that further investigation/consultation will be required to determine the nature of any flood risk on the site and whether further assessment and mitigation measures are required.

The applicant has submitted a Flood Risk Assessment and Surface Water Management Plan as part of the application.

The Surface Water Management Plan identifies the northern, western and southern parts of the site as comprising three catchment areas. SUDS would be achieved through the use of dry attenuation basins which would satisfy Airport requirements.

The Council's Flood Prevention Team has no objections to the proposals subject to conditions being applied in respect of hydraulic modelling (to address 30 year and 200 year plus climate change results), confirmation regarding adoption and maintenance of any surface water network including SUDS and connections to the combined network.

SEPA have remarked that there are no watercourses present on the site and any risk identified is from surface water flooding only. They have no objections to the proposal.

In summary, it is considered that, subject to conditions, that the proposals would address the requirements of LDP Policy Env 21 and Edinburgh Design Guidance, in that proposed SUDS arrangements are satisfactory and would not increase flood risk or result in the site being at risk of flooding itself.

The applicant has indicated that detail of SUDS arrangements are still subject to further design development and have yet to be finalised. In view of this, a surface water management plan and finalised SUDS arrangements would need to be confirmed at AMC stage. Finalised SUDS arrangements would also need to demonstrate compliance with the Edinburgh Design Guidance 2017, particularly that slope gradients to the attenuation basins should not exceed 1 in 6 or be fenced, with area designed to accommodate 1:30 and 1:200 year flooding events designed as parkland space and be easily maintainable by a private factor.

### Archaeology

The City Archaeological Officer has commented in relation to the revised Scheme 2 masterplan proposal and EIA Addendum which has considered built heritage issues.

The City Archaeological Officer has welcomed the proposed retention of the historic Georgian, West Craigs farmhouse. He has advised conditions regarding its retention, and detailed historic building survey is undertaken prior to and during any works. This is a higher requirement than outlined in the EIA which is considered inadequate. He has also recommended that a condition be attached requiring the conversion and rebuilding of the farmhouse's garden walls, which should endeavour to re-use rubble derived from the demolition of the farmsteading and existing boundary walls.

The City Archaeological Officer has noted the proposed demolition of the West Craigs farmsteading, this comprising a range of locally significant farm buildings, some of which may pre-date the construction of the farmhouse. However, given the state of repair of these historic buildings, it is noted that the preservation and re-use of these buildings is unfortunately not a viable option. Therefore, if consent is granted for their demolition, a detailed historic building survey (Level 3: internal and external elevations and plans, photographic, written survey and analysis) must be undertaken prior to and during the demolition of these buildings. This must be linked with an appropriate programme of archaeological works to deal with any underlying associated buried remains.

It is also proposed that the 19th Century, West Craigs Farm Cottage, at the entrance to West Craigs Farm from Craigs Road, would be demolished. The City Archaeological Officer has accepted this would be required to deliver the proposed development and has also requested that a level 3, detailed historic building survey be undertaken prior to and during demolition, as per that required for the farmsteading.

The City Archaeological Officer has also commented in relation to buried archaeology on the wider site. The proposed development will involve significant ground breaking works, these potentially having significant impact upon surviving archaeological remains, expected to range from 19th and 20th century farming through to prehistoric occupation. Given the potential for significant archaeological resources, it is essential that an archaeological mitigation strategy is undertaken prior to the submission of any detailed applications (AMSC/FUL), demolition or development. This will require a phased programme of archaeological investigation, the first phase of which will be the undertaking of an archaeological evaluation linked to a comprehensive metal detecting survey.

In summary, the proposed retention of the West Craigs farmhouse in an appropriate setting is welcomed. It will provide an acknowledgment of the history of the site, reinforce a sense of place within the development and addresses the requirements of LDP Policy Des 3, Development Design - Incorporating and Enhancing Existing and Potential Feature. Subject to conditions, requiring further archaeological survey and investigation be undertaken prior to submission of any detailed (AMC/FUL) applications, demolition or development, the proposals address the requirements LDP Policy Env 9 - Development of Sites of Archaeological Significance.

### Ecology and Protected Species

An assessment of Ecology and Nature Conservation has been undertaken as part of the Environmental Statement.

The Environmental Statement does not identify any significant ecological constraints to the development of this site with a low potential for protected species using the land.

However, the presence of badgers in the vicinity of the site has since been confirmed through the consultation process. The various buildings associated with the West Craigs farm and steading have also be identified as holding limited roosting potential for bats. Breeding birds have also been identified as being present on the site.

These matters would require further investigation and it is recommended that further ecological surveys are undertaken, prior to detailed design proposals being finalised and commencement of development works. Vegetation removal from the site should also occur outside the bird nesting season. It is also suggested that Swift bricks are implemented as part of the development, to enhance local biodiversity. These various matters can be highlighted through conditions and informatives as appropriate.

The proposal is considered to satisfy the requirements of LDP Policy Env 16 - Species Protection in so far as they are relevant to a Planning Permission in Principle and the current stage of design development.



## Trees

Tree cover within the application site is relatively limited. A strip of mature trees cover the rocky escarpment at the eastern boundary of the site with Maybury Road, with an area of woodland enclosing the West Craigs Industrial Estate to the south western boundaries of the application site. A Tree Survey and Arboricultural Implication Assessment has been submitted by the applicant in relation to these areas.

In addition there is also a hedgerow to the south of Craigs Road, two small clusters of planting including gorse to the southern part of the site and domestic tree planting associated with the two existing dwellings. These are not considered to be of significant arboricultural value, although it is recommended that a hedgerow to the south of Craigs Road is subject to tree survey prior to removal to ascertain the level of landscape mitigation.

The development of the site and proposed extensive re-grading will require the majority of trees and vegetation to be removed. However, the mature trees to Maybury Road are identified for retention, these providing landscape screening (as identified in the LVIA) to the eastern site boundary. In order to ensure these trees are protected during the construction works, it is recommended that a condition be applied to secure the necessary protection measures.

The proposal is considered to meet the requirements of LDP Policy Env 12 - Trees, in that, subject to conditions, the development would not have a damaging impact on trees or woodland worthy of retention. The proposed establishment of a new landscape structure for the site, as identified as part of the Landscape Strategy, would provide an appropriate level of tree replacement and mitigation.

## Airport Restrictions

Edinburgh Airport has been consulted in relation to the application given the site's proximity to the airport and flight paths. Edinburgh Airport has no aerodrome safeguarding objection to the proposal, subject to conditions being applied in relation to a height limitation of building to 75 metres AMSL, the submission of a Bird Hazard Management Plan, submission of a Landscaping Scheme and SUDS details and informatives relating to cranes and lighting.

## Amenity of Neighbours and Future Residents

This application is for Planning Permission in Principle only. The conceptual masterplan layout and development framework are not considered to present any particular issues in respect of neighbour amenity, with landscape buffers and adequate separation distances identified to those site edges which abut existing residential areas to the south and east. Detailed layout proposals would need to demonstrate compliance with LDP Policy Des 5, Development Design - Amenity, and relevant requirements of the Edinburgh Design Guidance both in relation to neighbouring properties and future residents of the development. These matters can be adequately addressed through condition and dealt with at AMC stage.

The former Braehead Quarry, which serves as a composting facility handling household and commercial waste, lies to the north west of the application site. The site is identified in the LDP as a safeguarded waste management facility (RS2).

Environmental Protection note that the Council has received odour complaints from existing residential properties which are located approximately 500 metres from the composting site boundary. The application site lies approximately 350 metres to the south east of this facility. However, this would be separated by the ridge to Craigs Road, and both existing and proposed landscaping. The separation between the composting site and application site should assist in protecting residents from odour nuisance during the normal operation of this site. Although a failure in the management of odour emissions from this site, combined with a north westerly wind could lead to an odour nuisance arising.

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

Environmental Protection has previously raised concerns regarding potential noise impacts from the neighbouring industrial estate and road noise from the A902, Maybury Road. In order to address these issues, a noise impact assessment detailing any mitigation measures will be required at AMC stage. Any noise attenuation measures along the eastern boundary with Maybury Road should be suitably integrated with the detailed landscape design proposals.

Environmental Protection has also noted that the site is outside the noise contours for the airport and therefore will not require this aspect to be further investigated.

Given the longstanding agricultural nature of the site there are no known sources of significant contamination. A Ground Investigation Report has been submitted by the applicant and this is currently being assessed by Environmental Protection. To address any issues relating to land contamination, Environmental Protection have requested that a condition be applied to ensure that any such issues that may be present are fully addressed.

Subject to further detailed assessment being undertaken in relation to noise and contaminated land with appropriate mitigation measures being identified, the proposal is considered to satisfy relevant LDP requirements, including LDP Policy Env 22 - Pollution and Air, Water and Soil Quality and LDP Policy Des 5, Development Design - Amenity, in so far as they are relevant to a Planning Permission in Principle and the current stage of design development.

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

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

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

The application was advertised on 6 December 2016, with a 28 day period for comments to take account of the accompanying Environmental Statement. In total 13 representations (13 objections) were received on Scheme 1 including Cramond and Barnton Community Council and a representation lodged on behalf of Edinburgh Airport.

The application was re-advertised for a further 28 day period on 9 March 2018 in order to allow for representations to be submitted on the EIA Addendum and applicant's revised masterplan. 20 representations (19 objections, 1 in support) were received in relation to Scheme 2.

### Scheme 2

#### Principle of development

- No requirement for additional housing in the city - proposal relates to an LDP allocated housing site.
- Additional housing should be focussed on prioritising the use of brownfield sites - proposal relates to an LDP allocated housing site.
- Do not object to housing in principle where there is a genuine requirement - addressed in 3.3 (a).

#### Traffic impacts

- Proposal and additional housing will generate traffic flow resulting in congestion and delays - particularly Maybury Road, Maybury, Gogar and Barnton junctions - addressed in 3.3 (c).
- Congestion is unpredictable in nature and often very busy outwith peak times - addressed in 3.3 (c).
- Traffic flow projections must take account of cumulative effect of other housing development in the area – addressed in 3.3 (c).
- Current road infrastructure and capacity in the vicinity of the site is not capable of sustaining additional volumes of traffic - proposals do not address poor road network around the site - addressed in 3.3 (c).
- Limited opportunities for walking, running and cycling in the area - addressed in 3.3 (c). Currently difficult to egress from West Craigs and East Craigs areas at peak times - addressed in 3.3 (c).
- Query as to whether existing 40mph speed limit on Maybury Road will be reduced to 30mph - speed limit would be reviewed as part of other transport interventions required to deliver the development.
- Pedestrian crossing to the south west corner of the site should be installed at an early stage of development as currently no safe crossing provision for pedestrians - addressed in 3.3 (c).
- Lack of detail regarding additional traffic impact to Turnhouse Road and Maybury junction. Concern regarding potential closure to general traffic and access for existing residents and businesses - addressed in 3.3 (c).
- Concern regarding impact of Airport freight traffic passing through the area - addressed in 3.3 (c).

- Limited parking in the areas - addressed in 3.3 (c).
- Lack of schools in proximity to the site will increase levels of car use and raise issues of child safety - addressed in 3.3 (c).
- Noise pollution arising from increased traffic - addressed in 3.3 (e).

#### Air Quality impacts

- Proposal will exacerbate air pollution (CO<sub>2</sub>) which are in breach of EU guidelines. Areas in locality of the site are some of the most polluted in the country with objectives for PM<sub>10</sub> and NO<sub>2</sub> are not being met - addressed in 3.3 (e).

#### Craigs Road/Maybury Road junction

- Proposed site access at Craigs Road/Maybury Road is inadequate and proposed signalised junction will result in more traffic congestion - Noted, addressed in 3.3 (c).
- Proposed junction layout and access to the site would make it difficult for vehicles to leave the estate - addressed in 3.3 (c).
- Query as to whether proposed Craigs Road/Maybury Road junction will include both left-hand and right-hand turning provision and through access to Craigs Road - addressed in 3.3 (c).
- Junction proposal could result in greater level of traffic, e.g. rat running into the Craigmount area, if through access permitted to Craigs Road (East) - addressed in 3.3 (c).
- Junction proposal should be delivered prior to commencement of development - addressed in 3.3 (c).
- Junction should be paid for in full by the developer and not as a contribution - contribution will be a proportional split with other developers as set out in 3.3 (d).
- Pedestrian crossings on Maybury Road should be re-designed as underpasses - not accepted, crossings should be at-grade with approach seeking to balance movement and place.

#### Local infrastructure

- Detrimental effect on Schools and no intent to provide additional infrastructure - addressed in 3.3 (d).
- Detrimental effect on primary health care providers, with local services currently overstretched - addressed in 3.3 (d).
- Query as to whether there will be developer contribution to Edinburgh Tram - addressed in 3.3 (d).

