

Development Management Sub Committee

Wednesday 22 May 2019

**Application for Planning Permission 18/01755/FUL
At Land 345 Metres Southeast Of 18, Cammo Walk,
Edinburgh
Development of LDP allocated site HSG20 for residential
development supported by ancillary mixed uses including
associated works and landscaping (as amended).**

Item number	6.1(b)
Report number	
Wards	B01 - Almond

Summary

The principle of housing development is acceptable on this allocated site (HSG 20 Cammo). The proposed development delivers a good mix of housing types with on-site affordable housing. There is a strong landscape context. The proposals comply with the wider objectives of the Local Development Plan.

Links

<u>Policies and guidance for this application</u>	LDPP, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LHOU10, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES09, LDEL01, LTRA01, LTRA02, LTRA03, LTRA04, LTRA08, LEN03, LEN07, LEN08, LEN09, LEN11, LEN12, LEN15, LEN16, LEN21, LEN22, SUPP, SGDC, NSG, NSGD02, NSHAFF,
--	--

Report

Application for Planning Permission 18/01755/FUL At Land 345 Metres Southeast Of 18, Cammo Walk, Edinburgh Development of LDP allocated site HSG20 for residential development supported by ancillary mixed uses including associated works and landscaping (as amended).

Recommendations

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

Background

2.1 Site description

The site lies within the Almond basin covering an area of approximately 28ha and is currently in agricultural use (Class 2 Prime Agricultural Land). The Edinburgh Green Belt abuts the site on its western and southern boundaries. The Bughtlin Burn also follows this boundary. Cammo Walk spans the length of the western edge of the site, providing links to Cammo Estate Park and further south to Craigs Road Junction. The northern site boundary is formed by the rear gardens of residential properties located along Cammo Grove, with Maybury Road (A902) forming the eastern boundary. The site topography is largely flat throughout, with a fairly steep level change off Maybury Road at the north east corner.

The surrounding area to the south and west is largely characterised by agricultural arable land with recreational opportunities at Cammo Estate Park. The residential area of Cammo to the north of the site is dominated by low density detached suburban villas. Directly to the east of Maybury Road, East Craigs is defined by higher density housing with an organic urban grain and an area of open space providing a landscaping buffer between this residential area and Maybury Road. Due to proximity to Edinburgh Airport, the site lies within an Airport Development Restriction Zone.

Beyond the application boundary to the west, there are a number of significant sites and designations within close proximity. These include; Cammo Special Landscape Area, Cammo Estate Local Nature Reserve, Cammo Garden and Designed Landscape, Cammo Tower and Mauseley Hill. There are also several listed buildings to the west of the site associated with Cammo Estate.

Cammo House Knoll (LB47715) on the top of Mauseley Hill and Cammo Water Tower (LB28039) are both Category B listed buildings which are located to the west of the site.

2.2 Site History

16 October 2013 - Proposed Application Notice for residential development supported by ancillary mixed uses, including associated works and landscaping on land to the southeast of Cammo Walk (13/03999/PAN).

04 December 2014 - An appeal against deemed refusal on grounds of non-determination for the Proposal for up to 670 unit residential development supported by ancillary mixed uses, including associated works and landscaping (as amended) (14/01776/PPP). An appeal was lodged to Scottish Ministers against non-determination and this appeal was dismissed (PPA-230-2134).

The Reporter was minded to grant the appeal, however it was called in by Scottish Ministers who dismissed the appeal. In dismissing the appeal Scottish Ministers took the view that in this case, there was prejudice to the Proposed LDP and the application should not be approved at this stage. Scottish Ministers considered that the wider cumulative impacts of the development within the West Edinburgh area were yet to be fully considered through the comprehensive LDP process. The start of the LDP examination was imminent at that point, and Scottish Ministers did not agree with the Reporter who concluded that the advantages of the scheme outweighed the implications to the LDP process.

08 November 2017 - Proposal of Application Notice for residential development supported by ancillary mixed uses including associated works and landscaping (Ref: 17/04395/PAN).

November 2016- The site was allocated for housing as LDP Site HSG 20 in the Adopted Edinburgh Local Development Plan.

Neighbouring Sites

LDP Site HSG 19

The neighbouring allocated site of Maybury HSG 19 lies under 1km to the south of the Cammo site and is allocated in the LDP for an estimated 1700-2000 houses, providing cycle and pedestrian links to Edinburgh Gateway Station.

Main report

3.1 Description Of The Proposal

The revised proposal is for planning permission for a residential development comprising of 655 units (previously 656 units), with ancillary mixed uses, associated works and landscaping. The ancillary uses within the proposed Community Hub at the north eastern corner of the site are proposed to be a nursery and multi-functional spaces.

A comprehensive masterplan has been developed which follows similar design principles of the previous PPP scheme (14/01776/PPP), respecting the two main view corridors looking from Maybury Road to the Special Landscape Area which are integral to this site. The masterplan is based around these two main view corridors which provide a variety of usable open spaces to serve future residents whilst creating a coherent green network throughout the site and beyond in both western and eastern directions.

The housing mix comprises of 491 private housing units and 164 affordable housing units, providing an overall total of 655 new homes. This has been broken down as follows:

Private Housing (491 in total)

Houses

82 x 3 bed (78 Terrace, 4 Detached)
121 x 4 bed (6 Terrace, 115 Detached)
32 x 5 bed (Detached)

Flats

10 x 1 bed
141 x 2 bed
63 x 3 bed
42 x 3 bed colonies

Affordable Housing (164 in total)

Houses

33 x 3 bed

Flats

33 x 1 bed
98 x 2 bed

The architectural style is predominantly modern, with traditional elements throughout. The split of houses between both developers, CALA and David Wilson Homes, can be seen within the Accommodation Schedule which has been submitted in support of this application. CALA will be delivering the houses to the north of Mauseley Park and Barratt David Wilson will deliver the houses to the south of this. All other infrastructure and landscape will be delivered jointly by the consortium.

Vehicular access would be taken from two access points on Maybury Road. The northern access will be a new junction some 150 metres south of Cammo Gardens. The access to the south of the development will be a new junction approximately 440 metres to the north of Maybury Drive roundabout. Pedestrians and cyclists have four access points along Maybury Road, as well as an existing access at the north west corner onto Cammo Walk and a proposed footbridge over the Bughtlin Burn at the south west corner. The hierarchy of footpaths and cycle routes within the site will connect to a series of existing surrounding active travel routes to encourage sustainable travel options in this busy area of West Edinburgh.

The primary road throughout the site links the north and south accesses, forming the principal street and acting as the main movement spine for pedestrians, cyclists and motorists. Avenue planting is proposed on both sides of the street to ensure this primary street is an attractive environment whilst helping to reduce vehicle speeds. This also helps to identify a clear street hierarchy and ensures legibility throughout the development.

There are four key landscape areas throughout the site providing a well-connected landscape led masterplan. These four landscape character areas have a variety of passive and active spaces incorporating active travel routes, play areas, community growing areas, civic space and informal open space.

Revised Scheme

A revised scheme was submitted in November 2018. This provided for the following revisions to the original scheme:-

- The design layout of housing along western edge, adjacent to Cammo Estate, have been amended to remove the private driveways/vehicular parking from the front of the homes and introduce a series of secondary lanes to the rear of the properties. This has moved the proposed houses forwards and created a car free frontage along the western edge;
- Communal Open Space has replaced the originally proposed car parking behind the apartment blocks;
- The form, location and heights of apartments along Maybury Road have been amended to comprise of 3 and 4 storey apartment blocks, with the massing reduced to 3 storey at the corners to frame the long views to Cammo Estate;
- Apartment blocks 10 and 11 adjacent to the community building have been lowered from 4 to 3 storey. Apartment block 19 has increased in height, from 3 to 4 storeys;
- Revised proposed material finishes with the apartment blocks to be finished in brick as opposed to the originally proposed mixed render and brick;
- The replacement of the proposed timber fence with a wall behind the community building and
- The proposed active travel route is extended to connect back to the existing path on the south eastern boundary.

Supporting Statements

The applicant submitted the following documents in support of the application:

- Cultural Heritage Desk-based Assessment;
- Design and Access Statement;
- Drainage Strategy Plan;
- Environmental Impact Assessment Report;
- Flood Risk Assessment;
- Ground Investigation Report;
- Landscape Framework Masterplan;
- Noise Impact Assessment;
- PAC Report;

- Quality Audit Report;
- Road Safety Audit;
- Swept Path Analysis; and
- Transport Assessment.

An Environmental Impact Assessment (EIA) Screening Request established that an EIA Report would be required for this development, namely to focus on the impacts on numerous significant sites within close proximity and to consider the wider cumulative impacts within the surrounding area. An EIA Report was submitted to accompany the planning application and broadly covered the following topic areas:

- Noise;
- Air Quality;
- Landscape and Visual Impact Assessment; and
- Ecology and Nature Conservation.

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.

In considering whether to grant consent, special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. For the purposes of this issue, preserve, in relation to the building, means preserve it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character.

Do the proposals comply with the development plan?

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

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

3.3 Assessment

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

- a) the principle of the development proposed is acceptable;
- b) the density, scale, design, layout and housing mix are acceptable;
- c) the landscape impacts are acceptable;

- d) the proposal preserves or enhances the historic environment; setting of listed building, designed landscape and archaeological significance;
- e) the impact on traffic, road safety and active travel is acceptable;
- f) the local infrastructure can accommodate the development;
- g) the proposal preserves neighbour and future occupier amenity;
- h) the impact on air quality is acceptable;
- i) flooding and drainage issues have been addressed;
- j) there is no adverse impact on local biodiversity;
- k) all public comments are addressed;
- l) the proposal meets sustainability criteria; and
- m) any impacts on equalities or human rights are acceptable.

a) Principle

The site is identified in the LDP as housing site HSG 20 Cammo. 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 LDP gives an estimated capacity of 500-700 homes based on a site of 28 hectares of which 20 hectares is developable land. These figures, as per the Housing Site Assessment within the LDP Environmental Report Volume 2 (2014), are based on providing 3ha of woodland planting and safeguarding 5ha for view corridors and Maybury Road frontage as part of the key Development Principles in the LDP; this did not include land which is non-developable due to flood risk. The proposed masterplan excludes a significant area of land from built development due to flood risk on the western and southern boundary of the site. This area is proposed as a large parkland area within the site, providing usable open space and ensuring the delivery of a co-ordinated masterplan, as per LDP Policy Des 2.

The Maybury and Cammo Site Brief sets out the parameters for the comprehensive development of the site through 12 key principles.

These are summarised below, with the full description set out on page 59 of the LDP:

- Maximum accessibility to public transport;
- Opportunity to enhance connections across and improve frontage of Maybury Road;
- Allow views through the site to Mauseley Hill, Cammo Water Tower, Cammo Estate Park and the Pentland Hills;
- Enhance the context of the Designed Landscape;
- Provide new woodland, grassland and wetland boundary along southern and western edge of site;

- Re-align and improve treatment of the Bughtlin Burn;
- Provide green network connections in and around the site;
- Address General Development Principles on transport and education for West Edinburgh;
- Ensure appropriate access from Maybury Road;
- Ensure safe pedestrian crossing of Maybury Road; -Address any impacts on the safe operation of the local road network; and
- Final masterplan to be informed by a Flood Risk Assessment.

The 12 LDP principles will be addressed throughout this report and the proposal satisfies the majority of these.

The principle of housing development on this site is therefore acceptable, subject to compliance with other relevant LDP policies.

b) Density, scale, design, layout and housing mix

The proposed overall residential density equates to 36 units per hectare. This excludes 9.8 hectares of non-developable land due to flood risk on the western edge. The LDP recommends a density of 25-35 units per hectare, therefore the proposal is slightly in breach of this. In comparison, the surrounding area to the immediate north of the site has a density of 25 units per hectare whilst the residential area to the east of the site has a density of 33 units per hectare.

The proposed higher density housing is located within the eastern edge of the site which borders Maybury Road. Flatted blocks are common place on the adjacent side of Maybury Road and therefore the high density units are not out of character for this area. This location is also closest in proximity to access existing bus services and further facilities on Queensferry Road and Whitehouse Road. The presence of high density buildings will also assist in changing the character of Maybury Road with the presumption of assisting to reduce vehicle speed limits.

Higher density low rise buildings (colonies) have also been incorporated within the proposal in the central spinal area of the masterplan, looking onto Mauseley Park and Cammo Tower Avenue. The higher density housing units are restrained to primary routes within the site which overlook areas of the proposed open space network.

Whilst the overall proposed density is higher than the surrounding areas, particularly the flatted blocks facing Maybury Road, the increased density is not perceived to have an adverse impact on local character, environmental quality or residential amenity, as per LDP Policy Hou 4 and the Edinburgh Design Guidance. The proposed densities allow a variety of townscape capable of achieving an urban environment with various characteristics and a good sense of place. The marginal increase from the LDP density recommendation is acceptable to ensure the efficient use of an allocated site land within the City.

Scale and height

LDP Policy Des 4 requires new development proposals to have similar characteristics to the surrounding urban grain, paying close attention to scale, height and positioning of buildings, whilst incorporating the wider landscape and view corridors.

The proposal includes a varied building scale and height throughout the site. As mentioned above, the higher density buildings are located adjacent to Maybury Road and in areas overlooking the avenues of public open space.

On Maybury Road, Scheme 1 proposed a more solid massing with four storey blocks spanning the length of this edge. Architecture and Design Scotland and various representations received were not supportive of this approach. As a result, Scheme 2 has revised the built form in this location to provide a broken roofscape with varied height and scale of three and four storey blocks. The overall scale and massing has therefore been reduced. This improved architectural response allows additional permeability through the site, a less dominant built form edge and raises awareness of the landscape through and beyond the site, as stipulated by the LDP site brief. This also has a positive impact on air quality with Maybury Road being perceived as less of a 'tunnel of development'.

The proposed units bordering both the northern and southern edge of Mauseley Park are three and four storeys in height, with a mixture of colony type units, terraces and larger flatted blocks with active frontages facing the public open space and anticipated key desire line. Further three storey blocks are spread infrequently throughout the central part of the site. The rest of the site features two storey, largely detached housing.

As development spans from east to west, the scale, height and massing of building intentionally drops off as the development approaches Cammo Estate contributing to defensible Green Belt boundary, as per LDP Policy Des 9. This hierarchy of architecture provides a suitable boundary and appropriate integration with the wider landscape.

Design and layout

LDP Policy Des 7 seeks new developments to enhance community safety and urban vitality whilst providing direct connections for pedestrians and cyclists through a well-designed layout.

The applicant has submitted a comprehensive Design and Access Statement which details the Urban Design Strategy for the proposal. It states that the overall masterplan concept has been designed around a landscape led approach, focussing on the key contextual structures and views beyond the site whilst ensuring permeability throughout the site to enhance connections with the wider environment.

The proposal includes two linear view corridors from Maybury Road through to the historic environment on the western periphery, which dictate the overall layout of the design concept. The proposed buildings are then split into three development blocks. The blocks are regular in shape and form, seeking to mirror the pattern of development within the existing Cammo residential area to the north. The general urban form within East Craigs could be described as organic in nature, so the proposal is more reflective of the area to the north.

The street hierarchy is clearly legible with the primary vehicle route looping through connecting the north and south access points. This street is tree lined on both sides to delineate it from other streets. A series of secondary streets provide connections and movements within this loop. Pedestrians and cyclists have four access points along Maybury Road with clearly visible green networks providing a car free environment on the linear parks to ensure safe movement throughout the site. These green networks have been successfully designed to combine open space with active travel routes and are overlooked by residential units. The proposed routes connect into an existing networks of paths to the north, east, south and west of the development.

Police Scotland have recommended their Secure by Design principles are incorporated to ensure crime prevention through environmental design. The applicant has been in discussions with Police Scotland to confirm the design is in accordance with their recommendations. The masterplan proposed active frontages to open spaces and footpaths which ensures a higher level of community security throughout the development.

The revised flatted blocks on Maybury Road are dual frontage to maximise the amenity of residents and increasing safety to allow flats to overlook the areas of open space. Projecting balconies were also originally proposed which Environmental Protection objected to due to air quality issues. The revised Scheme 2 has removed these projecting balconies and proposes a limited number of recessed balconies only on corner feature blocks which protects amenity and emphasises the architectural response.

The primary material proposed for this development site is brick. The palette of materials extends to include cream render, dark grey cladding, dark grey and brown UPVC windows and doors and grey concrete roof tiles. The architectural style and same materials runs throughout the whole development site to ensure coherence whilst contributing to a distinctive sense of place. The buildings located on the eastern edge of the site will be the most visible from passing traffic on Maybury Road. Two types of brick are proposed on these elevations, which would be utilised to create different textures with zinc panelling on feature corners.

A standard condition is recommended for a sample palette of materials to be approved prior to development commencing.

In terms of boundary treatments, Scheme 2 has amended the layout of housing to the western edge, adjacent to Cammo Estate, to remove the private drives along the front, and introduced a series of secondary lanes to the rear of the properties. This has created a vehicle free active frontage along the western boundary.

Overall the proposed design and layout is in accordance with the design principles for new development as set out in the LDP, and most notably with LDP Policy Des 1.

Housing mix

LDP Policy Hou 2 seeks developments to provide a wide range of house types and sizes to ensure there is a wide choice of housing provision to create sustainable and diverse communities. This allows a wide range of population groups to occupy the development.

The Edinburgh Design Guidance requires larger housing schemes to provide 20% of the total homes as family housing. Family housing is described as having three or more bedrooms, good levels of storage, direct access to private gardens, with a minimum internal floor area of 91m². The proposal is in accordance with these recommendations.

Affordable Housing

The applicant has made a commitment to provide 25% (164 units) on-site affordable housing. 100% of these units will be delivered on site. 70% of these units will be provided for an RSL, with the remainder 30% being provided as golden share housing.

Whilst the overall number of on-site affordable housing units are in line with LDP Policy Hou 6, Scheme 1 did not achieve a representative mix of house types and sizes being heavy reliant on 1 and 2 bed flats. After continued dialogue between the applicant and the Council's Housing Department, Scheme 2 now provides for the following:-

- 114 units for RSL housing in partnership with Places for People, with an acceptable mix of house sizes (104 x 2 bed flats, 10 x 3 bed terraces); with a majority of these 114 homes to be provided as social rent.
- 50 units (27 x 2 bed flats, 23 x 3 bed terraces) to be provided for Golden Share.

In order to meet the highest priority need of the city, the Council requested a reduction in the number of golden share properties and requested an increased number of RSL rented homes. However, supplementary guidance on affordable housing policy at the time this application was submitted stated a preference for 70% social housing and indicates by default, that 30% housing can be alternative tenures. As such, this provision is in compliance with LDP Policy Hou 6 and non-statutory guidance.

The affordable housing will be largely located on the eastern edge of the site; closest to existing amenities and public transport links. All the affordable homes must meet the Edinburgh Design Guidance and also meet the relevant Housing Association Design Guidance size and space standards. In the interests of delivering mixed, sustainable communities, the affordable housing policy units will be tenure blind through the use of the same palette of materials for private housing and well-integrated within the development.

c) Landscape Impacts

The landscape framework for this proposal is a vital consideration and integral to achieving a high quality development that can successfully integrate within the surrounding sensitive landscape. The surrounding environmental designations provide a unique setting and opportunity to create a distinctive development.

LDP Policy Des 8 supports proposals which demonstrate that all external spaces and features have been designed as an integral part of the scheme. The proposed landscape design strategy presents four key areas of open space that form the overall development masterplan.

Firstly, the two linear parks - Mauseley Park (460m x 32m) and Cammo Tower View (320m x 18m) - which span from east to west within the site provide community open space with a variety of functions within them including formal lawns, community growing areas, formal and informal play provision whilst providing a green network throughout the site from Maybury Road to Cammo Estate.

Secondly, Cammo Estate Park is within the flood plain, forming the western and southern edge of the development following the channel of the Bughtlin Burn and is a community parkland, helping to form an appropriate boundary between the surrounding landscape and proposed development. This informal open space provides wildflower meadows, varied grassland management, natural play spaces and a number of paths connecting into Cammo Estate and the south of Cammo Walk as well as through the development to Maybury Road.

