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**Decision date: 13 November 2019**

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS  
DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013**

Change of use of existing hay field to camp site with accommodation in timber pods  
and ancillary services.  
At Bonaly Farm Torduff Road Edinburgh

**Application No:** 19/03360/PPP

**DECISION NOTICE**

With reference to your application for Planning Permission in Principle registered on 12 July 2019, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

**Conditions:-**

**Reasons:-**

1. The proposal is contrary to the adopted Edinburgh Local Development Plan Policy Env 11 as it fails to demonstrate that the proposal will have a positive impact on the character and appearance of the Special Landscape Area.
2. The proposal is contrary to policy Env 10 of the adopted Edinburgh Local Development Plan as it would detract from the rural character and appearance of the surrounding area.

3. The proposal is contrary to policy Hou 7 of the adopted Edinburgh Local Development Plan as it would have a materially detrimental impact on the living conditions of neighbouring residents.
4. The proposal is contrary to policy Env 17 of the adopted Edinburgh Local Development Plan as it would have an unacceptable impact upon the character and landscape quality of the park.
5. The proposal is contrary to policy Des 5 of the adopted Edinburgh Local Development Plan as it would adversely affect the amenity of neighbouring developments.
6. The proposal is contrary to policy Rs 6 of the adopted Edinburgh Local Development Plan as not enough information has been supplied to show that there is adequate sewerage to meet the demands of the development.
7. The proposal is contrary to policy Des 4 of the adopted Edinburgh Local Development Plan as it will not have a positive impact on its surroundings.

Please see the guidance notes on our [decision page](#) for further information, including how to appeal or review your decision.

Drawings 01;02;03, represent the determined scheme. Full details of the application can be found on the [Planning and Building Standards Online Services](#)

The reason why the Council made this decision is as follows:

The introduction of timber pods within the site would result in the introduction of incongruous features which would have an adverse impact on the rural character of the surrounding area, the special character of the Pentlands Special Landscape Area and the character and landscape quality of the Pentlands Hills Regional Park. In addition, the proposal would result in the introduction of a use which is likely to have a materially detrimental effect on the living conditions of nearby residents. The proposal is contrary to policies Env 10, Env 11, Env 17, Des 5, Hou 7, Des 4 and Rs 6 of the adopted Edinburgh Local Development Plan (LDP) and the Council's Guidance for Development in the Green Belt and Countryside.

This determination does not carry with it any necessary consent or approval for the proposed development under other statutory enactments.

Should you have a specific enquiry regarding this decision please contact Robert McIntosh directly on 0131 529 3422.



**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**

## NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at [www.eplanning.scot](http://www.eplanning.scot) or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email [localreviewbody@edinburgh.gov.uk](mailto:localreviewbody@edinburgh.gov.uk).

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

# Report of Handling

## Application for Planning Permission in Principle 19/03360/PPP

At Bonaly Farm, Torduff Road, Edinburgh

Change of use of existing hay field to camp site with  
accommodation in timber pods and ancillary services.

Item	Local Delegated Decision
Application number	19/03360/PPP
Wards	B08 - Colinton/Fairmilehead

### Summary

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The introduction of timber pods within the site would result in the introduction of incongruous features which would have an adverse impact on the rural character of the surrounding area, the special character of the Pentlands Special Landscape Area and the character and landscape quality of the Pentlands Hills Regional Park. In addition, the proposal would result in the introduction of a use which is likely to have a materially detrimental effect on the living conditions of nearby residents. The proposal is contrary to policies Env 10, Env 11, Env 17, Des 5, Hou 7, Des 4 and Rs 6 of the adopted Edinburgh Local Development Plan (LDP) and the Council's Guidance for Development in the Green Belt and Countryside.

### Links

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<a href="#">Policies and guidance for this application</a>	LDPP, LDES01, LDES04, LDES05, LEN03, LEN09, LEN10, LEN11, LEN17, LHOU07, LTRA02, LTRA03, LRS06, LEN21, NSG, NSGCGB,
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# Report of handling

## Recommendations

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**1.1** It is recommended that this application be Refused for the reasons below.

## Background

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### 2.1 Site description

The application site relates to part of an existing hay field which forms part of Bonaly Farm off Torduff Road, Edinburgh. The site lies within the defined Greenbelt, the Pentland Hills Regional Park and is an area of great landscape value. There are a number of residential properties located fairly close to the field in question. This includes a grade A listed building, Bonaly Tower.

### 2.2 Site History

15/05533/FUL-Erection of a dwelling house - Withdrawn by applicant  
15/05501/FUL- Change of use of vacant land to burial ground- Refused at Development Management Sub Committee- 19th April 2017  
17/00489/EAMEN-Enforcement Enquiry- Alleged Untidy Land.  
18/00053/ENFORC-Appeal against enforcement- Untidy land- Appeal dismissed by Department of Planning and Environmental Appeals.

## Main report

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### 3.1 Description Of The Proposal

The application is for planning permission in principle for the change of use of an existing hay field to a camp site with timber pod accommodation and ancilliary services. The plans submitted indicate that there will be 10 pods and 2 ancilliary buildings to be constructed within the site.

### 3.2 Determining Issues

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

Do the proposals comply with the development plan?

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

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

### **3.3 Assessment**

To address these determining issues, it needs to be considered whether:

- a) The principle of the development is acceptable in the Green Belt;
- b) The proposal raises any issues in respect of the impact on the setting of a listed building;
- c) The design and density of proposal is acceptable
- d) The proposal will detract from the landscape quality and/or rural character of the Greenbelt, will it have a significant adverse impact on the special character of the Pentlands Special Landscape Area and an unacceptable impact upon the character and landscape quality of the Pentlands Hills Regional Park;
- e) The proposal will have an adverse impact on the amenity of neighbouring residents;
- f) The proposal raises any issues in respect of parking and road safety;
- g) The proposal raises any issues regarding flood prevention;
- h) The proposal raises any issues in respect of drainage or archaeology, and
- i) Any issues raised by objectors have been addressed.

#### **a) Principle of the Proposal**

Policy Env 10 of the adopted Edinburgh Local Development Plan (LDP) states that within the Greenbelt and countryside shown on the proposals map, development will only be permitted where it meets one of certain criteria and would not detract from the landscape quality and/or rural character of the area.

In addition, policy Env 11 states that planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of a Special Landscape Area.

Criteria (a) of LDP policy Env 10 states that development for the purposes of countryside recreation may be considered to form an acceptable greenbelt and countryside development.

The Edinburgh Guidance for the Countryside and Greenbelt also clarifies that countryside recreation is uses where the proposal requires the land resource and is compatible with an agricultural or natural setting such as horse riding facilities, golf courses and golf driving ranges, touring caravan and campsites.

The proposal would see the site operating in a manner similar to a caravan site or campsite, with the pods providing short term holiday accommodation in a rural location. The proposed use of the site for glamping pods can therefore be considered to be in compliance with criteria a of Policy Env 10. The principal of the proposal is therefore acceptable.

However as will be established in section d below, the proposal would detract from the landscape quality and rural character of the area and would have a significant adverse impact upon the character or qualities of the Special Landscape Area.



#### b) Setting of a Listed Building

One of the buildings located relatively near the site is Bonaly Tower a category A listed Baronial castle. However the site is located over 80 metres away (approximately) and is screened to a degree by trees. As a result the proposal will have no impact on the setting of the listed building.

The proposal complies with LDP policy Env 3.

#### c) Design and density of proposal

Policy Des 4 of the LDP states that planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact upon views having regard to

- (a) height and form,
- (b) scale and proportions, including the spaces between buildings
- (c) positioning of buildings and other features on the site
- (d) materials and detailing

Although full details have not been provided at this stage, the applicant has provided a proposed location/block plan indicating that ten pods and two other structures including a reception cabin and barbeque hut will be installed. The proposed pods shall be constructed from timber with timber single roofs or felt tile roofs.

The supporting information provided states that the proposed pods will be of varying sizes, housing between 2-6 occupants, of between 4.5 metres by 2.5 metres for the smaller pods and up to 9 metres by 5 metres for the larger pods. Whilst the suggested height of the pods is stated at around 2.7 metres.

Given the above the floor plan sizes of these pods are quite substantial and the floor sizes of the larger pods are not dissimilar to that of some flatted properties. The larger of the pods would likely be far more substantial than that shown on the indicative site plan submitted.

Even though the supporting statement suggests that the density of development on the site would be low, the levels of development proposed would be far greater than that already established nearby. The residential properties closest to the site appear to be set within quite large garden grounds and are separated a large distance apart.

While not enough information has been provided in order to conclusively assess the suitability of the proposal in terms of its proposed form, materials and detailing, the information submitted does show large almost dwelling house scale buildings which

do not have similar characteristics to the surrounding dwellings and do not respect the established countryside grain.

The proposal does not comply with LDP policy Des 4.

d) Landscape quality and/or rural character of the Greenbelt, special character of the Pentlands Special Landscape Area and impact upon the Pentlands Hills Regional Park

LDP Policy Env 10 requires that new development does not detract from the landscape quality and/or rural character of the area.

The site is identified in the LDP as a Special Landscape Area (SLA). It is also near a local biodiversity site, Braid Burn Complex- Bonaly Water, is near Bonaly Country Park and is within the Pentland Hills Regional Park.

Policy Env 11 Special Landscape Areas states that planning permission will not be granted for development which would have a significant adverse impact upon the special character or qualities of the Special Landscape Area. A landscape and visual impact assessment is likely to be needed in support of proposals affecting an SLA. No landscape or visual assessment has been submitted, although it is acknowledged that the submission of a detailed landscape and visual impact assessment would be difficult to produce at the planning permission in principle stage.

LDP policy Env 17 states that development which supports the aims of the Pentland Hills Regional Park will be permitted provided it has no unacceptable impact upon the character and landscape quality of the park.

A large part of the character of the landscape is its views and sense of parkland. The Edinburgh Landscape Character Assessment (2010) outlines the essential qualities and characteristics of the area and the potential for enhancement. It describes the landscape as *"providing an identifiable setting and containment of the city and surrounding settlements. It is of high scenic value and offers a sense of isolation."*

A Scottish Government Reporter stated in the recent enforcement appeal decision at the site (18/00053/ENFORC) that *This is a valuable area of countryside, potentially vulnerable to inappropriate urban influences, which makes an important contribution not only to the landscape setting of the city but also that of the Pentland Hills. It is reasonable to expect a high standard of visual amenity in such an area not least because, as I observed on my site inspection, significant numbers of people pass the entrance to the site on their way to and from the regional park*

Whilst the location of the pods have been restricted to the south side of the ridge, which is not visible from Edinburgh city, or the by-pass, the site will be highly visible from most of the above designations (i.e., the defined Special Landscape Area, Bonaly Country Park, the Pentlands Regional Park and especially from the adjacent Torduff Hill, a popular route for walkers.

The proposal would change the site from a green field which provides a simple uncluttered backdrop for the City of Edinburgh skyline and a defined rural entrance to

the Pentlands, to one of scattered camping pods and ancillary development. This will result in a permanent change in landscape character and would have an adverse visual impact on an area of high scenic value.

Another concern relating to the proposal is that there could be several other ancillary buildings required (small waste/ recycling enclosure, cycle secure enclosure and storage tank for the water supply), which have not been shown at this stage, as well as other ancillary development required including car parking and roads.

Whilst the supporting statement suggests that car parking and roads could be formed from loose surfacing or reinforced grass it is possible that these will need to be converted to more permanent hardstanding's in the future. Due to the sloping site, erosion (especially rill erosion) could be a problem. Therefore it is likely that the access road will need to be a bituminous material and drainage measures required to be implemented. This combined with the relatively substantial pods and other buildings, would all combine to have a significant adverse impact upon the special character or qualities of the defined SLA and the character and landscape of the Pentland Hills Regional Park.

The proposal would result in the construction of an incongruous development which would significantly disrupt the established rural character of the surrounding area. The site has a managed rural and agricultural appearance and contributes to the special character and qualities of the SLA.

The proposal would have a significant adverse impact on the special character and qualities of the SLA, the character and landscape of the Pentland Hills Regional Park and the landscape quality and rural character of the defined green belt.

The proposal is contrary to LDP policy Env 10, Env 11 and Env 17.

#### e) Amenity of Neighbouring Residents

LDP policy Des 5 states that planning permission will be granted where it is demonstrated that the amenity of neighbouring developments is not adversely affected.

LDP policy Hou 7 confirms that developments which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted. The policy is firstly, to preclude the introduction or intensification of non-residential uses incompatible with predominately residential areas and secondly to prevent further deterioration in living conditions in more mixed use areas which nevertheless have important residential functions.

Environmental Protection were consulted as part of the assessment of the application and have recommended that the application be refused due to its potential impact on the amenity of local residents. In particular they were concerned as the garden grounds of one property is sited within 10 metres of the boundary of the site.

The site is intended to be used by individuals who are on holiday. Individuals on holiday may often behave in a different manner to permanent residents of a residential

premises, and are more likely to utilise the areas outside the pods during the spring and summer months for long periods of time playing, eating, drinking and talking. The potential therefore exists for the proposal to cause noise disruption to neighbouring residents on a regular basis. No site management plan has been submitted and concerns are raised about how enforceable any site management plan would be in practice, especially with the site being so close to residential properties.

The pods could be positioned to ensure that they would not cause a material level of overshadowing to nearby properties. Likewise the windows could be positioned to ensure no loss of privacy. These matters could be conditioned for further details to be supplied as part of the required subsequent AMC application.

The proposal would have a materially detrimental impact on the living conditions of neighbouring residents and is contrary to LDP policy Des 5 and Hou 7.

#### f) Parking and Road Safety

LDP policy Tra 2 states that planning permission will be granted for development where the proposed car parking provision complies with and does not exceed the parking standards set out in Council Guidance.

LDP policy Tra 3 states that planning permission will be granted for development where the proposed cycle parking and storage provision complies with the standards set out in Council Guidance.

The Edinburgh Design Guidance does not contain any set vehicle or cycle parking standards for campsites. The proposal does not include any specific details with regards to car or cycle parking. However, these aspects could be conditioned for consideration under the required AMC application.

The Roads Authority was consulted on the proposal and raised no objection either on the grounds of parking or road safety. The proposal does not raise any issues in respect of these matters and complies with LDP policy Tra 2 and Tra 3.

#### g) Flood Prevention

The site does not fall within an area which is identified by SEPA as being subject to flooding. A surface water management plan would be required, however, this could be included as part of the later AMC application. The proposal will not be at risk of flooding or increase the flood risk to the surrounding area and complies with LDP policy Env 21.

#### h) Additional Material Matters

##### Archaeology

The city archaeologist has examined the proposal and advised that the site is located in an area of archaeological potential. Therefore, in the event that any proposal is granted

permission , it is recommended that a condition is attached requiring an archaeological survey to be undertaken before development is commenced. The proposal complies with LDP policy Env 9.

### Sewage and Drainage Provision

Scottish Water were consulted as part of the assessment of the application. They have confirmed that they have no objections to the proposal.

SEPA were also consulted in relation to the proposed sewage and drainage arrangements for the site. They responded that not enough information had been provided for them to comment on the potential consentability of the foul drainage arrangements under the Water Environment (Controlled Activities) (Scotland) Regulations and we therefore they objected due to a lack of information in this regard.

The proposal does not comply with LDP policy RS 6.

### i) Matters Raised in Representations

#### **Objection Comments**

#### **Material Considerations**

- Proposal is not an acceptable green belt use in principle - addressed in section 3.3 (a).
- Proposal will have an adverse impact on the setting of a listed building - addressed in section 3.3 (b).
- Proposal will have an adverse impact on the rural character and appearance of the surrounding area and the quality of the special landscape area - addressed in sections 3.3 (d).
- Proposal will have an adverse impact on the amenity of neighbouring residents by means of anti-social behaviour, privacy/overlooking and loss of daylight and light pollution - addressed in section 3.3 (e).
- Proposal will have an adverse impact on parking and road and pedestrian safety, especially for nearby school children- addressed in section 3.3 (f).
- Concerns relating to water and proposed sewage arrangements- addressed in section 3.3 (h).
- Concerns regarding the neighbour notification process- The process has been checked and has been found to have been carried out correctly.
- Proposal is contrary to Scottish Planning Policy - There is no specific policy within Scottish Planning Policy which regulates the erection of glamping pods.