#### Design and character

- Proposed nature and type of housing will be out of character with the area - addressed in 3.3 (b).
- Landscape impacts and setting of the city - addressed in 3.3 (e).
- Impact to wildlife in the locality of the site - addressed in 3.3 (e).
- Loss of green space - addressed in 3.3 (b).

- Welcome buffer planting, but this should be established early and comprise semi-mature trees - addressed in 3.3 (c).
- Flats to the southern corner of the site should not exceed 3 storeys on the side closest to Maybury Road, with no line of sight to East Craigs Rigg - addressed in 3.3 (b and e).

### Procedure

- Reasons for previous refusal of application(s) have not been adequately addressed - this is a new application which must be determined in accordance with the current Development Plan.
- Query regarding neighbour notification - application notified to neighbours in accordance with Council procedures.

### Non-Material

- Proposal constitutes development in the Green Belt.
- Applicant has not kept local residents informed regarding this most recent planning application.
- Blocking of private views.
- Impacts during the construction process including noise and smell, construction traffic.
- Development will pose danger to domestic pets in the area.

### Corstorphine Community Council Comments

- Concerns previously expressed regarding traffic impacts arising from major housing development in western Edinburgh, particularly as they affect Maybury Road, Barnton and Maybury junctions - addressed in 3.3 (c).
- Severe problems evident regarding congestion and grid locking at peak hours - addressed in 3.3 (c).
- This proposal represents only a minor part of both committed and other proposals in the locality which could comprise 2320 units. There are also other applications in the wider area that will have an effect on traffic including southern phase of Edinburgh Park, extension to the Gyle Centre and the proposed Garden District - addressed in 3.3 (c).
- Note the proposed changes to the Maybury Road/Craigs Road junction including installation of pedestrian/cycle crossings but concern regarding traffic management impact on the eastern limb of Craigs Road, e.g. rat-running - addressed in 3.3 (c).
- Traffic modelling exercises do not adequately take into account the tendency to grid-lock at peak times. Proposed development will compound the existing bad situation - addressed in 3.3 (c).
- Note recent interest in air pollution problems and concern regarding air pollution problems at St Johns Road and Queensferry Road. Modelling exercise regarding the dispersion of fumes on Maybury Road made optimistic assumptions of a 10% reduction of a 10% reduction in car usage - addressed in 3.3 (e).

- Prediction exercises are notoriously optimistic as past experience has borne out, with large housing developments dependant on the economy but many local residents expect to experience increased traffic related problems - addressed in 3.3 (c).

### Scheme 1

Issues were raised in respect of the following:-

- Principle of Use;
- Transport Assessment including WETA Refresh Study;
- Air Quality;
- Craigs Road/Maybury Road junction;
- Suggested transport solutions;
- Infrastructure funding and timing;
- Density, design and layout;
- Daylighting, Sunlighting and Privacy;
- Landscape impacts;
- Flooding and drainage; and
- Sustainability.

### **Conclusion**

The principle of housing development is acceptable and in accordance with the Edinburgh Local Development Plan (LDP). A concept masterplan, development framework and landscape strategy illustrate how the proposed development would comply with the LDP Site Brief and Development Principles and form a suitable basis for detailed design proposals to be prepared at AMC or FUL application stage. Subject to identified transport interventions being delivered in relation to the development, the proposals offer an acceptable level of connectivity to the existing settlement area, public transport and local facilities.

Planning obligations, as defined through the LDP Action Programme, require contributions to be secured through a Section 75 agreement in respect of transport infrastructure, Edinburgh Tram, educational provision, affordable housing and healthcare.

There are no other material considerations that outweigh this conclusion.

It is therefore recommended that the application be granted, subject to the applicant entering into a suitable legal agreement.

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

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

## Conditions:-

1. No development shall be undertaken on the site and no applications for the approval of matters specified in conditions (AMC) shall be submitted (as required by condition 05 below), until such time as a detailed masterplan and site layout for the entire application site has been submitted to and approved in writing by the Planning Authority.
2. The masterplan and site layout requirement, in condition 01 above, shall include all development plots, shall be developed substantially in accordance with the approved Development Framework Plan, Landscape Strategy and Environmental Statement. The applicant should also engage with any masterplan exercise being progressed by other parties for the wider HSG 19 allocated site (as set out in the Edinburgh Local Development Plan) so as to ensure an effective interface of this site masterplan with adjacent development(s) to the west and south west of this application site.

The masterplan and site layout must be accompanied by the following supporting information, as further outlined in the Approval of Matters condition 05 below:-

- (i) Details of site remodelling and confirmation of site levels, existing and proposed. Site levels must not exceed levels identified in the LVIA contained within the Environmental Statement;
- (ii) A site drainage strategy, surface water management plan and Sustainable Urban Drainage Systems (SUDS) all designed in accordance with the Council's Edinburgh Design Guidance standards. This must include hydraulic modelling and plans of all integrated SUDS elements for flood events of 1:30 plus climate change and strategic location of the Flood Landscape Areas (area between 1:30 plus climate change to the 1:200 plus climate change events). These areas to be below ground solutions with SUDS attenuation features detailed to form part of a parkland setting;
- (iii) Detailed landscape proposals for the entire site including all structural landscaping, public open space and streets, these being developed to be substantially in accordance with the approved Landscape Strategy;
- (iv) Finalised design proposals for the upgrading of the Craigs Road/Maybury Road junction, these developed generally in accordance with the principles identified in the approved indicative layout design. This approach to be agreed by the Council in its capacities as both Roads and Planning Authority;
- (v) Details of site access arrangements from Craigs Road, these fully integrated with finalised design proposals for the upgrading of the Craigs Road/Maybury Road junction, as above;
- (vi) A full Noise Impact Assessment to protect residential properties from noise generated by the A902 Maybury Road to the east and industrial estate premises to the south west, and details implementing the required mitigation integrated;
- (vii) Archaeological mitigation strategy including a phased programme of archaeological investigation, the first phase of which will be undertaking of archaeological evaluation;
- (viii) Site investigation/decontamination arrangements;
- (ix) Protected species survey work to demonstrate any use of the site by bats and badgers;

- (x) A full survey of the trees and hedgerows in that part of the site immediately to the south of Craigs Road; and
- (xi) Site clearance plan including removal of all structures, trees, hedgerows and boundary treatments.

3. The masterplan and site layout requirement, in condition 01 above, shall be accompanied by a phasing framework plan for the entire application site which shall include a plan identifying individual phases of development. Thereafter, reference to phases in subsequent conditions relates to the identified phases within the agreed phasing framework plan.

The phasing framework plan shall include the following items and the timing of their delivery for each sub-site:

- (i) the location of development phases;
- (ii) the minimum and maximum number of residential units;
- (iii) strategic landscaping and open space, play provision, woodland management, and SUDS; and
- (iv) pedestrian, cycle and vehicular links;

Thereafter, the delivery of individual plots and phases will be carried out in accordance with the approved phasing framework plan.

Subsequent AMC applications for each phase of the development shall be accompanied by the following supporting information:

- (v) an updated phasing plan;
- (vi) a Design and Access statement, detailing the layout, streets and spaces, accessibility, safety and security, sustainability and energy efficiency;
- (vii) details of management and maintenance of the landscaping, allotments, SUDS and open space; and
- viii) surface water management strategy.

4. The masterplan and site layout submission, required by condition 01 above, shall also include for the retention and re-modelling of West Craigs farmhouse within the overall development of the site as a whole.
5. Before any work on a sub-site is commenced, details of the undernoted matters shall be submitted to and approved in writing by the Planning Authority in a single package of information for the relevant sub-sites, in accordance with the approved plans for this planning permission in principle; the submission shall be in the form of a fully detailed layout and shall include detailed plans, sections and elevations of the buildings and all other structures, and in full accordance with the agreed masterplan and site layout, and phasing framework plan in accordance with conditions 01-04 above.

#### **Approval of Matters:**

- (a) residential unit numbers on the whole site of no less than 225 units and no more than 250 units;



- (b) Design Statement to address vision and design identity for the development, this to include a site design code and strategy for material finishes;
- (c) details of the siting, design of all buildings, structures and individual plots including design of all external features and glazing specifications (including acoustic capabilities);
- (d) heights of all buildings and structures (heights to be shown in relation to AOD including finished floor levels, eaves and ridges) these to be compliant with the airport requirements and not exceed 75 metres AOD. The development layout in the vicinity of the West Craigs farmhouse shall substantially reflect the spatial characteristics of the former steading buildings and shall not exceed 1.5 storeys in height;
- (e) site remodelling and confirmation of site levels, existing and proposed. Site levels must not exceed the levels identified in the LVIA contained in the Environmental Statement;
- (f) design and configuration of public and open spaces, all external materials and finishes, and details of the play equipment;
- (g) details of the vehicular access arrangements including access from Craigs Road and the widening of Craigs Road within the extents of the red line boundary of this application site;
- (h) plans detailing finalised layout of all roads, streets, footpaths and cycle routes, multi-use surfaces including the primary route linking Cammo Walk with Turnhouse Road and Edinburgh Gateway. This must also include signage of pedestrian and cycle access links and lighting details:
- (i) car 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, in full cognisance of the principles contained in the Scottish Government's Designing Streets Policy and the Council's Edinburgh Street Design Guidance. Parking provision within the development will not exceed requirements of Council's parking standards, Zone 3;
- (j) waste management and recycling facilities;
- (k) a site drainage strategy, surface water management plan and Sustainable Urban Drainage Systems (SUDS) all designed in accordance with the Council's Edinburgh Design Guidance standards. All SUDS must comply with Advice Note 6 'Potential hazards from Sustainable Urban Drainage Schemes'. The submitted plan shall include details of
- Attenuation times,
  - Profiles & dimensions of water bodies,
  - Details of marginal planting,
- Confirmation regarding adoption and maintenance of the surface water network including SUDS and the combined network;
- (l) site investigation/decontamination arrangements;
- (m) Protected Species Survey work of the use of the site by bats and badgers;
- (n) undertake a full Noise Impact Assessment to protect residential properties from noise generated by the A902 Maybury Road to the east and the industrial estate premises to the south of the site, and details implementing the required mitigation integrated with the detailed landscape proposals at (o) below;
- (o) full details of sustainability measures in accordance with the Edinburgh Design Guidance;

(p) All of the trees along the eastern boundary of the development site with Maybury Road (as per 'Tree Survey and Arboricultural Implication Assessment, April 2018') shall be protected at all times during the construction period by the erection of fencing, in accordance with clause 2 of BS 5837:2012 "Trees in relation to design, demolition and construction".

(q) 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. This shall include full details of the proposed northern woodland buffer area;

(iv) a schedule of plants to comprise species, plant size and proposed number/density;

(v) programme of completion and subsequent maintenance, including a separate landscape maintenance plan for the SUDS areas;

(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.

6. No development shall take place on site until a detailed scheme for the widening of that part of Craigs Road forming part of the site, to provide a 7.3 metre wide carriageway with a 2 metre wide verge on its northern side and a 4 metre wide combined footway/cycleway on its southern side within the existing road and application site boundary, has been submitted to and approved in writing by the Planning Authority. That approved scheme shall thereafter be formed laid out and constructed and be available for use prior to the completion of the first phase of any part of the development within the application site, at no cost to the Council.
7. No development shall take place on that phase of the overall site that incorporates West Craigs Farmhouse until a scheme for its restoration and rehabilitation has first been submitted to and approved by the Planning Authority.

Thereafter, those works shall have been completed prior to the first occupation of the last new residential property, within that phase of the site within which West Craigs Farmhouse sits, hereby granted planning permission.

8. No demolition or other means of development shall take place on each phase of the site until the applicant has secured the implementation of a programme of archaeological work (historic building recording, excavation, analysis, reporting, publication, preservation, public engagement) in accordance the approved written scheme of investigation, this being submitted to and approved by the Planning Authority.

9. No development shall take place on site until an updated Extended Phase 1 Habitat Survey has been undertaken. No development shall take place on each phase of the development until an updated Extended Phase 1 Habitat Survey for that phase has been undertaken and the findings incorporated into a detailed Landscape and Habitat Management Plan (LHMP) for that phase of the application site which shall be submitted to and approved in writing by the Planning Authority. Thereafter, those measures identified in the approved LHMP shall be implemented in full as part of the development of the relevant phase of the site.
10. Prior to the commencement of construction works on site:
- (a) a site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Planning Authority, 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) a where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- Any required remedial and/or protective measures shall be implemented, within their respective phase of the overall development, in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Planning Authority.
11. At least two months prior to the commencement of any works within a phase of the site, a phase specific CEMP must be submitted for that sub-site for the written approval of the Planning Authority and all work shall be carried out in accordance with the approved plan include the following provisions:
- (i) risk assessment of potentially damaging construction activities;
  - (ii) identification of "biodiversity protection Zone";
  - (iii) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
  - (iv) the location and timing of sensitive works to avoid harm to biodiversity features;
  - (v) the times during construction when specialist ecologists needs to be present on site to oversee works;
  - (vi) responsible persons and lines of communication;
  - (vii) the role and responsibilities on site of an Ecological Clerk of Works (ECoW) or similarly competent person; and
  - (viii) use of protective fences, exclusion barriers and warning signs.