Lastly, Maybury Road Avenue forms a new urban avenue parallel to the strategic road in an effort to change the character of this road into a street as opposed to an 'urban bypass', as per the LDP Site Brief. This linear park is 20m wide and spans the length of the eastern edge of the development. It would provide a 4m multi-user segregated path, an avenue of trees with shrub planting and nodes at frequent intervals with seating areas and bike stands. The proposed crossing points over Maybury Road will lead off from this avenue. At the most northern part of the site adjacent to the proposed community hub, built development has been set back to provide a grass amphitheatre within Cammo Square, a suitable design response for this area which has a challenging topography.

LDP Policy Des 8 d) has been satisfied through the submission of a Landscape Maintenance Schedule, detailing the proposed management and maintenance for soft landscaping, hard landscaping, SUDs management, play areas and all planting (including street trees, hedgerows, verges and lawns) for a 15 year period.

The LDP Site Brief requires views through the site to the surrounding landscape and historic environment, supported by the principles of LDP Policy Des 3. Mauseley Park and Cammo Tower View provide view corridors from Maybury Road through to the significant landmarks of Mauseley Hill, Cammo Water Tower and Cammo Estate itself. The vast parkland along the western edge, Cammo Estate Park, provides views to the south encompassing the Pentland Hills. Views to the south are also offered throughout the site down streets that bisect the proposed layout. A Landscape and Visual Impact Assessment was submitted as part of the application detailing the proposed developments impact on various viewpoints. The proposed layout, design and height of the development ensures that these key views will be protected.

LDP Policy Env 11 seeks to prevent any development making an adverse impact on any Special Landscape Areas (SLA). Cammo SLA spans 95 hectares and is directly to the west of the development site. The Review of Local Landscape Designations Report (January 2010) states that 'Cammo's distinctive character, recreational and cultural value is derived from its designed landscape of parkland, woodland and eye-catching structures, centred on low lying hills to the south of the Almond Valley'.

The principle of development on this site adjacent to Cammo SLA has already been established through the LDP. The LDP Site Brief puts landscape integrity at the forefront of the development principles and the developer has shown through the masterplan how the proposal can be integrated within the sensitive landscape whilst ensuring elements of the surrounding historic environment act as focal points. This helps to create a unique sense of place and identity from within the development site.

LDP Policy Des 9 ensures that development which adjoins the green belt will only be permitted where it: conserves and enhances the landscape setting; promotes access to the countryside; and strengthens the greenbelt boundary whilst contributing to enhanced green networks.

The proposal achieves all of the above principles to ensure integration between built development and the adjacent greenbelt. Vital views through the development are protected whilst green networks aim to promote access through the site into the greenbelt and Cammo Estate. The inclusion of tree species that reflect the species within Cammo Estate assist in strengthening the boundary treatment on the western edge of the development site. It is essential this woodland tree belt planting along the western and southern boundaries is carried out at the earliest stage of the development as this will help to mitigate the visual impact of the development from Cammo Estate into the development site, whilst promoting biodiversity.

The applicant submitted a Tree Survey and Arboricultural Constraints document which emphasised that the proposed masterplan allows for the retention of the majority of these peripheral trees and hedges whilst supplementing and enhancing them with significant additional planting. A condition is attached requiring a Tree Protection Plan to be submitted for approval. Furthermore, a condition is attached stipulating the submission of a Landscape Phasing Plan to be approved by the local authority.

Scottish Natural Heritage were consulted on this planning application and provided no objection. They stated that if the proposal was delivered to the appropriate standards then it would have the potential to provide a new neighbourhood with a favourable level of integrated, accessible and multi-functional green infrastructure.

Bughtlin Burn

The LDP Site Brief requires the development to 'improve the quality of the water environment through works to realign and improve the bank side treatment of the Bughtlin Burn'. This was included as per advice given by SEPA at the LDP Main Issues Report stage and consequently supported by the Reporter in the LDP Examination Report.

The development provides an opportunity to re-meander the artificially straightened burn and undertake habitat enhancement. Re-alignment of the Bughtlin Burn could provide more developable land, in addition to other benefits such as improved water quality and ecological status, and potentially allow more scope in design and layout opportunities for non-developable land to address both flooding and LDP development principles concurrently. Due to proximity to Cammo Garden and Designed Landscape, there is an opportunity to reflect the historic naturalistic landscape design through re-alignment.

However, the applicant does not propose re-alignment of the Bughtlin Burn. Alternatively, the applicant has stated that the new park along the southern and western edges of the site has been designed to incorporate the burn. It is proposed that appropriate planting and a strategy for ongoing maintenance will create an attractive and interesting edge to the masterplan and the boundary with Cammo Estate without the need for its re-alignment. As an alternative to the re-alignments, the applicant proposes to improve the quality of water through a channel enhancement, repairs to any sections of eroding river bank and minor changes to the river corridor.

In light of the above, given that the developer does not propose re-alignment of the Bughtlin Burn, this element of the proposal is contrary to the LDP Site Brief.

SEPA were consulted on this planning application and provided no objection. However they have stated that they support this aspect of the LDP Site Brief and a plan led planning system, and the current application does not fulfil the requirements of the LDP due to the exclusion of provisions to realign the Bughtlin Burn.

Notwithstanding the above, the overall water quality will be improved and the landscape framework satisfies the majority of the LDP Site Brief requirements which focus on landscape and the environment.

d) Historic Environment, Setting of Listed Building and Archaeological Significance.

The Historic Environment Policy for Scotland (HEPS) outlines how we should undertake our collective duty of care whenever a decision in the planning system will affect the historic environment. There are three key areas which define how the historic environment should be understood, recognised and managed to support participation and positive outcomes, including "Managing Change" under policies HEP2, HEP3 and HEP4.

Scottish Planning Policy aims to enhance elements of the historic environment whilst supporting sustainable development and advises that siting and design of development should take account of all aspects of the historic environment, including scheduled monuments, listed buildings and designed landscapes. The application site is surrounded by a diverse historic environment, defining the character and history of the local area. The LDP Site Brief seeks numerous design principles are considered to ensure the significance of the historic environment is retained and where possible, enhanced.

Setting of Listed Building

LDP Policy Env 3 aims to protect the setting of listed buildings. Cammo House Knoll (LB47715) on the top of Mauseley Hill and Cammo Water Tower (LB28039) are both Category B listed buildings which are located to the west of the site and currently highly visible from Maybury Road.

The proposal adopts a design, as determined by the LDP Site Brief, which ensures that views through the site to focal points on the periphery form the basis of the masterplan, allowing maintained views of both listed buildings from Maybury Road. These two iconic points of interest have informed the overall landscape strategy from the outset, ensuring that the proposed vistas continue to allow a visual representation from Maybury Road. Tree planting throughout the view corridors will be sensitively chosen to ensure these views are not compromised.

Designed Landscape

LDP Policy Env 7 seeks to protect sites included in the national Inventory of Gardens and Designed Landscapes. Cammo Garden and Designed Landscape (GDL00081) is located directly to the west of the site. Typical design features of this include enclosed parkland contained by woodland and shelterbelts with design avenues, vistas and eye catchers.

The proposal refers to this historic landscape and incorporates some of these features in a contemporary way, such as the proposed clumps of parkland trees surrounded by wooden fencing in Cammo Estate Edge Park. The view corridors proposed are functional to modern needs but also reflect the historical setting with Cammo Estate, ensuring the provision of a unique place and identity.

Archaeological Significance

The site has been identified as occurring within an area of historic archaeological significance. Policy Env 9 of the LDP aims to protect and enhance significant archaeological features from development; preserving remains in situ as a first option, and where this is not possible, archaeological excavation or an appropriate level of recording may be a suitable alternative.

Historic Environment Scotland were consulted and raised no objection. In their view, the development would not have a significant impact on the setting of the designed landscape. The Council's Archaeology Officer also believes that the provision of the linear parks and parkland surrounding the burn will ensure that there is no significant impact on the setting of Cammo Garden and Designed Landscape.

The applicant detailed the results of an archaeological evaluation undertaken between April and June 2018. The results demonstrated that the site has been heavily ploughed in the past however discovered Palaeo channels relating to the adjacent burn. Such deposits are archaeologically important as they can provide significant information regarding historic environmental changes and land uses going back perhaps as early as the last Ice Age circa. 12,000 BC.

Therefore a condition is recommended to ensure that a programme of archaeological works is undertaken to excavate, record and analyse these Palaeo-channels prior to development.

e) Traffic, road safety and active travel

LDP Policy Tra 8 requires all development proposals relating to major housing sites which would generate a significant amount of traffic to demonstrate through an appropriate transport assessment and proposed mitigation that any required transport infrastructure and site specific requirements have been addressed as relevant to the proposal .

The applicant submitted a Transport Assessment which includes baseline transport information, road safety and accident analysis, trip generation figures and an assessment of the envisaged impacts of the development. The EIA Report builds upon data within the Transport Assessment and concludes that no adverse impacts have been predicted for access, traffic and transport as a result of the proposed development. The mitigation measures proposed aim to improve road safety whilst creating an enhanced environment for pedestrians and cyclists.

Traffic and congestion

The vast majority of representations received through the consultation process for this planning application mention existing traffic congestion and the cumulative impact of allocated housing sites within the surrounding area. Cramond and Barnton Community Council also submitted a discussion paper entitled 'Barnton: Easing Traffic Congestion and Enhancing Safety', December 2017. The paper included suggested strategic infrastructure changes that could be considered in the LDP and Action Programme review and more localised suggestions that the North West Locality Team are currently considering, such as reviewing directional signage.

The development can bring opportunities to improve transport issues, by increasing active travel and public transport options in the area. The congestion will not be eased by this development, and the Council hopes to promote a change in travel behaviour through various ongoing projects. Considerable work is going into various projects which focus on encouraging sustainable travel within this area and the wider vicinity, most notably the Local Transport Strategy, Low Emission Zones and the West Edinburgh Active Travel Network.

Road safety

The LDP Site Brief requires development at HSG20 to change the character of Maybury Road through street design, to enable and improve path connections across Maybury Road and create residential frontage with a reduced speed limit from 40mph to 30mph.

Through the provision of four signalised crossing points , reducing the speed limit to 30mph, a landscaped urban avenue adjacent to the road and a strong built environment edge it is envisaged that the character of this strategic route will be positively altered and allow an improvement to road safety. A separate 4m wide pedestrian and cycle link would be set back the edge of Maybury Road within a 20m wide landscape zone creating a positive and safe pedestrian environment.

This development is of particular interest within the catchment area of the Community Links PLUS West Edinburgh Active Travel Network (WEATN). The proposed masterplan makes good provision for active travel throughout the site and into the surrounding area which is largely combined with the proposed green networks. The linear park adjacent to Maybury Road will be an attractive environment for pedestrians and cyclists, which will then connect into further WEATN links to the north, east and south as well as through the site connecting to Cammo Estate on the western boundary of the development.

Four crossing points will be provided on Maybury Road, connecting through to East Craigs into existing active travel routes. These crossings will all be signalised and either Toucan or D island crossings. It has been agreed that the developer will design and deliver the crossings over Maybury Road. Further design development will be required on the four links in to East Craigs. The Action Programme has set out a cost of £52,000 for these works. However, recent costings have provided a figure in the region of £300,000. It has been agreed with the developer that further design development will take place on these links and an appropriate level of contribution will be sought within the S75 Agreement.

Cammo Walk, which is to the west of the development site, was identified in the LDP as the alignment of a walking and cycling route, to be delivered through either a multiuse path running alongside the road, or by redetermining the roadway itself to close it off to motor vehicles. There is currently no definite position as to what will be implemented at Cammo Walk, or committed timescales. The southern end of Cammo Walk may be closed as a result of the Craigs Road junction redesign, however this is linked to the development at Maybury HSG19.

Parking

The proposed 529 car parking spaces (including 42 disabled) complies with the Council's car parking standards and is considered acceptable. Overall parking numbers are within parking standards as set out in the Edinburgh Design Guidance and LDP Policy Tra 2 for the whole site. The proposals have been amended to reduce front curtilage parking as set out in the Edinburgh Design Guidance. Parking for semi-detached and detached plots should be to the side of the dwelling with an optional garage set back. The revised proposal conveys better parking design solutions as detailed above.

Those areas with allocated parking bays will be built to adoptable standard but not offered up for adoption. These will be clearly defined by the use of different materials and narrowed entrances to ensure they are not utilised as main routes through the development.

Public Transport

The proposal includes the provision of a bus turning circle in the north east corner of the site at Cammo Square. This was not a requirement of the LDP Site Brief however the applicant insisted on this to ensure the site was future proofed for public transport, should a bus provider wish to turn within the site. The applicant has designed the layout of this facility in conjunction with a local bus provider.

There are currently no bus routes servicing Maybury Road. The nearest bus services to the site within a 10 minute walk (800m) are accessible at North Bughtlin Road, Queensferry Road and Maybury Drive, providing approximately 20 bus services per hour to and from the city centre. The applicant is in active discussion with bus service providers to extend current public transport routes in to the site. The developer is required to provide six bus shelters along Maybury Road.

Cycle parking, electric charging and car club

The 860 secure cycle parking spaces to be provided complies with the Council's minimum cycle parking requirement (844) for the proposed flats, colonies and terraces. The applicant proposes public bike hiring scheme adjacent to the community hall to promote cycling within the proposed development, in compliance with LDP Policy TRA 3. 19 motorcycle spaces being provided complies with the Council's minimum requirement for the proposed development.

The developer has committed to provide 100% of the driveways serving each property with an electric vehicle charging point in accordance with the Edinburgh Design Guidance along with one in six car charging points for the remaining car parking spaces. The applicant is also proposing 6 car club spaces.

Developer Contributions

The Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance identifies the application site to be within the Maybury/ Barnton Transport Contribution Zone. This states that Cammo HSG20 should contribute £1,171,117 towards improvements at three strategic junctions: Barnton (T18), Craigs Road (T17) and Maybury (T16). this represents a 29% share of the required contributions within this zone. The remaining 71% share of required contributions will be sought from the development of Maybury HSG19.

Most notably at Barnton Junction, the developer is required to make a contribution towards improved signal controls (likely to be MOVA or SCOOT) as well as making better provision for pedestrians and cyclists at this busy interchange. Given that school children from HSG20 will initially be within the catchment for Cramond Primary School and the Royal High School, ensuring this junction is safe for active travel is paramount.

The Action Programme details further site specific interventions and sets out the following required developer contributions:

- Cammo to Maybury cycle path, and extending to Cammo Estate. Toucan crossings at Craigs Road junction = £367,500;
- Bridge over Bughtlin Burn =£560,000;
- Four toucan or D island crossings providing pedestrian/cycle connection from development site across Maybury Road into East bullet Craigs = £245,000;
- Bus infrastructure on Maybury Road and peak period bus capacity improvements- Upgrade bus infrastructure (replace existing bus stops) = £490,000;
- TRO for lower speed limit along Maybury Road = £2,450;
- 3 x TROs = £6,000;
- Car Club contribution for 6 vehicles = £34,500;

- 3.5 metre wide shared use paths to connect to East Craigs =£51,450 - current costing is £305,000 - this figure will be reviewed as part of the progression of the Section 75 discussion.

Various active travel routes throughout the site and beyond which connect into existing path networks must also be delivered as a part of the development.

In conclusion, having reviewed the transport assessment and supporting information Transport is satisfied overall that the proposed transport infrastructure will be able to accommodate the impact of the proposed development and should be secured by condition/section 75 legal agreement if the planning application is granted to make the site suitable for housing.

f) Infrastructure provision

LDP Policy Del1 requires contributions to the provision of infrastructure to mitigate the impact of development. In addition to the developer contributions required for transport infrastructure as stated in section d above, the Action Programme and Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance sets out further contributions required for healthcare and education.

Healthcare

LDP Policy Hou 10 states that planning permission will only be granted where there are associated proposals to provide any necessary health facilities relative to the impact and scale of development proposed. The Action Programme sets out that the medical services for the Cammo development will be provided through an extension to Parkgrove Medical Practice and other new sites in West Edinburgh will be accommodated in a new practice co-located with the new Maybury Primary School within LDP Site HSG19. The location and provision of medical services for the proposed developments in West Edinburgh have been agreed with the Health and Care Partnership which consists of the Council and NHS Lothian.

This site is located within the Parkgrove Contribution Zone. The Council is seeking a contribution of £105 per dwelling towards the expansion of existing premises. The contribution towards healthcare facilities equates to £67,775 (£105 x 655 units).

Education

The Council's Action Programme identifies the need for a new primary school and a new secondary school within West Edinburgh to accommodate pupils from new development - including pupils from HSG 20. Potential school locations have been considered as part of the recent informal education consultation on future school infrastructure in West Edinburgh. The location for a new secondary school infrastructure in West Edinburgh will be progressed through development of a West Edinburgh spatial strategy to be prepared as part of the new Local Development Plan.

Communities and Families provided a consultation response which sets out the level of developer contributions required for this proposal which falls within Sub-Area W1 of the West Education Contribution Zone within the draft Developer Contributions and Infrastructure Delivery Supplementary Guidance. The assessment was based on 268 houses and 344 flats (excluding one bedroom flats), using the established 'per house' and 'per flat' rates for that zone. The total infrastructure contribution for education required has been calculated as £5,444,152.00. The total land contribution required is £711,000.

The developer has suggested that homes on the Cammo housing site could start to be completed from 2019 but may not be fully built out until 2026. The current Action Programme identifies a delivery date of 2022 for the new primary school and secondary school, although this date will be reviewed as part of a future update to the Action Programme and would be dependent on getting agreement with third party land owners.

The application site is currently within the catchment area of Cramond Primary School and The Royal High School but school roll projections show that there is not sufficient capacity in either school to support a significant increase in pupils.

If new housing on this development site progresses as expected but the required new schools are not in place, temporary arrangements may therefore have to be put into place to mitigate the impact of the new pupils. This may mean that pupils from the new development have to be assigned to the nearest appropriate existing school (a formal statutory consultation process would be required before such an arrangement could be put in place). Temporary accommodation solutions at existing primary schools may also be required. The legal agreement should therefore allow flexibility in terms of the use of contributions for the delivery of temporary and permanent accommodation solutions.

Open space and play provision

The North West Locality Open Space Action Plan (March 2017) indicates that there are homes without access to a good quality local and large greenspace and play areas in this vicinity in 2016. This document requires developers to provide the following through development of HSG 20:

- Provision of 2.5ha green corridor linking north and south, connecting Core Paths 11 and 12;
- Northern woodland planting at Maybury (3.5ha);
- Open space provision to provide view corridors to the west;
- A landscape framework to Maybury Road and Bughtlin Burn; and
- New on-site play provision.

The proposed play provision combines formal and informal facilities and will help to alleviate the deficit of good quality play facilities in the surrounding local area.

The development proposal satisfies all of the above requirements through the submitted landscape framework and are in line with the guidelines set out in the Edinburgh Design Guidance.

Community facilities

The masterplan proposes a Community Hub within the north east corner of the site - Cammo Square - which is the closest part of the site to existing bus services on Queensferry Road, as well as the proposed bus turning circle. The applicant has suggested this hub would be designed to accommodate a range of uses and be flexible to allow provision of facilities for the wider community. It is suggested Class 2 use (doctors and/ or dental surgery) and Class 10 use (nursery/ crèche/ community hall) would be potential initially.

The proposed Community Hub is not required as part of the site brief as it is considered that there are predominantly adequate community facilities within the surrounding area. Those areas where a deficit has been identified, developer contributions have been sought (e.g. healthcare provision). Whitehouse Road and East Craigs are both identified as nearby Local Centres providing various local services. Both Local Centres are identified as being within 400m (5 minute walking distance) from the edge of the development site; Whitehouse Road to the north east and East Craigs to the south east. Therefore there is no basis for the proposed Community Hub to be implemented through the Council and should be managed by the private sector.

g) Neighbour and future occupier amenity

LDP Policy Des 5 supports proposals that have no adverse impact on neighbouring developments. For this development proposal, the northern boundary is adjoining with existing rear gardens at properties along Cammo Grove and Cammo Gardens.

The applicant has proposed a treebelt boundary to ensure the privacy and amenity of existing residents is protected. Tree species must be carefully selected for the northern boundary to ensure that the existing rear gardens and houses receive sufficient sunlight.

Rear gardens at existing properties and rear gardens at proposed units on the northern edge of the development site will have no further issues for daylighting, sunlighting or privacy due to appropriate garden sizes.