- Potential health risks of the site being close to Pylons and telephone masts. - Environmental Protection were consulted and raised no concerns in this regard.

### **Non-Material Considerations**

- Proposal will create issues regarding waste disposal from the site - The City of Edinburgh Council no longer provides waste provision for commercial operators. It will be the responsibility of the applicant to arrange for the storage and collection of waste with a private contractor.

It is recommended that this application be Refused for the reasons below.

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

## **Reasons:-**

1. The proposal is contrary to the adopted Edinburgh Local Development Plan Policy Env 11 as it fails to demonstrate that the proposal will have a positive impact on the character and appearance of the Special Landscape Area.
2. The proposal is contrary to policy Env 10 of the adopted Edinburgh Local Development Plan as it would detract from the rural character and appearance of the surrounding area.
3. The proposal is contrary to policy Hou 7 of the adopted Edinburgh Local Development Plan as it would have a materially detrimental impact on the living conditions of neighbouring residents.
4. The proposal is contrary to policy Env 17 of the adopted Edinburgh Local Development Plan as it would have an unacceptable impact upon the character and landscape quality of the park.
5. The proposal is contrary to policy Des 5 of the adopted Edinburgh Local Development Plan as it would adversely affect the amenity of neighbouring developments.
6. The proposal is contrary to policy Rs 6 of the adopted Edinburgh Local Development Plan as not enough information has been supplied to show that there is adequate sewerage to meet the demands of the development.
7. The proposal is contrary to policy Des 4 of the adopted Edinburgh Local Development Plan as it will not have a positive impact on its surroundings.

## **Risk, Policy, compliance and governance impact**

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

## **Equalities impact**

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

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

## **Consultation and engagement**

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## **6.1 Pre-Application Process**

There is no pre-application process history.

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

16 letters of objection were received in relation to application. The points raised shall be addressed in section 3.3 of this report.

### **Background reading / external references**

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- To view details of the application go to
- [Planning and Building Standards online services](#)



**Statutory Development  
Plan Provision****Date registered** 12 July 2019**Drawing  
numbers/Scheme** 01;02;03,  
Scheme 1

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

Contact: Robert McIntosh, Planning Officer  
E-mail:robert.mcintosh@edinburgh.gov.uk Tel:0131 529 3422

## **Links - Policies**

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### **Relevant Policies:**

#### **Relevant policies of the Local Development Plan.**

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

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

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

LDP Policy Env 17 (Pentlands Hills Regional Park) identifies the circumstances in which development will be permitted in the Pentlands Hills Regional Park.

LDP Policy Hou 7 (Inappropriate Uses in Residential Areas) establishes a presumption against development which would have an unacceptable effect on the living conditions of nearby residents.

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 RS 6 (Water and Drainage) sets a presumption against development where the water supply and sewerage is inadequate.

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

### **Relevant Non-Statutory Guidelines**

**Non-statutory guidelines** DEVELOPMENT IN THE COUNTRYSIDE AND GREEN BELT, provide guidance on development in the Green Belt and Countryside in support of relevant local plan policies.

# Appendix 1

## Consultations

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Environmental Protection.

I refer to the above application and would comment that Environmental Protection are unable to support this application.

The proposed development is for a campsite which will provide accommodation in permanently sited camping pods (approximately 10 in number) along with site reception facilities and a barbecue pod.

The site is located on a roughly triangular shaped plot to the north of Bonaly Road. There are residential properties in close proximity to the site, the closest property is located to the south less than 10m from the site and shares a boundary with the strip of land surrounding the application site. There are several other properties located to the south, east and west of the proposed development.

The development is for leisure uses and therefore we have concerns in relation to the potential for noise and smoke or odour affecting the residential premises from activities on the site. It is possible that the site could accommodate up to 60 people dependant on the size and design of the pods. It is likely that the open space of the site will be used for socialising and activities. Noise from the activities of users of the site could potentially cause disturbance particularly at night to those residential premises situated in close proximity.

It is also noted that a barbecue pod will be provided for the use of site patrons. Smoke and odour from this and any other fires such as any wood burning stoves installed in pods, portable barbecues or informal fires could also affect the amenity of nearby residential properties. Although it is stated that informal fires and barbecues would not be permitted on site, it is not clear how this could be controlled or enforced.

It should also be noted that the site, if consent is approved, would be considered to be a caravan site. Under the Caravan Sites and Control of Development Act 1960 (as amended), the definition of a caravan is "any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted". The pods are, according to the statement submitted in support of the application, removable and therefore it is considered that the site would require to be licensed and the layout of the site, roads, parking and facilities etc. would require to meet the standards laid down in the Model Standards developed under the legislation.

Roads Authority

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

1. The applicant will be required to provide secure and under cover cycle parking;
2. The applicant should note that the Council will not accept maintenance responsibility for underground water storage / attenuation;
3. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), and timetables for local public transport;
4. The City of Edinburgh Council acting as Roads Authority reserves the right under Section 93 of The Roads (Scotland) Act 1984 to adjust the intensity of any non-adopted lighting applicable to the application address;
5. Electric vehicle charging outlets should be considered for this development;
6. The developer must submit a maintenance schedule for the SUDS infrastructure for the approval of the Planning Authority;
7. The applicant should note that Torduff Road is an adopted road. Therefore, any work proposed on or affecting Torduff Road requires road opening permits prior to the commencement of work.

#### Scottish Water

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

Water: There is currently sufficient capacity in the Marchbank Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Foul: There is currently sufficient capacity in the Edinburgh PFI Waste Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

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.

Infrastructure close to boundary: According to our records, the development proposals may impact on existing Scottish Water assets.

The applicant should identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at [service.relocation@scottishwater.co.uk](mailto:service.relocation@scottishwater.co.uk). The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

## SEPA

Further to your consultation with SEPA on the planning application detailed above.

I have consulted with colleagues in our local regulatory/permitting team, seeking their views on the specific question you included in your letter to SEPA, this being 'concerns over the septic tank. It is proposed to have the 10 pods drain to a septic tank where water, will return to ground via a soak-away within the applicant's land'.

Having reviewed the supporting information, the proposal would seem to be a discharge of treated foul effluent via a soakaway, and that the pods may have a total Population Equivalent (P.E.) of between 20 and 60. There is no confirmation of any percolation figures that may allow or disallow a soakaway at this location, or of the PE for the site.

As a consequence of this uncertainty, we are unable to comment on the potential consentability of the foul drainage arrangements under the Water Environment (Controlled Activities) (Scotland) Regulations and we therefore object due to a lack of information in this regard. We would ask that the applicant provides more detail on the drainage proposals in order to confirm the issues mentioned above.

END

## Memorandum

**To** Head of Planning  
City of Edinburgh Council  
Planning and Building Standards  
Services for Communities  
Waverley Court  
4 East Market Street  
Edinburgh  
EH8 8BG

F.A.O Lynsey Townsend

**From** John A Lawson

**Date** 4<sup>th</sup> December 2015

**Your ref** 15/05533/FUL

**Our ref** 15/05533/FUL

Dear Lynsey,

### Bonaly Farm Torduff Road

Further to your consultation request I would like to make the following comments and recommendations concerning this application for the erection of a house.

Lying at the foot of the Pentlands, the site occupies a prominent ridge adjacent to the historic 19<sup>th</sup> century Bonaly Castle. The present historic estate and castle constructed in 1820 by Lord Cockburn resulted in the destruction of Bonaly village depicted on General Roy's 1750's map of the area. This village may date back to 1280 and was attached to the large medieval estate of Redhall. The village was owned by Wallace's of Ayrshire between 1462 & 1555, who gave the village its alternative name of Bonaly Wallace. In addition to the medieval occupation in this are the surrounding northern slopes of the Pentlands are known to contain significant prehistoric activity, with several sites (Hillend, Swanston, Torgeth Knowe & Clubbidean) recorded within the immediate area.

The site is regarded as occurring within an area of archaeological potential and this application must be considered under terms of the Scottish Government's Scottish Planning Policy (SPP), PAN2/2011 and Scottish Historic Environment Policy (SHEP) and also Rural West Edinburgh Local Plan policies E30. **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.

The site occurs within an area of archaeological potential as development in this area may reveal remains associated with the medieval and later village and estate of Bonaly and possibly also earlier prehistoric activity. As the site has remained relatively undeveloped construction of this new house and associated

**Lynne Halfpenny, Director of Culture, Cultural Services, City Strategy and Economy**

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Tel 0131 558 1040 Fax 0131 558 1090  
john.lawson@edinburgh.gov.uk

access road is considered to have a low but potentially significant archaeological impact. It is therefore recommended that a programme of archaeological work is undertaken prior to/during development in order to fully excavate, record and analysis of any surviving archaeological remains that may be affected..

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

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Excavation, reporting and analysis, 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 (WSI) 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.

Please contact me if you require any further information.

Yours sincerely

**John A Lawson**  
**Archaeology Officer**



14<sup>th</sup> October 2019

Edinburgh City Council  
Waverly Court 4 East Market Street  
Edinburgh  
EH8 8BG



Development Operations  
The Bridge  
Buchanan Gate Business Park  
Cumbernauld Road  
Stepps  
Glasgow  
G33 6FB

Development Operations  
Freephone Number - 0800 3890379  
E-Mail - DevelopmentOperations@scottishwater.co.uk  
www.scottishwater.co.uk

Dear Local Planner

**EH13 Edinburgh Torduff Road Bonaly Farm**  
**PLANNING APPLICATION NUMBER: 19/03360/PPP**  
**OUR REFERENCE: 783624**

**PROPOSAL: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services**

**Please quote our reference in all future correspondence**

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

**Water**

- There is currently sufficient capacity in the Marchbank Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

**Foul**

- There is currently sufficient capacity in the Edinburgh PFI Waste Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

**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.**

### **Infrastructure close to boundary**

According to our records, the development proposals may impact on existing Scottish Water assets.

The applicant should identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at [service.relocation@scottishwater.co.uk](mailto:service.relocation@scottishwater.co.uk).

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

### **Scottish Water Disclaimer**

*"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."*

### **Surface Water**

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will **not** 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 taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted. Greenfield sites will not be considered and a connection to the combined network will be refused.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, 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.

### **General notes:**

- **Scottish Water asset plans can be obtained from our appointed asset plan providers:**

**Site Investigation Services (UK) Ltd**

**Tel: 0333 123 1223**

**Email: [sw@sisplan.co.uk](mailto:sw@sisplan.co.uk)**

**[www.sisplan.co.uk](http://www.sisplan.co.uk)**

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be

adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.

- If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.
- **Please find all of our application forms on our website at the following link <https://www.scottishwater.co.uk/Business-and-Developers/Connecting-to-Our-Network>**

#### **Next Steps:**

- **Single Property/Less than 10 dwellings**

For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.

- **10 or more domestic dwellings:**

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

- **Non Domestic/Commercial Property:**  
Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic

customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk)

- **Trade Effluent Discharge from Non Dom Property:**

Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.

If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email [TEQ@scottishwater.co.uk](mailto:TEQ@scottishwater.co.uk) using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found using the following link <https://www.scottishwater.co.uk/business/our-services/compliance/trade-effluent/trade-effluent-documents/trade-effluent-notice-form-h>

Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.

For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at [www.resourceefficientscotland.com](http://www.resourceefficientscotland.com)

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at [planningconsultations@scottishwater.co.uk](mailto:planningconsultations@scottishwater.co.uk).

Yours sincerely

**Angela Allison**

[Angela.Allison@scottishwater.co.uk](mailto:Angela.Allison@scottishwater.co.uk)

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Alexandra Murray

Address: 24 Redford Avenue Edinburgh

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal as there will be a significant increase in traffic volume directly past Bonaly Primary school (situated just before this site on the only road to the site) posing a significant risk to children coming to and from school. The school has had difficulties with road safety on this exact road over recent years and has been putting measures in place to try and overcome this. Clearly increasing the traffic volume on this road will not help with this issue.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Brian McGhee

Address: 61 Bonaly Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The application is for change of use as noted. The commentary on the application enlarges on that referring to 10 wooden accommodation pods of various sizes, a site office, a barbeque building, various other facilities, storage for bicycles, and parking adjacent to each pod. The field is within the Green Belt as designated in the Edinburgh Local Development Plan. It is also a Special Landscape Character area within the Pentland Hills Regional Park. All adjacent fields are used for agricultural purposes, primarily for horse or haylage.

I understand that development is restricted to agriculture, woodland and forestry.

This proposal seeks to change the nature of the environment to create a commercial business almost certainly leading to disturbance and other issues likely to change the nature of the locale. Interested parties, which are not limited to the neighbourhood notifications, are likely to include Bonaly Primary School (which has had recent traffic calming measures introduced to address the safety of children and parents), a variety of local residents, including but not limited to those at Bonaly Tower and adjacent properties, Bonaly Wester etc., and the general public of walkers gaining access to the Country Park via Torduff Road.

Foreseeable concerns for interested parties are likely to include visual impact (the site is clearly visible from Torduff Hill), noise disturbance, traffic impact, waste disposal amongst others.

Fundamentally this is a proposal for a change of use which is not aligned with the nature of the environment.

It is also worth noting that the proposed site adjoins a longstanding residential property, and it is difficult to see how a commercial camping site is ever likely to be an acceptable neighbouring use.

I appreciate that the application is for a change of use in principle, but it is important to look ahead to the implications if granted, and the weight of resultant practical issues that would arise.



# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr John Jamieson

Address: 65/1 Bonaly Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I list my serious concerns:

1/ A soak away septic tank is planned. Where exactly would the clear fluid seep away too? The Bonaly Burn flows right through our garden and I would be concerned about the additional waste.

2/ Fresh water, I am concerned that the additional water required to service these pods would lead to a further reduction in our pressure which is little enough at present.

3/ The owner of the adjoining field holds a party in the field once a year. This causes extreme noise in the adjoining houses and gardens. We accept this happens only once a year, but the potential of 10 pods and two BBQ pits is for there to be extreme noise from the podders every night of the week.

4/ Locally we have a huge problem with squirrels eating through rubbish bins and spreading waste all around, this in turn attracts other vermin. How will this be contained?

5/ Volume of traffic on this virtually one track road has increased dramatically over the last couple of years. The coming and going of the pod residents will only add to the congestion on Bonaly Road and further endangering the primary children, as strangers to the area are not familiar with giving priority to drivers coming up the hill.

6/ There is bound to be light pollution locally with having permanent pods including a warden's office. I understand that having a permanent residence on site would not be permitted within the country park or green belt area!!!



7/ The top 3 floors of Bonaly Tower would have sight of these pods and would therefore detract hugely from their views.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr brian finlayson

Address: 65(8) bonaly road colinton edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I note this application.

this represents an attempt to materially change the use of this field which is in the green belt and the Pentlands Hills Regional Park.

It envisages accommodation bods with various facilities and potentially a residential property.

Now traffic has materially increased in recent years with the opening of the school and expensive new road workings have had to be installed to cope with the increased traffic. Such a development would significantly increase traffic and there is no way in which the traffic can go any other way.

There is also the question of pollution and noise. I live in Bonaly Tower.

This represents the thin edge of the wedge.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Katie Cebula

Address: 29 Torduff Road Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We appreciate that the application is for change of use and 'planning permission in principle', but at this stage, objection is on the following grounds:

(1) This site is within an area designated as greenbelt land. The change of use described would be detrimental to the rural character of this area, with potential impact in terms of visual impact, noise disturbance, waste disposal, and wildlife. In particular, there is lots of wildlife (e.g. deer) frequently spotted in that field, and an additional 10 holiday dwellings and associated traffic will be detrimental to this.