Thereafter, all works carried out on the relative site or sub-site must be carried out in full accordance with the approved specific construction environmental management plan.

12. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority. The submitted plan shall include details of:
- (i) monitoring of any standing water within the site temporary or permanent;

- (ii) sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage schemes (SUDS) (available at <http://www.aoa.org.uk/policy-safeguarding.htm>);
- (iii) management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design';
- (iv) reinstatement of grass areas;
- (v) maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow;
- (vi) which waste materials can be brought on to the site/what if any exceptions, e.g. green waste;
- (vii) monitoring of waste imports (although this may be covered by the site licence);
- (viii) physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste; and
- (ix) signs deterring people from feeding the birds.

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

13. No building or structure erected within the development site shall exceed the heights specified in the 'Edinburgh Airport - Anticipated Maximum Ridge Heights' document, October 2014, as set out in the Edinburgh Airport consultation letter dated 7 December 2016 (Edinburgh Airport Ref: EDI2609).
14. 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 SUDS - Such schemes must comply with Advice Note 6 'Potential Bird Hazards from Sustainable urban Drainage Schemes (SUDS) (available at: <http://www.aoa.org.uk/policy-safeguarding.htm>); and  
(vi) others that the applicant or the Authority may specify and having regard to Advice Note 3: Potential Bird Hazards from Amenity Landscaping and Building Design and Note 6 on SUDS].

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

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

**Reasons:-**

1. In order to secure an integrated layout and satisfactory urban design for the site as a whole, restrict the quantum of development to that appropriate to the site characteristics and to that assessed by the associated Environmental Statement.
2. In order to secure an integrated layout and satisfactory urban design for the site as a whole, restrict the quantum of development to that appropriate to the site characteristics and to that assessed by the associated Environmental Statement.
3. To ensure the site is designed, developed and delivered cohesively.
4. In order to ensure the retention of this property and the contribution that it makes to the historic character of this part of the site.
5. 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.
6. To ensure an appropriate means of vehicular access between the site and the surrounding public road network to a standard that would accommodate the traffic generated by that development and existing traffic levels.
7. In order to ensure the retention of the property and promote its rehabilitation as a residential property.
8. In order to safeguard the interests of archaeological heritage.

9. Since the original ecological issues were first addressed those provisions have and overtime will become out dated. Prior to the commencement of development on the site there is a requirement to reappraise those findings to ensure an up to date LHMP.
10. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
11. To control pollution of air, land and water.
12. 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.
13. Development exceeding these heights would penetrate the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger aircraft movements and the safe operation of the aerodrome.
14. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the application site.
15. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)' (available at: <http://www.aoa.org.uk/operations-safety/>).

## **Informatives**

It should be noted that:

1. 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. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
4. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation all of those matters identified in the proposed Heads of Terms.

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

5. Charging outlet (wall or ground mounted) should be of the following minimum standard:

Type 2 (EN62196-2), Mode 3 (EN61851-1) compliant and be twin outlet. With the ability to supply 22kW (32 Amps) AC - Three Phase power and have the ability to be de rated to supply 11kW to each outlet when both are in use. Where this is not possible then 7kW (32 Amps) AC - Single Phase chargers that have the ability to deliver power of 7kW capacity to each outlet simultaneously.

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

Bedrooms - 30dB LAeq, T and 45dB LAfmax, and  
Living Rooms - 35dB LAeq, D

Where;

T = Night-time 8 hours between 23:00 - 07:00 hours, and

D = Daytime 16 hours between 07:00 - 23:00 hours

7. The following mitigation measures shall be included during each construction phase:

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

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

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

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

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

- f) Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.
- g) This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.
- h) No bonfires shall be permitted.
8. 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/>).
9. 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.
10. In regards to planning condition 12, 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.
11. The incorporation of swift nesting sites/swift bricks into the scheme is recommended. Further details on swift bricks can be found at: [www.edinburgh.gov.uk/biodiversity](http://www.edinburgh.gov.uk/biodiversity)
12. The applicant or his client to submit a Green Travel Plan to the Council's Transport Section prior to the first occupation of any property on the site.
13. **Heads of Terms**

**Limitation on development to the north of Craigs Road**

That area defined within the red line boundary of the application site to the north of Craigs Road shall not be developed in any way whatsoever other than specific development directly relating to, or forming a part of, the alteration and improvements to the junction of Craigs Road with Maybury Road, and only then following the submission of full details of those works to, and having obtained written permission from, the Planning Authority.



### **Affordable Housing**

25% of all residential units constructed across the entire site to be 'affordable housing' in accordance with the Council's 'Edinburgh Local Development Plan' and Housing policy. Those affordable houses should be completed and be capable of occupation prior to the completion of 66% of the total residential properties granted for the entire site. The legal agreement would be required to contain the full affordable housing provisions so that the Council's affordable housing policy is imposed on all future developers of the site and its various phases.

The commencement date shall not occur until the Applicant has agreed with the Council the following details in writing:—

- (a) the type of affordable housing tenure(s) for the affordable housing units;
- (b) the location(s) of the affordable housing subjects, if not already agreed between the Council and the proprietors;
- (c) the design standards to which the affordable housing units are to be built, which standards shall be agreed with the Council's Housing Regeneration section and shall not be deemed to have been agreed by virtue of the grant of planning permission or any other approval granted by the Council;
- (d) the type of affordable housing contracts by which the affordable housing units are to be leased, sold or otherwise made available to persons in housing need whether by transfer or land or completed units to the Council, to a registered social landlord or otherwise;
- (e) all of those affordable housing units shall have been constructed and capable of occupation prior to completion of 66% of the open market housing units within the whole site or the sub-site, subject to the choice made at 1 above.

### **Educational contributions**

Per unit infrastructure contribution requirement of:

- per Flat - £3,480
- per House - £17,783
- NB/. - 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 - £760
- per House - £3,930
- NB/. - no indexation to be applied to land contribution.

### **Tram Contribution**

Tram contribution (residential only (zone 3)):

Total contribution of £187,286 (based on a proposal of 250 residential units), equating to an individual unit cost of £749.14.

- (i) The planning obligation should be concluded using the agreed individual unit cost.

(ii) The Tram contribution shall then be calculated for each phase of the development; indexed linked (BCIS) from the date of the conclusion of the agreement, multiplied by the number of residential units within the phase and should then be paid; either in full prior to the commencement of that phase, or in two parts 50% prior to the commencement of development and 50% prior to the completion of the house equal to 50% of the number of dwellings within that phase.

(iii) The Council shall then utilise the Tram contribution towards the Tram Project.

### **Maybury/Barnton Transport contribution zone**

Taylor Wimpey Limited site area of 12.60 hectares is therefore 17.019% of the overall Edinburgh Local Development Plan HSG 19 allocation.

Thereby the £2,867,219 contribution required by and identified in the Supplementary Guidance would result in a proportionate contribution for this site of £487,972 for 250 units.

(i) The precise contribution should be further calculated on a per dwelling basis of £1,951.89.

(ii) The Maybury/Barnton Transport contribution shall then be calculated for each phase of the development; indexed linked (BCIS) from the date of the conclusion of the agreement, multiplied by the number of residential units within the phase and should then be paid; either in full prior to the commencement of that phase, or in two parts 50% prior to the commencement of development and 50% prior to the completion of the house equal to 50% of the number of dwellings within that phase.

(iii) The Council shall then utilise the Maybury/Barnton Transport contribution towards the defined works and repay any unused part within ten years of the date of receipt of the last payment made from this development.

Additional contribution in respect of the redesign and construction of Maybury Junction to facilitate improved cycling and walking throughout the junction with a total cost of £126,788. The proposed development of this site would require a contribution per dwelling of £86.31. On the basis of 250 units, this would equate to £21,577.

### **Railway bridge link to the south**

The developer will pay 17.019% of the total cost of providing the footbridge over the railway line to the south west of the site. That bridge to be either provided in full by a third party or by City of Edinburgh Council.

### **Cycle and Pedestrian links to the south**

Requirement for the provision of various cycle paths to link the development to the wider area. These are: Cycle paths to Gyle (600 metres) (and underpass of A8), A8 (300 metres) and to Gogar Link Road (500 metres). Route continues from completed underpass (led by Network Rail) via the shopping centre car park, to shared use footway by tram stop. Determine whether it is possible to take away the row of parking around periphery (or change to parallel parking), to make room for segregated cycle lane. Make underpass shared use Cycle path to Gogar Link Road - north of station. Plotted provisionally.

The contribution costs linked directly to the Edinburgh Local Development Plan allocation HSG 19 is £480,200 and therefore the proportion required (at 17.019%) for this development is £81,725.24 with a per dwelling payment of £326.90 based on 250 units.

### **Shared use cycleway along Turnhouse Road contribution**

Contribute a sum towards the provision of a shared use cycleway or on-road cycleway along Turnhouse Road (1.5 kilometres in length). The contribution costs linked directly to the Edinburgh Local Development Plan allocation HSG 19 is £517,000 and therefore the proportion required (at 17.019%) for this development is £87,988.23 with a per dwelling payment of £351.95 based on 250 units.

### **Car Club contribution**

The Car Club contribution and number of spaces required within the development site shall be provided on a phase by phase basis across the development site.

(i) This requires one vehicle to be provided for a development of up to 100 dwellings, and two vehicles for up to 200 dwellings, and so on for each phase of development.

(ii) The contribution would be for £5,500 per vehicle required plus £1,500 per order both figures index linked to the date of conclusion of the agreement.

(iii) Those contributions should be paid prior to the commencement of development on the respective phase of development.

(iv) The Council shall utilise the Car Club contribution towards a Car Club to fund the provision of a Car Club vehicle(s) to be located within the development, including the provision of suitably delineated on-street parking spaces and associated costs.

(v) In the event of the Car Club contribution not being utilised in full by the Council within ten years of the date of receipt of the last payment by the Council, then such contribution or the unused part thereof, as appropriate, together with any interest that has accrued thereon, shall be refunded to the Proprietors.

### **Traffic Regulation Orders contributions**

There would be a number of Traffic Regulation Orders (TRO) required in terms of; introducing loading and waiting restrictions, the re-determination of a road, the installation of a traffic management system, and/or speed reduction orders and stopping-up orders. These would need to be identified at the AMC application stage and the financial contribution for each of these is £2,000.

(i) The development shall not commence for each phase of development until the TRO Contribution(s) have been paid.

(ii) The TRO contributions shall be applied by the Council towards the promotion of a TRO for the purpose of any of the following; introducing loading and waiting restrictions, the re-determination of a road, the installation of a traffic management system, and/or speed reduction orders and stopping-up orders.

(iii) In the event of the TRO contributions not being utilised in full by the Council within ten years of the date of receipt of the last payment then such contribution, or the unused part, together with any interest, shall be refunded to the proprietors.

### **Toucan pedestrian crossing on Maybury Road**

A 'Toucan' signalised pedestrian crossing shall be installed by the applicant on Maybury Road at a location concurrent with and immediately to the south east corner of the site, at no expense to the Council.

- (i) Details of the design and specification of the crossing shall be submitted to and agreed by the Council within 6 months from the submission of the first AMC application to the Council as the Planning Authority; and
- (ii) Thereafter, the agreed crossing scheme shall be carried out, completed in full and be available for use prior to the first occupation of any residential dwelling on any part of the overall development site.

### **Healthcare Contribution**

A Healthcare contribution per dwelling of £1,050 is required; that is equivalent to a total of £262,500 for a development of 250 units.

- (i) The cost per dwelling contribution shall be; indexed linked (BCIS) from the date of the conclusion of the agreement, multiplied by the number of residential units within the phase and should then be paid; either in full prior to the commencement of that phase, or in two parts: 50% prior to the commencement of development and 50% prior to the completion of the dwelling equivalent to 50% of the number of dwellings within that phase.
- (ii) The Council shall utilise the healthcare infrastructure contribution towards the provision of healthcare infrastructure improvements, that are identified as actions in the Council's Action Programme within the Health Care Contribution Zone, located to the North and East of the Development.
- (iii) The Council may transfer the healthcare infrastructure contribution to the Health Board(s) responsible for where the healthcare infrastructure improvements are to be made who shall then apply the healthcare infrastructure contribution in accordance with 5 on the healthcare infrastructure improvements identified by the Council.
- (iv) In the event of the Healthcare contribution not being utilised in full by the Council within ten years of the date of receipt of the last payment by the Council, then such contribution or the unused part thereof, as appropriate, together with any interest that has accrued thereon, shall be refunded to the Proprietors.