Amenity of Future Occupants

LDP Policy Des 5 also aims to ensure that the amenity of future residents is a key consideration throughout the masterplan process. Edinburgh Design Guidance sets out minimum internal floor areas to ensure satisfactory amenity of future residents. The proposal meets these requirements.

Sunlight analysis has been submitted with the application. The proposal complies with criterion of the Edinburgh Design Guidance with respect to the protection of future occupiers.

In terms of privacy, the proposal meets the minimum distance required between window and window to ensure privacy is protected.

LDP Policy Hou 3 provides the specifications for an acceptable level of private green space within new housing developments. Whilst generous areas of public open space are proposed throughout the development, the provision of private open space, especially within flatted blocks, must also be acceptable to ensure the amenity of future residents.

The revised scheme conveys that the flatted blocks throughout the development meet the policy guidelines of 10 sq.m of communal open space per flat. All ground floor flats also have private gardens which are 3m in depth, meeting the standards set out in the Edinburgh Design Guidance. Recessed balconies are also proposed on feature corners of flatted block to provide additional open space for residents. However these do not meet the noise and air quality standards so have not been included in the overall calculations for amenity space for future residents.

Private garden grounds for the remaining housing units are also of an appropriate size. The distinction between public and private open space is apparent throughout the development with the provision of various boundary treatments: fencing, walls, hedging and estate railing (to define the Cammo Estate Park edge).

Concern was raised with regards to noise levels for amenity space in close proximity to Maybury Road. Details of proposed mitigation were submitted by the developer whom has proposed acoustic barriers along Maybury Road and reduced balconies to ensure that the required external noise criteria can be achieved in order to safeguard pleasant and useable outside spaces. Acoustic glazing is required on residential building facades exposed to Maybury Road.

The site falls outside the noise contours for the airport.

Overall, it is considered that a satisfactory level of amenity for neighbours and future occupants of the proposed development can be achieved.

h) Air Quality

Air Quality Management Areas (AQMA) have been declared for areas within City of Edinburgh Council. Poor air quality at these locations is largely due to traffic congestion, through exceedances of NO₂ and PM₁₀ objectives. There is a significant amount of development already planned for West Edinburgh and additional development will further increase pressure on the local road network, which may lead to the Council declaring further AQMA's where Air Quality Standards are exceeded.

The closest AQMA to this proposal is St Johns Road, under 2km to the south east of the site. The Air Quality Assessment submitted within the EIA Report accounts for committed development and concludes that the 'proposed development' does not prevent the implementation or success of Action Plan measures to improve air quality within the St Johns AQMA.

LDP Policy Env 22 aims to ensure that no development will result in significant adverse effects for health, environment or air quality and appropriate mitigation measures can be provided to minimise adverse impacts. Whilst the submitted assessment shows only a negligible impact on air quality with no mitigation measures proposed, the planning system has a role to in ensuring that future air quality is not compromised. Reducing the need to travel and promoting the use of sustainable modes of transport are key principles identified in the LDP.

An Air Quality Impact Assessment (within EIA Report) considered the potential for impacts on local air quality due to dust emissions during the construction phase and from road traffic emissions during the operational phase.

The result indicates that the proposed development does have the potential to increase levels of airborne dust and PM10 during the construction phase. A number of proposed dust mitigation measures have been identified and must be included within a Construction Environmental Management Plan which will be submitted and approved to the City of Edinburgh Council prior to commencement of development. A suitable condition has been suggested.

The EIA Report continues to assess predicted concentrations of NO₂ and PM10 vehicle emission factors with and without the proposed development. The assessment produced an outcome that conveyed an adverse impact at three locations adjacent to Maybury Road - Maybury House, Cammo Gardens and North Gyle Terrace as a result of the proposed development.

The proposal includes specific design measures to further reduce the impact of vehicle emissions through active travel provision and enhancing access to public transport options. The site is well situated in relation to the existing transport network, with a series of footpaths, footways and usable cycle links offering connections to the wider network, along with access to public transport. A Green Travel Plan will be produced to help mitigate traffic related air quality impacts.

The developer has committed to provide 100% of the driveways serving each property with an electric vehicle charging point in accordance with the Edinburgh Design Guidance as well as installing low NO_x boilers to the residential properties, along with one in six car charging points for the remaining car parking spaces.

SEPA were consulted on this application and had no objection in relation to air quality.

Many representations were received that objected to the proposal on the grounds of deteriorating air quality in the area and the detrimental impact this has on health of local residents. The Council are currently working on three projects with the primary aim of promoting sustainable travel and improving air quality across the City - Central Edinburgh Transformation, the City Mobility Plan and the Low Emission Zone. These three projects have recently been combined into one document called a Prospectus and sets out 15 ideas that will change movement in the City, and ultimately the deteriorating air quality in some parts. These projects, along with the development proposals of increasing active travel routes, provision of EV charging points and infrastructure for bus provision, should assist with air quality issues in the area.

i) Flooding and drainage

LDP Policy Env 21 sets out the criteria for assessing the impact of development on flood protection. The applicant submitted a Drainage Strategy Plan and Flood Risk Assessment which was carried out to the satisfaction of SEPA. The Bughtlin Burn flows along the western and southern boundaries of the application site with the immediate surrounding area lying within the 1 in 200 year floodplain. The SEPA flood maps show this area as being high and medium risk to surface water flooding.

In line with SPP, the proposal excludes this floodable area for any built development and instead proposes this non-developable area is utilised as Cammo Estate Park which is an acceptable land use. Additional attenuation is proposed within the site that would reduce the amount of overland flow going to the Bughtlin Burn. Development has also been set back from the edge of Maybury Road with a flow pathway between the road to route any flood waters overtopping the road into the site away from properties.

The proposal includes a combination of Sustainable Urban Drainage Systems and swales, which have been designed in accordance with LDP Policy Des 6. Given the proximity to Edinburgh Airport, Safeguarding of Aerodromes Advice Note 6 was also referenced when designing the detention basins and Edinburgh Airport have made no objection.

The Council's Bridges and Structure's Team has raised no objection to the proposed development and is satisfied that the developer has designed the site using best practice.

SEPA provided pre-application advice to the applicant at an early stage in the planning process and as a result, they have no objection to the proposal on flood risk grounds. Scottish Water were consulted on this application and have no objection.

The above ground storage (basins) is to be covered under section 7 agreement between Scottish Water and City of Edinburgh Council.

The applicant has confirmed that the details of the sewer network and associated underground tanks have been submitted to Scottish Water for approval through the Technical Approval process, with the intention that Scottish Water vests the pipes and underground tanks. The Council does not maintain these tanks.

j) Biodiversity

LDP Policy ENV 16 states permission will not be granted for development that would have an adverse impact on species protected under European or UK Law.

A need for further surveys was identified in respect of protected species, including bats, otters and badgers to be in compliance with Env 16. These surveys were submitted and for approval by the local authority. A Construction Environmental Management Plan is required to safeguard the interests of nature conservation.

The site is adjacent to a Local Nature Conservation Site within Cammo Estate. In line with LDP Policy Hou 15, the adverse consequences of allowing the development for the value of the site have been minimised and mitigated in an acceptable manner. This has been demonstrated through an appropriate landscape framework for the site which respects the surrounding sensitive landscape, enhances connections through improved green networks and provides an enhanced ecological corridor along the Bughtlin Burn.

k) Public Comments

Neighbours were notified of Scheme 1 on 11 May 2018. The proposal generated eight letters of support and 238 letters of objection. A petition with some 2,050 names objecting to the planning application was also submitted on 8 June 2018.

Neighbours were notified of Scheme 2 on 14 Jan 2019 which generated 96 letters of objection.

Support

- The site is allocated in the Local Development Plan;
- Good for City growth; and
- Addressing housing shortage.

Material Objections

- Existing traffic congestion in surrounding area, most notably at Barnton Junction, Queensferry Road and Maybury Road - addressed in section 3.e).
- Insufficient infrastructure in area to accommodate a rise in population, most notably the existing road network, schools and medical services - addressed in section 3.f).
- Concerns with air quality due to pollution from congestion and the impacts this has on the health of residents - addressed in section 3.h).
- Loss of views to Cammo Estate and Cammo Tower – addressed in section 3.c).
- Lack of bus service along Maybury Road - addressed in section 3.e).
- Active Travel proposals are insufficient to address transport and congestion problems - addressed in section 3.e).
- Intelligent traffic lighting will not solve traffic problems - addressed in section 3.e).
- Loss of biodiversity, wildlife, ecology and open space due to greenfield development - addressed in section 3.j).
- Against the principle of development on this site - addressed in section 3.a).
- Destruction of greenbelt - addressed in section 3.a).
- Existing flooding, drainage and sewerage problems in the area - addressed in section 3.i).
- Failure to consider brownfield development sites - addressed in section 3.a).
- Transport Assessment is complacent - addressed in section 3.e).
- Cammo Gardens junction is already dangerous and this development would only exacerbate this - addressed in section 3.e).
- Over development in the area - addressed in section 3.b).
- Flats along Maybury Road will destroy views - addressed in section 3.c).
- Concerns over the northern boundary - addressed in section 3.g).

- Proposed density is inappropriate based on the area of developable area – addressed in section 3.b).
- Footpaths into East Craigs are inappropriate and will destroy acoustic bund - addressed in section 3.e).
- Maybury Road is unsafe and development will exacerbate this - addressed in section 3.b).
- Over provision of car parking - addressed in section 3.e).
- Development does not prioritise pedestrians with a dominance on car use - addressed in section 3.e).
- New community hub will detract from existing facilities at Barnton junction - addressed in section 3.f).
- Too much unusable open space with a high maintenance burden - addressed in section 3.b).
- Poor standard of design and layout - addressed in section 3.b).
- Detrimental impact on Cammo Estate - addressed in section 3.c).
- Environmental Assessment is flawed as a lack of surveys have been carried out - addressed in section 3.c and 3.j).
- No safe route to Cramond Primary School or Royal High School - addressed in section 3.e).
- Contrary to SESplan and LDP policies - addressed in section 3.a).
- Four storey buildings at Maybury Road will cause a wind tunnel - addressed in section 3.b and 3.f).
- There should be public open space with a good size and quality play park - addressed in section 3.b).
- Impact on surrounding residents has been ignored - addressed in section 3.g).
- Application is premature and requires proper assessment of impact of both HSG 19 and HSG 20 - addressed in section 3.a).
- Insufficient parking provided on site and will result in overspill in Cammo streets - addressed in section 3.e).
- Concerns over privacy for existing residents at Cammo Grove - addressed in section 3.g).
- Lack of housing mix with priority for existing upmarket homeowners - addressed in section 3.b).
- Site was least preferred option at Main Issues Report stage so consultation was based on that and therefore a new consultation process should take place before allocating site - addressed in section 3.a).

Non-material comments

- Creating paths into East Craigs will promote crime;
- Developers should be making contributions to Cammo Estate;
- Developer Contributions to amenity and transport are inadequate;
- The number of properties in the city that are used for holiday homes and/or buy to let needs to be controlled to help address the housing shortage;
- Planning application is seriously flawed;
- A footpath into Cammo Walk will cause an accident;
- Boundary to Cammo Grove is inadequate and will cause disruption and break ins;
- Residents will have to travel further for shopping;

- The development will have a detrimental impact on internet speed;
- Loss of view from existing house at Cammo Grove;
- Development is solely for the financial gain of the Council; and
- Detrimental impact on house prices in the area.

The following additional comments were raised in Scheme 2.

Material Considerations

- Danger to human and animal life due to proposed soakaway on north western boundary- addressed in section 3.i).
- Lack of elderly parking spaces- parking arrangements addressed in Section 3.d).
- Impact of SUDs Basins with regards to odour/sediment monitoring-addressed in section 3.i).

Community Council

Cramond and Barnton Community Council objected to the proposed development. The community council accepts that the site is allocated for housing within the LDP. The key areas of concern for the community council are identified as:

- Delivery of Infrastructure;
- Traffic Issues;
- Landscape Impacts of 4 storey buildings;
- Schools Provision;
- Air Quality;
- Link Path; and
- Ownership Issues along the northern boundary.

l) Sustainability

The applicant has submitted a Sustainability Statement Form in support of the application. The proposal has been assessed as a major development and has been assessed against Part B of the standards.

The proposal meets the essential criteria. The proposal accords with LDP Policy Des 6.

m) Equalities and Human Rights

The proposal does not impact upon equalities or human rights.

Conclusion

The proposal complies with the development plan and non-statutory guidance. The principle of housing development is acceptable on this allocated site (HSG 20 Cammo). The proposed development delivers a good mix of housing types with on-site affordable housing. There is a strong landscape context. The proposals comply with the wider objectives of the Local Development Plan. There are no material considerations that outweigh this conclusion.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. No development shall take place until a construction environmental management plan, relating to biodiversity (CEMP: biodiversity), has been submitted to and approved in writing by the planning authority.

The CEMP (biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
 - b) Identification of "biodiversity protection zones".
 - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.
 - d) The location and timing of sensitive works to avoid harm to biodiversity features.
 - e) The times during construction when specialist ecologist need to be present on site to oversee works.
 - f) Responsible persons and lines of communication.
 - g) The role and responsibilities on site of ecological clerk of works (ECoW) or similar competent person.
 - h) The use of protective fences, exclusion barriers and warning signs.
2. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority. The submitted plan shall include details of: -
 - monitoring of any standing water within the site temporary or permanent
 - sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operationssafety/>).
 - management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'
 - reinstatement of grass areas - maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow
 - which waste materials can be brought on to the site/what if any exceptions e.g. green waste - monitoring of waste imports (although this may be covered by the site licence) - physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
 - signs deterring people from feeding the birds. The Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Planning Authority

3. No development shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, reporting & analysis and publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority
4. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
5. The following noise protection measures to the proposed development, as defined in the Robin Mackenzie Partnership 'Environmental Noise Assessment' report (Ref R-7982A-CL4-RGM), dated 27 November 2018:
 - Glazing units with a minimum insulation value of 10/12/6.4mm double glazing shall be installed for the external doors and windows with trickle ventilators with a minimum $D_{n,e,w+Ctr}$ 42dB facades highlighted in drawing 17153(PL)001_E, dated 18/04/18.
 - Glazing units with a minimum insulation value of 10/12/6mm double glazing shall be installed for the external doors and windows with trickle ventilators with a minimum $D_{n,e,w+Ctr}$ 40dB facades highlighted in drawing 17153(PL)001_E, dated 18/04/18.
 - Glazing units with a minimum insulation value of 6/16/6.8 double glazing shall be installed for the external doors and windows with trickle ventilators with a minimum $D_{n,e,w+Ctr}$ 38dB facades highlighted in drawing 17153(PL)001_E, dated 18/04/18.
 - Glazing units with a minimum insulation value of 10/12/4mm double glazing shall be installed for the external doors and windows with trickle ventilators with a minimum $D_{n,e,w+Ctr}$ 36dB facades highlighted in drawing 17153(PL)001_E, dated 18/04/18.
 - Acoustic barriers with a minimum a minimum surface density of 10 kg/m² and minimum heights (1.8m-2.3m) as stated on drawing 17153(PL)001 dated 18/04/18 shall be installed prior to occupation of the phased sites. Where close boarded timber fences are used as noise barrier, they must be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base.
6. Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

- b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- i) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
7. Prior to the commencement of works a Landscape Phasing Plan is to be submitted for approval by the Planning Authority. This shall demonstrate the delivery of the strategic landscaping.
 8. Prior to the commencement of works an updated Tree Survey shall be carried out and submitted to the local authority for approval. This shall include a Tree Protection Plan which shall be implemented to the commencement of development on site and retained throughout the construction of the development.
 9. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.

Reasons:-

1. In order to safeguard the interests of nature conservation.
2. 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.
3. In order to safeguard the interests of archaeological heritage.
4. In order to enable the Head of Planning to consider this/these matter/s in detail.
5. In order to protect the amenity of the occupiers of the development.
6. In the interests of public safety.
7. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
8. In order to safeguard protected trees.
9. In order to ensure that the approved landscaping works are properly established on site.

Informatives

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation all of those matters identified in the proposed Heads of Terms.

These matters are:

Healthcare - Parkgrove Contribution Zone - £105 per dwelling - £67,775

Education - Infrastructure Contribution - £5,444,152

-Land Contribution - £711, 000

Transport

Contribute £1,171,117 towards improvements at three strategic junctions: Barnton (T18), Craigs Road (T17) and Maybury (T16).

Identified Action Programme Works:

- o Cammo to Maybury cycle path, and extending to Cammo Estate. Toucan crossings at Craigs Road junction = £367,500;
 - o Bridge over Boughtlin Burn =£560,000 - to be reviewed during Section 75 process to refine total cost.
 - o Four toucan or D island crossings providing pedestrian/cycle connection from development site across Maybury Road into East Craigs = £245,000;
 - o Bus infrastructure on Maybury Road and peak period bus capacity improvements- Upgrade bus infrastructure (replace existing bus stops) = £490,000;
 - o TRO for lower speed limit along Maybury Road = £2,450;
 - o 3 x TROs = £6,000;
 - o Car Club contribution for 6 vehicles = £34,500;
 - o 3.5 metre wide shared use paths to connect to East Craigs =£51,450.
- Initial design costing provides figure of £305,000. This figure to be reviewed followed further value engineering works.

Affordable Housing - 25% on site provision

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.

2. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.

5. Roads Authority Informatives

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;

A Quality Audit, as set out in Designing Streets, to be submitted prior to the grant of Road Construction Consent;

In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), 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;

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;

6. 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.

7. Edinburgh Airport Informatives

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.

8. SEPA

Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).

Management of surplus soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

You may need to apply for a construction site licence under CAR for water management across the whole construction site. These will apply to sites of 4ha or more in area, sites 5 km or more in length or sites which contain more than 1ha of ground on a slope of 25 degrees or more or which cross over 500m of ground on a slope of 25 degrees or more. It is recommended that you have pre-application discussions with a member of the regulatory team in your local SEPA office. Guidance can be found [here](#).

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

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

Tel: 0131 449 7296

9. Environmental Protection - Construction Impacts

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.

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.

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.

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.

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

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.

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.

No bonfires shall be permitted.

The applicant should ensure that SEPA are fully consulted regarding the possible impacts from the composting facility and furthermore if there is any proposed medium sized (1MW>) combustion plant on the development site.

10. 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.

Financial impact

4.1 The financial impact has been assessed as follows:

This planning application is subject to a Section 75 Legal Agreement.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

The proposal has been subject to pre-application discussions.

The proposal was considered at the Architecture and Design Scotland (A&DS) Workshop and a report was issued dated 30th May 2018.

8.2 Publicity summary of representations and Community Council comments

Neighbours were notified of Scheme 1 on 11 May 2018. The proposal generated eight letters of support and 238 letters of objection. A petition with some 2,050 names objecting to the planning application was also submitted on 8 June 2018.

Neighbours were notified of Scheme 2 on 14 Jan 2019 which generated a further 0 letters of support and 95 letters of objection.

Cramond and Barnton Community Council also submitted a discussion paper entitled 'Barnton: Easing Traffic Congestion and Enhancing Safety', December 2017.

Background reading/external references

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

Statutory Development

Plan Provision

The proposal is an allocated site, Cammo HSG 20, in the Edinburgh Local Development Plan.

Date registered

2 May 2018

Drawing numbers/Scheme

001B- 214B,

Scheme 2

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Sonia Macdonald, Planning Officer

E-mail: Sonia.Macdonald@edinburgh.gov.uk Tel: 0131 529 4279

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LDP Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

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

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

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

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

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

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

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

Relevant Non-Statutory Guidelines

Non-Statutory guidelines Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings, parking, streets and landscape, in Edinburgh.

Non-statutory guidelines - on affordable housing gives guidance on the situations where developers will be required to provide affordable housing.

Appendix 1

Application for Planning Permission 18/01755/FUL At Land 345 Metres Southeast Of 18, Cammo Walk, Edinburgh Development of LDP allocated site HSG20 for residential development supported by ancillary mixed uses including associated works and landscaping (as amended).