(2) Concerns about the impact on the local water supply of having such an increase in the number of people (unspecified at this stage, but potentially 50+ including, presumably, a permanent on-site manager) requiring water in the vicinity. We have already had issues this year with water pressure drop off on Torduff Road, and that is on the basis of currently having only 5 houses on the road.

(3) Torduff Road is predominantly used by dog walkers and cyclists. The access proposed in this application is on the corner of a road - you would struggle to find a more dangerous access point on this road. Scottish Water are currently using this access point out of necessity (and it is clearly a dangerous point, given the very large number of caution signs they have erected for cyclists).

(4) Concerns around increase in traffic, particularly as the site can only be accessed by going past Bonaly primary school, which has recently had traffic calming measures put in place.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Ronald Partington

Address: 67 Bonaly Road Colinton Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

I wish to register my concerns about this planning application.

The field is within the Green Belt as designated in the Edinburgh Local Development plan (EDLP) also it is within the Pentland Hills Regional Park and a Special landscape character area.

Conditions for development are specified in EDLP, ENV10 and ENV11. Essentially development is restricted to agriculture woodland and forestry. Building development is restricted to existing structures. The proposal seeks to change the use of the field by interpreting the conditions stipulated for environmental and landscape issues as being met by the applicant and that there would be no detracting from the landscape quality and character.

This application is for a Commercial enterprise, which would have a significantly detrimental impact on this rural area, especially in the generation of extra traffic on the existing restricted road system that passes the Bonaly Primary School. It would create considerable noise and disturbance within the area and is out of character with the surroundings. The visual impact would also be adversely affected, especially viewed from Torduff hill.

It is appreciated that the application is for change of use in principle, but the Planning Committee should be made aware of the issues that would have to be addressed, if this or any variation of the proposal is considered.

- Ten permanent pods together with reception cabin and BBQ hut, all on concrete bases, randomly situated on open farmland
- Parking for a vehicle, adjacent to each pod.

- Accommodation for bicycles.
- Control of the site and noise levels.
- Water supply.
- Access to the field, which is proposed on a dangerous bend of Torduff Road.

The notification of the application was sent only to myself and one other local resident. It was received at my home one day prior to a holiday from which I returned on the 10th August (i.e. four days in which to respond).

The implications of setting up a business of this nature in an existing agricultural/residential area are considerable and wide-spread. I would ask that further time be allowed to carry out a more comprehensive consultation.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Melanie Izon

Address: 24 Harebeating Drive Hailsham

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am the owner and neighbour of the field that is on the boundary to the western side of the proposed site.

I did not receive any formal notification of this proposed change of use! I was informed yesterday (13/8/19) by a concerned friend who uses my paddock for her horses! I have very little time to look into this comprehensively as the last date for comment is today!

I wish to register my objection and concerns over this proposed planning application. The field is within the Green Belt area in the EDLP. It is within the Pentland Hills Regional Park and is a Special Landscape Character area.

Conditions for development specified in EDLP ENV10/11 are restricted to agriculture woodland and forestry. Building development is restricted to existing structures.

This proposal seeks to change the field use by interpreting the conditions stipulated for environmental and landscape issues as being met by the applicant, stating that there would be no detracting to the character and quality of the landscape.

This is an application for a commercial enterprise which will have a significant and detrimental impact on this rural area. Although this application is for a change of use in principle, the Planning Committee should be made aware of the issues that need to be addressed if this or any variation of the proposal is considered.

1. Design and appearance of the development - permanent wooden structures on concrete bases

with gravel standing for cars, this is a lodge park and not my understanding of glamping

2. The impact upon the landscape - the visual impact would be adversely effected particularly viewed from Torduff hill
3. The overshadowing of an overbearing presence near a common boundary to the detriment of neighbours
4. Overlooking and loss of privacy for neighbours
5. Light pollution - campers up at all hours
6. Health and crime fears
7. Road issues: traffic generations (coming and going of campers and service vehicles) vehicle access ( with Bonaly primary school nearby the extra traffic ends in a bottleneck at the junction by the school leading to the proposed site) road safety for students and walkers become an issue
8. Car parking provision - on or off-site - this is not accounted for in the site layout
9. The capacity of the local infrastructure - drainage (particularly with respect to Bonaly Burn), water, and electricity
10. The noise and disturbance resulting from use - the proposed site is to be open all year round. Noise from campers and traffic
11. Smells - refuse waste, and use of, and control of campfires
12. Security on and off-site
13. Effect on adjoining fields containing livestock - currently in use with horses
14. Control of dogs - if off-lead could escape and cause stress and damage to livestock
15. Lack of equal access for people with disabilities to the glamping pods

I have been made aware that only two residents were formally notified of this proposed venture. Surely with the setting up of a commercial business of this nature within an existing residential and agricultural area, there would be a widespread interest from the neighbourhood.

I ask if a more comprehensive distribution of this proposal be made.





# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Caroline Ashbrook

Address: 1 Redford Crescent Colinton Edinburgh

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Very concerned about the increase in traffic this will incur. I think the camping will lead to unacceptable levels of danger for the school children.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Judith McLean

Address: 54 Torphin Road Colinton Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I strongly object to this proposal. This is Green Belt Land. Just like the recent application by Tiphereth for Torphin Road proposing flats and houses on Green Belt Land. Development on both of these sites is inappropriate

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Tammy Piper

Address: 88 Bonaly Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Although the proposal's green credentials are good, I am concerned about the increase in traffic going over the bridge to the proposed campsite. As the last house before the flyover bridge we already have a lot of traffic going this way when any event at the scout hut and with the current waterworks. I am also concerned about noise from campsite users - would large groups be able to stay onsite, stag/hen parties? Would the site owners be onsite to manage any noisy guests?

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Stephen OSullivan

Address: 69 Dreghorn Loan Colinton Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: As a regular user of the Pentland hills and the beautiful green belt area to the South of the city, I feel strongly that this business goes against the keeping of our limited green areas green".

There is ample camping not too far from here on multiple sites.

My children attend Bonaly PS and this business would result in increased traffic. Additionally there is a scout camp further up that same road which is regularly used for camp purposes.

There seems to me to be no end to the fine ancient deciduous trees being cut down (across road from me) and re-purchasing of what was protected green areas for things that are simply not required and take from this place rather than enhance.

Enough please.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Heather Hartley

Address: 6 Bonaly Grove Edinburgh

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My reasons for objection are twofold:

1. This is green belt land. It should therefore be land that is largely undeveloped, wild or agricultural in nature.
2. A campsite would result in increased traffic on Bonaly Road, passing Bonaly Primary School.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Mukhayyo Umarova

Address: 56 Bonaly Road Edinburgh

## Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object because

1. The site will increase the traffic load which will put children in danger in nearby Bonaly Primary School.
2. It would spoil natural balance at the foot of Pentlands on which deer, many wild birds would be further disturbed.
3. It will diminish local peoples ability to access Pentlands.
4. It will add pressure to already overused parking area on Torduff road.

# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mrs Janette Loraine McPherson

Address: 30 Bonaly Crescent Colinton Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Reference number: 19/03360/PPP

Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services at Bonaly Farm, Torduff Road, Edinburgh.

I would like to object to the above proposed development.

1. This is yet another attempt of a creeping development into the green belt.
2. Bonaly Road is a busy narrow road with traffic calming measures in place. This road is already congested and cannot take any more traffic. Bonaly estate should not be used as "rat run". It also has narrow roads with Bonaly School at the south west end onto Bonaly Road.
3. Safety of school children should be paramount. The proposed development traffic would go right past Bonaly School at the narrowest section of Bonaly Road. The school has already got zigzag markings on the road and the children have a "walking bus" as there are no facilities to park to drop off the children due to the narrow road structure. More traffic would endanger the children during construction and when the proposed development is completed.
4. Once a change of use is granted the amount of development, ancillary buildings etc. tend to increase in numbers.
5. The application form states that the access to the proposed development is from a public road. The supporting planning statement states the proposed access is from Torduff Road which the statement states is a private road owned by Scottish Water. It also states that the proposal is change of use of existing hay field to campsite etc. but under certificates and notices they have stated that the land is not part of an agricultural holding.
6. I do question if there are potential health risks with the proposed development in a field with nearby masts for mobile telephone transmissions and pylons for high voltage electricity transmission.

I request that this application be rejected





# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Ian McPherson

Address: 30 Bonaly Crescent Colinton Edinburgh

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Reference number: 19/03360/PPP

Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services at Bonaly Farm, Torduff Road, Edinburgh.

I would like to object to the above proposed development.

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5. The application form states that the access to the proposed development is from a public road. The supporting planning statement states the proposed access is from Torduff Road which the statement states is a private road owned by Scottish Water. It also states that the proposal is change of use of existing hay field to campsite etc. but under certificates and notices they have stated that the land is not part of an agricultural holding.
6. I do question if there are potential health risks with the proposed development in a field with nearby masts for mobile telephone transmissions and pylons for high voltage electricity transmission.

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# Comments for Planning Application 19/03360/PPP

## Application Summary

Application Number: 19/03360/PPP

Address: Bonaly Farm Torduff Road Edinburgh

Proposal: Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Case Officer: Robert McIntosh

## Customer Details

Name: Mr Stuart Patterson

Address: 21 Bonaly Terrace Edinburgh

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this development for the following reasons:

\* This development is proposed on green belt land. Edinburgh's green belt is under sustained attack from developers, and approving these plans sets a precedent for any future developments to reference.

\* Access to the site is exclusively via Bonaly Road - this road is home to Bonaly Primary school. Increased traffic from this development endangers the children attending school. Indeed, it was only recently that the council proposed traffic free periods to protect children on their way to/from school, following an accident where a child was hit by a vehicle in 2014.

\* The plans mention a waste water treatment system with soak-away for waste water. Scottish Water are currently building a new water main close to the site, yet there have been no assurances that the water supply will not be contaminated from this development.

\* Nearby camping is available at the following locations:

- Bonaly Scout Camp
- Mortonhall Camp Site (within 5 miles)
- Seasonal camping in August near the Royal Highland Centre.

As such there is already ample camping in the area, especially during the peak season (August)

# MEMORANDUM

## PLACE

To: **Robert McIntosh**

Our Ref: T/TP/DC/41067/MS

Your Ref: 19/03360/PPP

Date: 18 September 2019

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997**

**PLANNING APPLICATION NO: 19/03360/PPP**

**FOR: CHANGE OF USE OF EXISTING HAY FIELD TO CAMP SITE WITH  
ACCOMMODATION IN TIMBER PODS AND ANCILLARY SERVICES**

**AT: BONALY FARM, TORDUFF ROAD, EDINBURGH**

### **ROADS AUTHORITY ISSUES**

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

1. The applicant will be required to provide secure and under cover cycle parking;
2. The applicant should note that the Council **will not accept** maintenance responsibility for underground water storage / attenuation;
3. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), and timetables for local public transport;
4. The City of Edinburgh Council acting as Roads Authority reserves the right under Section 93 of The Roads (Scotland) Act 1984 to adjust the intensity of any non-adopted lighting applicable to the application address;
5. Electric vehicle charging outlets should be considered for this development;
6. The developer must submit a maintenance schedule for the SUDS infrastructure for the approval of the Planning Authority;
7. The applicant should note that Torduff Road is an adopted road. Therefore, any work proposed on or affecting Torduff Road requires road opening permits prior to the commencement of work.

**Matthew Simpson**

**Tel: 3-3426**

To: Robert McIntosh  
From: Ann Connolly, Environmental Protection, Place

Date: 15<sup>th</sup> August 2019

**TOWN AND COUNTRY PLANNING SCOTLAND ACT 1997  
19/03360/PPP CHANGE OF USE OF EXISTING HAYFIELD TO CAMPSITE WITH  
ACCOMMODATION IN TIMBER PODS AND ANCILLARY SERVICES| BONALY FARM, TORDUFF  
ROAD OFF BONALY ROAD, EDINBURGH**

I refer to the above application and would comment that Environmental Protection are unable to support this application.

The proposed development is for a campsite which will provide accommodation in permanently sited camping pods (approximately 10 in number) along with site reception facilities and a barbecue pod.

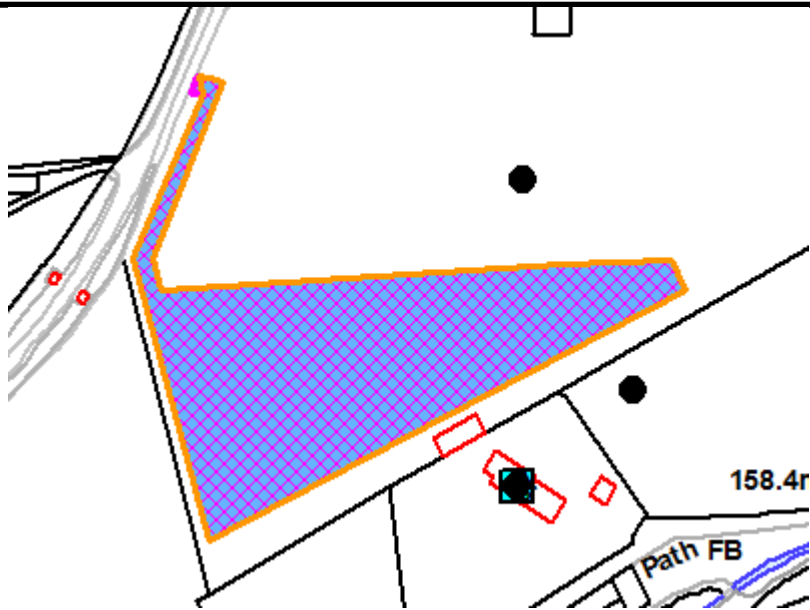
The site is located on a roughly triangular shaped plot to the north of Bonaly Road. There are residential properties in close proximity to the site, the closest property is located to the south less than 10m from the site and shares a boundary with the strip of land surrounding the application site. There are several other properties located to the south, east and west of the proposed development.

The development is for leisure uses and therefore we have concerns in relation to the potential for noise and smoke or odour affecting the residential premises from activities on the site. It is possible that the site could accommodate up to 60 people dependant on the size and design of the pods. It is likely that the open space of the site will be used for socialising and activities. Noise from the activities of users of the site could potentially cause disturbance particularly at night to those residential premises situated in close proximity. It is also noted that a barbecue pod will be provided for the use of site patrons. Smoke and odour from this and any other fires such as any wood burning stoves installed in pods, portable barbecues or informal fires could also affect the amenity of nearby residential properties. Although it is stated that informal fires and barbecues would not be permitted on site, it is not clear how this could be controlled or enforced.

It should also be noted that the site, if consent is approved, would be considered to be a caravan site. Under the Caravan Sites and Control of Development Act 1960 (as amended), the definition of a caravan is "any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted". The pods are, according to the statement submitted in support of the application, removable and therefore it is considered that the site would require to be licensed and the layout of the site, roads, parking and facilities etc. would require to meet the standards laid down in the Model Standards developed under the legislation.

Please contact me on 0131 469 5806 should you wish to discuss the above.

## Neighbours Notified for 19/03360/PPP Date 24 July 2019



### Location Plan

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Number 100023420 The City of Edinburgh Council 2012.