### **Landscape with the boundary of future public roads**

Landscape trees and shrubs to be adopted by the City of Edinburgh Council within the boundaries of any future public road are to be clearly identified on separate landscape plans. Those trees and shrubs to be adopted shall be checked by the developer's chartered Landscape Architect at the following stages:

- (i) Tree and plant material delivery on site and storage conditions;
- (ii) Inspection of tree pit construction;
- (iii) Topsoil inspection of all planting areas;
- (iv) Inspection of planted tree with watering facility; and
- (v) The Landscape Architect to be present at the handover meeting with the Council Team that will be responsible for the future maintenance.

At each stage there shall be a letter signed by the landscape architect to be sent to the Planning Authority certifying that the works on site accord with the planning requirements.

### **Strategic Green Corridor provision**

Detailed provision of a 'Strategic Green Corridor' incorporating the necessary pedestrian and cycle access shall be formed as part of the overall site layout of the development of the site in accordance with the approved details forming part of the Planning Permission in Principle and as set out in full in the subsequent AMC applications. That corridor shall extend to the south-western boundary of the site in such a manner so as to link through to the adjoining development site such that the corridor formed is continuous and the pedestrian and cycle access is available from this site to that neighbouring development and vis-a-versa.

### **Open space and play provision and maintenance**

Detailed provision shall be made for all open space identified within the development site, in the terms agreed as part of the AMC applications submitted in accordance with condition 05, to be maintained in a suitable manner and so as to be available for public access at all times.

Within those open space areas there shall be four locations to be equipped to provide play areas, as follows:

- (i) two as Local Areas for Play (LAP), one each within the north-western and the south-western parts of the site;
- (ii) one as a Locally Equipped Area for Play (LEAP); and
- (iii) one as a Multi-Use Games Area (MUGA) to be delivered within the vicinity of the proposed green corridor/linear park;
- (iv) all to be in locations to be first agreed with the Planning Authority as part of the submission of the first AMC application;
- (v) the details of the proposed equipped areas shall be submitted to and approved by the Planning Authority prior to the occupation of the first dwelling unit on the whole site;
- (vi) the costs of implementation of the equipped play areas are to be met in full by the developer; and
- (vii) details of the future maintenance of those sites are to be undertaken in accordance with a scheme which shall first be submitted to and agreed by the Planning Authority.

All equipped play areas shall be formed, laid out and constructed and be available for use prior to the occupation of the 200th dwelling unit on the whole site.

## **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:**

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

## **Sustainability impact**

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

This application is not subject to 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 (13/05073/PAN) was submitted to City of Edinburgh Council on 10 December 2013. The development description outlined proposed residential development with associated access, landscaping and open space. The PAN considered by the Council's Development Management Sub-Committee on 12 March 2014. The Committee noted the key issues at this stage in the process.

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

#### Community Councils:

- Corstorphine Community Council

#### Neighbourhood Partnerships:

- Western Edinburgh Neighbourhood Partnership

#### Ward Councillors:

- Drumbrae Ward/Gyle Councillors

## Public Exhibition

The Proposal of Application Notice (reference 13/05073/PAN) refers to a notice in the Edinburgh Evening News on 13 February 2014 advertising two public exhibitions to be held on 20 and 22 February 2014. There was a further unmanned exhibition in the Drumbrae Library from 24 February to 1 March 2014. Leaflets advertising the exhibitions were sent out to residential areas to the south and east of the site, along with invitations to view the proposals, which were also sent to the neighbours of the site, the Cockburn Association and Edinburgh and Lothians Greenspace Trust. The results of the community consultation were submitted with the application as part of the Report on Community Consultation.

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

The application was advertised on 6 December 2016, with a 28 day period for comments to take account of the accompanying Environmental Statement. In total 13 representations (13 objections) were received on Scheme 1 including Cramond and Barnton Community Council and a representation lodged on behalf of Edinburgh Airport.

The application was re-advertised for a further 28 day period on 9 March 2018 in order to allow for representations to be submitted on the EIA Addendum and applicant's revised masterplan. 20 representations (19 objections, 1 in support) were received in relation to Scheme 2.

The matters raised in representations are considered in the Assessment section 3.3.

Corstorphine Community Council provided comments in relation to Scheme 2. These are included in Appendix 1, Consultations.

### **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 forms part of Housing Proposal HSG19 in the adopted Edinburgh Local Development Plan 2016.

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

Draft Supplementary Guidance: Developer Contributions and Infrastructure Delivery, approved for consultation, 18 January 2018.

Edinburgh Local Development Plan Action Programme, approved 18 January 2018.

Edinburgh Design Guidance 2017

Edinburgh Street Design Guidance 2015

Open Space 2021, Edinburgh's Open Space Strategy 2016

Scottish Government, Designing Streets 2010

**Date registered** 18 November 2016

**Drawing numbers/Scheme** 01, 03-08,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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.

**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.

Draft Developer Contributions and Infrastructure Delivery SG sets out the approach to infrastructure provision and improvements associated with development.

# Appendix 1

## **Application for Planning Permission in Principle 16/05681/PPP**

### **At Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh Residential development with associated transport infrastructure, landscaping and open space (scheme 2)**

#### **Consultations**

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##### **Archaeology**

*The site is centred the historic West Craigs Farm located on the Craigs ridge overlooking Edinburgh Airport and former RAF base of Turnhouse to the SW. The origins of the farm date back to the 15th/16th centuries, though earlier medieval occupation is thought possible. The site contains a range of important rural historic buildings dating back to the late-18th / early- 19th century including West Craigs Farm House, West Craigs Steading and West Craigs Farm Cottages. Archaeological evidence from the surrounding area also suggests that the site has significant potential for containing archaeological evidence dating back to early prehistory.*

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

##### *Historic Buildings*

###### *West Craigs Farmhouse Steading*

*Although unlisted West Craig Farm in my opinion considered to be an important local survival of a Georgian Farmhouse dating from the period of Agricultural Improvement starting in the late 18th century. Although undoubtedly 'altered' from its original date of construction (I would like to know what 200-year-old building isn't) this in my opinion does not distract from its local archaeological and historic significance. Indeed, given the age of this building combined with the historic evidence suggesting that this is the last of a series of farm buildings going back to perhaps the turn of the 16th century (S Harris, Place Names of Edinburgh).*

*In my opinion the potential loss of West Craig Farmhouse would be considered as having a significant adverse archaeological impact and one that is contra to planning policies ENV8b & ENV9.*

### *West Craigs Farm Cottages*

*The 19th century cottage situated on the entrance to West Craigs Farm from Craigs Road is clearly depicted on the 1st Edition OS map Although not designated this historic farm worker's cottage associated with West Craigs Farm is in my opinion of local historic/archaeological significance.*

*Accordingly, it is recommended that this building is retained as its loss would be considered as having a significant adverse archaeological impact and contra to Policy ENV8b & ENV9.*

*It is strongly felt that the retention of these buildings will significantly contribute to the design of the new scheme and be in line with earlier CEC design briefs for the area and also Scottish Government and CEC Design Guidance and Place Making Agendas. Their retention and reuse will also tie into the requirements on the neighbouring and associated development site centred upon Meadowfield Farm West Craigs, where the historic significance of similar contemporary buildings has been recognised as contributing significantly to emerging design.*

*As such it is recommended that this application is refused consent.*

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

### *Buried Archaeology*

*The proposals will require significant ground breaking works in regards to the construction of the various phases of development. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 19th/20th century farming activity through to prehistoric sites.*

*Given the potential for significant archaeological resources to occur across the proposed area, it is essential that if consent is granted for this scheme that an archaeological mitigation strategy is undertaken prior to submission of any further detailed (FUL/AMC) applications, demolition or development. In essence this strategy will require the undertaking of phased programme of archaeological investigation, the first phase of which will be the undertaking of archaeological evaluation (min 10%) linked to comprehensive metal detecting survey & field walking.*

*The results from this initial phase of work will allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains during each phase of development.*

## *Public Engagement*

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

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

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

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

## **Archaeology further comment**

*I would like to make the following comments and recommendations in respect to the revised concept Masterplan, EIS, Design & Access Statement Addendum and Access, Movement & Circulation information submitted in response to this application for proposed residential development with associated transport infrastructure, landscaping and open space.*

*As stated in my earlier 2017 response, this site is centred the historic West Craigs Farm located on the Craigs ridge overlooking Edinburgh Airport and former RAF base of Turnhouse to the SW. The origins of the farm date back to the 15th/16th centuries, though earlier medieval occupation is thought possible. The site contains a range of important rural historic buildings dating back to the 18th and 19th centuries including West Craigs Farm House, West Craigs Steading and West Craigs Farm Cottages. Archaeological evidence from the surrounding area also suggests that the site also has significant potential for containing archaeological evidence dating back to early prehistory.*

*As such the site has been identified as containing occurring within and area being of archaeological and historic significance both in terms of buried archaeology and surviving rural farm buildings and cottages. Accordingly, this application must be considered under terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP) and Historic Environment Scotland Policy Statement (HESPS) 2016 and also CEC's Edinburgh Local Development Plan (2016) Policies DES 3, 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 Buildings*

#### *West Craigs Farmhouse Steading*

*It is welcomed that the proposed new masterplan has taken on board our objections regarding the loss of this locally important historic Georgian Farmhouse and that this building will now be retained along with its gardens. It is recommended therefore that a condition is attached to this PPP application that will see its retention as outlined in the revised indicative masterplan and associated documents.*

*In addition as part of any future conversion/redevelopment of this building it is essential that a Detailed historic building survey (internal and external elevations and plans, photographic and written survey and analysis) is undertaken prior to and during any works. West Craigs Farmhouse Steading This is a higher requirement that outlined in Turley's EIS (section 11.55) which is considered inadequate. This programme of HBR will be linked with an appropriate programme of archaeological works to deal with any associated buried remains (both internal and external).*

*Furthermore it is also recommended that a condition should also be attached requiring the conservation and rebuilding of the farmhouses garden walls. This should endeavour to reuse rubble derived from the demolition of the farms steading.*

#### *West Craigs Farm Cottages*

*The proposed revised scheme will require the demolition of the 19th century cottage situated on the entrance to West Craigs Farm from Craigs Road. As stated in my original 2017 response I regard this historic farm worker's cottage as being of local historic/archaeological significance. Accordingly it is demolition would be considered as having a significant adverse archaeological impact and potentially contra to Policy ENV8b & ENV9.*

*Having assessed the submitted revised documents it is clear that the applicants have considered carefully its retention as part of the new masterplan. However its will with reluctance that I concur that to successfully deliver the proposed development that this building will required to be lost. However it is essential to mitigate against this loss and that a permanent record of this historic building is undertaken. This will require the undertaking of a detailed historic building survey (level 3: internal and external elevations and plans, photographic and written survey and analysis) prior to and during demolition. This will also be linked with an appropriate programme of archaeological works to deal with any associated buried remains.*

## *West Craigs Farmhouse Steading*

*As stated earlier the Steading attached to West Craigs Farm comprises a range of locally significant farm buildings some of which may pre-date the construction of the Georgian Farmhouse. However given the state of repair of these historic buildings preservation and reuse is unfortunately not a viable option. Therefore it is essential that if consent is granted for their demolition that a detailed historic building survey (level 3: internal and external elevations and plans, photographic and written survey and analysis) is undertaken prior to and during demolition of these historic buildings. This will be linked with an appropriate programme of archaeological works to deal with any underlying associated buried remains.*

### *Buried Archaeology*

*The proposals will require significant ground breaking works in regards to the construction of the various phases of development. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 19th/20th century farming activity through to prehistoric occupation.*

*Given the potential for significant archaeological resources to occur across the proposed area, it is essential that if consent is granted for this scheme that an archaeological mitigation strategy is undertaken prior to submission of any further detailed (FUL/AMC) applications, demolition or development. In essence this strategy will require the undertaking of phased programme of archaeological investigation, the first phase of which will be the undertaking of archaeological evaluation (min 10%) linked to a comprehensive metal detecting survey.*

*The results from this initial phase of work will allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains during each phase of development.*

### *Public Engagement*

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

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

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

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

## **Affordable Housing comment**

### *1. Introduction*

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

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

### *2. Affordable Housing Provision*

*This application is for a development consisting of a 250 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (62) homes of approved affordable tenures.*