Consultations

Scottish Water comment

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

Water

This proposed development will be fed from Glencorse Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website at the following link:

www.scottishwater.co.uk/business/connections/connecting-your-property/newdevelopment-process-and-applications-forms/pre-development-application

Foul

This proposed development will be serviced by Edinburgh Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website at the following link:

www.scottishwater.co.uk/business/connections/connecting-your-property/newdevelopment-process-and-applications-forms/pre-development-application

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

Surface Water

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

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

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps

10 or more domestic dwellings

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals. Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

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.

Flood Prevention initial comment

In support of the above planning application the Flood Prevention Unit have reviewed the following documents,

- o Location Plan drawing, number 17153(OS)001B dated 12/04/2018*
- o Proposed Site Layout Plan drawing, number 17153(PL)002 dated 26/09/2018*
- o Drainage Strategy Plan dated April 2018*
- o Flood Risk Assessment version 4.0 dated 20/03/2018*
- o Pre- Development Flow Paths Sheet 1, P13692-1000 dated 14/03/2018*
- o Pre- Development Flow Paths Sheet 2, P13692-1001 dated 14/03/2018*
- o Post Development Flow Paths Sheet 1, P13692-1002 dated 14/03/2018*
- o Post Development Flow Paths Sheet 2, P13692-1003 dated 14/03/2018*
- o Proposed Drainage Schematic Sheet 1 of 2, P13692-1004 dated 18/04/2018*
- o Proposed Drainage Schematic Sheet 2 of 2, P13692-1005 dated 18/04/2018*

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

1. *The applicant has not completed a declaration for this application covering the flood risk assessment (Certificate A1). As this development is classed as a major development under Planning definition then an independent consultant is also required to check the design and submission. They must then sign the required declaration (Certificate B1) for inclusion with the application prior to determination by CEC Planning.*

Flood Prevention final comment

The application can proceed to determination with no further comment from our department.

Flood Prevention comment on EIA

Our response to the EIA scoping would be to follow the CEC guidelines available on the website.

http://www.edinburgh.gov.uk/info/20045/flooding/1584/flood_planning_application

The documents produced to support 18/01755/FUL (FRA and Drainage Strategy) largely address the guidelines.

Transport Scotland comment

The Director does not propose to advise against the granting of permission.

Parks and Greenspace comment

The issue will be more around visitors to Cammo Park deciding to park outside the homes of the new residents, causing conflict.

Cramond + Barnton Community Council comment

Community Council is responding as a statutory consultee to the application for full planning consent for housing and associated development and landscaping at Cammo (HSG 20).

The Community Council accepts that the Cammo site is allocated for housing development in the Local Development Plan and is striving to ensure that any development on this site and its associated landscaping provides a high quality living environment, fits within the local neighbourhood and landscape and provides supporting infrastructure which fully meets the needs of the residents of the proposed housing and pressures on wider locality from the resultant increase in population.

Having fully assessed the proposals, with support from professional planners and traffic engineers, and consulted the community through an exhibition of the proposals and discussion at its May meeting, Cramond and Barnton Community Council advocates refusal of the application, or the use of suspensive conditions, to ensure that deficiencies in the application and issues with regard to design, drainage, traffic, etc. are resolved to the satisfaction of the City Council, Community Council and local communities, prior to any planning proposals being approved.

Of particular concern to the Community Council are -

- Unresolved ownership issues relating to northern boundary
- Substantial deficiencies in assessments supporting the application
- Density, layout and landscape impacts associated with the apartment buildings
- Traffic and air quality issues
- Inadequate assurances on provision of essential infrastructure
- Opportunities to enhance the utility, landscaping and layout of proposals.

Many of these issues have been the subject of more detailed documentation submitted by the Community Council and displayed on the planning portal (see Consultation documents: 28 May).

UNRESOLVED OWNERSHIP ISSUES RELATING TO NORTHERN BOUNDARY

For the last few years, the Community Council, Cammo Residents Association and property owners have emphasised issues arising from the lack of clarity and discrepancies between property boundaries shown on plans and those demarcated on the ground by fences, hedges, etc. Over many years some boundaries have been extended beyond those in residents' titles; however, the current developers have indicated a flexibility and acceptance of the de facto boundaries, rather than reverting precisely to owners' title boundaries.

It is apparent to residents that reliance on an informal agreement is unsatisfactory and could lead to legal and planning issues; for example: planning permissions, conditions and obligations would apply to all land within red line boundaries shown on plans accompanying the application. However, the straight line boundaries do not precisely reflect proprietors titles and may not include land incorporated within individual boundaries over a long period of occupation, which may be covered by legal provisions for prescription.

It is unacceptable to residential owners along the Cammo Gardens and Cammo Grove boundary that parcels of their land may inadvertently be incorporated in land covered by planning decisions, conditions or obligations resulting from this application.

While the developers are prepared to accept the on-the-ground boundaries, it is not sufficient for this to rely on a gentleman's agreement, as the current or new owner of the development site could challenge this in future. Residential owners have concerns also regarding uncertainties over the extent of their ownership/occupation of land in legal events, such as the sale of their property.

These boundary issues are not insurmountable and the Community Council has proposed consultations between the residents and developers to enable demarcation of mutually agreed boundaries for registration in the Scottish Land Registry. Planning approval should not be granted until all property issues along the northern boundary have been resolved.

SUBSTANTIAL DEFICIENCIES IN ASSESSMENTS SUPPORTING THE APPLICATION

It is unacceptable that, between the validation date of 2 May and 28 May, around 65 plans and assessments have been drip-fed onto the planning portal in support of the application and it is understood that the Council has sought further documentation. All documents should have been available throughout the entire public consultation period.

Consequently, the Community Council is seeking a further public notification and consultation period, once all supporting information has been provided, including information identified below as being deficient. This is required to strengthen the community's confidence in the planning process, which is at an extremely low level resulting from involvement in, and treatment of submissions on, the HSG 20 site throughout the LDP process.

With specific regard to assessments available on the planning portal (at end May), the Community Council has concerns over:

Deficiencies in Landscape Impact Assessments

The LDP brief for HSG 20 respects the importance of views of the Pentland Hills from the site and Maybury Road, and views from the north through the site to the treed Craigs Road ridge and Pentland Hills are highly valued features of the landscape for Cammo residents, who along with the Community Council have argued for safeguarding of such views. The proposed 4- and 3- storey apartment blocks along much of the northern and south-western edges of the Mauseley Park corridor - comprising much of the highest ground in the site, will effectively block medium-distance views of Craigs Road ridge and longer-distance views of the Pentlands from within the site and residential areas to the north.

Current photomontages inadequately represent wider landscape impacts. A topographical cross-section of the site from a high point in existing housing at Cammo (e.g. Cammo Parkway) across the site is required, showing heights of land and buildings along the Mauseley Park corridor to the Craigs Road ridge and including a representation of the Pentland Hills. This would illustrate the extent, if any, of views which may be retained across the site from north to south and beyond. In addition, a helium balloon test would demonstrate likely landscape impacts of the 3- and 4- storey buildings.

The recommended assessments may demonstrate the need to relocate apartment blocks from the northern side of Mauseley Park to a less prominent position, or reduce the height of at least some apartment blocks. The assessments recommended above are identified in Edinburgh Design Guidance as appropriate to the assessment of landscape impacts of housing developments. Without this information, the landscape impacts cannot be fully assessed, the application and EIA are deficient and permission should be withheld.

Inadequacies in Traffic Assessments

Traffic impacts of the proposed development, and the cumulative impacts of other major developments in North and West Edinburgh and beyond, comprise a principal basis for the community's concerns over the proposals.

The Community Council, with support from transport engineers, has assessed the Transport Assessment (TA) and found it inadequate in scope, data and assessments - especially in respect of traffic flows, congestion levels and time delays on key arterial roads and junctions which will be effected by the development. Key deficiencies are highlighted in the Appendix below.

The applicants should be required to provide a more robust and comprehensive TA, which the community and Council's Planning Service can have confidence in. This should be the subject of community consultations, prior to any planning decisions for the Cammo site.

Deficiencies in Air Quality Assessments

The air quality assessments are deficient and largely derived from estimates/forecasts of average traffic speeds on key traffic corridors. They do not assess the air quality impacts of queuing traffic during saturation traffic flows at Barnton, Maybury and other junctions/crossings. Due to the sensitivity of these junctions, any increase in traffic volumes will exacerbate congestion and create disproportionate increases in exhaust gases and particulates emissions of hazard to health.

Data from the air quality monitoring device on Queensferry Road, near Barnton Junction, shows PM10 particulate matter concentrations exceeding EU/UK regulation standards 8 times and NO2 exceedances twice in 2017 (www.scottishairquality.co.uk). Additional traffic from the Cammo development, and cumulative traffic volumes generated by developments in West Edinburgh and beyond, along with new junctions and crossings on Maybury Road, will exacerbate traffic congestion and queuing on Maybury, Queensferry, Whitehouse and Glasgow Roads, with associated traffic generated pollution.

These issues should be of concern to the City Council in exercising its duties to ensure pollution levels do not exceed permitted health standards and to reduce exceedences. More comprehensive assessments are required of air pollution and health impacts of traffic volumes, congestion and queuing on traffic arteries in the vicinity of the proposed development.

Drainage and Flood Risk Assessments

The Flood Risk Assessment refers to the redundant ditch along the northern boundary and suggests that this ditch along with the proposed 5m landscape buffer will be 'more than sufficient. to pass any surface flows able to reach the ditch and ' In this way an appropriate flow pathway will be maintained along the northern edge of the site, in the event of flooding from the ditch/culvert or from any of the Scottish Water services flowing along the edge of the site.

A further statement indicates that ' an appropriate flow pathway should be provided along the northern edge of the site to route flows emerging from sewers along the site boundary without flooding properties, within or outside of the site. Any water emerging from the sewers would flow along the low-lying ground along the northern edge of the site. Sections of the lowest-lying ground along the northern boundary are owned by adjacent residential owners.

Assessments that the redundant ditch may be available and suitable as a flow pathway for flood water and/or sewerage overflows are inaccurate, as the ditch will remain at least partially outwith the ownership and management of the developers and much of the ditch has been partially or completely infilled. Hence, assessments and proposals for drainage along the northern boundary of the site require to be revised.

Ecological Assessments

Only preliminary ecological assessments have been undertaken. Further surveys will be required in respect of protected species, including bats and badgers, to satisfy UK and EU regulations.

DENSITY, LAYOUT AND LANDSCAPE IMPACTS ASSOCIATED WITH APARTMENT BLOCKS

Table 4 of the LDP indicates an estimated total capacity: 500-700 (housing units) for HSG 20 and the LDP Site Brief states that ' The finalised site capacity, design and layout should be informed by an adequate flood risk assessment. Subsequently, the applicants' Flood Risk Assessments have resulted in substantial areas within the southern, western and north-western sections of the site being identified as subject to risk from flooding and allocated for open space. However, the number of proposed houses in the current application remain at the higher level (i.e. 656 houses), resulting in a higher density of development than originally envisaged in the LDP and the need to include a substantial number of 3- and 4-storey blocks of flats - mostly in dominant locations in the landscape on higher ground along the Mauseley Park corridor, which will largely block views across the site to the treed Craigs Road corridor and Pentland Hills beyond.

Similarly, the blocks of 4-storey flats along Maybury Road will effectively block views of the high landscape bund bordering the east side of Maybury Road - another attractive landscape feature.

The LDP Site Brief refers to the protection of key views and the Community Council and wider community have consistently argued for height restrictions on any apartment buildings and protection of views through the site in all directions. Throughout the formulation of the LDP and PAN stages of this/previous planning applications, concerns have been raised also about the orientation of Mauseley Park on exposed ground along the direction of the prevailing south-westerly winds. Higher flats along the northern edge of Mauseley Park will exacerbate wind tunnel effects and channel winds along Mauseley Park to the discomfort of residents and users of the open space.

The developers should be required to submit amended plans, which reduce the density of development on this site and, in particular:

replace the dominant, high apartment blocks along the Mauseley Park corridor, with lower height buildings (e.g. colony or townhouse-type buildings) and more intervening spaces

replace the 4-storey apartment blocks along Maybury Road with 3-storey apartments in both cases, to reduce landscape and climatic impacts of these buildings, as highlighted above.

TRAFFIC AND AIR QUALITY ISSUES

Issues associated with traffic generation, congestion and delays - deficiencies in the Transport Assessment and Air Quality Assessment documents are outlined above and in the Appendix. Traffic is a principal issue of concern to the Community Council and local communities. It is widely recognised, including by Council officers, that Maybury and Barnton Junctions are often operating at or over capacity, resulting, in the latter case, in queuing on Queensferry Road, as far as Dalmeny (morning) and Telford Road Junction (evening), and on the Maybury and Whitehouse Road approaches to Barnton Junction (many times of day). This congestion results in lengthy travel delays and economic costs to the City. Proposals to change the character of Maybury Road to a 'street' ignore the strategic role of this artery as a de facto extension of the City Bypass. Any displacement of traffic from Maybury Road onto Drumbrae and/or Clermiston Road will cause greater delays and unacceptable disruption to local communities.

The proposals rely on MOVA traffic signals and the advocacy of modal shift as solutions to additional traffic volumes and congestion generated by the Cammo, West Edinburgh SDA and other major developments in North/West Edinburgh and beyond. These solutions alone are unrealistic, given the frequent saturation flows on Queensferry and Glasgow Roads and associated junctions and the additional congestion which will be created on Maybury Road by introducing new signal controlled junctions and pedestrian crossings to serve the Cammo development. The Community Council, with traffic engineering support, has promoted recommendations in its Barnton Junction Discussion Paper for improving traffic flows and safety at Barnton. So far these have been side-lined by Council officers.

Cramond + Barnton Community Council comment on EIA

The Community Council is responding formally, as a statutory consultee, to the consultation on the EIA accompanying the Cammo development.

The Community Council objects to the continuing drip-feed of additional information onto the planning portal since validation of the planning application, including EIA material which should have been required from the developer in advance of validation. Over 65 documents of relevance have been added between the validation date (2 May) and date of this submission (25 May), and CEC have informed the CC that more information is expected. This makes a mockery of the public notification and consultation process and compounds issues of loss of confidence in the planning process resulting from CEC's responses to previous consultations on the Cammo (HSG20) site.

With specific regard to EIA contents currently provided on the planning portal, the Community Council has concerns over:

Landscape Assessments

The LDP brief for HSG20 respects the importance of views of the Pentland Hills from the site and Maybury Road and views from the north through the site to the treed Craigs Road ridge and Pentland Hills are highly valued features of the landscape for Cammo residents, who along with the CC have argued for safeguarding such views. Proposed 4 and 3 storey apartment blocks along much of the northern and south-western edges of the Mauseley Park corridor, which comprises much of the highest ground in the site, will effectively block medium-distance views of Craigs Road ridge and longer-distance views of the Pentlands from residential areas to the north.

Current photomontages provide inadequate representation of wider landscape impacts. A topographical cross-section of the site from a high point within existing housing at Cammo (eg Cammo Parkway) across the site is required, showing heights of land and buildings along the Mauseley Park corridor to the Craigs Road ridge and including a representation of the Pentland Hills. This would illustrate the extent, if any, of views which may be retained across the site from north to south and beyond. In addition, a helium balloon test would demonstrate likely landscape impacts of the 3 and 4 storey buildings.

The recommended assessments may demonstrate the need to relocate apartment blocks from the northern side of Mauseley Park to a less prominent position, or to reduce the height of at least some apartment blocks. The assessments recommended above are identified within Edinburgh Design Guidance as appropriate to the assessment of landscape impacts of housing developments and without such information the landscape effects of the development cannot be fully assessed, the EIA is deficient and permission should be deferred.

Inadequacies in Traffic Assessments

Traffic impacts of the proposed development, and the cumulative impacts of major new developments in North and West Edinburgh and beyond, comprise a principal basis for the community's concerns over the proposals. The CC, with support from transport engineers, has assessed the Transport Assessment (TA) and found it inadequate in scope, basic data and assessments - especially assessments of traffic flows, congestion levels and time delays on key arterial roads and junctions which will be impacted by the development. Key deficiencies are highlighted in the Appendix below.

Assessments of the planning application should be deferred until a more robust and comprehensive TA, which the community and Council's Planning Service can have confidence in, is completed.

Air Quality Assessments

The air quality assessments are deficient and largely derived from estimates/forecasts of average traffic speeds on key traffic corridors. They do not assess the air quality impacts of queuing traffic during saturation traffic flows at Barnton, Maybury and other junctions and crossings. As a result of the sensitivity of these junctions, any increase in volumes, however small, will exacerbate congestion and create disproportionate increases in exhaust gases and particulates emissions which are hazardous to health.

Data from the air quality monitor on Queensferry Road, east of Barnton Junction, shows PM10 particulate matter concentrations exceeding EU/UK regulation standards 8 times and NO2 exceedances twice in 2017 (www.scottishairquality.co.uk). Additional traffic from the Cammo development, and cumulative traffic volumes generated by developments in West Edinburgh and beyond, along with new junctions and crossings on Maybury Road, will exacerbate traffic volumes and queuing on Maybury, Queensferry, Whitehouse and Glasgow Roads, with associated traffic generated pollution.

These issues should be of concern to the City Council in exercising its duties to ensure pollution levels do not exceed permitted health standards and to reduce exceedences where these occur.

More comprehensive assessments are required of the air pollution and health impacts of future traffic volumes, congestion and queuing at key junctions and traffic arteries in the vicinity of the proposed development.

Drainage and Flood Risk Assessments

The Flood Risk Assessment (Kaya Consulting Ltd 2018) refers to the redundant ditch along the northern boundary and suggests that this ditch along with the proposed 5m landscape buffer will be more than sufficient to pass any surface flows able to reach the ditch and in this way an appropriate flow pathway will be maintained along the northern edge of the site, in the event of flooding from the ditch/culvert or from any of the Scottish Water services flowing along the edge of the site.

Similarly, a later statement indicates that an appropriate flow pathway should be provided along the northern edge of the site to route flows emerging from sewers along the site boundary without flooding properties, within or outside of the site. Any water emerging from the sewers would flow along the low-lying ground along the northern edge of the site. Sections of lowest-lying ground along the northern boundary are owned by adjacent residential owners.

Indications in the EIA documents that the redundant ditch may be available and suitable as a flow pathway for flood water and/or sewerage overflows are inaccurate, as the ditch will remain at least partially outwith the ownership and management of the developers and much of the ditch has been partially or completely infilled. Hence, assessments and proposals for drainage along the northern boundary of the site require to be revised.

Ecological Assessments

It would appear from the documentation that only preliminary ecological assessments have been undertaken and further surveys are required in respect of protected species, including bats and badgers, to satisfy UK and EU regulations.

Appendix

CRAMOND AND BARNTON COMMUNITY COUNCIL REVIEW OF PROPOSED RESIDENTIAL DEVELOPMENT, CAMMO (HSG20)

TRANSPORT ASSESSMENT (SWECO 2018)

This initial review has been undertaken by Cramond + Barnton Community Council (CC) with support from professional traffic engineers. It has exposed a number of apparent deficiencies in the Traffic Assessment (TA) which result in the CC and its advisers having concerns over the comprehensiveness and reliability of the TA.

As the Community Council has not, so far, been able to access the City of Edinburgh Council's (CEC) Scoping Report (omitted from Appendix A of TA) and advice on intended coverage of the TA, it has been unable to ascertain whether perceived shortfalls in the TA are a consequence of the Council's guidance on the scope of the TA, or deficiencies in SWECO's assessments.

Key Issues

Scope of TA

Current and future traffic volumes and characteristics are dependent on traffic volumes, roads and junctions' capacities, etc beyond those relating directly to the HSG20 development, Maybury Road and its approaches to Barnton and Maybury Junctions, and development sites assessed within the WETA Study. The TA fails to adequately assess, for example, traffic volumes, congestion, etc. on Queensferry Road and Whitehouse Road - all of which have implications for traffic flows, queuing, etc through Barnton Junction and beyond and knock-on effects on traffic flows and congestion on Maybury Road.

In particular, the assessments ignore data within the SESPlan Cross Boundary Report relating to traffic generated by out-of-town developments on the A90 corridor and Barnton Junction, which the Cross Boundary Report identifies as operating in excess of capacity - currently and in traffic forecasts. CBCC sought assurances at meetings with the Consultants and CEC staff that the TA would assess Cross Boundary traffic issues, in addition to those pertaining to West Edinburgh.