67 Bonaly Road Edinburgh EH13 0PB

29 Torduff Road Edinburgh EH13 0PA











Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Tel: 0131 529 3550 Fax: 0131 529 6206 Email: [planning.systems@edinburgh.gov.uk](mailto:planning.systems@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100226030-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent

## Agent Details

Please enter Agent details

Company/Organisation: Gain Planning Services

Ref. Number: You must enter a Building Name or Number, or both: \*

First Name: \* Peter Building Name:

Last Name: \* MacLeod Building Number: 122

Telephone Number: \* Address 1 (Street): \* Scott Street

Extension Number: Address 2:

Mobile Number: Town/City: \* Galashiels

Fax Number: Country: \* United Kingdom

Postcode: \* TD1 1DX

Email Address: \*

Is the applicant an individual or an organisation/corporate entity? \*

☐ Individual ☒ Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text"/>
First Name: *	<input type="text"/>	Building Number:	<input type="text" value="54"/>
Last Name: *	<input type="text"/>	Address 1 (Street): *	<input type="text" value="Main Street"/>
Company/Organisation	<input type="text" value="Pentlands Outdoor Activities (DPM)"/>	Address 2:	<input type="text" value="Davidsons Mains"/>
Telephone Number: *	<input type="text" value=""/>	Town/City: *	<input type="text" value="Edinburgh"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="United Kingdom"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="EH4 5AA"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value=""/>		

## Site Address Details

Planning Authority:	<input type="text" value="City of Edinburgh Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text"/>
Address 2:	<input type="text"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text"/>
Post Code:	<input type="text"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="667860"/>	Easting	<input type="text" value="321121"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services

## Type of Application

What type of application did you submit to the planning authority? \*

- ☐ Application for planning permission (including householder application but excluding application to work minerals).
- ☒ Application for planning permission in principle.
- ☐ Further application.
- ☐ Application for approval of matters specified in conditions.

What does your review relate to? \*

- ☒ Refusal Notice.
- ☐ Grant of permission with Conditions imposed.
- ☐ No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

A separate detailed appeal statement is being submitted. The applicant is appealing the refusal because they are of the opinion that planning permission ought to have been granted. The reasons are presented in the attached statement.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

☒ Yes ☐ No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

It has been highlighted in the statement that measures to create some acoustic screening can be incorporated and that details of the design and number of the pods can be flexible, as this application is in principle only.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

The appeal statement, all previous planning submissions, the report of handling and decision notice.

## Application Details

Please provide details of the application and decision.

What is the application reference number? \*

19/03360/PPP

What date was the application submitted to the planning authority? \*

12/07/2019

What date was the decision issued by the planning authority? \*

13/11/2019

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

☐ Yes ☒ No

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may select more than one option if you wish the review to be a combination of procedures.

Please select a further procedure \*

By means of inspection of the land to which the review relates

Please explain in detail in your own words why this further procedure is required and the matters set out in your statement of appeal it will deal with? (Max 500 characters)

It is important to understand the topography of the site, its character and its context.

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

☐ Yes ☒ No

Is it possible for the site to be accessed safely and without barriers to entry? \*

☒ Yes ☐ No

If there are reasons why you think the local Review Body would be unable to undertake an unaccompanied site inspection, please explain here. (Max 500 characters)

The site is not visible from Torduff Road due to the topography. It can be seen from more distant viewpoints towards Torduff Reservoir. Access is across a grass field which has recently been excavated for water suppl pipe upgrade by Scottish Water.

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

☒ Yes ☐ No

Have you provided the date and reference number of the application which is the subject of this review? \*

☒ Yes ☐ No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

☒ Yes ☐ No ☐ N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

☒ Yes ☐ No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

☒ Yes ☐ No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr Peter MacLeod

Declaration Date: 21/01/2020



Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Tel: 0131 529 3550 Fax: 0131 529 6206 Email: [planning.systems@edinburgh.gov.uk](mailto:planning.systems@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100173224-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- ☐ Application for planning permission (including changes of use and surface mineral working).
- ☒ Application for planning permission in principle.
- ☐ Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- ☐ Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

Change of use of existing hay field to camp site with accommodation in timber pods and ancillary services.

Is this a temporary permission? \*

☐ Yes ☒ No

If a change of use is to be included in the proposal has it already taken place?

☐ Yes ☒ No

(Answer 'No' if there is no change of use.) \*

Has the work already been started and/or completed? \*

☒ No ☐ Yes – Started ☐ Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Gain Planning Services		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Peter	Building Name:	
Last Name: *	MacLeod	Building Number:	122
Telephone Number: *		Address 1 (Street): *	Scott Street
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Galashiels
Fax Number:		Country: *	United Kingdom
		Postcode: *	TD1 1DX
Email Address: *			
Is the applicant an individual or an organisation/corporate entity? *			
<input type="checkbox"/> Individual <input checked="" type="checkbox"/> Organisation/Corporate entity			

## Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	
First Name: *		Building Number:	54
Last Name: *		Address 1 (Street): *	Main Street
Company/Organisation	Pentlands Outdoor Activities (DPM)	Address 2:	Davidsons Mains
Telephone Number: *		Town/City: *	Edinburgh
Extension Number:		Country: *	United Kingdom
Mobile Number:		Postcode: *	EH4 5AA
Fax Number:			
Email Address: *			

## Site Address Details

Planning Authority:

City of Edinburgh Council

Full postal address of the site (including postcode where available):

Address 1:

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

Post Code:

Please identify/describe the location of the site or sites

Northing

667855

Easting

321139

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

☐ Yes ☒ No

## Site Area

Please state the site area:

0.49

Please state the measurement type used:

☒ Hectares (ha) ☐ Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

Grass/hay field.

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

☒ Yes ☐ No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.



<p>Are you proposing any change to public paths, public rights of way or affecting any public right of access? * <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.</p>
<h2 style="margin: 0;">Water Supply and Drainage Arrangements</h2> <p>Will your proposal require new or altered water supply or drainage arrangements? * <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p>
<p>Are you proposing to connect to the public drainage network (eg. to an existing sewer)? *</p> <p><input type="checkbox"/> Yes – connecting to public drainage network</p> <p><input checked="" type="checkbox"/> No – proposing to make private drainage arrangements</p> <p><input type="checkbox"/> Not Applicable – only arrangements for water supply required</p>
<p>As you have indicated that you are proposing to make private drainage arrangements, please provide further details.</p> <p>What private arrangements are you proposing? *</p> <p><input checked="" type="checkbox"/> New/Altered septic tank.</p> <p><input type="checkbox"/> Treatment/Additional treatment (relates to package sewage treatment plants, or passive sewage treatment such as a reed bed).</p> <p><input type="checkbox"/> Other private drainage arrangement (such as chemical toilets or composting toilets).</p>
<p>What private arrangements are you proposing for the New/Altered septic tank? *</p> <p><input checked="" type="checkbox"/> Discharge to land via soakaway.</p> <p><input type="checkbox"/> Discharge to watercourse(s) (including partial soakaway).</p> <p><input type="checkbox"/> Discharge to coastal waters.</p>
<p>Please explain your private drainage arrangements briefly here and show more details on your plans and supporting information: *</p> <div style="border: 1px solid black; padding: 10px; min-height: 100px;"> <p>This application is planning permission in principle, however it is proposed to have the 10 pods drain to a septic tank where water will return to ground via a soak-away within the applicant's land.</p> </div>
<p>Do your proposals make provision for sustainable drainage of surface water?? * <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>(e.g. SUDS arrangements) *</p> <p>Note:-</p> <p>Please include details of SUDS arrangements on your plans</p> <p>Selecting 'No' to the above question means that you could be in breach of Environmental legislation.</p>
<p>Are you proposing to connect to the public water supply network? *</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No, using a private water supply</p> <p><input type="checkbox"/> No connection required</p> <p>If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).</p>

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

☐ Yes ☒ No ☐ Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

☐ Yes ☒ No ☐ Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

☒ Yes ☐ No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

☐ Yes ☒ No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013? \*

☐ Yes ☒ No ☐ Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

☐ Yes ☒ No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*

☒ Yes ☐ No

Is any of the land part of an agricultural holding? \*

☐ Yes ☒ No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate A

# Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Certificate A

I hereby certify that –

(1) - No person other than myself/the applicant was an owner (Any person who, in respect of any part of the land, is the owner or is the lessee under a lease thereof of which not less than 7 years remain unexpired.) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding

Signed: Peter MacLeod

On behalf of: Pentlands Outdoor Activities (DPM)

Date: 11/07/2019

☒ Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

☐ Yes ☐ No ☒ Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

☐ Yes ☐ No ☒ Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- ☒ Site Layout Plan or Block plan.
- ☐ Elevations.
- ☐ Floor plans.
- ☐ Cross sections.
- ☐ Roof plan.
- ☒ Master Plan/Framework Plan.
- ☐ Landscape plan.
- ☐ Photographs and/or photomontages.
- ☒ Other.

If Other, please specify: \* (Max 500 characters)

A supporting planning statement incorporating images and plans is included in the submission.

Provide copies of the following documents if applicable:

- |  |  |
|--|--|
| A copy of an Environmental Statement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Design Statement or Design and Access Statement. *                                   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Flood Risk Assessment. *   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). * | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Drainage/SUDS layout. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Transport Assessment or Travel Plan  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Contaminated Land Assessment. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Habitat Survey. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Processing Agreement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |

Other Statements (please specify). (Max 500 characters)

Planning supporting statement

## Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name:

Declaration Date:

**Proposal Details**

Proposal Name	100226030
Proposal Description	Planning permission in principle for change of use of existing hay field to camp site with accommodation in timber pods and ancillary services and access
Address	
Local Authority	City of Edinburgh Council
Application Online Reference	100226030-001

**Application Status**

Form	complete
Main Details	complete
Checklist	complete
Declaration	complete
Supporting Documentation	complete
Email Notification	complete

**Attachment Details**

Notice of Review	System	A4
LRB Appeal Statement 21 January 2020	Attached	A4
Application Form	Attached	A4
Planning Submission	Attached	A2
19_03360_PPP-Report and Decision letter	Attached	A4
Notice_of_Review-2.pdf	Attached	A0
Application_Summary.pdf	Attached	A0
Notice of Review-001.xml	Attached	A0

APPEAL FOR LOCAL REVIEW AGAINST REFUSAL OF PLANNING  
PERMISSION 19/03360/PPP FOR OUTDOOR CAMPING FACILITIES  
INCORPORATING CAMPING PODS & ANCILLARY WORKS  
AT  
TORDUFF ROAD, BONALY, EDINBURGH



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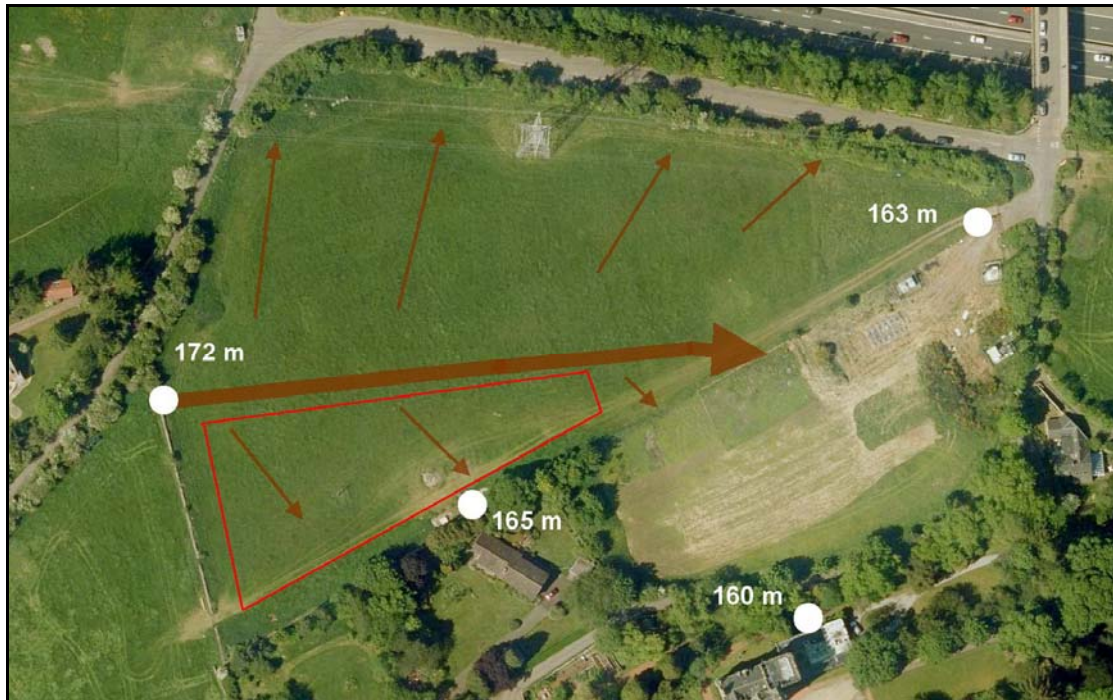
## 1. INTRODUCTION

This statement forms the supporting information for the applicant's request for the Council to review the case under Section 43A of the Town and Country Planning (Scotland) Act 1997.

**THE SITE** - The site is a roughly triangular grass field bounded on the north and the west by Torduff Road, and to the south east by a field boundary towards Bonaly Road. The site is on the south side of a small ridge, or shoulder, that slopes down from west to east (from Torduff Road at the west to Bonaly Road in the east). The site slopes down to the south towards Bonaly Burn, but also down towards the north where the City Bypass sits in a prominent dip. The highest point of the site is at around 172 metres AOD, close to the property at 29 Torduff Road.

The site areas is 0.5 hectares. There is a thin strip of land surrounding this in the ownership of the applicant to remain undeveloped and which will contain landscaping. Torduff Road is a private road, owned by Scottish Water.

**THE PROPOSAL** - The proposal is for planning permission in principle to change the use of the site to permanently sited camping pods. These are yet to be detailed, but can vary in size, designed to accommodate from 2 to 6 persons. It is anticipated that there will be UP TO 10 of these timber units within the development site, with two small ancillary buildings. The number, size and design are expected to be matters to be approved at the detailed stage. All units will incorporate a WC with shower unit, and will have a small food preparation area within the living area. The two ancillary buildings are a reception hut and a barbeque pod. No other buildings are required. The site has access to a mains water supply and to drainage. Car parking will not require any hard surfaces.



An aerial photograph showing the ridge line, spot heights, and the direction of slope

#### THE REASONS FOR REFUSAL OF APPLICATION 19/03360/PPP

1. *The proposal is contrary to the adopted Edinburgh Local Development Plan **Policy Env 11** as it fails to demonstrate that the proposal will have a positive impact on the character and appearance of the Special Landscape Area.*
2. *The proposal is contrary to **policy Env 10** of the adopted Edinburgh Local Development Plan as it would detract from the rural character and appearance of the surrounding area.*
3. *The proposal is contrary to **policy Hou 7** of the adopted Edinburgh Local Development Plan as it would have a materially detrimental impact on the living conditions of neighbouring residents.*
4. *The proposal is contrary to **policy Env 17** of the adopted Edinburgh Local Development Plan as it would have an unacceptable impact upon the character and landscape quality of the park.*
5. *The proposal is contrary to **policy Des 5** of the adopted Edinburgh Local Development Plan as it would adversely affect the amenity of neighbouring developments.*
6. *The proposal is contrary to **policy Rs 6** of the adopted Edinburgh Local Development Plan as not enough information has been supplied to show that there is adequate sewerage to meet the demands of the development.*
7. *The proposal is contrary to **policy Des 4** of the adopted Edinburgh Local Development Plan as it will not have a positive impact on its surroundings.*

Firstly, some of these reasons are duplicative, so in summary the reasons for refusal can be more succinctly summarised as follows:

- A. Negative impact upon the special landscape character of the regional park;
- B. Detrimental impact upon neighbouring occupiers; and
- C. Lack of information on waste water drainage.

The use of seven reasons for refusal is therefore considered to be excessive and which inadvertently undermines the positive attributes of the proposal.



Policy **Env 11** is incorrectly quoted, it does in fact state that “*Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas*”. Therefore a neutral impact is acceptable, and development does not have to lead to a positive change.

There are no responses from consultees uploaded onto the Council’s Planning Portal and so a full understanding of these is not made possible. The responses were summarised in the report of handling.

15 legitimate online comments of objection were received, initially these numbered 22, but 7 were duplicated, perhaps suggesting a concerted effort to undermine the validity of the proposal.

## 2. THE APPEAL

**The applicant is of the opinion that planning permission should be granted.**

The proposed timber camping pods (often termed “glamping”) are submitted in outline only with indicative details submitted as to date no one design has been selected for the business, and the applicant is open to advice on acceptable design solutions. The proposed use is one that should be seen as being appropriate within a countryside location.

The appearance of these timber eco-pods is designed to be appropriate within a countryside setting. The precise detailing size and materials can vary but generally we are looking at an all timber shipboard finish with curved roofs and sides. The applicant is open to other roof coverings including turf roofs. The design and materials would be controlled by the planning authority in any detailed consent (AMC or FUL application).