*The application site is included as part of the LDP site HSG 19 Maybury, which will deliver up to 2,000 new homes, with a mix of 2, 3, 4 and 5 bed houses and apartments. CEC Housing is keen to assist the applicant indication that the affordable housing will amongst the first phase(s) of the development. It was agreed that there would be four main areas for affordable housing within HSG 19; two on the West Craigs land, one on the Taylor Wimpey land (subject of this application) and one are on the land owned by Roseberry Estates. 25% of the homes across the sites will be affordable housing and the applicant has confirmed they are working with Dunedin Canmore and that the properties would be tenure blind. Dunedin Canmore proposed a mix of social rented housing, mid-market rented housing and low cost home ownership (likely to be Golden Share). These would be a combination of low/mid rise flats and houses and would include some homes specifically for elderly people across HSG 19 Maybury.*

### *3. Summary*

*The applicant has made a commitment to provide 25% (62 homes) on site affordable housing and this is welcomed by the department. These will be secured by a Section 75 Legal Agreement. This department welcomes this approach which will assist in the delivery of a mixed sustainable community.*

- *The applicant has indicated it is working with Dunedin Canmore Housing to deliver the affordable housing*
- *The affordable housing includes a variety of house types and sizes to reflect the provision of homes across the wider site.*



- *In the interests of delivering mixed, sustainable communities, the affordable housing policy units will be expected to be identical in appearance to the market housing units, an approach often described as "tenure blind"*
- *The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.*

## **Affordable Housing comment updated April 2018**

### *1. Introduction*

*Housing and Regulatory Services 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 Provision*

*This application is for a development consisting of a 250 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (62) homes of approved affordable tenures. The affordable homes are required to be tenure blind, fully compliant with latest building regulations and further informed by guidance such as Housing for Varying Needs and the relevant Housing Association Design Guides. The applicant has stated there will be a mix of, two, three, four and five bedroom houses on site as well as two bedroom flats. The affordable housing should be represented by this mix. The Council aims to secure 70% of new onsite housing for social rent and we ask that the applicant supports the Council aims by entering into an early dialogue with the Council and RSLs to ensure that this is delivered.*

*The application site is included as part of the LDP site HSG 19 Maybury, which will deliver up to 2,000 new homes, with a mix of 2,3,4 and 5 bed houses and apartments. CEC Housing welcomes the affordable housing being amongst the first phase(s) of the development. It was agreed that there would be four main areas for affordable housing within HSG 19; two on the West Craigs land, one on the Taylor Wimpey land (subject of this application) and one are on the land owned by Roseberry Estates. 25% of the homes across the sites will be affordable housing and the applicant has confirmed they are working with Dunedin Canmore and that the properties would be tenure blind.*

*Dunedin Canmore proposes a mix of social rented housing, mid-market rented housing and low cost home ownership across the masterplan area. These would be a combination of low/mid rise flats and houses and would include some homes specifically for elderly people.*

*In terms of accessibility, the affordable homes are to be situated within close proximity of regular public transport links and are located next to local amenities. An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, is provided.*

### **3. Summary**

*The applicant has made a commitment to provide 25% (62 homes) on site affordable housing and this is welcomed by the department. These will be secured by a Section 75 Legal Agreement. This department welcomes this approach which will assist in the delivery of a mixed sustainable community.*

- o The applicant is working with Dunedin Canmore Housing to deliver the affordable housing*
- o The affordable housing includes a variety of house types and sizes to reflect the provision of homes across the wider site*
- o The applicant is requested to support the Council aims to secure 70% of the affordable housing on site for social rent*
- o In the interests of delivering mixed, sustainable communities, the affordable housing policy units will be expected to be identical in appearance to the market housing units, an approach often described as "tenure blind"*
- o All the onsite affordable homes must meet the Edinburgh Design Guidance and the affordable homes will have to be designed and built to the RSL design standards and requirements.*
- o The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.*
- o An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, is provided.*

### **Architecture + Design Scotland**

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

### **Background**

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

## *Offer of Support*

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

*The purpose of such a process would include:*

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

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

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

## **Building Standards**

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

## **Corstorphine Community Council**

*Our views on this development are similar to those we have expressed on neighbouring and earlier developments and consist chiefly on concerns regarding the potential impacts on traffic growth, local infrastructure provision, density of housing development, loss of open space and Green Belt and general degradation of the local environment. There is recognition that the major forcing factor behind recent adoption of LDP2 comes from housing pressures. The question is often asked as to what is the optimum size to which Edinburgh should aspire to grow.*

*As regards traffic growth the main concern here is chiefly in conjunction with potential air pollution though there are also other issues such as road crossing and walking and contributions to degradation of local environment and dwelling space. Traffic pollution levels are at present under scientific and medical review and advisory limits continue to be reviewed downwards and new pollutants found in vehicle exhausts - for example I quote the 'New Scientist' article on p16 of the 29/10/2016 issue.*

*We note the various traffic assessments prepared on the developer's behalf for these local major developments those for 14/03502/PPP and the more recent 16/04738/PPP were unduly optimistic in some of the underlying assumptions whilst the 'Weta' assessment for this application gives no guidance to underlying assumptions and makes no comments regarding pollution levels on St.John's Rd. in Corstorphine Village or on the Queensferry Rd. There is also no mention of other local developments such as the opening of the new Forth Rd. Bridgand developments at Newbridge, Kirkliston, and South Queensferry and district. The influence of HGV's and commercial delivery vehicles also seems somewhat downplayed.*

## **Corstorphine Community Council - Addendum to ES/Non-Tech Summary March 2018**

*As a community council concern has been expressed from the earliest submission of plans for major housing developments in western Edinburgh regarding the knock on effect on traffic management on Maybury Rd. and the associated junctions at Barnton and Maybury. There are already severe problems with regard to grid locking particularly during the morning 'rush hour' and to a somewhat lesser extent in the evenings.*

*This development is only a minor part of other major housing developments in the area - the major one being 16/04728/PPP AT 19 Turnhouse Rd. for 1400 units and currently under developer's appeal against refusal and 17/04395/PAN at 18 Cammo Walk for 670 units. The sum total of these developments would be 2320 units, not to mention the developer's intention to emplace a further 400 units north of Craigs Rd. bringing the total to 2720 housing units. There are also other applications out with the immediate area that will have an effect on traffic - 18/01012/PAN for mixed use development comprising the southern phase of Edinburgh Park and 17/05894/PAN for extension to the Gyle complex. There are also plans for a large housing development on the Western limb of Queensferry Rd. and the possible 'Garden City' development of 3200 units between Gogar and Hermiston.*

*The changes to road layout enabling West - East access of Craigs Rd. over Maybury Rd. is noted together with the associated installation of pedestrian / cyclist crossings but concern is expressed, particularly by local residents, of the potential for severe effects on traffic management on the eastern limb of Craigs Rd. running from Maybury Rd. to Drum Brae where there are already problems of road side parking, morning 'rat running' and 'school drop off'.*

*We note that there have been various traffic modelling exercises with respect to this and the neighbouring developments based on various 'trip rates' and vehicle numbers per length of road but are concerned that this does not adequately take into account the tendency to grid - lock at peak times. It has to be realised that these developments are additions to an existing bad situation as regards traffic.*

*Recently there has been local concern regarding problems of air pollution particularly on St. James's Rd. and Queensferry Rd. - a modelling exercise regarding the dispersion of fumes on Maybury Rd. made the optimistic assumptions of a 10% reduction of car usage in the immediate area owing to the provision of footpaths and cycle ways etc. and minimum traffic speeds of 5 - 10 kilo meters/ hr.*

*It is acknowledged that the 'car habit' will be notoriously difficult to break and at rush hour periods cyclists and pedestrians whether going to work or school etc. will be concentrating at the new crossing points at the north - east and south east corners of the site when traffic is likely to be stationary or only moving intermittently thus reducing the dispersal of traffic fumes.*

*Many prediction exercises are notoriously optimistic as past experience has often born out and such large housing developments as mentioned above are obviously dependent on the long term performance of the national economy but many local residents expect to experience in their lifetimes increased traffic related problems.*

## **Children + Families comment**

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

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

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

### *Assessment and Contribution Requirements*

*Assessment based on:*

*50 Flats  
200 Houses*

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

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

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

*The application is for planning permission in principle. The required contribution should be secured through a legal agreement based on the established 'per house' and 'per flat' contribution figures set out below.*

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

*Per unit infrastructure contribution requirement:*

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

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

*Per unit land contribution requirement:*

*Per Flat - £628*

*Per House - £3,673*

*Note - no indexation to be applied to land contribution.*

### **Children + Families further comment**

*The CF response sent in February will still apply despite the revised drawings.*

### **Cramond & Barnton Community Council**

*From the outset, this Community Council wishes to record its continuing opinion that this development is inappropriate, given potential traffic generation and congestion issues specific to this and adjacent development proposals and cumulative flows from other developments in West and North Edinburgh and beyond, on the A8 and A90 corridors and on Barnton and Maybury Junctions. However, we accept that this development is part of LDP2 and likely to go ahead. In this context, we wish to ensure that traffic, educational, medical and landscape issues are fully taken into account by the City Council in considering this application.*

#### *Consideration of the Planning Applications in Isolation*

*While recognising that the planning system requires this application to be considered on its individual merits, we are concerned at -*

*a. issues relating to the consideration of proposed developments in North and West Edinburgh, without recognition of the cumulative impacts on roads infrastructure and education and health services. These issues were highlighted in a recent joint paper to the Council from the Chairs of Queensferry & District, Kirkliston, and Cramond & Barnton Community Councils and discussed with the Locality Manager and senior representatives of Planning Services. We would urge planning officers and elected members to appreciate the cumulative effects of the several major LDP2 developments in our, and adjacent, Community Councils' areas, where roads, education and GP services are all operating at, or over, capacity.*

*b. lack of an integrated approach to aspects of this development and the adjacent proposed development 16/04738/PPP, in particular with regard to the proposed location of junctions onto the Maybury Road, and proposals for land on the northern edge of Craigs Road. We urge a more integrated approach to the planning of the adjacent HSG19 development sites and agreement on the preferred junction with Maybury Road (see comments below).*

#### *Prematurity*

*Cramond & Barnton Community Council contends that any current decision on Application 16/05681/PPP is premature, given -*

a. *the intended production of Supplementary Guidance on contribution zones, as outlined in LDP2 Del1. Also, Del2 states that*

*'Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time.'*

*We have been unable to ascertain that funding and implementation commitments have been made by the City Council in respect of the required roads improvements - especially at the Maybury, Barnton and Craigs Road Junctions, or Bughtlin Roundabout, and to deliver the educational infrastructure required to support this development. Indeed, the Report to the Finance & Resources Committee (19/01/2017) highlighted gaps in required infrastructure funding to support these and other LDP developments and risks that developer contributions may fall short of those required, due to factors such as inflation, market conditions, etc..*

*Permission for this development should be withheld until funding to deliver roads, education and other essential infrastructure is assured, as consistent with LDP2 policies Del1 and Del2.*

b. *SESplan and the LDP Reporter have highlighted issues of traffic generation and congestion arising from growth in cross-border traffic and the cumulative effects of developments in the City, Fife and the Lothians. These issues were not fully assessed in LDP2, have been the subject of the SDP2 Transport Appraisal and will be assessed in the Cross-Border Transport Appraisal. As indicated in SDP2 Transport Appraisal, traffic flows and congestion associated with the A8 and A90 corridors and Barnton and Maybury Junctions are forecast to be significantly higher than previously estimated and road corridors and junctions are likely to require more substantial up-grades than proposed in LDP2 (e.g. 'smart' traffic lights as the solution to Barnton Junction congestion is risible).*

*Permission for this development should be withheld until -*

a. *results of the Cross-Border Transport Appraisal are known, identification of adequate mitigation measures for the A8 and A90 corridors and Maybury and Barnton Junctions are identified, and the delivery of such improvements has been completed.*

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

#### *Specific Traffic and Roads Issues*

i. *There is a lack of clarity on whether a new Craigs Road/Maybury Road Junction (as proposed by the Council) or an additional arm to the Bughtlin Roundabout (as application 16/04738/PPP) is the most appropriate option for access to/egress from these developments and land uses at Turnhouse. The Community Council has considered both junction options and recommends that -*

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

- A signalised pedestrian/cyclist crossing should replace the proposed road junction at Craigs Road, to provide a more direct sustainable travel link to Craigmount High School and the eastern footway on Maybury Road
- provision of any new Bughtlin Roundabout approach road should be accompanied by substantial landscaping to minimise landscape impacts of roads infrastructure, traffic and street lighting on views from Cammo parkland and Cammo, Barnton and East Craigs residential areas.