Strategic Importance of Maybury Road and Queensferry Road Corridors

Recent reports have highlighted the scale and economic costs of congestion in Edinburgh. The TA ignores the strategic role of Maybury Road which is essentially a de facto extension of the City Bypass. There are no data on the costs of traffic congestion and delays associated with the development of numerous new junctions and pedestrian crossings associated with the Cammo and Maybury developments, or the effects of additional traffic generated by the developments on congestion and delays on the Queensferry Road corridor, where traffic backs up to Telford Road in the evening peak.

Reliance on WETA traffic data, without validation of WETA data and calibration of traffic model to take account of local traffic patterns - The TA indicates data used for modelling traffic flows and junction capacities on Maybury Road and at the site access points were derived from the WETA study. There is no indication that the data were validated against on-the-ground surveys of traffic volume, queuing and time delay data for the northern section of Maybury Road, or key junctions (e.g. Barnton, Cammo Gardens, East Craigs/Bughtlin and Maybury Junctions), or that the traffic models were calibrated against such locally derived data. A related example, of discrepancies between the WETA information and observed reality are the peak traffic times (s 7.3), as daily observations indicate that peak evening traffic flows are 17.00-19.30 not 17.00-18.00. The assessments took account of the cumulative effects of the proposed new junctions and pedestrian crossings on traffic flows and congestion.

The modelling assessments in Figs 7.2 and 7.3 are further flawed, as the calculations for the southern approaches to the two new junctions assume that continuing traffic flows along Maybury Road northwards towards Barnton will not be obstructed.

However much of the time the Barnton Junction is over-capacity (as shown in Cross Border Study) and traffic is backed-up southwards on Maybury Road often as far as the location of the proposed southern access to the Cammo development, and certainly as far as the northern access point.

Traffic turning in and out of Cammo Gardens further exacerbates traffic volumes and delays on this section of road (not assessed in TA).

In the above situations, traffic would not flow through the junctions, to clear the queues estimated in Figs 7.2 and 7.3 and these would further build-up over time along with congestion and travel delays/costs on this strategic travel route. Consequently, the data in Figs 7.2 and 7.3 for traffic travelling northwards towards Barnton Junction are patently misleading, as these do not take account of queuing when traffic routes and junctions are at/near saturation levels. Further data on queue lengths and time delays in the wider network especially throughout Maybury Road and on Queensferry Road and Whitehouse Road are required as part of the TA.

Due to the deficiencies in baseline data and subsequent assessments, and, in particular, the lack of detailed traffic impact assessments for the northern section of Maybury Road and Barnton Junction and redesign requirements for the key junctions (see above), the community has little confidence in the assessments in section 7 of the TA.

Issues of community severance have not been assessed - Transport Scotland's Transport Assessment Guidelines (s 5.19) state that transport assessments should identify any effects which a proposed development may have on creating a barrier to access within the community and whether the level of traffic using nearby roads make links between parts of the community more difficult.

CBCC's Barnton Junction Discussion Paper (provided to developers and CEC) highlights access and egress issues and roads safety hazards relating to the Cammo Gardens/Maybury Road and Pinegrove Gardens and Maybury Road junctions.

These issues have not been assessed and will be exacerbated by traffic generated by the Cammo development, unless traffic signal controls are installed to cover these junctions. Again, the CC brought such issues to the Consultants and CEC's attention and asked that these be considered in the TA.

Distance from schools and implications for travel modes

The TA (Fig 4.2) shows that Cramond Primary School and the Royal High School - the interim schools serving the Cammo development prior to the new Maybury Primary and West Edinburgh High Schools being developed (still at early planning stage) - are some 2.4km/30 minute adult walking time, excluding major road crossings from the mid-point of the Cammo site.

It is unrealistic to expect most primary pupils and many secondary pupils to walk such distances to school and PAN 75 Planning for Transport (Scottish Government) states that a maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. It is the case also that parents are unlikely to undertake two 4.8km (1 hour) return journeys to take primary pupils to and collect pupils from Cramond Primary, which has current issues of parking congestion and road safety hazards associated with children drop-offs and collection.

Cramond + Barnton Community Council further comment

The Community Council accepts that the Cammo site is allocated for housing development in the Local Development Plan and is striving to ensure that any development and associated landscaping provides a high quality living environment, fits within the local neighbourhood and landscape and provides supporting infrastructure which fully meets the needs of the residents of the proposed housing and minimises pressures on wider locality from the resultant increase in population.

The Community Council appreciates the developers' recognition of, and responses to, recent suggestions made by the Community Council and others in respect of the previous application and their on-going liaison with the Community Council. However, having fully assessed the proposals, with support from professional planners and traffic engineers, and consulted the community through an exhibition of the revised proposals and discussion at its recent meetings, Cramond and Barnton Community Council advocates refusal of the revised application, or use of suspensive conditions, to ensure that deficiencies in the application and the issues outlined below are resolved to the satisfaction of the City Council, Community Council and local communities, prior to any planning proposals being approved.

Of particular concern to the Community Council are -

- o Need for Implementation Programme to match stages in development with delivery of infrastructure and services*
- o Traffic issues*
- o Landscape impacts of 4-storey apartment buildings*
- o Schools provision*
- o Air quality issues*
- o Link path to Cammo Local Nature Reserve*
- o Unresolved ownership issues relating to northern boundary*

Many of these issues have been the subject of more detailed documentation previously submitted by the Community Council, as provided on the planning portal.

- 1. Need for Implementation Programme to match stages in development with delivery of infrastructure and services by the Council and developers*

The LDP Action Programme highlights key infrastructure needed to support this development (e.g. roads/junction improvements, schools, drainage). While the developers are prepared to comply with planning obligations and fund required infrastructure, discussions with Council staff have highlighted uncertainties over the Council's commitments to funding and delivering infra-structure and services for which the Council will be responsible.

Insofar as the CC is aware:

o While the LDP Action Programme provides for improved traffic signals and pedestrian/cyclist crossings at Barnton Junction, meetings with the Council's traffic engineers have disclosed that more substantial measures to enhance traffic flows through Barnton Junction (including proposals by CBCC) are still under investigation and no budgets have been confirmed. Such works are essential to reduce queueing and congestion on Maybury Road and other approaches to Barnton Junction and will not be achieved solely through the introduction of 'smart' signalling systems, as proposed by the Council.

o Local GP practices are operating at/over capacity, however, the current Action Programme states that a new West Edinburgh practice is still at exploring options stage, with no delivery timescale.

o The City Council have been unable to assure the Community Council that primary and secondary schools capacity will be available during and following the roll-out of the housing development (see 4. below).

LDP Policy Del 1 requires 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. Consequently, the Community Council urges the City Council to withhold planning consent until the developers and the Council agree an explicit Implementation Programme (or similar), which sets out commitments to the funding and delivery of essential infrastructure, especially road junction improvements, schools capacity and GP surgery provision, and matches such provision to key stages in the roll-out of the Cammo development. This is required to provide the community and in-coming residents with confidence that policy Del 1 will be upheld and that key stages of the Cammo development will proceed alongside the phased provision of essential infrastructure.

2. Traffic Issues

Traffic issues arising from existing traffic levels on Queensferry, Glasgow and Maybury Roads, additional traffic generated by the Cammo development and cumulative impacts of traffic from major developments in nearby areas (e.g. Maybury, IBG, Edinburgh Park), Fife and West Lothian are of major concern to CBCC, the communities it represents and the wider communities of North and West Edinburgh.

Evaluations of the developers' Traffic Assessments and proposals by CBCC members and experienced traffic engineers have highlighted major issues, which require resolution prior to any planning consent being granted. These include -

Deficiencies in the Traffic Assessment (TA) - for example -

The assessments ignore data in the SESplan Cross Boundary Report on traffic generated by out-of-town developments on the A90 corridor and Barnton Junction, which the Cross Boundary Report identifies as operating in excess of capacity - currently, and in forecasts for future traffic levels. CBCC has sought assurances at meetings with the Consultants and CEC staff that the TA would assess Cross Boundary traffic issues, in addition to those pertaining to West Edinburgh, but these shortfalls remain.

The TA fails to adequately assess traffic volumes, congestion and delays on Queensferry Road and Whitehouse Road - all of which have implications for traffic flows and congestion through Barnton Junction and beyond, and knock-on effects on impeded traffic flows on Maybury Road on the local traffic network (e.g. Drumbrae and Clermiston Roads).

Recognition should be given also to the Council's intentions to control traffic movements (especially of diesels) in the vicinity of the proposed St Johns Road Low Emissions Zone, which may result in more vehicles using the Queensferry Road-Maybury Road-Glasgow Road route to avoid the St Johns LEZ. This has not been factored into the Cammo TA.

The traffic assessments and proposals fail to recognise and assess the economic costs of congestion on roads associated with this development - Recent reports (e.g. INRIX) have highlighted the immense scale and economic costs of congestion in Edinburgh. The TA provides no data on the costs of congestion and delays arising from the installation of several new junctions and pedestrian crossings associated with the Cammo and Maybury developments, or the cumulative impacts of additional traffic from these developments on congestion and delays on the Queensferry Road corridor and road network throughout North and West Edinburgh.

Reliance on WETA traffic data, without validation of WETA data and calibration of traffic models to take account of local traffic patterns - data used for modelling traffic flows and junction capacities on Maybury Road and site access points were solely derived from the WETA study. CBCC's evaluation of the TA indicates that SWECO's assessments -

Failed to validate data and calibrate models against locally derived data relating to traffic volumes over a significant period, queuing times or congestion costs on Maybury Road and key junctions at Barnton, Cammo Gardens, East Craigs/Bughtlin and Maybury. For example, local observations indicate that the evening peak on Maybury Road extends from 16.30 to 19.30, not 17.00-18.00, as in WETA.

Fail to take account of the cumulative effects of the proposed new junctions and pedestrian crossings on traffic flows and congestion.

Provide inaccurate modelling of traffic flows and underestimate potential congestion on Maybury Road, as they indicate that -

Traffic on Maybury Road will be free from congestion - ignoring issues of queuing due to Barnton Junction operating at/near saturation and/or traffic queuing at the Cammo Gardens or Pinegrove Gardens junctions, or at the new signals controlled junctions and pedestrian crossings associated with the Cammo development. These assumptions are patently flawed, as, for example, over many hours each day, the Barnton and Maybury Junctions operate at/ over capacity (as shown in the Cross Boundary Report).

Estimates of an additional 372 vehicles entering/leaving the Cammo development during the forecast one-hour morning peak period and 383 vehicles entering/leaving during the one-hour evening peak will be absorbed within the capacity of Maybury Road. This may be shown in modelling, but Maybury Road is already operating at/over capacity at the evening peak; hence additional congestion and queuing will result on extensive sections of Maybury Road.

Due to deficiencies in baseline data and subsequent assessments, and, in particular, the lack of reliable traffic impact assessments for the northern section of Maybury Road and Barnton Junction, the community has little/no confidence in the assessments in the TA.

Effects of changing the character of Maybury Road to a 'street' -

Current proposals to change the character of Maybury Road to a 'street' ignore the strategic role of this artery as a de facto link between the City Bypass and the road networks of North Edinburgh, including to the Port of Leith. Any displacement of through traffic from Maybury Road onto Drumbrae, Clermiston Road or other local roads will cause greater delays and unacceptable disruption to communities throughout North and West Edinburgh.

Inadequate proposals to resolve congestion at Barnton Junction and on Maybury Road.

Currently City Council staff are proposing the introduction of 'smart' traffic signals at Barnton Junction and the promotion of modal shift as solutions to additional traffic volumes and congestion at Barnton Junction and on Maybury Road. These solutions alone are unrealistic, given the frequent saturation flows on Queensferry and Glasgow Roads and associated junctions and the additional congestion which will be created on Maybury Road by introducing signal controlled junctions and pedestrian crossings to serve the Cammo development.

The Community Council, with traffic engineers' support, has promoted recommendations in its Barnton Junction Discussion Paper for improving traffic flows and safety at Barnton. It is understood that these are now being examined by the Council's traffic engineers; however, officers have informed the Community Council that programming and funding of physical improvements to enhance traffic flows at Barnton Junction (e.g. lane widening) are not programmed and no funding is committed. Development of the HSG 20 site should not be approved until the developers and City Council provide realistic, programmed and funded commitments to mitigating additional traffic volumes and congestion that will be generated in this locality by the Cammo and other major developments in North and West Edinburgh.

There is a one-off opportunity to use s.75 planning obligation funding to improve the physical layout of Barnton Junction to the benefit of those residing in the new Cammo development, the wider community and all users of road networks in North and West Edinburgh. The developers' consultants and CBCC's advisers have developed several means of enhancing traffic flows. This opportunity should not be lost due to intransigence by the Council.

Unrealistic expectations for modal shift due to distances from schools and workplaces -

The TA (Fig 4.2) shows that Cramond Primary and the Royal High School, both of which are expected to serve the Cammo development prior to the new Maybury Primary and proposed West Edinburgh High Schools being developed, are around 2.4km/30 minute adult walking time from the Cammo site. These walking times fail to take account of slower walking speeds of young children and times taken to cross major traffic routes, such as Queensferry Road.

PAN 75: Planning for Transport (Scottish Government) states that ' A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. It is clearly unrealistic to expect most primary pupils and many secondary pupils to walk such distances to school and few parents can spare the time to undertake two or more 4.8km (1 hour) return walking trips to/from Cramond Primary each day. The proposed Maybury Primary and West Edinburgh High Schools will also be outwith the walking threshold.

Hence, the focus in the TA on active travel trips to schools fails to appreciate the implications of schools' locations and forecasts of high levels of modal shift from car travel to walking (or cycling) to schools are extremely unlikely to be met.

Community severance -

Transport Scotland's Transport Assessment Guidelines (s. 5.19) state that transport assessments should identify any effects which a development may have on ' creating a barrier to access within the community ' and ' whether the level of traffic ' using nearby roads make links between parts of the community more difficult.

Despite emphasis of the issues in CBCC's Barnton Junction Discussion Paper (provided to developers and CEC) and in discussions with the developers and CEC staff, access/egress issues and safety hazards at the Cammo Gardens/Maybury Road and Pinegrove Gardens/Maybury Road junctions have not been assessed and will be exacerbated by traffic generated by the Cammo development, unless traffic signal controls are installed to cover these junctions. Additional traffic loads on Maybury Road and proposed closure of Cammo Walk will effectively leave the 450 or so houses at Cammo, Strathalmond and Lennie landlocked and dependent on access solely via the Cammo Gardens Junction, as access to from the City-bound carriageways to/from Cammo Road is too hazardous to safely negotiate at most times.

Provision for emergency services -

Currently, hatched sections of Maybury Road are the only means whereby emergency service vehicles can pass queuing traffic and speedily and safely travel along northern sections of Maybury Road, which is a strategic travel route in emergencies at the Airport, City Bypass, etc.. The removal of this non-traffic corridor and obstructions by several new traffic islands, crossings and lights controlled junctions will significantly reduce emergency response times. This issue has not been taken account of in the TA. Traffic-related air quality issues - see below.

3. Landscape Impacts of 4-Storey Apartment Buildings

The LDP Site Brief refers to the protection of key views and the Community Council and wider community have consistently argued for height restrictions on the apartment buildings and protection of views through the site in all directions. Throughout the formulation of the LDP and PAN stages of this and previous planning applications, concerns have been raised also about the orientation of Mauseley Park on exposed ground along the direction of the prevailing south-westerly winds. Higher flats along the northern edge of Mauseley Park will exacerbate wind tunnel effects and channel winds along Mauseley Park to the discomfort of residents and users of the open space.

The Community Council welcomes the applicants' lowering of some 4-storey apartments along Maybury Road, but notes that some 4-storey apartments are retained along sections of Maybury Road and on higher ground along Mauseley Park corridor. The scale and massing of the latter, as illustrated in Section 5 (page 110) of the Design and Access Statement is of particular concern.

The Community Council urges the Council to require the developers to -

- o replace all 4-storey apartment blocks along Mauseley Park corridor with 3-storey apartments, or preferably colony or townhouse buildings;*
- o reduce all 4-storey apartment blocks along Maybury Road to 3-storey buildings in both cases, to reduce the landscape and climatic impacts of these buildings.*

4. Schools Provision

The 2019 LDP Action Programme indicates delivery dates of August-23 for a new West Edinburgh Secondary School and August-22 for a new Maybury Primary/Nursery School. The planning, design and development stages of these schools are at such an early stage that the community has no confidence of the delivery date for either school being met. Hence, temporary accommodation is being proposed at existing schools, which are outwith acceptable walking distances and currently operating near capacity, especially in respect of younger age groups.

The local community is extremely concerned at the lack of adequate school provision for residents of the proposed development, the potential distance from the development site to a new West Edinburgh School (e.g. Ratho, Kirkliston, IBG) and impacts on the temporary receptor schools of increased pupil numbers, given their current and forecast capacities in the 2020s.

5. Air Quality Issues

Data from the air quality monitoring device on Queensferry Road, near Barnton Junction, show PM10 particulate matter concentrations exceeding EU/UK regulation standards 4 times (daily mean) and NO2 exceedances twice (hourly mean) in 2018 (www.scottishairquality.co.uk). Additional traffic from the Cammo development, and cumulative traffic volumes generated by developments in West Edinburgh and beyond, along with new junctions and crossings on Maybury Road, will exacerbate traffic congestion and queuing on Maybury, Queensferry, Whitehouse and Glasgow Roads (including the St Johns Road AQMA) and increase traffic-generated air pollution and health risks.

The air quality assessments provided for this development are deficient and do not assess the air quality impacts of queuing traffic during saturation traffic flows at Barnton and Maybury, or resulting from queuing at new junctions and crossings associated with the development.

Due to the sensitivity of the Barnton and Maybury junctions, any increase in traffic volumes will exacerbate congestion and create disproportionate increases in exhaust gases and particulates emissions of hazard to health. More comprehensive assessments are required of air pollution and health impacts of traffic volumes, congestion and queuing on traffic arteries in the vicinity of the proposed development.

While the Transport Assessment suggests that modal shift can minimise traffic generated by the Cammo development to relatively low levels, this is unrealistic, for reasons outlined above.

Air quality issues should be of concern to the City Council in exercising its duties to ensure pollution levels do not exceed permitted health standards and to reduce exceedences. This application should be refused until credible proposals are produced to mitigate increases in air pollution associated with additional traffic volumes and congestion arising from the Cammo, Maybury and other major developments in North and West Edinburgh.

6. Relocation of Link Path to Cammo Local Nature Reserve and Provision of Parking Area

As agreed by Cammo Estate Advisory Committee and the Council's Parks, Forestry & Cemeteries Service, the proposed link path from the Cammo development to Cammo LNR should be realigned to a more southerly location on Cammo Walk (north of the 90o bend). This realigned path would connect to the entrance to South Field in the LNR, as opposed to the route currently proposed, which requires users to walk along Cammo Walk (restricted footway), enter the current gate, and return along the boundary path to South Field, or walk to the main entry at Cammo Lodge. Avoidance of this longer and tortuous route is likely to result in the creation of damaging desire lines through the woodland edge of Cammo LNR.

Local experience suggests that some residents of, and professional dog walkers serving, the new homes will use vehicles to travel to Cammo LNR, despite the short distances involved. The developers should be required to provide a small layby for 6-8 cars, with disabled parking, within the development and close to the relocated path linking to Cammo LNR (as above); thereby helping to discourage parking in the LNR car parks, which are often at capacity with resultant overspill parking on Cammo Walk or Cammo Road.

7. Unresolved Ownership Issues relating to Northern Boundary

The Community Council, Cammo Residents' Association and individual owners have emphasised discrepancies between property boundaries on the northern boundary, as shown on plans and as demarcated on the ground by fences, hedges, etc. The developers have indicated a flexibility and acceptance of the de facto boundaries, but indicated that these cannot be accepted until they acquire ownership of the land.

Residents consider that reliance on an informal agreement on boundaries is unsatisfactory and could lead to legal and planning issues; for example -

o planning permissions, conditions and obligations would apply to all land within the 'red line' boundaries on plans accompanying the application. However, these 'straight line' boundaries do not accurately reflect proprietors' titles and include land which may be covered by legal provisions for prescription. It is unacceptable to residential owners along the Cammo Gardens and Cammo Grove boundary that parcels of their land may inadvertently be incorporated in land covered by planning decisions, conditions or obligations resulting from this application.

o while the developers are prepared to accept the 'on-the-ground' boundaries, it is not sufficient for this to rely on a 'gentleman's agreement', as the current or a new owner of the development site could challenge this in future. Residential owners have concerns also regarding uncertainties over the extent of their ownership/occupation of land in legal events, such as the sale of their property.