The site is designated as Green Belt and it is within a designated special landscape character area (The Pentland Hills). **ELDP Policy Env 10** (Development in the Green Belt and Countryside) sets out criteria for what types of development are acceptable, so long as these would not detract from the landscape quality and/or rural character of the area. The prime criteria is that the development must be for the purposes of agriculture, woodland and forestry, horticulture, countryside recreation, or where a countryside location is essential, and provided any buildings, structures or hard standing areas are of an appropriate scale and quality of design.

There is no dispute that the development is a recognised countryside activity, being camping accommodation related to existing outdoor recreational facilities and activities. The site is at one of the gateways to the Pentland Hills Regional Park, and Bonaly Country Park. It adjoins two formal car parking areas, one a car park on Bonaly Road, the other the roadside lay-by parking on Torduff Road. The proposal will enhance opportunities for tourists to access the countryside, and it may tempt Edinburgh residents, who do not wish to travel so far, to enjoy an outdoor holiday on their doorstep. The site is close to the Bonaly Scout Centre, a clear indicator of the outdoor recreational value of the area.

## RESPONSE TO THE COUNCIL'S REASONS FOR REFUSAL AND REPORT OF HANDLING

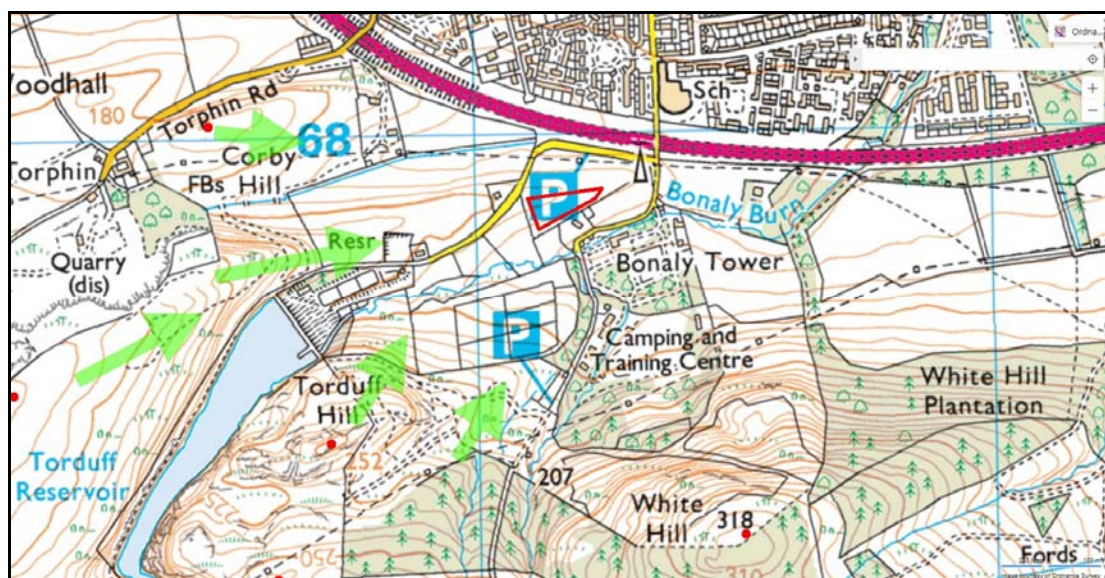
As highlighted earlier, the seven reasons for refusal actually only raise three issues, and these are analysed as follows:

### **Issue 1. The negative impact upon the special landscape character of the regional park.**

One of the key tests for proposals in the green belt is to ensure that the development does not detract from the landscape quality and/or rural character of the area. The location of the proposal within the Special Landscape Area (Pentland Hills Regional Park) requires that special care needs to be taken over preserving the landscape character, however this does not mean that the character of the field must remain unchanged, more so that the developed site should not look out of place in this location in relation to its context. Clearly the development will alter the appearance of the site (presently an open grass field), but the resultant impact will be 'different' not 'adverse', and in terms of the impact upon the character of the area and context in general, this will be slight.

The site is not a remote rural site but it sits at the edge of the urban area, close to the City Bypass, a transitional landscape area where the Pentland Hills meet the City edge. It has a degree of human activity with pylons, a gas pipeline and recently installed water supply pipes crossing the site and with a telecommunications station to the south east corner. The site also is adjacent to significant lay-by parking for visitors to the Pentland Hills Regional Park. The adjacent field to the south east is used occasionally as a camp site.

The local plan explains how the Pentland Hills meet the urban edge in the south west of the city and provide the backdrop to many of its finest views. The development will be on the south side of a small ridge and there would be no impact upon the backdrop that this area provides to the City.



The site context topography, local summits and main areas of visibility (green arrows)

Most visual impacts will be restricted to close views from Torphill Road and from the area of the Pentland Hills immediately above the site, to the west and south west, one is shown below and others are included in the appendix.



A panoramic view from above Torduff Reservoir with the site outlined

The changes will be seen, but they are not considered to be negative nor necessarily positive, more so they are deemed to be “appropriate”.

The report of handling makes several unfair assumptions in its assessment of the proposal. These include:-

1. *“the floor plan sizes of these pods are quite substantial and the floor sizes of the larger pods are not dissimilar to that of some flatted properties”*
2. *“the information submitted does shows large almost dwelling house scale buildings”*
3. *“there could be several other ancillary buildings required which have not been shown at this stage, as well as other ancillary development required including car parking and roads”*
4. *“it is possible that these (car parking and roads) will need to be converted to more permanent hardstanding's in the future”*
5. *“it is likely that the access road will need to be a bituminous material and drainage measures required to be implemented”.*

These are all inappropriate assumptions and ones which may unjustly convince the reader of negative issues that don't exist. These are perhaps matters raised in objections (it has not been possible to view the details of objections). Furthermore these issues can be handled at the detailed stage.

With regards to the size of the pods, points 1 and 2 above, these are nowhere near the size of a flatted dwelling, let alone a house. The Design Guidance sets a minimum standard for a studio flat at 36m<sup>2</sup>. In reality the largest pod suggested might be 7.5 by 5 metres, a six-person pod, but his need not be the case, and details would have to be agreed. 6 metres by 4.5 metres would be more likely.

Regarding the third quote, no additional buildings will be required. The only ancillary buildings are a reception cabin and a barbeque hut.

With regards to the access road and parking surface comments, the appellant would suggest that the Council bears in mind that many Forestry Commission and national/regional park visitor car parks, which carry vast amounts of traffic, operate perfectly well without the need for bituminous surfaces.



It is therefore concluded that these statements are unfair comment and that the details could have been agreed by the detailed application.

**Issue 2. The detrimental impact upon neighbouring occupiers.**

There is one potentially affected property, at 67 Bonaly Road to the south. The application site is separated from the garden of 67 by a strip of land, owned by the applicant, 6 metres deep. There is an existing building on the boundary as well as significant tree and hedge planting as the following two images show.



The south boundary, to 67 Bonaly Road with nearest neighbours numbered

The first issue is whether or not the use is an unneighbourly one, likely to lead to disturbance. It is certainly the intention of the applicant that this operates as a high quality managed accommodation facility, not as a free-for-all camp site. These are enclosed units incorporating all facilities and are not tents. There will be no camp fires. The barbeque building would operate within an enclosed environment with a central flue.



The site from the east, showing boundary planting (29 Torduff Road visible to left)

If noise was deemed to be a significant concern then screening, soil bunding and planting are possible solutions as well as agreement of the site layout, all of which can be handled at the detailed planning stage.

The reasons for refusal refer to **Policy Hou 7** (Inappropriate Uses in Residential Areas). It is argued that this is not an area that would be best described as a residential area. Doing so would undermine its status as Green Belt and as a Regional Park. This reason is therefore invalid.

**Issue 3. The lack of information on waste water drainage.**

This is a simple matter of agreeing details. There are no barriers to obtaining a satisfactory waste water drainage plan. It would have to be a soak away, septic tank, or water treatment tank. The properties around the site use septic tanks, so it would not be something that is not already used in the area. Composting toilets could also be an option. This is not an intensive use that would require exceptional waste water capacity.

**Other Material Considerations**

As clearly presented in the planning statement, which is a document that should be read in order to fully assess this proposal, the use is one that is perfectly suited to this site. It is on the footstep of the regional park and country park and is an ideal opportunity to enhance visitor facilities to the area. There has been an increase in holidays taken at home in recent years, and with Britain entering an era of uncertainty as it prepares to leave the European Union, this trend is only likely to extend and deepen. This is a type of accommodation that is very much in demand and which there is very little of in the area. It would be of great mutual benefit to the regional park, and it would add to the attractiveness of Edinburgh as a tourist destination.

Despite what has been said there will be minimal impact on amenity. It will allow the amenity of the hills to be enjoyed by families. The typical profile of glamping is those who enjoy and love countryside. It is not a 'partying' activity, and it covers a more responsible demographic than some elements of camping.

People love camping but do not necessarily like the hassle of tent erecting in unreliable weather, and the returning home with muddy equipment that requires to be cleaned and dried. More critically, this type of camping provides an opportunity for those with mobility problems and who would have difficulty erecting a tent.

**3. CONCLUDING REMARKS**

The Regional Park is a very important recreational asset to the City. This development will enhance the enjoyment of it whilst preserving and enhancing the setting of the park by limiting development to a small number of eco-friendly, and landscape friendly pods set within a naturally landscaped setting near to the edge of the urban area. It will not undermine the principles of the Regional Park or green belt, and will enhance access to it and enjoyment of it. It will allow the landscape virtues of the regional park to be appreciated and readily accessed on foot, bike or by horse/pony. It is an opportunity to provide an alternative City Break in the countryside, and one which will satisfy the current trend in holiday making.

This is a use that is well suited to the urban fringes of the green belt, allowing visitors to enjoy the Regional Park whilst also having the opportunity to visit the City via good public transport and cycle links. It will not undermine the principles of the green belt. It will change the landscape of the site itself but it will not have a negative impact on the area as a whole.

The natural appearance of the pods, and the use of reinforced perforated matting for roads will ensure that the development will remain in keeping with the landscape setting of the Bonaly area, and the recreational nature of the PHRP as is evident from other nearby uses and features. Furthermore, the pods and grass reinforcement are not permanent structures and can be removed with ease, returning the landscape to its previous condition without any trace within a short period of time.

It will enhance the viability of local businesses, such as local shops, horse riding and cycling related businesses.

It is therefore concluded that this is a positive recreational resource which will interact well with the purpose and nature of the Regional Park and with existing local activities and which in terms of a visual impact will incorporate some very positive attributes.

## 4. APPENDICES

### A. Policies referred to in reasons for refusal: -

**Policy Env 10 Development in the Green Belt and Countryside** - Within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area:

- a) For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.
- b) For the change of use of an existing building, provided the building is of architectural merit or a valuable element in the landscape and is worthy of retention. Buildings should be of domestic scale, substantially intact and structurally capable of conversion.
- c) For development relating to an existing use or building(s) such as an extension to a site or building, ancillary development or intensification of the use, provided the proposal is appropriate in type in terms of the existing use, of an appropriate scale, of high quality design and acceptable in terms of traffic impact.
- d) For the replacement of an existing building with a new building in the same use provided:
  - 1) the existing building is not listed or of architectural / historic merit;
  - 2) the existing building is of poor quality design and structural condition,
  - 3) the existing building is of domestic scale, has a lawful use and is not a temporary structure; and
  - 4) the new building is of a similar or smaller size to the existing one, lies within the curtilage of the existing building and is of high design quality.

**Policy Env 11 Special Landscape Areas** - Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas shown on the Proposals Map.

**Policy Env 17 Pentlands Hills Regional Park** - Development which supports the aims of the Pentlands Hills Regional Park will be permitted provided it has no unacceptable impact on the character and landscape quality of the Park.

**Policy Hou 7 Inappropriate Uses in Residential Areas** - Developments, including changes of use, which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted.

**Policy Des 4 Development Design - Impact on Setting** - Planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to:

- a) height and form
- b) scale and proportions, including the spaces between buildings
- c) position of buildings and other features on the site
- d) materials and detailing

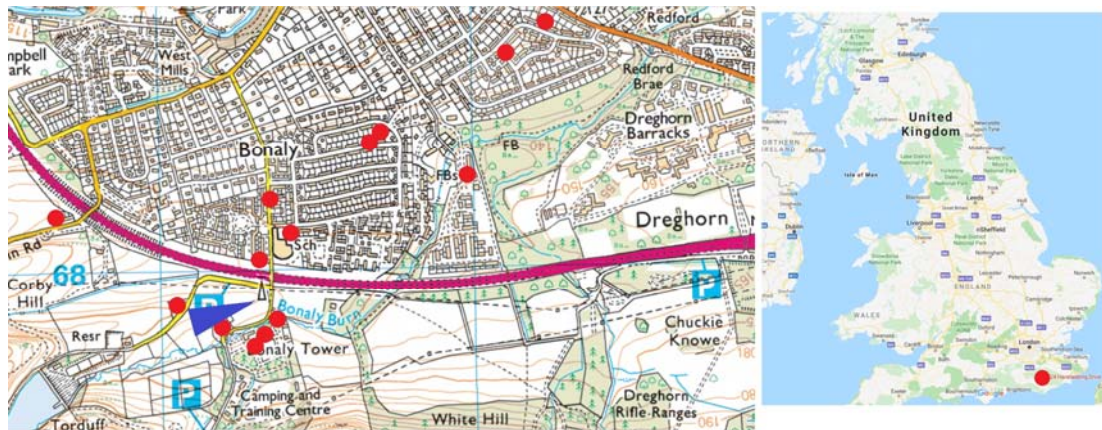
**Policy Des 5 Development Design - Amenity** - Planning permission will be granted for development where it is demonstrated that:

- a) the amenity of neighbouring developments is not adversely affected and that future occupiers have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook
- b) the design will facilitate adaptability in the future to the needs of different occupiers, and in appropriate locations will promote opportunities for mixed uses
- c) community security will be promoted by providing active frontages to more important thoroughfares and designing for natural surveillance over all footpaths and open areas
- d) a clear distinction is made between public and private spaces, with the latter provided in enclosed or defensible forms
- e) refuse and recycling facilities, cycle storage, low and zero carbon technology, telecommunications equipment, plant and services have been sensitively integrated into the design.

**Policy RS 6 Water and Drainage** - Planning permission will not be granted where there is an inadequate water supply or sewerage available to meet the demands of the development and necessary improvements cannot be provided.