*The principal reasons underpinning these recommendations are that interruptions to the through flow of traffic on Maybury Road should be minimised, especially as further lights- controlled junctions and pedestrian crossings on Maybury Road will be required to serve the Cammo development. Cumulatively these junctions and crossings will exacerbate delays and congestion on Maybury Road, which already experiences unacceptable levels of congestion at peak times.*

*In addition, the proposed Craigs Road/Maybury Road Junction will encourage cross flows of traffic from Craigs Road West to Craigs Road East; thereby, increasing issues of 'rat-running' through East Craigs to avoid congestion at Maybury Junction and increasing traffic flows and hazards in the vicinity of Craigmount High School.*

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

*ii. The Community Council is aware that Craigs Road and Turnhouse Road are essential emergency access routes for Edinburgh Airport and ready access from Turnhouse airfreight complex to Maybury Road and the national roads network is essential for airfreight operators and Edinburgh's economy. The Community Council emphasises the need for robust assessments of the impacts of proposed changes to road access arrangements associated with the HSG19 developments, including restrictions on through-access on Turnhouse Road, Airport emergency incident responses and airfreight operations. Current Traffic Assessments are deficient in the respects.*

*iii. While the walking/cycling route across the site will serve users from the Gyle and Gateway Station, it will not provide a convenient off-road alternative to Maybury Road for cyclists travelling between Maybury and Barnton or East Craigs. A section of off-road cycle route should be provided within the development site running parallel to Maybury Road, or a developers' contribution made to widening the footway along Maybury Road in this vicinity to provide a segregated, or joint use, cycle route. This would complement proposals for an off-road cycle path alongside Maybury Road within proposals for the Cammo development.*

### **GP Services**

*GP services in North West Edinburgh are currently under major strain and mostly operating over capacity and not accepting new patients. Planning permission for this development should not be granted until assurances are provided by NHS Scotland that additional GP services can be provided to satisfy the expanded populations resulting from the HSG19 and HSG20 developments.*



## *Landscape Issues*

*The Environmental Assessments show intrusive skyline impacts of the development, when viewed from Cammo parkland, Mauseley Hill and northern sections of Maybury Road, largely due to the topography of the site. Such skyline intrusion will be evident also from existing and proposed residential areas at Cammo and only partially be mitigated by the 30m green buffer strip on the south side of Craigs Road. Also, as Craigs Road runs along an elevated ridge, traffic flows and street lighting will be evident on views from the North. The Community Council recommends that planning permission should be conditional on -*

*a. inclusion of a woodland buffer strip on land adjacent to the north side of Craigs Road. This should 'mirror' the buffer strip on the south of Craigs Road and reduce daytime landscape impacts and night-time light pollution.*

*b. boundary planting on the southern and northern sides of Craigs Road, being undertaken in advance, or at the initial stages, of development and including a significant proportion of semi-mature trees.*

## *Appropriateness of Submission*

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

## **Edinburgh Airport**

### *Height Limitation on Buildings and Structures*

*No building or structure of the development hereby permitted shall exceed 75m AMSL.*

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

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

### *Submission of a Bird Hazard Management Plan*

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

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

- management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached
- reinstatement of grass areas
- maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow
- which waste materials can be brought on to the site/what if any exceptions e.g. green waste
- monitoring of waste imports (although this may be covered by the site licence)
- physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
- signs deterring people from feeding the birds.

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

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

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

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

#### *Submission of SUDS Details*

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

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

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

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

#### *Submission of Landscaping Scheme*

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

*These details shall include:*

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

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

*Reason: To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the application site.*

*We would also make the following observations:*

#### *Cranes*

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

## *Lighting*

*The development is close to the aerodrome and the approach to the runway. We draw attention to the need to carefully design lighting proposals. This is further explained in Advice Note 2, 'Lighting near Aerodromes' (available at <http://www.aoa.org.uk/operations-safety/>).*

*Please note that the Air Navigation Order 2005, Article 135 grants the Civil Aviation Authority power to serve notice to extinguish or screen lighting which may endanger aircraft.*

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

## **Flood Prevention comment**

*1) The applicant has not included an independent check declaration for this application. They have repeated the checklist already submitted by the report originator. Goodsons must complete and sign the section of the declaration certificate below the phrase 'To Be Completed by the Checking Organisation'.*

*2) The proposed discharge rates included in Appendix 2b on drawing 8746/401 rev A are acceptable to CEC Flood Prevention.*

*3) Should the Head of Planning be minded to grant Permission in Principle for this application then Flood Prevention require two conditions to be included to be addressed at a future planning permission stage:*

*a. The applicant will submit detailed hydraulic modelling calculations for acceptance by Head of Planning.*

*(Informative note: hydraulic modelling calculations for all underground pipework shall include rainfall data, manhole and pipe schedules (to mAOD), and pipe surcharge report for all underground pipe connections. The manholes in the calculation should be cross-referenced to the drainage drawing to enable interpretation. The results should include the 30 year and 200 year plus climate change results. Should the model identify flood or flood risk in the system then drawings will be required to indicate where exceedance flow will be directed, how it will be contained within the site and lastly how it will be drained once the event has subsided).*

*b. Please stipulate who will adopt and maintain the surface water network, including any SUDS and connections into the combined network.*

*Point 1 above should be addressed before proceeding to determination.*

## **Flood Prevention further comment**

*Please find attached a consultation response. Points 1 and 2 require to be addressed before PPP can be granted. Point 3 is for future AMCs and the like.*

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

1. *The applicant has not included an independent check declaration for this application. As this is classed as a major development under planning an independent check is required.*

2. *The proposed discharge rates for the development do not align with CEC Flood Prevention guidelines. The North area of the site draining surface water to the highway drain running North is 4.1Ha in area. However, it is noted that the area positively drained from this in the storage estimate include in Appendix 3C is 2.46Ha. CEC Flood Prevention request a discharge rate equal to the 2 year Greenfield runoff rate or 4.5 l/s/ha is used, whichever is smaller. Therefore we would anticipate a maximum discharge rate into the highway drain of 11.1l/s during the 200 year + 30% cc event. Please revise the storage calculation and confirm that this revised volume of storage can be included in the site layout.*

*We would also note that the applicant should obtain permission from CEC Roads Locality to discharge to the highway drain running along Maybury Road.*

3. *Should the Head of Planning be minded to grant permission in principle for this application then Flood Prevention require two conditions to be included to be addressed at a any future planning permission stage:*

a. *The applicant will submit detailed hydraulic modelling calculations for acceptance by Head of Planning.*

i. *Informative note: hydraulic modelling calculations for all underground pipework shall include rainfall data, manhole and pipe schedules (to mAOD), and pipe surcharge report for all underground pipe connections. The manholes in the calculation should be cross-referenced to the drainage drawing to enable interpretation. The results should include the 30 year and 200 year plus climate change results. Should the model identify flood or flood risk in the system then drawings will be required to indicate where exceedence flow will be directed, how it will be contained within the site and lastly how it will be drained once the event has subsided.*

b. *Please stipulate who will adopt and maintain the surface water network, including any SUDS and connections into the combined network.*

### **Flood Prevention further comment**

*Flood prevention are happy for this to be determined with no further comment provided two conditions along the lines of those below are included in any permission.*

a. *Prior to the start of works on site the applicant will submit detailed hydraulic modelling calculations for acceptance by Head of Planning.*

i. *Informative note: hydraulic modelling calculations for all underground pipework shall include rainfall data, manhole and pipe schedules (to mAOD), and pipe surcharge report for all underground pipe connections. The manholes in the calculation should be cross-referenced to the drainage drawing to enable interpretation. The results should include the 30 year and 200 year plus climate change results. Should the model identify flood or flood risk in the system then drawings will be required to indicate where exceedence flow will be directed, how it will be contained within the site and lastly how it will be drained once the event has subsided.*

b. *Prior to the start of works on site the applicant will confirm who will adopt and maintain the surface water network, including any SUDS and connections into the combined network.*

### **Police Scotland comment**

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

### **SEPA comment**

*We have no objection to this planning application. Please note the advice provided below.*

#### *Advice for the planning authority*

#### *1. Flood Risk*

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

*1.2 The risk identified at this site is from surface water flooding only. Ironside Farrar Ltd (September 2016) have not identified any small watercourses on site and we have no additional information to suggest otherwise. A Drainage Impact Assessment has been submitted and the council should be satisfied that surface water from the site can be captured and discharged at an agreed rate, which will not increase the flood risk to existing nearby development (or cause flooding on-site). The areas identified on the SEPA Surface Water Flood Map as being lower areas where water may pond have been identified as green space and SUDS on the Framework Masterplan drawing (ref. no. 10\_3201, dated October 2016) which we support.*

*1.3 We would reiterate that for all development in this area, consideration should be given to the proposed future realignment of the Gogar Burn to ensure development complements this realignment and does not restrict its feasibility.*

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

### **SEPA further comment**

*We note that our consultation response dated 13 December 2016 offered no objection and also highlighted that the flood risk at this site was due to surface water only - this is an issue for the Council's flood prevention officer to comment on and we therefore have no further comments to make.*

## **SEPA comment - Addendum to ES/Non-Tech Summary March 2018**

*We have no objection to this planning application. Please note the advice provided below.*

### *1. Flood Risk*

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

*1.2 The risk identified at this site is from surface water flooding only. Ironside Farrar Ltd (September 2016) previously did not identify any small watercourses on site and we have no additional information to suggest otherwise. The latest information submitted in the Environmental Statement Addendum Non-Technical Summary (February 018) states that the findings in the November 2016 Environmental Statement remain valid. A Drainage Impact Assessment was also submitted in 2016 and the council should be satisfied that surface water from the site can be captured and discharged at an agreed rate and not increase the flood risk to existing nearby development (or cause flooding on-site). The areas identified on the SEPA Surface Water Flood Map as being lower areas where water may pond remain as green space and SUDS on the Framework Masterplan drawing (ref. no. 30\_02, dated November 2017), which we support.*

*1.3 We would reiterate that for all development in this area, consideration should be given to the proposed future realignment of the Gogar Burn to ensure development complements this realignment and does not restrict its feasibility.*

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

### *2. Air Quality*

*2.1 We are encouraged to note that a number of committed developments have been included in the air quality impact assessment. A particular concern is that individual developments when assessed on their own are often shown to have a negligible impact, but cumulative development can contribute to a "creeping baseline" and may lead to future air quality issues.*

*2.2 The assessment concluded that the impact of the development and committed developments on air quality will be negligible and no mitigation measures for air quality have been recommended. Air quality dispersion models have a degree of uncertainty as they rely on a number of assumptions. We therefore highlight that the planning system has an important role to play in ensuring that future air quality problems are prevented or minimised.*

2.3 Having reviewed the City of Edinburgh Council's local air quality monitoring, which formed part of the air quality assessment for this development. We note that the automatic monitoring sites at St John's Rd (2.1km east of development site) and Queensferry Rd (1.5km north-west of development site) recorded an exceedance of the annual mean NO2 objective in 2016. The City of Edinburgh Council currently have six Air Quality Management Areas (AQMA's) due to exceedances of NO2 and PM10 objectives. Five of these AQMA's are due to transport emissions. This indicates that air quality is an issue in the council's area.

2.4 Although we do not object to this development on air quality grounds, we strongly recommend that good practice to reduce emissions and exposure is incorporated into all developments. 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.

2.5 The council should take these principals in to consideration. We also support the council's Environmental Services comments regarding electric vehicle charging points outlined in the ES addendum appendices as follows "We would encourage the applicant to commit to installing 100% of the houses with electric vehicle 7Kw chargers like other developers".