These issues are not insurmountable and the Community Council has proposed consultations between the residents and developers to enable demarcation and registration in the Scottish Land Registry of mutually agreed boundaries. Planning consent should be subject to a suspensive condition requiring the resolution of property issues along the northern boundary of the development site.

Architecture + Design Scotland comment

1.0 Scope of Appraisal

(This indicates the purpose of this appraisal report. It indicates the status of this advice relative to that of statutory and other consultees for the planning submissions intended.)

A&DS's appraisal of the proposals for housing at Cammo is based on a desktop review of the planning application as submitted in comparison to earlier proposals discussed at pre-application stage. We have reviewed the extent to which qualities and objectives of placemaking design sought in our pre-application advice have been addressed. It should be noted that this does not represent a review of the full scope of the planning application documentation.

A&DS are an advisory, non-statutory body who have provided advice to the applicant and the council at pre-application stage. Our advice and this appraisal is not intended to replace or override the policy assessment of the council or statutory consultees.

2.0 Background

(This section indicates the role that A&DS have had in engaging with the project, the stages of engagement and those involved. This section highlights the proposals that were current at appraisal stage. This section also highlights the focus of attention during the workshop series, including the scope of topics that have been covered and that have given rise to A&DS's advice)

2.1 A&DS have provided design advice and support to the council and the developers design team in parallel with pre-application design development between October 2017 and February 2018. This has taken the form of a series of four workshops managed by A&DS. These aligned with stages of pre-application community consultation to provide a link.

2.2 The site at Cammo is allocated as a major housing site in the Edinburgh Local Development Plan (LDP). The planning application description indicates "Development of LDP allocated site HSG20 for residential development supported by ancillary mixed uses including associates works and landscaping to southeast of Cammo Walk."

2.3 The present proposals are being brought forward by a design team led by Ewan Macintyre Architects and OPEN landscape architects for Barratt/David Wilson Homes and for CALA Homes.

2.4 An earlier series of A&DS workshops provided advice to the design team and council during the design development stage of masterplan proposals for the site by Halliday Fraser Munro and the landowners appointed design team. This input was preparatory to submissions to the council for an application for Planning Permission in Principle in 2013 - 14.

3.0 Summary Appraisal

(This section provides a summary of A&DS's appraisal of the project and records the level of support. Levels are assessed in relation to the question. "Have the building and the environs been successfully considered in terms of the needs of the users as well as the wider community?". Supported: level 1- potential exemplar, level 2 - well considered. Unsupported: level 3 - with potential, level 4 - outcome at risk.)

3.1 Summary

3.1.1 During the pre-application stage considerable work has been done by the project team to develop qualities of place for the proposed housing that builds on dialogue with A&DS, the council, SNH and HES during the earlier masterplan stage and more recent workshop series. We welcome this work and the strengths of the proposals in many aspects. Many of the issues raised and discussed have been addressed in the planning application.

Improvements have included:

- o steps to define the function, purpose and sustainability of the various parkland landscapes, amenity areas and corridors;*
- o steps to design formats of apartment housing and colonies to create well-defined urban and parkland frontages;*
- o steps to create a variety of street character and identity responsive to site conditions;*
- o steps to improve on the amenity of planned 'back court' parking in areas of high density;*
- o steps to create a street network that is attractive and easy to move around for people cycling or on foot;*
- o steps towards elevational design and materials palette linking the various housing formats into a family;*
- o steps to integrate the site with the neighbouring residential areas of Cammo and East Craigs, with Barnton to the north and the planned new school at Maybury to the south;*
- o steps to integrate a sustainable urban drainage system and flood management within the streetscape and landscape proposals.*

All this has required an alignment of the commercial brief, market assessment, housing tenure and mix with objectives of placemaking and designing street policies.

3.1.2 *Whilst the proposals are broadly supported in these respects some concerns remain in relation to:*

- o Layout Design:*
 - o Design of the gateway square*
 - o Design of edge housing to the wider landscape and Cammo Tower Park*
 - o Shelter tree planning in Mauseley Park*
 - o Implementation:*
 - o Provision of routes external to the site by the council.*
 - o Maybury Road Frontage detail.*
 - o Street detailing generally including - plot boundary, landscape and civil engineering elements. In particular street detailing to high density and on-street parking areas.*
 - o Open spaces, gardens and play areas detailing.*
 - o Factoring and landscape management.*
- 3.2 *Level of Support*

The proposals are capable of being supported as level 2 - well considered. However this would be subject to our further advice being addressed by the applicants and the council as indicated in the topics below.

4.0 Appraisal by Topic

(This section indicates a concluding analysis and appraisal of the proposals in terms of the topics discussed during the Design Forum workshop Series. Further advice is included where applicable)

4.1 Landscape Framework:

4.1.1 Objectives identified in previous advice:

Managing the scale of parkland proposed to ensure it has a well-defined purpose and is capable of being well maintained - with a balance of low maintenance and high maintenance areas.

Ensuring that particular immediate residential amenity areas and gardens are identified with residents of particular blocks likely to use these and have a sense of ownership.

Ensuring that wider recreational uses are provided for such as larger playgrounds, sport and recreational use, allotments, open space etc.

Having a legible set of characteristics for different types of street and parkland landscape to provide a sense of place and ease of orientation within the street network.

Ensuring the routes through the Cammo Estate edge landscape are attractive and well linked into walking routes.

4.1.2 Appraisal on this topic:

The extent to which open space standards are met is a matter for the council. However the proposals have largely addressed our advice in these areas. The steps taken to better define the purpose of the extensive proposed areas of parkland and open space are recognised as are the amenity elements included in the streetscape and the simpler form of landscape corridor now proposed towards Cammo Estate.

4.1.3 Further advice on this topic:

We would note the importance of ensuring suitable factoring arrangements are in place however this aspect has not been reviewed.

Given their extent and importance as a focus for the new community the detailed design and quality of implementation of the open space elements will be very important and these aspects should continue to be prioritised.

In terms of immediate residents amenity and the planned street character close attention continues to be required to follow through with detailed design and delivery of key landscape elements. This includes private garden boundary hedges and walls, street trees and the design of the accessible amenity gardens associated each area of housing. It includes the provision of suitable and accessible play areas and immediate recreation space associated with areas of high density where levels of parking provision and hard standing have an impact on private amenity. Parents should feel confident that their children have somewhere to play safely in these areas.

Wider Pedestrian Framework and Accessibility

4.2.1 Objectives identified in previous advice:

Provision allowing attractive and accessible wider footpath and cycle linkages to East Craigs with crossings over Maybury Road, through the existing woodland/embankment and south to Mabury. To achieve integration for existing and new residents between existing and planned local facilities and amongst adjoining residential areas.

Ensuring user experience is considered for remoter routes and with particular consideration to safe routes to school, including lighting and building layout providing for passive surveillance from adjoining housing - with a particular focus on the landscape edges of the site: the south-west corner leading to Maybury and the boundary with Cammo Estate.

Clear definition within the site of an integrated network of pedestrian and cycle routes linking to neighbouring areas.

4.2.2 Appraisal on this topic:

The proposals have largely addressed our advice towards a layout built on a more coherent and legible network of footpath, cycle linkages within the site and linking to planned infrastructure outwith the site.

4.2.3 Further advice on this topic:

This remains subject to the delivery by the council of routes including planned footpaths from Maybury Road linking through the adjoining woodland and across the embankments into neighbouring housing at East Craigs and also linking south across the burn to the proposed new school at West Craigs.

4.3 Maybury Road and Bus Loop

4.3.1 Objectives identified in previous advice:

To adjust the characteristics of Maybury Road to create an urban street environment compatible with a residential area and to slow cars. Designing Streets policy provides a point of reference.

Integration of public transport (buses) within easy walking distance for new residents and as part of attractive public spaces and including, as needed for the extension of local bus routes, the integration of a bus turning loop.

We noted a preference for bringing buses into the site to strengthen the gateway role of the proposed square and local centre.

We sought drawings demonstrating the designed changes planned to Maybury Road.

4.3.2 Appraisal on this topic:

The proposals have largely addressed our advice with a more comprehensive design solution and linear parkland at street level along Maybury Road, integral space for bus turning and a new urban character along Maybury Road. (Please note separate appraisal of the street elevations to Maybury Road below).

4.3.3 Further advice on this topic:

None

4.4 Maybury Road Frontage Housing and Gateway

4.4.1 Objectives identified in previous advice:

The design of a coherent urban frontage to Maybury Road compatible with the significance of the urban gateway location of the site.

Ensuring that this is an active frontage contributing to urban life at street level through the incorporation of urban spaces and building entrances that are attractive and well used.

Avoiding repercussions for new residents of unattractive and unsafe 'rear' parking courts resulting from the proposed urban frontages.

The inclusion of a well-planned urban square at the site gateway incorporating the local centre, bus stops and gateway buildings. Consideration of the experience of this space for a pedestrian or cyclist, in all weathers and at different times of day.

Achieving a suitable mix of uses for the local centre to ensure that this is sustainable and well used.

4.4.2 Appraisal on this topic:

Along Maybury Road we recognise the steps taken to create an active urban frontage that is likely to be well used at street level with a linear park and active uses and entrances from street level apartments.

Steps taken to create variations in material and frontage articulation are recognised and have helped to break down the perceived frontage massing, creating a more animated elevation to Maybury Road.

However whilst the local centre and gateway area has a better defined role and consultation with residents promises uses meeting local needs, our advice has not yet been fully addressed. The local centre facilities and square remain separated from the gateway street by level changes and layers of trees that are likely to disperse activity, limit usability and activity.

4.4.3 Further advice on this topic:

We would recommend a review of the design of the square at the local centre.

The quality of detailing and material selection of the architecture will be essential to achieving a well-articulated urban frontage to Maybury Road.

4.5 Handling Wider Views

4.5.1 Objectives identified in previous advice:

Maintaining the view corridors to Cammo Tower and Mauseley Hill as planned in the earlier masterplan, to maintain views and links into the designed landscape of Cammo Estate.

Incorporating tree planting within the view corridors to provide shelter.

Achieving views of the Pentland Hills across the new housing from Cammo Grove.

4.5.2 Appraisal on this topic:

The proposals have largely addressed our advice.

4.5.3 Further advice on this topic:

Shelter tree planning along the edges of Mauseley Park will be an important element to be further checked and confirmed.

4.6 Urban Form and Density

4.6.1 Objectives identified in previous advice:

A range of densities and a considered townscape design that (1) creates a coherent identity and sense of place for the new neighbourhood and (2) re-inforces the function and role of adjoining public spaces, parks and streets for the community. The need for a sense of enclosure and interaction between houses and adjoining parks is one notable example. Another is the intent for Mews characteristics in the interior of the site, established in the earlier masterplan.

A strong and legible street hierarchy and urban form compatible with Designing Streets objectives. Including house plots and block design formats that contribute to a legible street network easily understood and navigable in terms of townscape, creating a pleasant and attractive experience for residents and visitors at street level. Including avoiding wide undifferentiated streets dominated by front curtilage car parking.

Managing the consequences for residents of higher densities and meeting parking standards to ensure that the quality and attractiveness of the street environment is not compromised and including:

(1) ensuring that impacts of car parking provision are planned to protect resident privacy, amenity and security.

(2) ensuring attractive and usable spaces at street level to serve immediate resident needs and amenities, for families in particular e.g. informal play, barbecue areas etc. within residential courtyard spaces.

This involves layout considerations as well as boundary design, providing suitable private garden thresholds and space for local amenities.

Environments prioritising the experience of people (whether pedestrians, parent with buggies, children playing, cyclists) before movement (cars, deliver vehicles, refuse collection).

A well-defined and attractive planned edge to the wider landscape to the west and south.

4.6.2 Appraisal on this topic:

The proposals have largely addressed our advice in these areas. We note that elements of street hierarchy, a more recognisable set of distinct street types and legible townscape characteristics have been established and this is welcomed. Strong urban edges to the proposed Mauseley Park are welcomed and the mews streets behind the parkland frontages have been substantially modified and improved as permeable parts of the street infrastructure. These mews are overlooked by house fronts and entrances providing safer and more attractive places at street level despite the extent of parking required.

The delivery of the proposed street trees, amenity planting and garden boundaries will be important for all these areas.

4.6.3 Further advice on this topic:

The handling of parking and courtyard spaces in higher density areas has been modified and improved to incorporate amenities such as common garden spaces and street trees to break up the extensive street level car parking. However these areas still risk being dominated by car parking. All steps taken to carefully design and implement high quality landscape and streetscape elements including strong garden boundaries, lighting, soft landscape, street trees, pedestrian priority detailing and quality materials selection will be essential.

4.7 Housing Typologies

4.7.1 Objectives identified in previous advice:

Maintaining housing formats in a variety of forms that support the clear block structure, street character and hierarchy of the earlier masterplan.

A distinct form and character of housing responding to the landscape edge.

A coherent palette of cladding materials and architectural language that links areas of high density housing (bespoke contemporary apartments and colonies blocks) with modified/re-elevated house types.

A strong and consistent structure of linking element and garden thresholds in areas of detached housing with well-defined garden boundaries and planting to form streets and places.

4.7.2 Appraisal on this topic:

Our advice has been largely addressed in these areas with more definition of townscape character through linking formats of housing to each type of street. This could go much further and be more consistent at street edges and frontage lines which can be fragmented in places. Endeavours have been made towards greater coherence of character between areas of contemporary high density housing and the traditional character of the standard houses types proposed. House type facing materials and forms have been modified to unify what would otherwise have been various house styles, plot types and formats of housing.

4.7.3 Further advice on this topic:

However the edge housing towards Cammo Estate has less definition and coherence than anticipated at this visible landscape edge to the city. This has a predominance of detached housing and a series of steps and offsets determined by individual house plots layouts. There is no defined form of edge housing presenting a consistent frontage to the wider landscape. The boundary walls between houses will help to some extent as will the proposed 'estate' fencing. Nevertheless the visual coherence of this important visible edge to the landscape has yet to be realised in an architectural response. We would recommend a review.

Similar issues and lack of a defined frontage also apply to the edge housing to the Cammo Tower park where front curtilage parking arrangements predominate, setting frontages back from the park edge. This could be more consistent with the approach along Mauseley Park.

4.8 Flood Management and Corridor

Objectives identified in previous advice:

A flood alleviation landscape exploring creative solutions to surface water management, including incorporating opportunities for providing wildlife habitat and biodiversity

Incorporating the 1:30 and 1:200 - year flood attenuation areas into publicly accessible open space. An edge that adds value as a different type of accessible parkland.

A strong/simple structured landscape corridor that binds the whole edge together.

4.8.2 Appraisal on this topic:

The proposals have largely addressed our advice in these areas.

4.8.3 Further advice on this topic:

However this is subject to suitable factoring arrangements being put in place to ensure maintenance of the planned quality of landscape in the longterm.

4.9 Precedent for Quality of Architecture

4.9.1 Quality of place objectives identified in previous advice:

We sought qualities of design evident in comparable precedent developments in Cambridge, Harlow, Polnoon and Craigmillar as a benchmark for Cammo given the prominence and importance of the May bury Road Frontage and the setting of the designed parkland of Cammo estate.

This included qualities around domestic boundaries and thresholds; forms responsive to street hierarchy; containing the visibility of car parking; distinctive types of architecture for visible edges to landscape, for major streets, for secondary street and for an interior grain of mews.

4.9.2 Appraisal on this topic:

Steps have clearly been taken to establish a more consistent approach to design qualities in elements such as elevational design, garden boundary design, managed variations in density, scale and form linked to variations in landscape and urban conditions as set out above. The quality of detail in the precedents gives a benchmark to aim for in the architecture and public realm design for Cammo.

4.9.3 Further advice on this topic:

None

4.10 Community Input and Ideas

Objectives identified in previous advice:

We encouraged the project team and council to work with local community to determine the needs of adjoining residents, to allow consideration of community input and ideas as the proposals emerged.

4.10.2 Appraisal on this topic:

Our proposal to document community views via a Place Standard assessment was not taken up. However community commentary whether given at public events or as documented and reported by the community council were discussed at the Design workshops. It is evident that the community input has influenced the design and layout of the proposals.

4.10.3 Further advice on this topic: None

HES comment on Proposal+ES

We have considered the EIA Report in our role as a consultee for our historic environment remit as set out under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

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

Proposed Development

We understand that the proposal comprises residential development supported by ancillary mixed uses including associated works and landscaping at land 345m southeast of 18, Cammo Walk, Edinburgh (development of LDP allocated site HSG20).

Our Advice

We have assessed the information provided with this consultation and consider that it is sufficient to come to a view on the proposal. We do not consider that the proposal raises issues of national significance and therefore we do not wish object to it. In coming to this view, we have noted the proposal's proximity to Cammo Inventory Garden and Designed Landscape (GDL). We understand that a woodland and grassland zone is proposed along the boundary of the site and the GDL. We also note that views to and from Cammo Tower and Mauseley Hill are to be retained via planned green avenues (or linear parks) that would bisect the development. Therefore, the development would not, in our view have a significant impact on the setting of the designed landscape.

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

Waste Services comment

Compliance with Waste Strategy (Domestic Waste Only)

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).

The waste collection teams will require safe and efficient access to these from the earliest occupation, and therefore cognisance must be taken of my comments below in relation to operational viability.

For low density properties, we would recommend individual kerbside collections. This provides each property with landfill (140 litres); mixed recycling (240 litres), glass (box), food box and internal caddy; and optionally garden waste bin (240 litres). All of these must be presented on the day of collection before a specified time and removed thereafter. They must otherwise be stored off street at all times.

For high density properties, we would recommend communal waste containers, for: landfill waste, mixed recycling for paper and packaging, glass, and food.

Key points are:

- o 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 in one bin storage area, and others in a different collection point, as recycling is a fully integrated part of the service;*
- o 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;*
- o provision must be made for the storage and disposal of bulky waste such as furniture produced by the residents, and indeed access to those by our collection teams.*

Developers can either source their own bins in line with our requirements, or can arrange for us to do so and recharge the cost- this will probably be most convenient for them.

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.

With regards to the application 18/01755/FUL the swept path analysis provided on the planning portal does not indicate the access to all properties. I will require a full swept path analysis unless other arrangement for waste collection is proposed and agreed on. I will also require information on the location and size of the bin stores for communal bins as well as presentation points for individual bins.

SEPA comment

Advice for the planning authority

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

Policy HSG 20 in the Local Development Plan requires development of this site to accord with the Maybury and Cammo Site Brief. This site brief includes improving:

o the quality of the water environment through works to realign and improve the bank side treatment of the Bughtlin Burn.

SEPA supports this aspect of the site brief. We have provided a response on the planning application as submitted, but we advise that SEPA supports a plan led planning system and the current application does not include provision to realign the Bughtlin Burn.

Flood Risk

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

We have provided pre-application advice for the proposed development at Cammo, advising, for instance on 09 March 2018, that we would object unless modelled tabular output was provided to support the Flood Risk Assessment (FRA).

The FRA has been updated to include the modelled tabular output.

The modelled tabular output shows that there are relatively high Froude numbers and velocities at the top of the model and where the current culvert is underneath Maybury Road. These are representative of the steep topography currently existing at this site, and, therefore, we accept the modelled output provided and have no objection to this application.

Caveats & Additional Information for Applicant

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

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

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

Air Quality

SEPA is 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.

We are also supportive of the approach to assessment in regards to holding the emission factors at 2016 for the future year scenario so as not to assume any improvements in vehicle technologies which may not materialise. However, we are discouraged to see only one year of Met data has been used in the model. Five years of Met data is the recommended minimum for air quality assessments using ADMS roads dispersion models. This is to establish a worse case reporting year. We advise the City of Edinburgh Council to request that five years of Met data is used for these assessments in future.

The assessment indicates that there will be a slight adverse impact on air quality at three receptor locations, but that air quality objectives will not be exceeded at these locations. Exceedances of air quality objectives are predicted in areas where there are known air quality issues and the impact of the development on concentrations in all cases was predicted to be negligible having a 0.5% contribution or less.