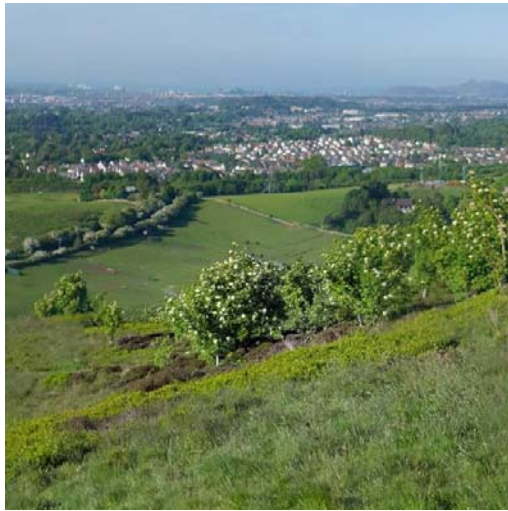
**B. LIST OF OBJECTIONS (direct neighbours in green)**

- |     |                       |                      |                                |
|-----|-----------------------|----------------------|--------------------------------|
| 1.  | Mrs Janette McPherson | 30 Bonaly Crescent   | Edinburgh EH13 0EW             |
| 2.  | Mrs Heather Hartley   | 6 Bonaly Grove       | Edinburgh EH13 0QD             |
| 3.  | Mrs Mukhayyo Umarova  | 56 Bonaly Road       | Edinburgh EH 13 0EQ            |
| 4.  | Mr Brian McGhee       | 61 Bonaly Road       | Edinburgh EH130PB              |
| 5.  | Mr John Jamieson      | 65/1 Bonaly Road     | Edinburgh EH13 OPB             |
| 6.  | Mr Brian Finlayson    | 65/8 Bonaly Road     | Edinburgh EH 130PB             |
| 7.  | Mr Ronald Partington  | 67 Bonaly Road       | Edinburgh EH 13 OPB            |
| 8.  | Mrs Tammy Piper       | 88 Bonaly Road       | Edinburgh EH 13 OPE            |
| 9.  | Mr Stuart Patterson   | 21 Bonaly Terrace    | Edinburgh EH13 OEL             |
| 10. | Mr Stephen O'Sullivan | 69 Dreghorn Loan     | Edinburgh EH 13 0DB            |
| 11. | Mrs Melanie Izon      | 24 Harebeating Drive | Hailsham, East Sussex BN27 1HX |
| 12. | Mrs Alexandra Murray  | 24 Redford Avenue    | Edinburgh EH13 OBU             |
| 13. | Mrs Caroline Ashbrook | 1 Redford Crescent   | Edinburgh EH 13 OBR            |
| 14. | Mrs Katie Cebula      | 29 Torduff Road      | Edinburgh EH 13 OPA            |
| 15. | Mrs Judith Mclean     | 54 Torphin Road      | Edinburgh EH13 OPF             |



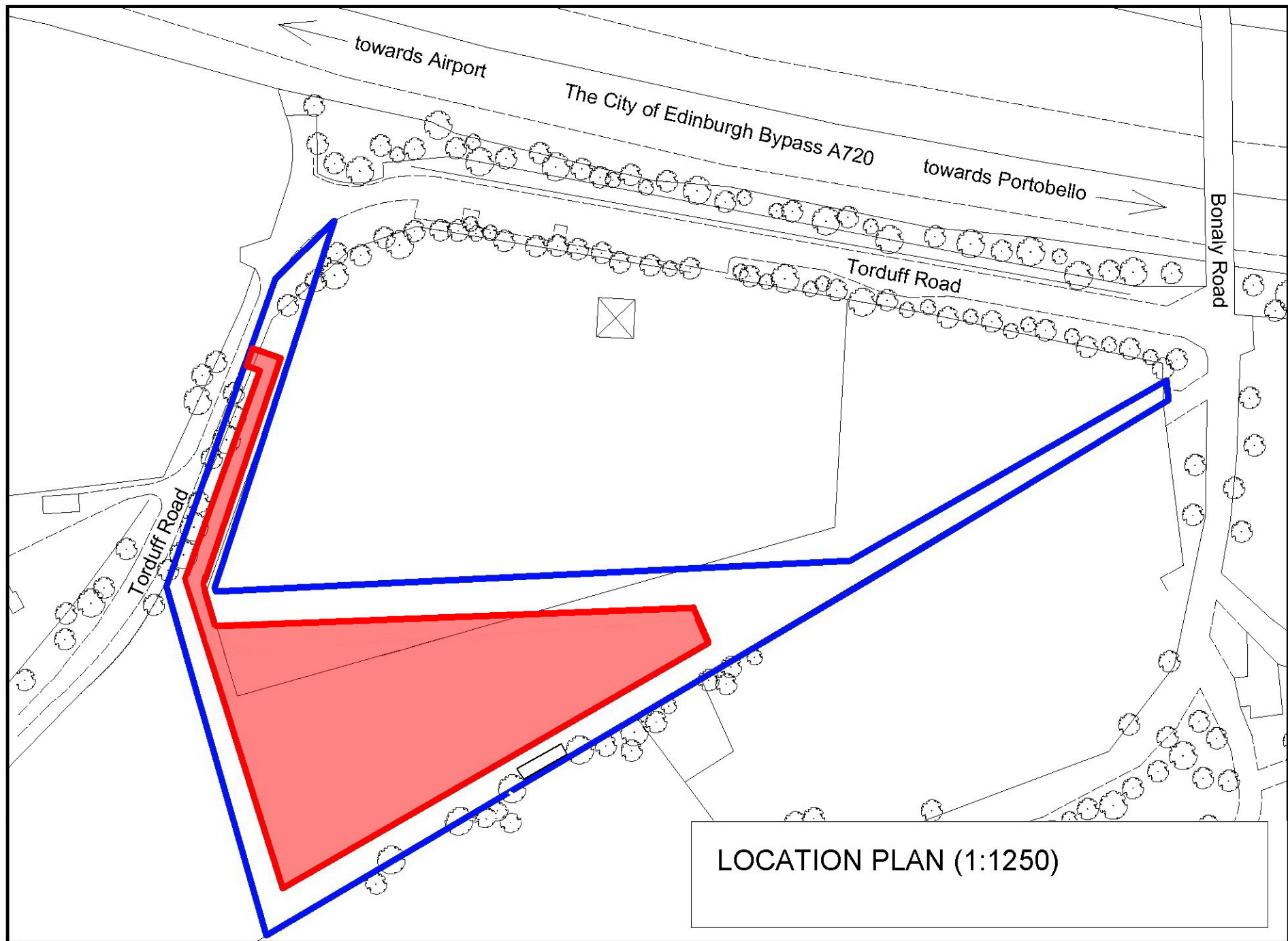
Location of the objectors (site in blue)





**Views of the site from elevated viewpoints**

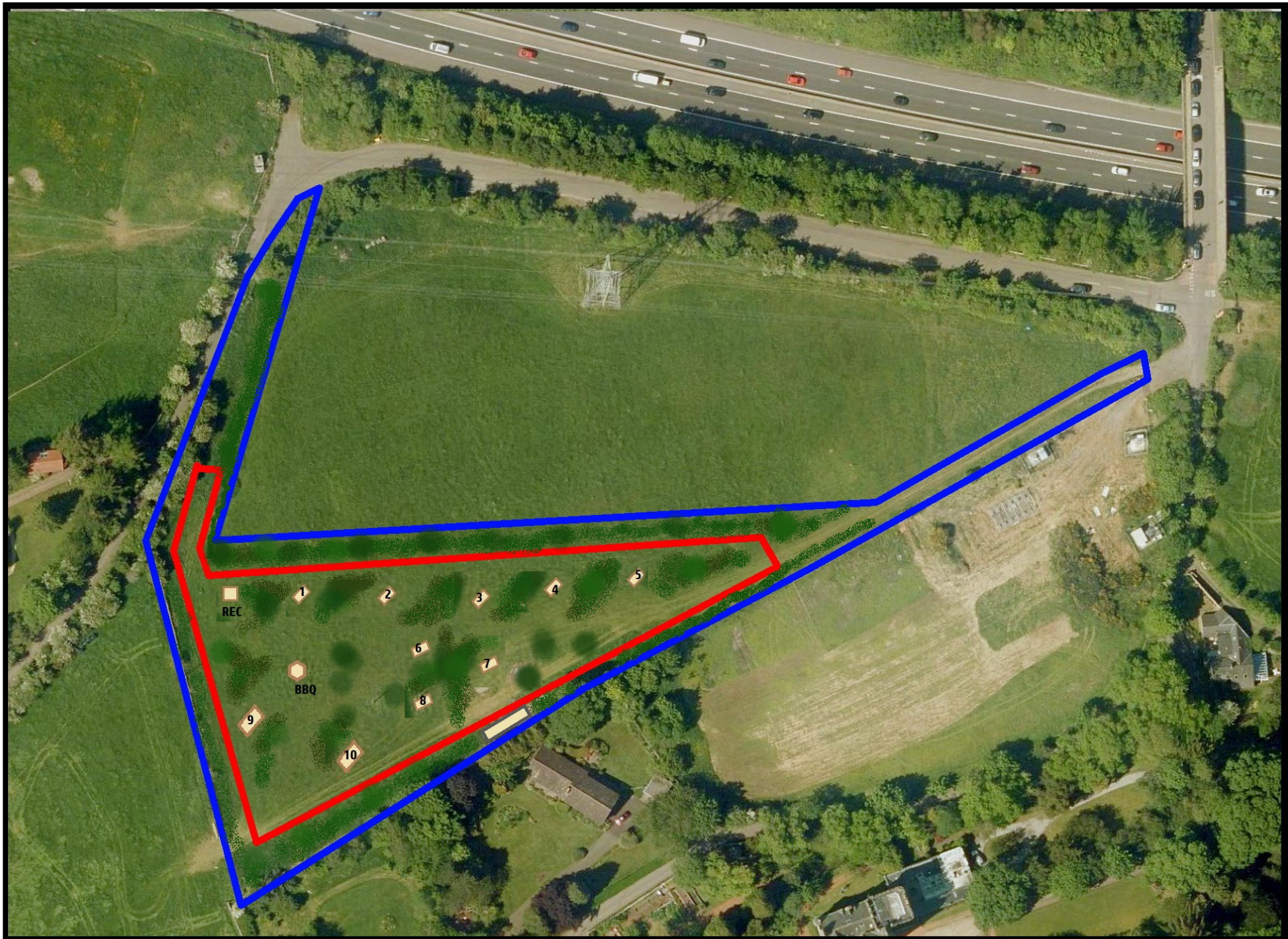
NORTH



LOCATION PLAN (1:1250)



NORTH



**Pentlands Outdoor Activities - Proposed Camping Site - SITE PLAN [NTS] INDICATIVE ONLY**



PLANNING PERMISSION IN PRINCIPLE FOR OUTDOOR CAMPING  
FACILITIES INCORPORATING CAMPING PODS & ANCILLARY WORKS  
AT  
TORDUFF ROAD, BONALY, EDINBURGH

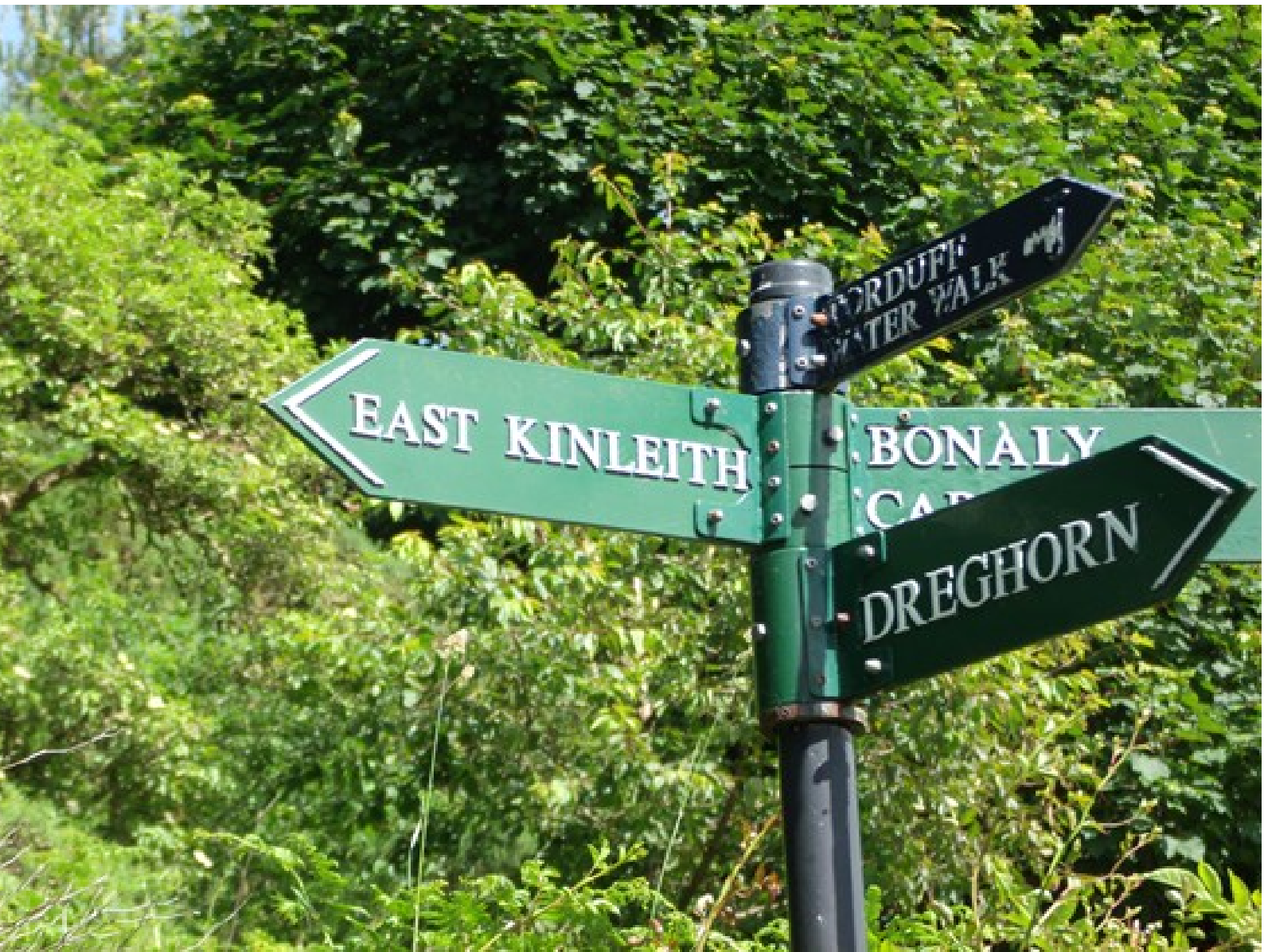


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11 JULY 2019

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## 1. Introduction

### The area

The site is located in the Bonaly area of Edinburgh, and is very close to the edge of the built-up area of the City.

Bonaly is rural suburb on the south-western outskirts of Edinburgh and the northern slopes of the Pentland Hills, lying within the Parish of Colinton. It is a mix of mainly post-war housing; it contains much woodland, grassland (for grazing and hay production) and heather moorland.

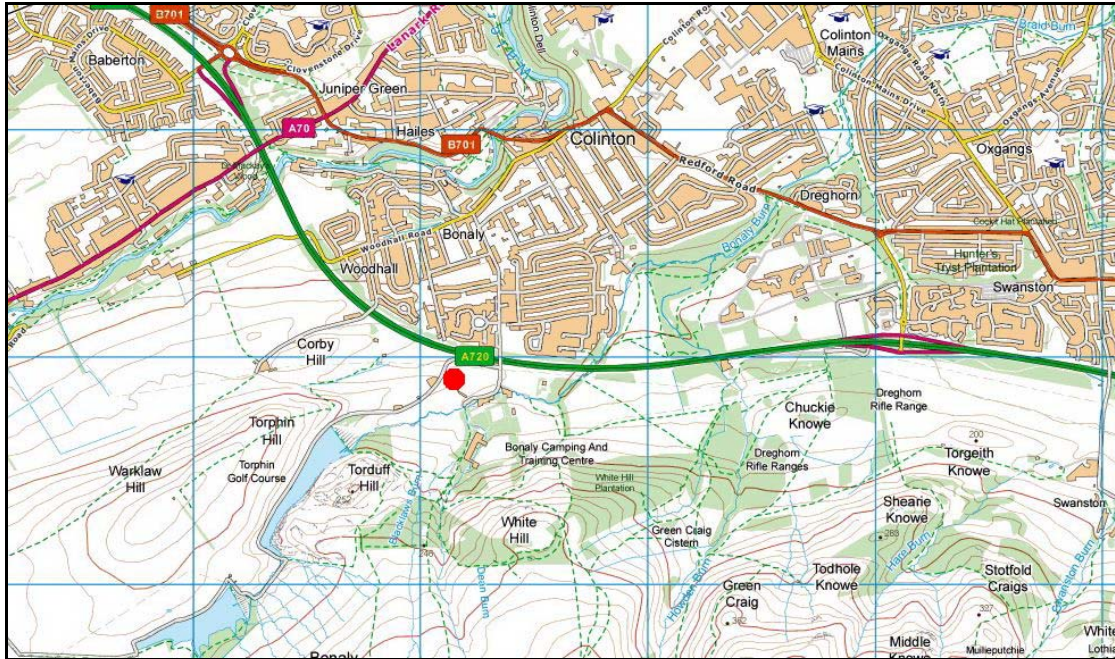


Figure 1: The site location

The Edinburgh City Bypass passes through Bonaly, to the immediate north of the site, dividing the rural and suburban parts of the area. There is no direct access onto the bypass from Bonaly Road. The road crosses the City Bypass and eventually joins Colinton Road to the north. There is no direct access to the city bypass, the nearest junctions being Baberton to the west and Dregghorn to the east, both at around 1.8 kilometres.