## **Scottish Natural Heritage comment**

### *Position*

*This proposal, if delivered to appropriate standards and in accordance with the framework masterplan drawing, the supporting design statement and associated EIA documents, could provide a well integrated housing expansion to the west of Edinburgh. This would provide multi-functional green infrastructure with landscape, amenity and recreational benefits, with connecting recreational access both through the site and beyond. Further detailed advice is provided below and we suggest that the Council closely considers the planning measures that may be necessary to enable successful delivery of the proposal, including the landscape and recreational access proposals, along with all other associated natural heritage enhancement or mitigation.*

### *Background*

*This is a strategically important site in terms of city expansion westwards, and one which will link into the rest of the larger Maybury LDP allocation. This locally sensitive landscape requires a good approach to layout and design of housing and green infrastructure, with consideration of how streets and the development edge, including the green infrastructure proposed, will connect to the adjacent West Craigs North development.*

### *Appraisal*

#### *Landscape and Visual, and Green Infrastructure*



*We consider the proposal has built on the key development principles outlined within the LDP, producing a more detailed development framework and a set of masterplan principles for the site. These principles, including the design approach for the site's green infrastructure, if successfully delivered to appropriate standards and ensuring appropriate linkages to the neighbouring developments and proposals, could lead to multiple benefits for both people and nature.*

*We note evolution of the masterplan from the previous submission and recommend that the key principles and framework for the site, as currently proposed, are taken forward and developed in more detail, namely:*

- the full specification of the various green networks and open spaces, including linear park and smaller green spaces, detention basins, 30m woodland edge and general tree planting through the site;*
- the detailed design of development frontages onto the various green network and open spaces proposed;*
- the design and connectivity of the various paths which, if delivered to appropriate standards, will allow access to permeate around and through the site, connecting to proposals beyond.*

*However, we also recommend that further detailed consideration is given to the likely Civil Aviation Authority requirements for Aerodrome Safeguarding in this area and the specific implications this may have for the design layout and delivery of landscaping and other aspects of environmental mitigation, including SUDS. In this regard we would advise that there is still some uncertainty on how likely restrictions on SUDS and planting will influence or alter the design and layout of such features. We therefore recommend that the Council should be sufficiently satisfied that these measures can be delivered to satisfactory standards or in accordance with submitted plans.*

*We also recommend that further clarity on the content and long term financing of maintenance and management of the open spaces is secured as this will be important for the successful delivery of the placemaking objectives and environmental mitigation for the site.*

### *Ecology*

*We are satisfied with the results and conclusions of the species surveys and advise that no protected species licences will be required. We recommend that the standard construction mitigation measures for badgers, listed in 6.76 and 6.77 of the ES, are taken forward as there is the potential for badgers to visit the site from surrounding areas.*

## **Scottish Natural Heritage - Addendum to ES/Non-Tech Summary March 2018**

### *Background*

*You have consulted us on the Environmental Statement (ES) Addendum. We previously provided you with advice on the content of the original ES by letter dated 20 January 2017.*

## *SNH Advice - Landscape and placemaking*

*We note that this Addendum includes several minor changes to the proposed development. Some of these changes may result in minor improvements to landscape and placemaking elements when compared to the original scheme. However we are content to rest on the principles and advice we provided to you in our previous letter, dated 20 January 2017.*

## *SNH Advice - Ecology*

*We note that the ES Addendum rests on the assessment within the original ES. We support this position and we rest on the ecology advice provided in our letter dated 20 January 2017.*

## **Transport Scotland comment**

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

## **Roads Authority Issues comment**

*With regard to the overall layout (drawing number 10\_3201 revision 01)*

*Road layout and parking numbers etc. will be reserved matters. However the following should be noted with regard to the preliminary layout on this drawing;*

- *There should be a cycle/pedestrian link in the SE part of the site linking to Maybury Road. (as per the LDP)*
- *All shared cycle/pedestrian paths should be minimum 4m in width*
- *Roundabouts on internal roads are not acceptable*
- *A footway is required on the south side of Craigs Road (immediately alongside)*
- *There should be a footway on both sides of any road (not applicable to 'shared surface' areas)*
- *Cul de Sacs should have turning areas*
- *the roads should be suitable for a 12m refuse vehicle (including turning areas)*
- *future proof pedestrian/cycle links are required to the industrial estate to the south*
- *all roads to comply with Designing Streets. A Quality Audit will be required prior to agreeing any road layout.*

*With regard to the Craigs Road / Maybury Road junction (drawing TP/062/SK/004E)*

- *we will require a pedestrian (and possibly cycle) crossing facilities on the north arm*
- *does Cammo walk provide a direct replacement for the footway being removed NW side of junction ?*

- *the crossings should be designed as a cycle crossing as well as pedestrian (discussions required with active travel team)*
- *we require cycle advanced stop lines and lead in lanes*
- *radii seem excessive (c 10m) on one corner*
- *the design should be allow for a right turn into Craigs Road (from Maybury Road northbound) - for possible future implementation*
- *check positioning of push buttons as they do not seem to line up with tactile paving in one location*
- *anti-skid surfacing may be required on approaches*
- *the 'slip road' type arrangement for the left turn from Maybury Road is not desirable from a cycle safety point of view and should be reviewed*
- *The east - west alignment of the junction will not work and should be reviewed*
- *The arrangement of the pedestrian crossings is not ideal as they are not very direct. We would prefer to see fewer staggered crossings if possible.*

*A full assessment will be carried out by our traffic signals team. Please note that some of the comments above relating to the junction will likely affect the transport assessment.*

*The developer should be aware of the contribution zones for both the LDP action plan and the WETA study. The development will also be assessed for a Tram contribution.*

### **Roads Authority Issues comment - finalised**

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

1. *The applicant will be required to;*

a. *Contribute the sum of £187,285 (based on 250 units in Zone 3) to the Edinburgh Tram in line with the approved Tram Line Developer Contributions report. The sum to be indexed as appropriate and the use period to be 10 years from date of payment;*

b. *Contribute the sum of £487,972 (based on 250 units) to the Maybury / Barnton contribution zone (includes upgrading to Maybury junction (T17), Craigs Road junction (T18) and Barnton junction (T19));*

c. *Contribute a sum towards; Cyclepaths to Gyle (600m) (and underpass of the A8), A8 (300m) and to Gogar Link. Route continues from completed underpass (led by Network Rail) via the shopping centre car park, to shared use footway by tram stop. Possible removal of parking around periphery to make room for segregated cycle lane. Make underpass shared use Cyclepath to Gogar Link Road - north of station. Total estimated cost (excluding design and contingencies which will be added to final amount) £392,000. Amount payable will be proportional based on the overall level of development of HSG19;*

d. *Contribute a sum towards the provision of a shared use cycleway along Turnhouse Road (1.5 km approximately) or on-road segregated cycleway. Estimated total cost £517,000 (including design costs). Amount payable will be proportional based on the overall level of development of HSG19;*

- e. *Contribute a sum towards the re-design of Maybury Road junction for cycling and walking. Total estimated cost £126,788 (including design and contingency costs). Amount payable will be proportional based on the overall level of development of HSG19;*
- f. *Contribute the sum of £2,000 to progress a suitable order to introduce a lower speed limit along Turnhouse Road. Amount will be proportional based on the overall level of development of HSG19;*
- g. *Contribute the sum of £2,000 to progress a suitable order to re-determine sections of footway and carriageway as necessary for the development;*
- h. *Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary;*
- i. *Contribute the sum of £2,000 to promote a suitable order to introduce a 20pmh speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council*
- j. *In support of the Council's LTS Cars1 policy, the applicant should contribute the sum of £18,000 (£1500 per order plus £5,500 per car) towards the provision of car club vehicles in the area;*
- k. *Provide a signalised pedestrian/cycle crossing on Maybury Road linking the south east corner of the site to routes beyond. To be installed prior to the occupation of the south east part of the site.*

*Items b) to f) above as per the LDP Second Action Programme January 2018.*

*Note regarding orders; the applicant should be advised that the successful progression of any Order is subject to statutory consultation and advertisement and cannot be guaranteed;*

*2. The internal road layout (including parking) and the precise positions of the access/es into the development are to be reserved matters. The applicant should note that the general layout shall be in accordance with the Maybury and Cammo Site Brief (Edinburgh Local Development Plan November 2016) and shall include provision for the following;*

- a. *Maybury/Edinburgh Gateway pedestrian/cycle route - route to be formed as part of the new development layout. This route forms part of the strategic green corridor from Edinburgh Gateway to Cammo and quality landscaping is required.*
- b. *Bus route Craigs Road /Turnhouse Road - bus route and bus stop facilities to be included as part of the overall road layout design.*

3. *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;*
4. *A Quality Audit, as set out in Designing Streets, to be submitted prior to the submission of the AMC application/s. The scope of the Audit to be agreed with the Council and all recommendations made by the Audit report to be incorporated into the final design;*
5. *In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (incl.. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;*
6. *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;*
7. *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;*
8. *Any sign, canopy or similar structure mounted perpendicular to the building (i.e. overhanging the footway) must be mounted a minimum of 2.25m above the footway and 0.5m in from the carriageway edge to comply with Section 129(8) of the Roads (Scotland) Act 1984;*
9. *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 the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;*
10. *Electric vehicle charging outlets are to be provided for this development, one per five spaces (on street) with garages/driveways each having passive provision of an electric charging point.*

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

Notes:

*Parking -*

*The application will be assessed under the Councils 2017 parking standards. The proposed development is in Zone 3 of the parking standards.*

*As stated above, parking numbers to be reserved matters, however the following indicates the zone 3 parking standards;*

*Car Parking - Maximum number of car parking spaces;*

*studio / 1 - 2 rooms: 1 space*

*3 rooms: 1.5 spaces*

*4 or more rooms: 2 spaces*

*Cycle Parking;*

*studio/1 room: 1 cycle parking space*

*2 / 3 rooms: 2 cycle spaces*

*4 or more rooms: 3 cycle spaces*

*Motorcycle Parking;*

*1 per 25 units*

*Disabled car parking;*

*5% of total capacity.*

*Transport Assessment*

*The submitted Transport Assessment has been assessed as being generally reflective of the existing and future traffic patterns in the area. The proposed junction arrangement at Craigs Road/Maybury Road is to be finalised and further modelling will be required before the final design is agreed.*

### **Waste Services comment**

*As this relates to the construction of domestic properties at Craigs Road, we would expect this Service to be responsible for the provision of waste management services to this property.*

*The requirements from our point of view relate to:*

## *Compliance with Waste Strategy*

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

*Given the area and the waste management arrangements for properties nearby, we would have assumed that the waste collection for the houses will be by kerbside collection, so that the residents are responsible for presenting the waste on the street on the correct collection days, and removing the containers afterwards.*

*The bins provided would be for: landfill waste (140 litre bin), mixed recycling (240 litre bin), glass, batteries, small electricals, and textiles (small box), food (small box) and - where relevant- garden waste (240 litre bin).*

*We would assume that the waste collection for the flats shown will be by communal bins, so that the residents are not responsible for presenting the waste on the street on the correct collection days, and removing the containers afterwards. Assuming that this is the case, the waste collection teams will require safe and efficient access to these, and therefore cognisance must be taken of my comments below in relation to operational viability. While there is mention of, "external waste and recycling bins including external composting facilities which are accessible via the rear of the properties to ensure waste is not carried through properties", we are unable to identify their location or size, and would need to ensure that they are suitable for the correct arrangement of bins.*

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

*Key points are:*

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

*- the maximum size of a food bin is 500 litres; and that of a glass bin is 660 litres, which are both smaller than other types of waste, due to weight issues;*

*- provision must be made for the storage and disposal of bulky wastes such as furniture produced by the residents, and indeed access to those by our collection teams.*

## *Operational Viability*

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

*Developers need to speak to us to ensure that our requirements for safe access are complied with, as well as to ensure that there is sufficient off street storage for the containers. I would recommend they do so as soon as possible.*

### **Waste Services further comment**

*Waste Service's response provided in December 2016 still applies for 16/05681/PPP. In order to agree on waste strategy I will require swept path analysis for the whole development to confirm Refuse Collection Vehicles can safely enter, service and exit the site. Detailed requirements are listed in the attached Architects Instructions.*

### **Roads Authority Issues**

*Note - The internal layout (including parking) of the roads servicing the development and the precise position of access(es) onto Craigs Road are all reserved matters. Consequentially the only matters being considered at this stage, relevant to Transport, are;*

*1) If the proposed signalised junction access at Maybury Road/Craig's Road can accommodate this development and the other sites in the LDP.*

*2) An assessment of the impact of the development and the other LDP developments on the local road network.*

*The application should be continued.*

*Reasons:*

*1. The layout of the Maybury Road / Craigs Road junction will require further discussions to ensure that the design meets the aims of Transport Proposal T17 (Table 9 p.39) in the approved LDP (also referred to as T18 in the Action Programme).*

*T18 (Craigs Road Junction) in the Action Programme (December 2016) requires 'improvements to Craigs Road and increased junction capacity/bus priority at junction with Maybury Road. New signalised cross roads allowing bus, pedestrian and cycle access to and from Craigs Road'.*

*It is acknowledged that the proposals do increase junction capacity as demonstrated in the submitted Transport Assessment, however the facilities for cycles and pedestrians at the junction require improvements to that proposed, particularly to fulfil the requirements of the LDP site brief for HSG 19.*

*The following elements of the design require further discussion/review;*

- o Provision of cycle/pedestrian crossing facility on the north arm (Maybury Road).*
- o The slip road type arrangement northbound on Craigs Road is not acceptable from a cycle safety position.*
- o Footway and cycleway widths.*
- o Overall road and lane widths.*
- o Provision of more direct pedestrian / cycle crossing routes including connections with the Cammo Walk to Edinburgh Gateway station green corridor.*



- o *The re-determination of the south end of Cammo Walk (required as part of the proposed design).*
- o *Widths of central islands/reserves.*
- o *Alignment of east-west route (Craigs Road) through the junction.*

*The developer will be required to demonstrate that any revised design can accommodate the traffic generated by this development and the other sites in the LDP. The developer should also include an updated analysis of both the Maybury Junction and Barnton Junction in the context of the development taking into account the final LDP, based on the Transport Statement previously submitted for the site.*