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, the verification of this model shows at some locations there is >20% disagreement between monitored and modelled concentrations. We highlight that the planning system has an important role to play in ensuring that future air quality problems are prevented or minimised.

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 and Queensferry Road 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 AQMAs are due to transport emissions. This indicates that air quality is an issue in the council's area.

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.

The council should take these principles in to consideration, especially those measures focused on encouraging active and low emission travel to and from the development. We would also encourage the council to request the applicant to install a percentage of the houses with electric vehicle 7Kw chargers.

Drainage

Surface Water Drainage

The drainage plan is acceptable in terms of the Simple Index Approach output for SUDS. Foul Drainage

The proposal is to connect to the waste water sewer network with Scottish Water's approval. We advise you to have confirmation from Scottish Water that this connection will be approved.

Public Transport + Infrastructure comment

It is our view that local bus operators see no commercial benefit from extending a bus service into the development site. The developer, therefore, should engage with the bus operators in order to better understand what provision they can make to enhance the attractiveness of public transport to the new residents. As a minimum, the design of the development should include high quality, safe, and direct pedestrian links to the existing public transport infrastructure in order to make it as convenient as possible for residents to access current services in the area.

SNH comment on Proposal + ES

Thank you for consulting us on the 4 May 2018 with the planning application and EIA for the above proposed development.

Summary

The latest proposal, if delivered to appropriate standards and in accordance with submitted masterplans, designs and codes, has the potential to provide a well-integrated housing expansion to the west of Edinburgh, providing a new neighbourhood with a favourable level of integrated, accessible and multi-functional green infrastructure.

There are areas that would benefit from further revised design or detailed specification, particularly wildflower seeding and plant establishment, and the delivery of suitable standards of maintenance and management for all open space areas. We suggest the council seeks to secure further details on these matters as, along with all the aspects of mitigation and landscape layout submitted so far, they will be important to the overall environmental outcomes of the development of this site.

Due to the broad similarities in the spatial layout of built form and open space, much of our advice on this current proposal relates to that provided on the previous application for this site (SNH response letters of June and December 2014).

Background and strategic context

The Cammo site is allocated within the Local Development Plan for Edinburgh. In terms of the landscape setting and the growth of the city to the west, the site lies in a prominent and strategic location and therefore it will be important to ensure delivery of good design and integration between the city and its wider landscape setting, much of which is currently designated as greenbelt. Through any development of the site and its environs, it will also be important to establish multi-functional green network links between the city, greenbelt and other nearby allocated LDP sites, as well as linking to the Cammo Estate and other key recreational routes in the area.

Appraisal of Impacts and advice

Landscape and green networks

The site lies on the city edge and within close proximity to Cammo designed landscape. Associated issues of landscape sensitivity, public access and important key views mean that careful consideration of the layout and design of the site is critical to the successful long term integration of this site within its wider context. The proposals, while fundamentally changing the existing character of the landscape and the nature of currently available views, have been closely considered through the Design Review process, with matters relating to landscape and visual impacts, movement networks, site edges and detailed design of open spaces having been discussed with SNH and other stakeholders.

We consider that the resulting masterplan contains a network of open spaces and an approach to access and landscape mitigation that has the potential to deliver appropriately connected and well integrated green infrastructure, which, if delivered successfully to appropriate standards, has the potential to lead to multiple benefits for both people and nature. For example, the various green networks through and around the site will provide a positive environment for walking and cycling through the site, linking to areas beyond as well as maintaining, to some degree, the key views to Cammo designed landscape.

We recommend that further information is needed for the appropriate detail, delivery, maintenance and management of the proposed green infrastructure. We encourage the Council to ensure that it is delivered in full accordance with, and building upon, the positive work in the submitted proposals, plans, cross sections and codes. It is important that spatial dimensions and the overall standards set out for the open space and landscape framework are adequately secured at this stage and not weakened over time or through a multi stage approach to detailed design. The short and long term approach to maintenance and management of all areas of open space will strongly define the quality of the local environment created within the application area and we advise that these matters are adequately clarified in advance.

Cammo Estate Park Edge - wildflower establishment

We welcome the intentions of the landscape and access layout for the large open areas near the Bughtlin Burn ('Cammo Estate Park Edge'), and support the potential benefit to people and wildlife of the managed wildflower and grassland areas proposed. However, we are currently unsure of the likely success of wildflower specification in this area.

For example, given the current arable use of the site and the likely high fertility of the soil in its current state, we query what approach will be needed for successful establishment of the proposed grass and wildflower meadow areas. An approach to lowering fertility, through short-medium term maintenance during the construction period and appropriate intervention and maintenance thereafter, could be required, or alternatively proposals to manipulate the growing substrate could be put forward. We recommend that full details of implementation proposals and maintenance should be secured.

We are very supportive of this aspect of the scheme however, and believe getting it right will lead to lower cost maintenance and improved outcomes for people and wildlife over the longer term (also delivering on the objectives of the Scottish Pollinator Strategy). In terms of delivering a successful proposal, we would be happy to advise further if it was of help. We also suggest it could be useful for the developer or agents to explore the lessons learned from the Calderwood development in West Lothian and the meadow establishment process they adopted, as similar issues were presented by that site and their landscape proposals.

Ecology

We are content with the surveys that have been undertaken. Several trees have been found to have bat roost potential within 30m of where foot/cycle paths are proposed. Mitigation has been described in 8.8.3 and Table 8.7 regarding construction of these paths and potential disturbance to bat roosts. It may be that not all of this mitigation will be required at the construction stage. Once further details of path location and construction methods are finalised, and once roost surveys have been carried out, then the level of mitigation required can be reviewed, including any need for a licence. We are happy to provide advice on this if required.

The use of directional LED lighting however should be adopted as discussed in the mitigation sections, as this will help prevent light spill more generally from the paths.

Active Travel comment

1. This development is of particular interest within the catchment area of the Community Links PLUS West Edinburgh Active Travel Network (WEATN). It is imperative that this new development supports the design principles of Community Links PLUS and the LDP to avoid this new neighbourhood being built at odds with the council's active travel agenda. We need to encourage a move away from reliance on the car and support residents to adopt sustainable travel options from the point of occupation through a reduction in car parking provision and clear pedestrian and cycle priority throughout the site, integrated into the wider network.

2. We would hope to see significant improvements to Maybury Road and the Craigs Road Junction to make travel on foot, by bike and by public transport attractive, safe and convenient. The LDP specifies that it should be addressed beyond its current movement function, to more of a 'street'. This can be achieved by reducing the width of the lanes and widening the footpaths to a standard outlined in the ESDG. Ideally, Maybury Road would be reduced to three lanes and incorporate features such as staggered build outs to enforce the reduced speed limit and pedestrian priority (see ESDG G6 - Speed Reduction and Traffic Management). There should be at least two controlled toucan crossings over Maybury Road as specified in the LDP, with at least four crossings provided in total, tying into the existing off-road path network to the east (this is addressed in the Transport Assessment p13).

3. Lighting paths, particularly along the western edge of the site, is essential. This path would be more accessible and overlooked if it was closer to the houses - it still remains unconnected to ends of residential streets which should feed into each other intuitively rather than as two separate entities. The use of estate railing between path and road is unnecessary in places. I'd like to see further details of chicanes on this path for comment.

4. The proposed levels of car parking on site is excessive. The landscape risks being dominated by car parking - levels of parking provision and hard standing have an impact on private amenity.

5. There are awkward corners on Maybury Road Avenue, and elsewhere across the site - pedestrians will likely follow the shortest possible route, even if it is over grassed areas. There's a potential conflict point leading out of Cammo Square onto main vehicular route - the pavement ends abruptly here. Extend the raised table at end of path running through Mauseley Park in line with shared footway - these paths currently do not align.

6. Concern over junction details at north end of site. Pedestrian crossing point should be provided to link the footpaths running along the eastern edge of the site - at the moment the paths do not align, and there is potential for the bus loop to be a conflict point as pedestrians cross on their own desire lines heading north. Re-align the bus only exit so it is perpendicular to Maybury Road - this will improve sight lines/crossing distances/ability for buses to turn. The width of Maybury Road could be reduced to 3 lanes here - build out and remove central hatching - to reduce its feeling of a traffic thoroughfare and to aid informal crossing points and footpath widths.

7. *Cycle parking provision for the Community Centre is lacking - this only needs to be external Sheffield stands, or as per the covered bike stores. This should be at the centre's entrance to make cycling and walking the most convenient option for arriving at the facility. The path along the side of the nursery isn't currently very overlooked (elevation D Community Centre), this is likely to have security and implications with negative safety perceptions, particularly being at the north end of the site with potential reduced use out of hours. This also applies to the parking behind the centre - it's very isolated and lends itself to antisocial behaviour. Lighting is to be provided, and the path should be suitably widened along the building's western edge (2m isn't acceptable as a shared use path between two high walls), with additional overlooking to be provided if possible. The walled nursery outdoor space is uninspiring and doesn't add to the community's amenity space, and again the high boundary wall may encourage inappropriate use. The play area may be more appropriate outside the front of the community centre to add value and activity to the surrounding space. Think about visually linking it to the shared green spaces in the site/Cammo Sq, or allowing the nursery outdoor space to be used by the community outside of nursery hours. Additionally, the centre and square are separated from the gateway street by level changes and layers of trees that are likely to disperse activity, although they do provide a buffer to stop the proximity of busses detracting from the site.*

8. *More info is needed on internal cycle parking before I'm able to comment. Generally looks suitable, with internal space for non-standard bikes/trailers/bikes with child seat attachments/maintenance. Need to have sufficient space for single storey cycle parking rather than relying on two-tiered options. Doorway options to be suitable for manoeuvring a bike out without too much effort. Block 1B has doors opening out onto grass - this should be hardstanding or a path - I assume it is a drawing error. See also Block 6, 7, 8. Unconvinced by location of cycle store in Block 9 - could it be nearer main stairwell? Bike stores should lead directly into the main stairwells where possible rather than requiring users to leave the building again (internal and external access points). Where are the entrances to Block 10 and 11's Bike Stores? Ensure all covered external bike stores are easily accessible from the road, overlooked, attractive, and located close to building entrances.*

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.

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 6 Affordable Housing in the Edinburgh Local Development Plan 2016.

2. Affordable Housing Provision

This application is for a development consisting of a 656 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (164 units) homes of approved affordable tenures. We request that the developer enters an early dialogue with the Council:

- o The tenure of the affordable housing must be agreed by the Council and;*
- o The Council will identify the Registered Social Landlord(s) (RSLs) to take forward the affordable homes, and deliver a well integrated and representative mix of affordable housing on site.*

The applicant has provided the Council with an Accommodation Schedule showing the breakdown of house-types and sizes by tenure.

The proposal does not achieve a representative mix of house-types and sizes as per the Affordable Housing policy. This department would therefore wish to see a more even balance of flats and houses between the tenures. In particular a reduction in 1 and 2 bed flats and an increase in the 'colony' style and 3 bed apartments in the affordable provision.

3. Summary

The applicant has made a commitment to provide 25% (164 units) on-site affordable housing. These will be secured by a Section 75 Legal Agreement. This department welcomes this approach which should assist in the delivery of a mixed sustainable community.

- o The applicant is requested to enter into an early dialogue with the Council who will identify Registered Social Landlord(s) (RSLs) to deliver the affordable housing*
- o The tenure of the affordable housing must be agreed with the Council*
- o The affordable housing must include a variety of house types and sizes to reflect the provision of homes across the wider site*
- o All the affordable homes must meet the Edinburgh Design Guidance and also meet the relevant Housing Association Design Guidance size and space standards*
- 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 The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.*
- o The applicant will be required to make adjustments to the composition of the affordable housing provision to better reflect a representative mix of house types and sizes within the wider development.*

Affordable Housing further comment

1. Introduction

Recommendation: 100% Onsite Delivery - 70% RSL - 30% Golden Share

I refer to the consultation request from the Planning Department about this planning application.

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 6 Affordable Housing in the Edinburgh Local Development Plan 2016.

2. Affordable Housing Provision

This application is for a development consisting of a 656 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (164 units) homes of approved affordable tenures.

The applicant is proposing 100% onsite affordable housing, 70% for the RSL Places for People, with the remainder 30% being provided as golden share housing. There are 114 properties being provided by Places for People, with an acceptable mix of house sizes and with a majority of these 114 homes to be provided as social rent.

Barratt have proposed a very large number of Golden Share properties at 30%, or 50 in total. This department requested a significantly increased number of RSL rented homes and a reduction in golden share, to meet the highest priority affordable housing need of the city. However, our supplementary guidance on affordable housing policy at the time this application was submitted, states a preference for 70% social housing and indicates by default, that 30% housing can be alternative tenures.

In response to this large number of golden share housing, updated guidance on affordable housing is now in place and states a maximum 12 golden share homes can be provided. However, this was put in place after this application was submitted.

These golden share properties will be subject to valuations at the time of sale. Should they not fall within the thresholds for Golden Share affordability, which are £214,796 for a three bedroom property, then the properties will be required for RSL housing.

Type	RSL	Golden Share
2 Bed Apartments	104	27
3 Bed Terraces	10	23
	114 (70%)	50 (30%)
Total Affordable	164	

3. Summary

The applicant has made a commitment to provide 25% (164 units) on-site affordable housing. These will be secured by a Section 75 Legal Agreement.

o The applicant has confirmed they will provide 164 homes onsite

- o 114 of these will be for RSL housing in partnership with Places for People
- o All the affordable homes must meet the Edinburgh Design Guidance and also meet the relevant Housing Association Design Guidance size and space standards
- 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 The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.

Roads Authority

A transport assessment detailing the impacts of the proposed development and mitigations was submitted as part of this application. This assessment predicted that peak time vehicular trips related to this proposed development of 700 residential units are 372 (AM peak) and 383 (PM peak) trips. 2011 census data related to transport modal share of three representative post code areas namely; Cramond, Cammo and Baberton, East Craig and Gyle was applied to TRICS vehicular trips estimate of the proposed development to generate multi-modal trips prediction for the proposed development. This is considered a robust analysis technique in relation to traffic data for modelling the proposed access junctions and as compared with the multi-modal trips generated by TRICS which resulted in fewer vehicular trips. Cumulative traffic flow data on Maybury Road for assessment year 2027 extracted from the WETA model (which includes traffic from all committed development and proposed sites) was used together with the vehicular trip estimate of the proposed development to model the proposed access junctions. The modelling on Maybury Road is based on one southbound lane with right turn only lane and two north bound lanes. The proposed is considered acceptable because the LDP envisages Maybury Road a pedestrian friendly street rather than four lane road which promotes vehicular movement. Additionally, Maybury Road has already been restricted to one southbound lane for safety reasons.

The strategic transport appraisal in support of the LDP (including Cammo site); considered the cumulative impacts of all LDP proposed sites and committed developments and identified a number of interventions to mitigate the impacts of trip generation from these sites. Among the interventions identified to mitigate the impacts of Cammo development are contribution for actions that are set in the 2019 LDP Action Programme for improvement of Barnton junction, Craigs Road junction, Maybury junctions, active travel infrastructure and public transport. Transport is satisfied that the existing transport infrastructure and proposed transport infrastructure and junction improvements will be able to accommodate the impacts of the proposed development and therefore complies with LDP Policies Tra 1, 2, 3 and 8. The Council and the applicant should coordinate the delivery of the LDP Action Programme in order to effectively mitigate the impacts of the proposed development since the actions to be delivered by each party are interdependent.

The general layout including dedicated walking and cycling routes are well considered and has the potential to link with the wider active travel network in West Edinburgh and to the north. The walking and cycling links per the 2019 LDP action programme are essential and should be secured by section 75 legal agreement or condition to make the site suitable for housing. Internal layout is designed with a mix of vehicular route, shared surface, footways, and pedestrian/cycle routes with priority crossings. The main vehicular route is 5.5m wide and designed with raised junctions to manage vehicular speed. Footways are minimum of 2m wide with a number footway connections that provide linkages between the proposed developments and the wider path network. This is achieved via 4m pedestrian/cycle routes that is proposed through the site. The applicant has incorporated measures from Edinburgh Street Design guidance namely continuous footway/priority crossings, raised junctions and change in material to prioritise walking and cycling and reduce vehicular speed within the proposed development. However, the design of parking does not fully accord with Edinburgh Street Design guidance which requires that in all new developments, car parking should be designed to have a minimal visual impact on the site and surrounding area and with less impact on pedestrian movement. The guidance requires that parking solutions that use land efficiently and are set within a high quality public realm be explored including parking to the rear and side of dwelling. The use of integral garages and off-street parking to the front of buildings should generally be avoided. Where this is to be provided strong boundary treatments and defensible space to the front should be provided to deliver high quality living environment and public realm (Edinburgh Design Guidance page 51-54). Notwithstanding this, the extent of active travel infrastructure, speed management measures and walking and cycling priority measures incorporated in the design to promote a safe walking and cycling environment within the proposed development makes the design acceptable.

Having reviewed the transport assessment and supporting information; transport is satisfied that the existing and proposed transport infrastructure will be able to accommodate the impact of the proposed development and should be secured by condition/section 75 legal agreement if the planning application is granted to make the site suitable for housing (Items 1, 5, 6, 7, 8, 9, 10, 14, 15 below as per the 2019 LDP Action Programme with accepted changes to the location of Cammo Walk link (north) as item 10 below; item 11 and 14 below as per 2016 LDP Cammo Site Brief); cost of LDP actions that are to be designed and delivered by the applicant are not provided in this response but are captured in the transport proforma. Action items 11, 12 and 16 below per the 2016 LDP Cammo Site Brief are not costed and to be delivered as part of the development by the applicant. Action items 4, 5, 10, 11, 12, 13, 14, 15 below are to be delivered by the applicant prior to first occupation of the proposed development).

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

- 1. Contribute £1,171,117 towards the Maybury/Barnton Transport Contribution Zone for improving Barnton junction through improved signals control and improved provision for walking and cycling. The contribution will also improve the capacity and active travel provision at both Maybury Road and Craigs Road junctions;*
- 2. Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary;*

3. *Contribute the sum of £2,000 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. The applicant should be advised that the successful progression of this Order is subject to statutory consultation and advertisement and cannot be guaranteed;*
4. *Contribute the sum of £2,000 to progress a suitable order to prohibit traffic movement on the proposed Bus only junction to the development and subsequently install all necessary signs and enforcement cameras to the satisfaction and at no cost to the Council prior to first occupation of the proposed development;*
5. *Contribute the sum of £2,450 to promote a suitable order to introduce a 30mph speed limit on Maybury Road, and subsequently install all necessary signs and markings at no cost to the Council. The applicant should be advised that the successful progression of this Order is subject to statutory consultation and advertisement and cannot be guaranteed (it is noted that this is being pursued by City of Edinburgh Council and may be in place prior to development);*
6. *Contribute £367,500 for design and construction of cycle path connecting Cammo development to Maybury site at Craigs Road and extending from the site north to existing Cammo Estate including toucan crossing at Craigs Road junction; and that excludes 4m wide part route to be delivered within site by the applicant as item 11 below;*
7. *Contribute £560,000 for design and construction of bridge/deck over Bughtlin Burn south of the site connecting Cammo development to Maybury cycle path (Land purchase needed but not costed);*
8. *Contribute £305,000 for 4.5m wide shared use paths across existing open space to connect East Craigs estate to the proposed development via crossings on Maybury Road (Land cost not included);*
9. *Contribute £200,000 to support a bus service along Maybury Road;*
10. *Design and build Cammo Walk link (4m wide pedestrian and cycle route immediately south of proposed Mauseley Park that connects footway west of Maybury Road to pedestrian and cycle route west of the site to the satisfaction and at no cost to the Council; proposed location of Cammo Walk link other than the site north envisaged in the LDP action programme is considered acceptable due to provision of vehicular route and a footway along north of the site that provide direct pedestrian/cycle connection from Maybury Road to existing Cammo Estate). It is understood that privacy issues of existing Cammo Estate necessitated the siting of Cammo Walk link (north) away from the LDP proposed location;*
11. *Design and install 4m wide walking and cycling route(part of walking and cycling route from Cammo Estate to Maybury site per the 2016 LDP Cammo Site Brief along the site western frontage with a number of footway and cycle path connections to the proposed development that link Cammo Estate to the north and to both the proposed bridge/deck (as item 7 above) and 4m wide walking and cycling route (as item 16 below) to the south and to the satisfaction and at no cost to the Council;*
12. *The applicant is required to design and deliver changes to Maybury Road with site boundary in order to change the character of Maybury Road. The actions to be designed and deliver to change the character of Maybury Road include introduction of 30mph and enforcement cameras to reduced vehicle speed limit; introduction of bus stops, signalised pedestrian crossings and physical infrastructure associated with toucan crossing and enhanced D island which could minimise risk of inappropriate overtaking manoeuvres and urbanising the road through the development, partial retention of the central hatching on the southbound approach, 4m wide shared route separated from Maybury Road by 3m wide grass verge and 7m wide planting and street trees along the site frontage to the satisfaction and at no cost to the Council;*

13. The existing footway west of Maybury Road is to be re-determined to a 3m wide grass verge;

14. Design and install four pedestrian/cycle crossing facilities on Maybury Road (x2 signalised pedestrian crossings on Maybury Road as part of the proposed signalised vehicular access junctions, 1x toucan crossing between the proposed signalised vehicular access junctions and 1x enhanced D island immediately north of proposed bus only access on Maybury Road) to the satisfaction and at no cost to the Council;

15. Applicant is required to provide a bus turning facility within the proposed development with a bus only access on Maybury Road; and to upgrade/design and install 6 new bus stops with shelters (4x on Maybury Road and 2x on bus turning facility area within the proposed development) to the satisfaction and at no cost to the Council. The bus shelters are to be aligned to the proposed crossing points on Maybury Road with 2 on each side of Maybury Road;

16. Design and install a 4m wide walking/cycling route (as per the 2016 LDP Cammo Site Brief) on west side of Maybury Road along the site frontage; segregated from the road by verge (3m wide grass and 7m wide planting and street trees); with footway connections that link the development to Maybury Road crossings for pedestrian access to public transport services on Maybury Road and East Craig to the satisfaction and at no cost to the Council;

17. All the proposed signalised junctions on Maybury Road are required to be installed with induction loop vehicle detectors for Barnton junction upgrade to SCOOT (adaptive urban traffic signal control) system to respond to variations in traffic demand on a cycle-by-cycle basis and reduce delays and stops and at no cost to the Council.