The surrounding countryside is mixed woodland and grazing on the northern slopes of the Pentland Hills. It is south of the Edinburgh City Bypass (A720T). The site is within the countryside and is within the northern boundary of the Pentland Hills Regional Park.

There are several dispersed residential properties in the general area, with a grouping to the south at Bonaly Tower Farm. Bonaly Tower, to the south, is a category A listed building (Ref: 28033).

To the south west is Torduff Reservoir and water works. The Bonaly Burn feeds into and flows out from this reservoir.

## The Site

The site is a roughly triangular grass field bounded on the north and west by Torduff Road, and to the south east by a field boundary towards Bonaly Road. The site is on the south side of a small ridge, or shoulder, that slopes down from west to east (from Torduff Road at the west to Bonaly Road in the east). The site slopes more noticeably to the south towards Bonaly Burn, but also down towards the City Bypass which sits in a noticeable dip. The highest point of the site is at around 172 metres AOD, close to the property at 29 Torduff Road. There is a rectangular flat roofed building on the south boundary.

The area of the development site is 0.5 hectares. There is a thin strip of land surrounding this in the ownership of the applicant which will be undeveloped and which will contain landscaping.

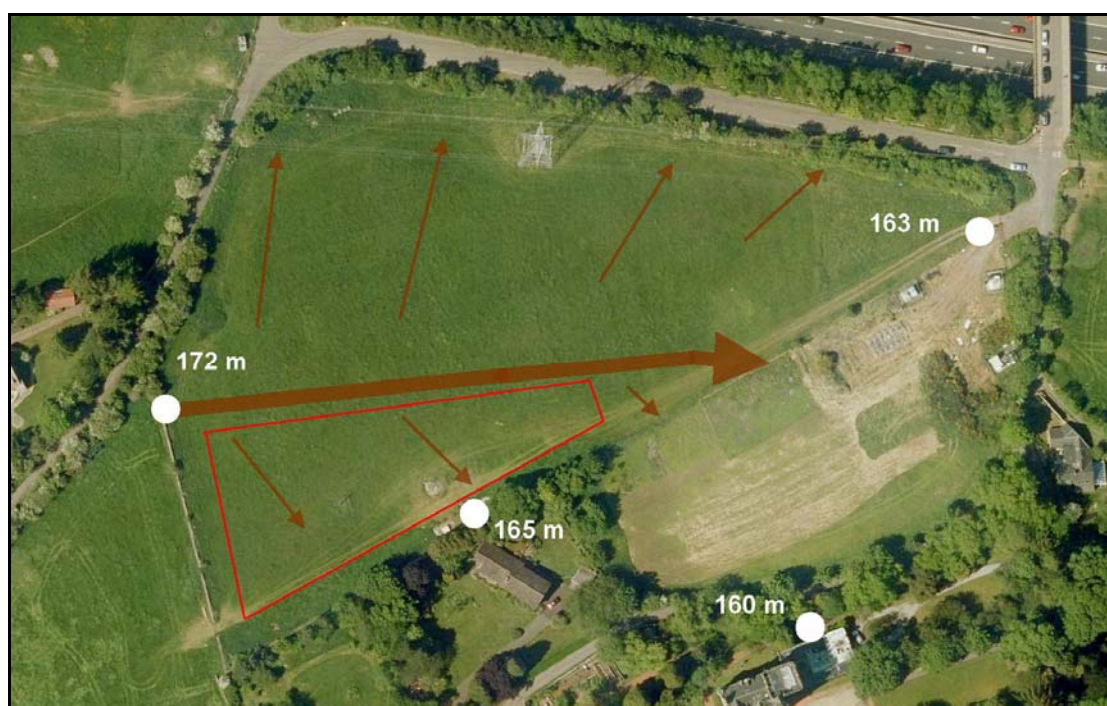


Figure 2: An aerial photograph of the site showing the ridge line and some spot heights

It is the southern half of a grass field used for the production of hay. It is not prime agricultural land. It is lined with trees/hedging along most of the length of the south boundary. The west boundary is a mix of fencing, stone wall and some hedging. The north boundary is defined by the ridge of the shoulder and has no physical delineation at present. The south boundary is a post and wire fence with trees and hedging along the west half only.

The Bonaly Burn does not cross the site, but passes to the south of the site, 70 metres distant at its closest point. The Bonaly Burn originates in the hills above Bonaly and flows towards Oxfangs, where it becomes the Braid Burn.

A dwellinghouse sits to the immediate south, close to the boundary (67 Bonaly Road). To the west, across the road is a dwellinghouse at 29 Torduff Road.

Torduff Road is a private road, owned by Scottish Water.



## 2. The proposal

This is an application for planning permission in principle. It is proposed to change the use of the site to permanently sited camping pods. These are yet to be detailed, but can vary in size, designed to accommodate from 2 to 6 persons.

It is anticipated that there will be around 10 of these timber units within the development site. The number size and design are expected to be matters to be approved at the detailed stage. The following images show some examples of typical smaller pods.

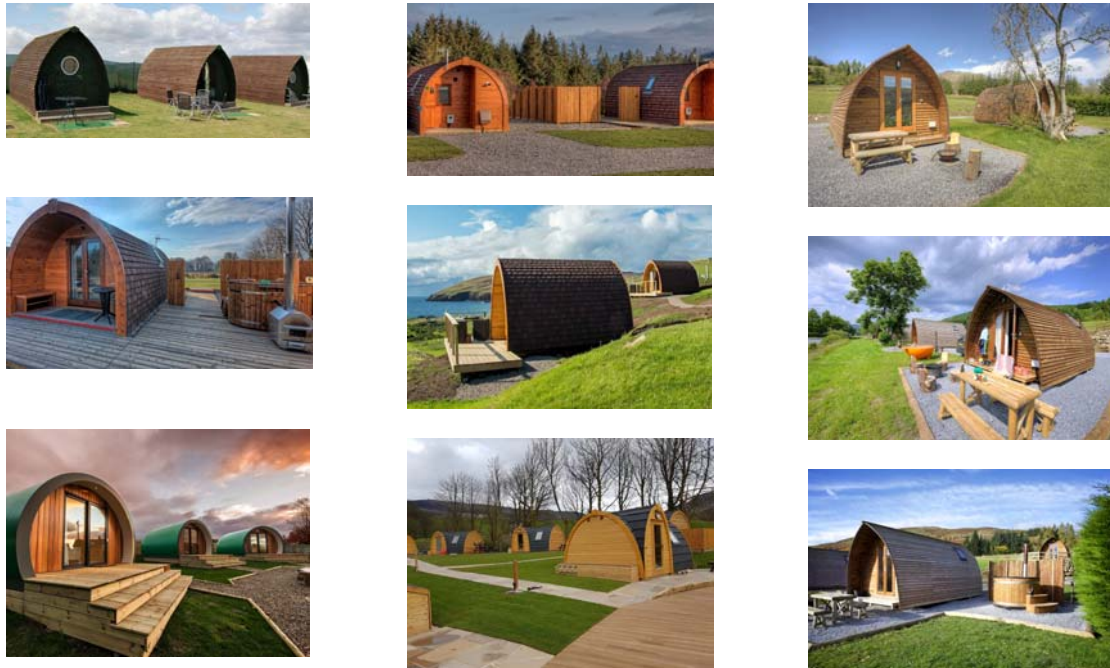


Figure 3: Some typical 'glamping' pod examples

The applicant is keen to include one or two larger more luxurious units which may include better accommodation and facilities.

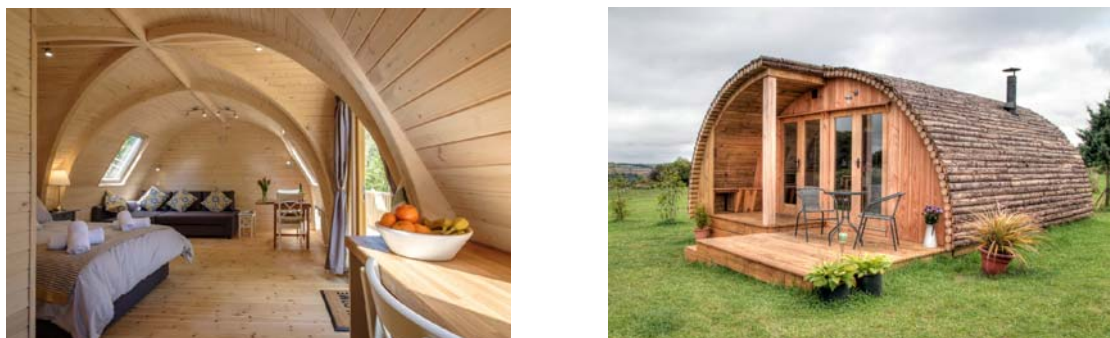


Figure 4: Larger unit designs

All units will incorporate a WC with shower unit, and will have a small food preparation area within the living area.



Car parking and heavily trafficked areas will be kept informal and will be on loose surface (crushed stone/ash/woodchips) or on reinforced grass matting or grass reinforcement solution. There would be no hard surfaces or edging.

Significant levels of planting will be carried out on boundaries and between plots, predominantly smaller tree species and hedging.

The site will be accessed via a new access onto Torduff Road into the adjacent site to the north, an access that will be created by Scottish Water as part of their ongoing water mains upgrade in the area. Torduff Road, which is privately owned and maintained by Scottish Water, links onto Bonaly Road which crosses by bridge over the A720T city bypass. Bonaly Road in turn links onto Woodhall Road and then Colinton Road.



Figure 5: Two examples of medium sized pods to sleep 3 or 4 persons

Excluding the access road, the west boundary of the site measures around 67 metres and the long south boundary about 121 metres. There is ample room to accommodate 10 pods plus three ancillary buildings.

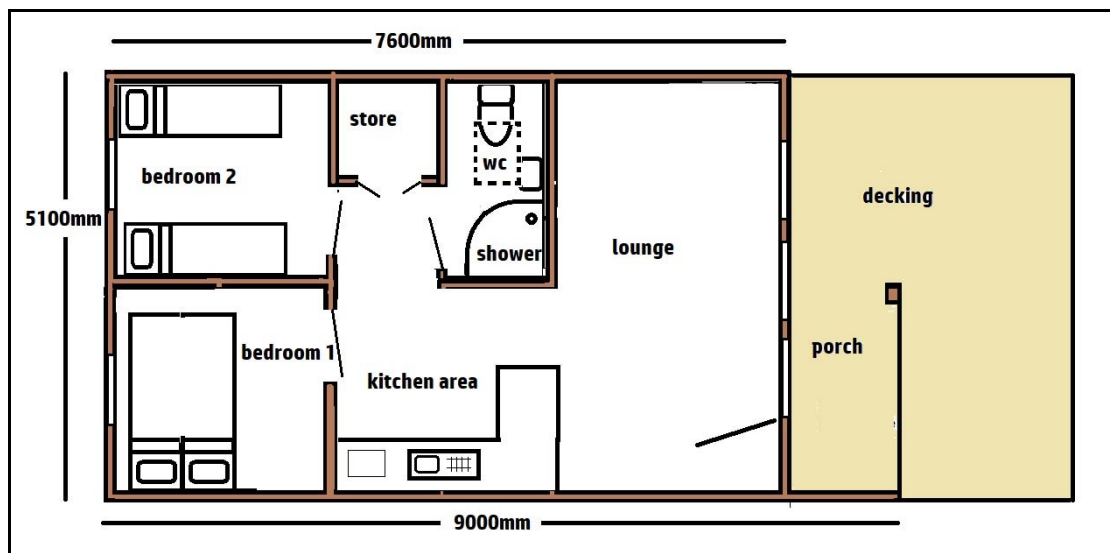


Figure 6: A six person pod (bunk beds in bedroom 2)

Larger pods may be up to 9 metres by 5 metres, and smaller ones being 4.5 by 2.5 metres.

The only ancillary buildings are a reception cabin and a barbeque hut. There will be no requirement for a toilet or shower block as these facilities will all be included within the units. Informal fires or barbeques will not be allowed.



Figure 7: Example of a bar-b-que/cooking pod

Materials would be predominantly timber, with natural or green stained wood shingles.

This is an application in principle and these details would be handled at the “approval of matters in conditions” stage.

There will be no under-building. As the site is sloping, the plinths for the pods will be cut into the hillside. Excavation material will be redistributed on site.

Landscaping details will be agreed with the Council’s ecologist and will be submitted in detail in the subsequent ‘AMC’ application.



Figure 8: A compact layout showing sleeping area, WC/shower and kitchen

The site has already got access to a water supply and to electricity. Small solar panels on the pod roofs will be installed to run low voltage pod lighting. It may be decided, at the detailed (AMC) planning stage that a small storage tank be installed on site just to secure an adequate water supply and to ensure that at



peak times there is no adverse impact upon local water supply. There are no known water supply issue in the area.

Waste water will be treated and returned to ground via a soak-away system within the site.



Figure 9: Indicative site layout plan showing rough plot layout and access

The above layout is indicative only and the red line boundary should not be relied upon. Please refer to the submitted location and site plan for this.

### 3. Background

The site is on the doorstep of the Pentland Hills Regional Park and Bonaly Country Park and is perfectly located in respect of the juxtaposition of the City, the Hills and the access.

There is presently an opportunity in the local tourism market to provide an outdoor recreation based holiday close to the City of Edinburgh and at an affordable price.

There has been an increase in holidays taken at home in recent years, and with Britain entering an era of uncertainty as it prepares to leave the European Union, this trend is only likely to extend and deepen.

The provision of a pseudo camping experience but with the comfort of a solid roof over your head and with cosy sleeping facilities and washing facilities is becoming very popular. People love camping but do not necessarily like the tent erecting and the returning home with muddy equipment that requires to be cleaned and dried.

Another strong factor in the decision to opt for timber pods is that it provides a camping opportunity for those with mobility problems and who would have difficulty erecting a tent.

Also, cycle holidays are very popular, and if the cyclists are able to ride without carrying their tenting equipment then this allows for a freer roaming experience. The site is perfectly located to access the many cycle and walking routes within the Pentland Hills.

#### **“Glamping”**

Glamping is a *portmanteau* of ‘glamorous’ and ‘camping’ and describes a style of camping with amenities and, in some cases, resort-style services not usually associated with "traditional" camping. Glamping has become particularly popular with 21st-century tourists seeking the luxuries of hotel accommodation alongside "the escapism and adventure recreation of camping". The word "glamping" first appeared in the United Kingdom in 2005 and was added to the Oxford English Dictionary in 2016.

Camping in a ‘glamping pod’ is a cheap break option that offers a glamping experience without the luxury price. Glamping pods offer cosy shelter for year round camping, if bad weather was to strike. Camping pods vary in terms of facilities; some have beds, electricity, a compact kitchen area and even a hot tub.

All washing up and showering facilities will be included within the units, again benefitting those with mobility issues, but also providing additional comfort. Guests are usually required to bring their own Bedding, Cooking Utensils, Crockery, Sleeping Bags, and Towels, however a more service orientated experience may be provided.

Glamping pods are generally intended for couples or for 2 adults and 2 children, however, larger modules are of course possible, sleeping 4 to 6 persons.

### Edinburgh and Tourism

According to the Edinburgh 2020 Tourism Strategy Mid-term Review, Tourism is one of the most important business sectors in Edinburgh. The city sells £1.3 billion of services to staying visitors, which supports around 30,000 jobs, and pays wages and salaries of around £400 million, per year. Tourism has grown strongly over the period of the Edinburgh 2020 Strategy with visitor spending rising 30% from £1.0 billion in 2010.