*In addition to the internal layout and access position onto Craig's Road, all required transport contributions as per the LDP should be reserved matters. The development will also be assessed for a Tram contribution in line with the approved Developer Contributions report. Further, the applicant will require to prepare all required road redetermination plans and meeting the council's full cost in respect of advertising the Order.*

*All contributions sought as outlined above can be subject to suitable legal agreements associated with the future AMC applications.*

*A Quality audit as per Designing Streets will require to be submitted with the AMC application- the scope and terms of this QA are to be agreed with the council.*

## **Environmental Protection comment**

### *Local Air Quality*

*Planning Advice Note (PAN) 51: Planning, Environmental Protection and Regulation 3 sets out the Scottish Executive's core policies and principles with respect to environmental aspects of land use planning, including air quality. PAN 51 states that air quality is capable of being a material planning consideration for the following situations where development is proposed inside or adjacent to an Air Quality Management Area (AQMA):*

- o *Large scale proposals.*
- o *If they are to be occupied by sensitive groups such as the elderly or young children.*
- o *If there is the potential for cumulative effects.*

*The planning system has a role to play in the protection of air quality, by ensuring that development does not adversely affect air quality in AQMAs or, by cumulative impacts, lead to the creation of further AQMAs (areas where air quality standards are not being met, and for which remedial measures should therefore be taken.*

AQMAs have been declared at five areas in Edinburgh - City Centre, St John's Road (Corstorphine), Great Junction Street (Leith) Glasgow Road (A8) at Ratho Station and Inverleith Row/Ferry Road. Poor air quality in the AQMAs is largely due to traffic congestion and the Council's Air Quality Action Plan contains measures to help reduce vehicle emissions in these areas. The Council monitors air quality in other locations and may require declaring further AQMAs where Air Quality Standards are being exceeded. It is noted that a significant amount of development is already planned / committed in west Edinburgh and additional development will further increase pressure on the local road network. Committed development has therefore been accounted for in the applicants Air Quality Impact Assessment.

Reducing the need to travel and promoting the use of sustainable modes of transport are key principles as identified in the LPD. The LDP also states growth of the city based on car dependency for travel would have serious consequences in terms of congestion and air quality. An improved transport system, based on sustainable alternatives to the car is therefore a high priority for the Council and continued investment in public transport, walking and cycling is a central tenet of the Council's revised Local Transport Strategy 2014-19.

The site is well-situated in relation to the existing transport network. A series of footpaths, footways and usable cycle links exist in the surrounding area offering connections with the wider network. The site is well-located for access to public transport services with local bus routes and heavy rail within walking distance of the site at the new Edinburgh Gateway station. Edinburgh tram is also within walking distance.

Environmental Protection raised concerns regarding the potential impacts this development may have on local air quality. Traffic generated by the development will add to existing high traffic flows on Maybury Road, Glasgow Road and Queensferry Road. There is also a composting facility located approximately 350 m north-west of the application site which is a potential source of dust and odour emissions. It's noted that there are one hundred existing residential properties along stretches of these roads within 1 km of the site. The applicant has therefore submitted a supporting air quality impact assessment which has considered the potential impacts from construction activities at the application site, the impacts of emissions of traffic generated by the proposed development once operational and the cumulative impact of emissions of traffic generated by the proposed development and other planned development in the local area that is likely to impact on traffic flow on the same routes. The air quality impact assessment has been carried out based on 250 residential units being developed within the application site.

The applicant has submitted a supporting air quality impact assessment and air quality is anticipated to be affected during the construction phase of the development by dust emission from earth moving and materials handling, however the level of emission is largely dependent on weather conditions. Mitigation measures will be adopted to limit dust emission and its associated effects on the environment and amenity. Environmental Protection shall recommend an informative to ensure this is controlled within a detailed construction and Environmental management plan.

*When the development is completed the primary impact on air quality will result from traffic emissions. The extent of the impact is dependent on the travel behaviour of its resident population.*

*Local Authorities undertake air quality monitoring in order to meet its duties under Part IV of the Environment Act. This includes measurements of Nitrogen Dioxide (NO<sub>2</sub>) at various locations across the city using diffusion tubes including some of which are within 2 km of the development site. The NO<sub>2</sub> diffusion tube measurements from across Edinburgh show high concentrations exceeding the 40  $\mu\text{g}/\text{m}^3$  annual mean objective is present next to busy roads, particularly within street canyons. In the vicinity of the proposed development site, exceedences have been recorded on the Glasgow Road and at the Barnton junction/Queensferry Road. Annual mean concentrations at other locations around the Barnton junction/Queensferry Road are below the objective level. There was one breach of the annual mean objective outwith the AQMAs and that was at Queensferry Road. This data has consistently resulted in breaches of the annual mean objective, even though adjacent monitoring, including that from the automatic analyser has always been compliant. Façade measurements concurrent with the site also meet the objective.*

*Trend analysis of the annual mean NO<sub>2</sub> concentrations at most sites shows there is a slight decrease in NO<sub>2</sub> levels, including Queensferry Road. There is a flattening trend at Glasgow Road, with concentrations varying between 26 and 29 $\mu\text{g}/\text{m}^3$  over the five-year period.*

*The applicant has predicted that concentrations of NO<sub>2</sub> within the application site closest to Maybury Road would be lower than at the nearest monitoring site at 158 Glasgow Road and at the Barnton junction due to the lower traffic flow along the A902 than along the A90 or A8 and the greater distance of the application site from the junctions of the A902 with the A90 and A8.*

*The air quality impact assessment shows that the annual mean objective for NO<sub>2</sub> is likely to be met at all receptor locations. However, the annual mean objective for Particulate Matter (PM<sub>10</sub>) may not be met at two receptors near the Maybury junction. The applicant states that the traffic from the proposed development makes no perceptible difference to concentrations of PM<sub>10</sub> at these locations and will not significantly affect whether or not the objective is achieved.*

*If consented the operational phase of the development will cause increases in local traffic at a level which will give rise to imperceptible increases in concentrations of PM<sub>10</sub> and NO<sub>2</sub> at roadside locations on affected roads. The significance of these changes has been deemed negligible, even at roadside properties on the Glasgow Road and at the junction of Maybury Road with Queensferry Road where existing concentrations of PM<sub>10</sub> and NO<sub>2</sub> may be close to the relevant annual mean objectives. Therefore, the proposed development on its own will not have an adverse impact on local air quality.*

*Air quality mitigation for the operational phase can be limited however the applicant must ensure that as a minimum they install electric vehicle charging points in accordance with the Edinburgh Design Standards and install low NO<sub>x</sub> boiler to the residential properties.*

*Environmental Protection encourage the developer to work with this department to produce an up-to-date Green Travel Plan which should incorporate the following measures to help mitigate traffic related air quality impacts;*

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

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

*The applicant must be aware that there are now requirements stipulated in the Edinburgh Design Guidance must be achieved. Edinburgh has made progress in encouraging the adoption of electric/hybrid plug-in vehicles, through deployment of extensive charging infrastructure. As plug-in vehicles make up an increasing percentage of the vehicles on our roads, their lack of emissions will contribute to improving air quality especially as this site is located near an AQMA, furthermore their quieter operation will mean that a major source of noise will decrease.*

*The Sustainable Energy Action Plan is the main policy supporting the Council's Electric Vehicle Framework. Increasing the number of plug-in vehicles and charging infrastructure in Edinburgh will provide substantial reductions in road transport emissions.*

*To ensure that the infrastructure required by the growing number of electric vehicles users is delivered, one of every six spaces should include a fully connected and ready to use electric vehicle charging point, in developments where ten or more car parking spaces are proposed. Electric vehicle parking spaces should be counted as part of the overall car parking provision and not in addition to it.*

*Due to the proximity to the AQMA as a minimum Environmental Protection would recommend that 7Kw charging provision will be required for all residential properties with rapid chargers located at some communal parking spaces. Information on chargers is detailed in the Edinburgh Design Standards Technical Information Design Standards.*

*Environmental Protection are satisfied that the impacts of this proposed development will be limited. The applicant must keep the numbers of car parking spaces to a minimum, committed to good cycle provisions, electric vehicle charging facilities and supported with a travel pack. It is recommended that the travel pack is refreshed. Due to the proximity of the air quality management areas Environmental Protection will recommend the electric vehicle charging points are fully installed and operational prior to occupation serving 100% of the spaces.*

## *Cumulative Impacts*

*As stated in addition to the proposed development at West Craigs, there is provision in the Local Development Plan for further 1700 - 2000 residential properties at Maybury and 500-700 new residential properties at Cammo. In addition to this "Special Economic Development Areas" have been identified north of the Glasgow Road at the Royal Bank at Gogarburn and at the Royal Highland Centre. Although each planning application must be considered on its own merits, within the confines imposed by national, regional and local policies in circumstances such as this it presents difficulties when developments are permitted sequentially, with each individually having only a relatively low polluting potential, but which cumulatively result in a significant worsening of air quality.*

*All of these potential developments will cumulatively generate additional traffic on the local network leading to an increased risk that the air quality objectives for PM10 and NO2 will not be met in the immediate vicinity of the junctions of Maybury Road with Queensferry Road and the Glasgow Road. The potential cumulative impact of already committed development plus the residential development at Cammo has been modelled by the applicant and the output of the model states that the annual mean objective for NO2 is likely to be met at all the receptor locations allowing for the cumulative effects of committed development and the proposed development at Cammo as well as this proposed development.*

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

## *Composting*

*The existing composting site north-west of the application site is located approximately 350m from the boundary of the application site. In 2012 the site handled 32,259 tonnes of household and commercial waste. The site is regulated by Scottish Environment Protection Agency (SEPA) and is required to control emissions of dust and odour.*

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

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

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

### *Contaminated Land*

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

### *Noise*

*Environmental Assessment raised concerns regarding the potential noise impacts from the neighbouring industrial estate and road noise from the A902. Details of mitigation will be required during the detailed stage. This must be submitted in the form of a noise impact assessment which details exactly what mitigation measures are required. The site is outside the noise contours for the airport therefore we will not require this aspect to be further investigated.*

*Therefore, Environmental Protection offers no objection to this application subject to the following conditions;*

### *Conditions*

*1. Prior to the commencement of construction works on site:*

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

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

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

2. *The development shall not commence until a scheme for protecting the residential properties hereby approved from noise from the industrial estate to the south and A902 has been submitted to and approved in writing by the Head of Planning; all works which form part of the approved scheme shall be completed to the satisfaction of the Head of Planning before any part of the development is occupied.*

3. *Electric vehicle 7Kw (type 2) chargers shall be installed throughout the development site serving at least every sixth parking space, details shall be shown on submitted detailed plans.*

#### *Informative*

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

*Bedrooms - 30dB LAeq, T and 45dB LAfmax*

*Living Rooms - 35 dB LAeq, D*

*T - Night-time 8 hours between 2300 - 0700*

*D - Daytime 16 hours between 0700 - 2300*

#### *Construction Mitigation*

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

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

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

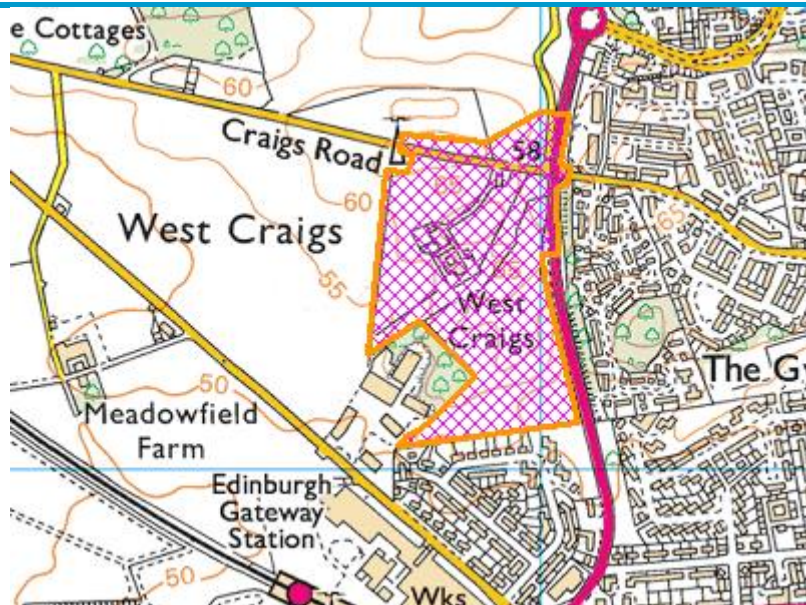
d) *Surfaced roads and the public road during all ground works shall be kept clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping shall be recorded as part of documented site management procedures.*

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

- f) *Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.*
- g) *This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.*
- h) *No bonfires shall be permitted.*

## Location Plan

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