18. Land south of the proposed 4m wide pedestrian/cycle route west of Maybury Road along the site frontage (as item 15 above) is required to be secured/transferred to Council ownership to future proof it and allow for continuation of the route to the south at no cost to the Council.

19. Continues footways without tactile at driveways/minor junctions and with tactile at side streets with high traffic flow and raised junctions that provides straight pedestrian desire lines are required to be provided along both sides of the main vehicular route to ensure pedestrian priority at junctions and driveways without detour and dropped kerbs.

20. All footways, pedestrian and cycle route crossings are to be provided with continues footway that provides pedestrian/cycle priority;

21. Tiger crossings are required for all internal junctions of walking and cycling routes with the main vehicular route. Two tiger crossings to be provided on the junction of the proposed Cammo Walk link (4m wide pedestrian and cycle route from the bus turning facility to west of site) with the main vehicular route south of proposed Mauseley Park. One tiger crossing to be provided on the junction of east west walking and cycle route with the main internal vehicular route.

22. All the required cycle spaces to be provided should be secure, covered and easy to use.

23. 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. For avoidance of doubt, the road layout including lighting and drainage is not approved at this stage and is subject to road construction consent.

24. A Quality Audit, as set out in Designing Streets, to be submitted prior to the grant of Road Construction Consent;

25. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), 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;

26. 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;

27. 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;

28. Any works affecting an adopted road must be carried out under permit and in accordance with the specifications. See Road Occupation Permits http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point;

29. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed 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 as part of any sale of land or property;

Note:

a) The modelling demonstrates that the proposed junctions on Maybury Road will be operating under capacity.

Junction

Approach to Junction

AM DoS

Queue

PM

DoS

Queue

Northern Site Junction

Maybury Rd Southbound Approach

88%

31PCUs (186m)

73%

18PCUs (108m)

Maybury Rd Northbound Approach

Av. 52%

11PCUs

(66)

Av. 58%
Av. 7PCUs
(42m)
Southern Site Junction
Maybury Rd Southbound Approach
87%
33PCUs (198m)
67%
13PCUs (78m)

Maybury Rd Northbound Approach
Av.52%
12PCUs (72m)
Av. 64%
Av.16PCUs
(96m)

b) Current Council parking standards could permit up to 810 car parking spaces for the proposed 486 flats, colonies terraces and apartments (43 1bed flats; 239 2bed flats; 105 3bed flats/colonies; 93 3bed terraces and 6 4bed terrace). The proposed 529 car parking spaces (including 42 disabled and 40 EV charging bays) complies with the Council's car parking standards and is considered acceptable due to level of PT accessibility. Double garages and driveways being provided for the houses.

c) The 860 secure cycle parking spaces to be provided complies with the Council's minimum cycle parking requirement (844 spaces) for the proposed flats, colonies and terrace as per revised site layout- bike store location. The applicant proposes public bike hiring scheme adjacent to the community hall to promote cycling within the proposed development.

d) The community hall(864sqm) to be provided with 8 car parking spaces including 2 disabled spaces, 13 secure cycle spaces and 1 motorcycle space and complies with the Council's parking standards;

e) 19 motorcycle spaces being provided complies with the Council's minimum requirement for the proposed development;

f) The applicant by means of swept path analysis demonstrated that the proposed layout and bus turning facility are able to accommodate refuse collection and bus turning movements respectively.

g) It is noted that in support of the Council's LTS Cars1 policy, the applicant has agreed to contribute the sum of £34,500 (£1,500 per order plus £5,500 per car) towards the provision of six car club vehicles in the area;

h) Residents have expressed concerns about safety of existing Cammo Gardens junction and requested for the junction to be signalised. This is an existing problem and cannot be attributed to the impact of the proposed development and addressed through this application. The provision of signalised junction cannot be guaranteed because a holistic approach will be undertaken for Barnton junction and Maybury Road transport corridor improvement and that will dictate remedial measures for Cammo Gradens junction. It is understood that the Council's Road Safety team has carried out annual collision investigation and implemented remedial measures aimed at addressing this problem. Cramond & Barnton Community Council submitted transport/traffic report with suggestions to improve Barnton junction and the surrounding road networks. The suggestions have been noted and will influence the holistic approach of the transport corridor improvement but there is no guarantee that all the suggestions will be adopted.

Edinburgh Airport comment

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

Submission of a Bird Hazard Management Plan

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

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

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

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

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

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

We would also make the following observations:

Cranes

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

Lighting

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

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

Archaeology comment

The site occupies a large area of open farmland to the east of the Bughtlin Burn and adjacent to the designated historic landscape surrounding Cammo House and also to the north of the medieval farming centre of West Craigs. Accordingly, this site has been identified as occurring within an area of archaeological historic and archaeological significance. This application must be considered therefore under terms the Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and also CEC's Edinburgh Local Development Plan (2016) Policies ENV7, 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.

Buried Archaeology

Given the potential for significant buried remains across the site it was required that the results of an archaeological evaluation (trenching, metal-detecting) were undertaken to inform any approved mitigation strategy for the site and also potential layout of the masterplan. Following approval of a WSI with the applicant GUARD Archaeology undertook this programme of work between April and early June 2018 with their report (GUARD Ref: 4757) submitted for approval on the 22nd June.

The results from GUARD's evaluation have demonstrated that the site has been heavily ploughed in the past and proved largely negative, with exception of fragmentary remains of medieval-post-medieval rig and furrow and small finds of similar date. The exception to this was the discovery of Palaeo-channels relating to the adjacent burn. Such deposits are archaeologically important as they can provide significant information regarding historic environmental changes and land uses going back into prehistory perhaps as far back as the last Ice-Age c. 12,000BC.

It is recommended that prior to development that a programme of archaeological works is undertaken to excavate, record and analyse these Palaeo-channels and any associated deposits and that the following condition is attached to ensure the undertaking of this required programme of archaeological works;

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

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

Cammo Designed Landscape Setting

As stated the proposal occur immediately to the east of the Cammo Inventory Garden and Designed Landscape. As such key views to and from this site are required to be protected. Having looked over the submitted plans we are happy that these key view to and from Cammo Tower and Mauseley Hill are to be retained via the linear parks planned to bisect the development and the planned green space surrounding the burn separating the these two areas.

Accordingly it has been concluded that these proposals do not have a significant impact on the setting of the designed landscape at Cammo.

Environmental Protection comment

The applicant is seeking Full Planning Permission for a development which is residential led with ancillary uses. 656 new homes are proposed and will contain a mix of flatted apartments along Maybury Road, as well as detached and semi-detached houses. The site will be centred around Mauseley Park, and to the north, west and south by areas of woodland and grassland. A composting facility is located approximately 530m to the west of the application site. To the north of the application site there is existing residential properties.

The development comprises the construction of up to 700 residential units, community hub and bus turning facility with associated vehicle access and parking 656 units served with 950 car parking spaces

Access points will be from the north and south ends of Maybury Road, with potential pedestrian connections from the north-west and south-west corners of the site.

A green corridor will form the western and southern boundaries, including woodland and grassland with paths proposed to run through this area connecting the development site to the wider area.

The Local Development Plan (LDP) which was adopted in November 2016 identified the site as HSG20, which is recognised as a greenfield site allocated for housing. In this respect the planning context for the site has been established along with a number of nearby large-scale development sites.

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.

Transport related 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 500 m west of the application site which is a potential source of dust and odour emissions. The applicant has 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 700 residential units being developed within the application site.

The submitted supporting air quality impact assessment has anticipated possible adverse impacts 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 to meet its duties under Part IV of the Environment Act. This includes measurements of Nitrogen Dioxide (NO₂) at various locations across the city using diffusion tubes including some of which are near to the development site. The NO₂ 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 NO₂ concentrations at most sites shows there is a slight decrease in NO₂ 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 air quality impact assessments predicted concentrations of NO₂ using 2016 vehicle emission factors predicted exceedances of NO₂ with and without the scheme at two receptors within St John's Road AQMA and at four receptors on Queensferry Road/Barnton Junction. The magnitude of change due to the proposed development is less than 0.5 % at these locations, and therefore the impact of the proposed development is predicted to be negligible according to the applicants air quality impact assessment.

However the applicant has highlighted that the impact has been determined to be slight adverse at three locations adjacent to Maybury Road, Maybury House, Cammo Gardens and North Gyle Terrace, however the total predicted concentration at these locations remains below the NO₂ objective levels but Environmental Protection notes that at North Gyle Terrace is near the objective level and there is the possibility of a plus or minus 20% deviation which could actually lead to an exceedance.

The applicants predicted concentrations of PM₁₀ levels using 2016 vehicle emission factors predicted at each existing sensitive receptor within the study area for the future scenario of 2027 with and without the proposed development. It should be noted that PM₁₀ levels at Queensferry Road have increased to 22 µg/m³ for 2017 which exceeds the objective levels.

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 PM₁₀ and NO₂ at roadside locations on affected roads. The significance of these changes has been deemed negligible by the applicant, even at roadside properties on the Glasgow Road and at the junction of Maybury Road with Queensferry Road where existing concentrations of PM₁₀ and NO₂ may be close to the relevant annual mean objectives.

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_x 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;

- o Keep Car Parking levels to minimum.*
- o Car Club facilities (electric and/or low emission vehicles).*
- o Provision of rapid electric vehicle charging facilities.*
- o Public transport incentives for residents.*
- o 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 have serious concerns with the level of car parking proposed. The applicant must keep the numbers of car parking spaces to a minimum, be committed to good cycle provisions, electric vehicle charging facilities and supported with a travel pack. 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 but will not support the current level of proposed car parking at 950.

The applicant has concluded that there are no significant adverse effects predicted for local air quality due to the increase in traffic emissions due to the Proposed Development and therefore no specific mitigation measures are proposed.

The applicant states that the proposed development includes a number of design measures aimed at promoting sustainable travel and providing connectivity to public footpaths and public transport links. Environmental Protection have raised concerns with the location of the footbridge linking the wider development sites including this one to the Gogar Train Station.

The applicant has advised that the proposed development will only have a negligible impact on the air quality within the St John's AQMA. The Council has been working with partners to tackle the air quality issues on St Johns Road. This includes a number of measures to improve air quality within the AQMA. Environmental Protection believe the proposed development along with committed developments in the area will adversely impact the local air quality in this area. The level of car parking is excessive and must be significantly reduced.

The applicant states that following a meeting with the Council on the 8th March 2018, it was agreed that the parking spaces for electric vehicles will be provided with the ducting to allow for a future electric charging point to be introduced. There will be passive provision (i.e. infrastructure to allow the future delivery of electric vehicle charging points) made for all properties with driveways and garages. This is not acceptable to Environmental Protection each house with a driveway shall be fitted with a charging point as a minimum with further consideration given to further installations serving communal spaces. Plans would need to be submitted highlighting where all the chargers and feeder pillars would be located.

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 250 new residential properties at West Craigs. 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 this site 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 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 are operational with or without the additional traffic associated with the proposed development. The assessment also shows that there is potential that objectives may not be met at other receptors. 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. It must be stressed that the proposed level of car parking for the proposal is excessive.

Composting

The existing composting site north-west of the application site is located approximately 500m 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. The applicant has not assessed the odours.

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 road noise from Maybury Road. 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 and the applicant has provided a sufficient assessment to ensure that we will not require this aspect to be further investigated.

The noise measurements were undertaken at the three locations it has highlighted significant exceedances of the World Health Organisations Community Noise Guideline levels along Maybury road. Environmental Protection have advised the applicant that they must meet these guideline levels.

The Associating Exceedance Noise Levels for the façades overlooking Maybury Road from the nearest proposed residential blocks to the east of the site would be exceeding 10 dB, corresponding to a 'Major Adverse' Magnitude of Impact.

The noise impact assessment show the amenity space along Maybury Road and balconies will be exposed to excessive noise.

Therefore, Environmental Protection recommend the application is refused on noise and air quality grounds.

Communities + Families comment

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

In areas where additional infrastructure will be required to accommodate the cumulative number of additional pupils, education infrastructure 'actions' have been identified. The infrastructure requirements and estimated delivery dates are set out in the Council's Action Programme (January 2018).

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

Assessment and Contribution Requirements

Assessment based on:

358 Flats (35 one bedroom flats excluded)

263 Houses

This site falls within Sub-Area W1 of the 'West Education Contribution Zone'.

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

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

The proposed development is therefore required to make a contribution towards the delivery of these actions based on the established 'per house' and 'per flat' rates for the appropriate part of the Zone.

Total infrastructure contribution required:

£5,917,509

Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.

Total land contribution required:

£1,305,670

Note - no indexation to be applied to land contribution.

Delivery of Required Education Infrastructure

The Council's draft Supplementary Guidance states that development should only progress where it is demonstrated that required education infrastructure can be delivered, and at the appropriate time. It also states that if the pupils from a new development cannot be accommodated until education actions have been delivered, conditions may be used to phase the development to reflect the delivery programme for the required infrastructure.

The Council's Action Programme identifies the need for a new primary school and a new secondary school within West Edinburgh to accommodate pupils from new development - including pupils from HSG 20 (Cammo). Potential school locations have been considered as part of the recent informal consultation on future school infrastructure in West Edinburgh. The location for a new secondary school infrastructure in West Edinburgh will be progressed through development of a West Edinburgh spatial strategy to be prepared as part of the new Local Development Plan.

The developer has suggested that homes on the Cammo housing site could start to be completed from 2019 but may not be fully built out until 2026. The current Action Programme identifies a delivery date of 2022 for the new primary school and secondary school, although this date will be reviewed as part of a future update to the Action Programme and would be dependent on getting agreement with third party land owners.

The application site is currently within the catchment area of Cramond Primary School and The Royal High School but school roll projections show that there is not sufficient capacity in either school to support a significant increase in pupils.

If new housing on the Cammo site progresses as expected but the required new schools are not in place, temporary arrangements may therefore have to be put into place to mitigate the impact of the new pupils. This may mean that pupils from the new development have to be assigned to the nearest appropriate existing school (a formal statutory consultation process would be required before such an arrangement could be put in place). Temporary accommodation solutions at existing primary schools may also be required. The legal agreement should therefore allow flexibility in terms of the use of contributions for the delivery of temporary and permanent accommodation solutions.

Communities + Families further comment

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

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

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

Assessment and Contribution Requirements

Assessment based on:

344 Flats (43 one bedroom flats excluded)

268 Houses

This site falls within Sub-Area W1 of the 'West Education Contribution Zone'.

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

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

The proposed development is therefore required to make a contribution towards the delivery of these actions based on the established 'per house' and 'per flat' rates for the appropriate part of the Zone.

Total infrastructure contribution required:

£5,444,152

Note - all infrastructure contributions shall be index linked based on the increase in the BCIS Forecast All-in Tender Price Index from Q4 2017 to the date of payment.

Total land contribution required:

£711,000

Note - no indexation to be applied to land contribution.

Delivery of Required Education Infrastructure

The Council's draft Supplementary Guidance states that development should only progress where it is demonstrated that required education infrastructure can be delivered, and at the appropriate time. It also states that if the pupils from a new development cannot be accommodated until education actions have been delivered, conditions may be used to phase the development to reflect the delivery programme for the required infrastructure.

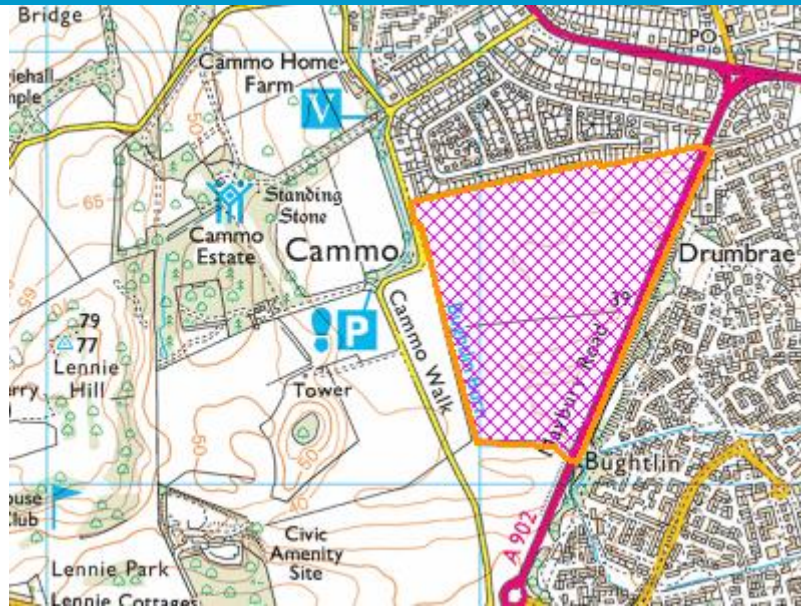
The Council's Action Programme identifies the need for a new primary school and a new secondary school within West Edinburgh to accommodate pupils from new development - including pupils from HSG 20 (Cammo). Potential school locations have been considered as part of the recent informal consultation on future school infrastructure in West Edinburgh. The location for a new secondary school infrastructure in West Edinburgh will be progressed through development of a West Edinburgh spatial strategy to be prepared as part of the new Local Development Plan.

The developer has suggested that homes on the Cammo housing site could start to be completed from 2019 but may not be fully built out until 2026. The current Action Programme identifies a delivery date of 2022 for the new primary school and secondary school, although this date will be reviewed as part of a future update to the Action Programme and would be dependent on getting agreement with third party land owners.

The application site is currently within the catchment area of Cramond Primary School and The Royal High School but school roll projections show that there is not sufficient capacity in either school to support a significant increase in pupils.

If new housing on the Cammo site progresses as expected but the required new schools are not in place, temporary arrangements may therefore have to be put into place to mitigate the impact of the new pupils. This may mean that pupils from the new development have to be assigned to the nearest appropriate existing school (a formal statutory consultation process would be required before such an arrangement could be put in place). Temporary accommodation solutions at existing primary schools may also be required. The legal agreement should therefore allow flexibility in terms of the use of contributions for the delivery of temporary and permanent accommodation solutions.

Location Plan



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