In Scotland, tourism expenditure overall has grown by 23% over the five years, while growth in Edinburgh has been 30%. Expenditure has grown more significantly than visit numbers.

Edinburgh is not just a destination in itself, it is also a gateway to the rest of Scotland and part of more extensive itineraries. It is by far the dominant city in attracting international visitors. In fact, 70% of all overseas holiday trips to Scotland stay in Edinburgh and almost 60% of all overseas tourism expenditure is made in the city.

The top ten inbound markets for the UK in terms of number of visits during 2018 accounted for almost two in three visits (63%). This proportion has been trending down over time: in 2005, the top ten accounted for 69% of all visits. The top ten markets have been the same every year since 2005; the only change in 2018 from 2017 was the USA overtaking France to claim first place. Only two long-haul markets, the USA and Australia, appear in the top ten.

Year	Number of Visits (m)	Spend (£bn)	Average spend per visit	Average nights per visit	Nights (m)
2016	37.609	£22.543	£599	7.4	277
2017	39.214	£24.507	£625	7.3	285
2018	37.905	£22.897	£604	7.0	266

As the above table shows, there has been a slight drop off in the inbound tourists to the UK over the period from 2017 to 2018.

The top ten origin countries are, in order; USA, France, Germany Ireland, Spain, Netherlands, Poland, Italy, Belgium and Australia. Eight of these are European. It is uncertain, but highly likely that these 8 European countries figures may fall after Britain leaves the EU.

These same Economic Consequences have been leading to Britons taking vacations within the UK. The London Economic reported in May 2019 that *“New research has revealed a third (36%) of Brits will opt for ‘staycations’ over foreign travel in 2019 as a result of the uncertainty caused by Brexit”*. It goes on *“the average couple expects to spend almost £1,000 to holiday abroad this*

*year, compared to just £574.10 if they were to do a 'staycation' in the UK. As a result, two out of five (40%) plan to take multiple domestic trips in 2019, according to research by VoucherCodes".*

There is also a trend for more active holidays, with concerns that children are not getting adequate exercise due to the reliance on technology based lifestyles.

Therefore 'at home', activity-based holidays which are competitively priced are looking to be very strong options for the immediately forthcoming tourism market period. Pony-trekking, cycling and walking based vacations will become more popular.

The total spending by visitors to Edinburgh staying overnight has increased by 30% from 2010 to 2015. This is faster than in Scotland as a whole, and the UK. Growth has come from both domestic visitors (33% more than in 2010) and from overseas visitors (27% more than 2010).

	2017		2016		2015	
	Town/city	Visits(000s)	Town/city	Visits(000s)	Town/city	Visits(000s)
1	London	19,828	London	19,060	London	18,851
2	Edinburgh	2,015	Edinburgh	1,689	Edinburgh	1,543
3	Manchester	1,319	Manchester	1,191	Manchester	1,152

*Source: International Passenger Survey, Office for National Statistics*

As can be seen from the above recent statistics, Edinburgh is the second most visited city destination after London, in the UK.

Most of Edinburgh's attraction comes from its historic city status and the sites mainly within the world heritage site, as well as the Edinburgh Festival.

There is an opportunity to make more out of the natural heritage within the Pentland Hills, allowing tourists to experience the best of both worlds.

Edinburgh has limited camping and cycling based accommodation and this is an area that can be developed.

Therefore there is a clear need to provide for opportunities in greater numbers of shorter term home based holidays with an outdoor theme, at reasonable cost and providing a good degree of comfort for couples and families alike.

This has driven the significant increase in what has now been termed 'glamping' style holiday sites.



#### **4. Constraints and Policy Considerations**

The site is directly affected by two landscape designations. It is located within the Pentland Hills Regional Park (PHRP) and it is within a special landscape character area, which relates to the PHRP.

There are no wildlife nor cultural heritage designations within or immediately adjacent to the site boundary.

The Bonaly Burn crosses the area to the south of the site. The Burn is designated as a local nature conservation site.

There is a high power transmission line crossing to the north of the site from east to west, but this should have no impact.

Bonaly Tower to the south east is a category 'A' listed building.

There is a residential property close to the south boundary.

Torduff Road is a private road.



**Figure 10: Edinburgh City Local Plan constraints**

The site is within an area designated as countryside and green belt by the Edinburgh Local Development Plan 2016 (ELDP).

The most relevant policies of the ELDP will be **Policy Env 10** Development in the Green Belt and Countryside, **Policy Env 11** Special Landscape Areas and **Policy Env 17** Pentlands Hills Regional Park. Also relevant is the non-statutory guidelines ‘**Development in the Countryside and Green Belt**’ A list of all of the relevant policies is provided in the appendices of this report.

## 5. Assessment of impacts

### Location - the Principle of the Use

One of the critical issues will be the location within the Green Belt/Countryside. With respect to this, **ELDP Policy Env 10** (Development in the Green Belt and Countryside) is designed to ensure only appropriate development takes place within this designation. It sets out a set of criteria for what is acceptable, as well as an overriding requirement that the development would not detract from the landscape quality and/or rural character of the area. The prime criteria is that the development must be for the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.

The proposed development is a recognised countryside activity, being outdoor camping accommodation related to existing outdoor recreational facilities and activities.

The site is at one of the gateways into the Pentland Hills Regional Park, and also Bonaly Country Park. It adjoins two formal car parking areas, one a car park on Bonaly Road, the other the roadside lay-by parking on Torduff Road.

Numerous paths into the hills start here. The following two maps show the recognised cycling routes and walking/trekking routes.

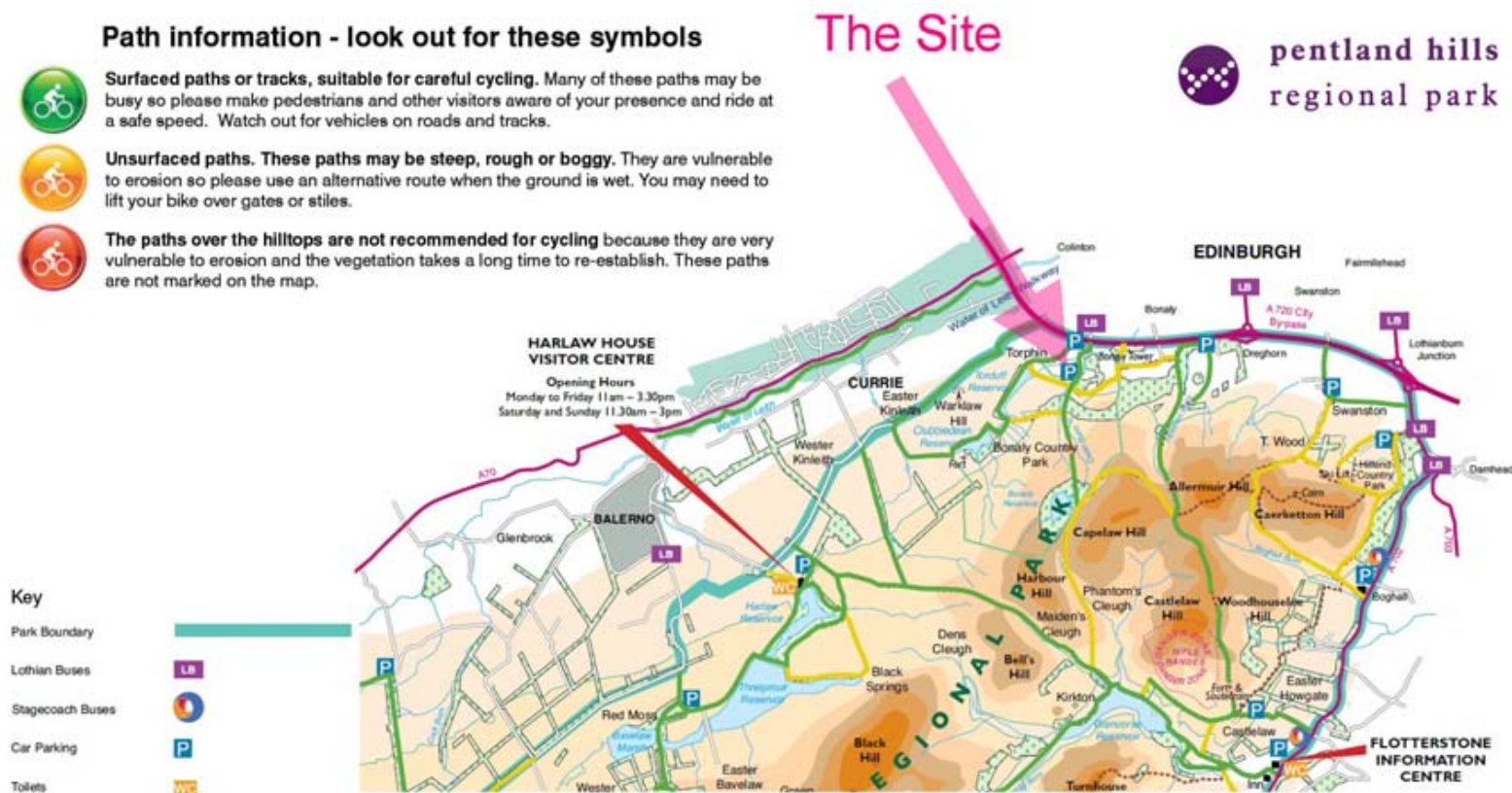


Figure 11: Pentland Hills Cycle Routes (site highlighted)



# The Site

## Path Information

- Roads, mostly private, expect to meet cars
- Surfaced paths or tracks
- Unsurfaced paths or tracks. These paths may be steep, rough or uneven. Beware of boggy sections in wet weather
- Park boundary
- Defence training area
- LB Lothian buses
- S Stagecoach buses
- P Parking
- WC Toilets



Figure 12: Pentland Hills Walking/Trekking Routes (site highlighted)

The Pentland Hills has a long tradition of people accessing the hills for a range of recreational activities. With over 100 kilometres (60 miles) of paths in the Regional Park, there are many paths suitable for horse riders, cyclists and walkers. As can be seen in the above two figures, the site is very well placed for access to the Pentland Hills and to these numerous recreational routes.

The proposed use for 'outdoor' accommodation will provide far greater opportunities for tourists to access the countryside, and it may even be tempting to those who live closer to Edinburgh who do not wish to travel so far to enjoy an outdoor holiday.

The site is close to the Bonaly Scout Centre, a clear indicator of the outdoor recreational value of the area.

The Council's non-statutory guidance (NSG) 'Development in the Countryside and Green Belt' provides more detailed advice. It states that careful consideration will be given to the intensity of use and the scale, siting and design of any built elements of proposals. The key test for all proposals in the green belt and Countryside areas will be to ensure that the development does not detract from the landscape quality and/or rural character of the area.

The guidelines elaborate on the definition of 'countryside recreation' as uses where the proposal requires the land resource and is compatible with an agricultural or natural setting such as horse riding facilities, golf courses and golf driving ranges, touring caravan and campsites. This clearly applies to the proposed development. Also, the NSG advises that ancillary development in the green belt or countryside will be acceptable provided the proposal is appropriate in type in terms of the existing use, is of an appropriate scale, is of a high quality design and is acceptable in terms of traffic impact.

The design of the proposed development will be such that it is appropriate to the location in respect of these key criteria.

The following is an image of a similar type of facility recently opened in Dumfries and Galloway and the visual impact would be similar, subject to landscape enhancements, including planting.



Figure 13: The Gorsebank 'glamping' site near Dalbeattie

The use of appropriate materials for buildings and for surfaces will be critical, as will scale and layout.

The site is within walking distance of the local general store, and campers will make use of the shop strengthening its customer base and viability giving it greater economic security for the future. Other local businesses may also benefit and there will be greater use of local transport services which in turn may secure these routes.

It is therefore concluded that the site is an appropriate location for this type of development and that it should be further assessed in respect of other issues such as landscape impact, design, amenity and access.

## Landscape Issues

The location of the proposal within the Special Landscape Area and the Regional Park require that special care needs to be taken over preserving the landscape character. This does not mean that the character of the field must remain unchanged, more that the end result should not look out of place in this location in relation to its context.

**Policy Env 11 (Special Landscape Areas)** advises that planning permission will not be granted for development which would have a **significant** adverse impact on the special character or qualities of the Special Landscape Areas (SLAs) shown on the Proposals Map. The extract from the candidate SLA's is presented in the appendix to this statement.

Whilst the development will certainly change the appearance of the field within which it is situated (it being an open grass field at present) the resultant impact will be different but not adverse, and in terms of the impact upon the character of the area and context, this will be slight.



The site is within a transitional landscape area where the Pentland Hills meet the City edge at the City Bypass. The local plan explains how the Pentland Hills meet the urban edge in the south west of the city and provide the backdrop to many of its finest views. These are visually important aspects of scenic interest.

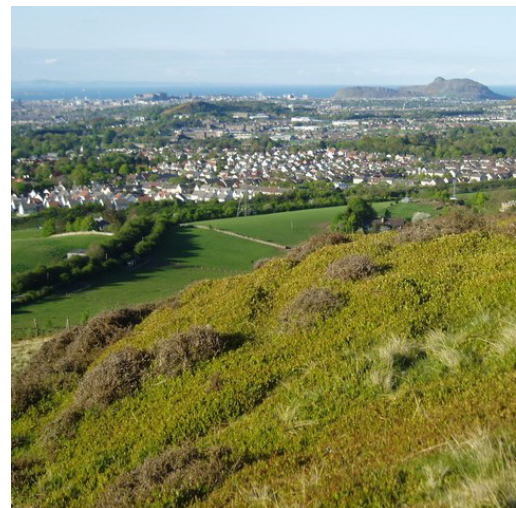


Figure 14: Views of the site from elevated viewpoints

The key pressures on the landscape quality of the area are increased recreational demand, changes in land management and agricultural practices, in particular grazing, and cumulative impacts upon landscape character and visual amenity. Potential for landscape enhancement includes the management of the structure of woodland belts, woodland regeneration, the restructuring of coniferous plantations with mixed native woodland, and the maintenance of stone walls and hedged field boundaries on the north Pentland slopes.

This application contains no large permanent buildings, and the structures proposed are predominantly timber and are removable. They have been designed with a countryside location in mind. Heights are low, generally around 2.7 metres. Planting to the boundary and between plots will naturalise the setting.

The development will be on the south side of a small ridge and there would be no impact upon the backdrop that this area provides to the City. The type of development is a low key one with varying sizes of 'pods' of predominantly timber construction in a fairly organic form. There will be significant native woodland planting in and around the site. The west boundary dry stone wall can be repaired and maintained.

It will be in the interests of the landowner to provide a pleasant and natural setting for the development. The whole concept is to provide a genuine outdoor experience, with the ability to turn ones back on the city and its suburban trappings. Planting between units will also enhance privacy, as well as naturalising the proposal and softening the landscape impact.

**Policy Env 17 (Pentlands Hills Regional Park)** advises that development that supports the aims of the Pentlands Hills Regional Park will be permitted provided it has no unacceptable impact on the character and landscape quality of the Park. The policy aims to ensure that proposals for outdoor recreation activities, whilst likely to be supported in principle, do not detract from the special rural character of the Regional Park. The landscape issues have been covered above.

The aims of the Regional Park are:

- to retain the essential character of the hills as a place of peaceful enjoyment of the countryside;
- caring for the hills, so that the landscape and the habitat is protected and enhanced;
- within this caring framework, to encourage responsible public enjoyment of the hills;
- co-ordination of these aims so they can co-exist with farming and other land uses within the park.

The development would not undermine any of these aims and would provide a sensitive means by which accommodation and access to the hills can be provided. It will enhance opportunities for outdoor recreation in an appropriate manner.

The site is just north of Bonaly Country Park. Under the definition contained in 'A Park System for Scotland', Bonaly Country Park is a selected part of the Pentland Hills in which 'recreation is the dominant form of land use'. The implication of this is a presumption in favour of increased recreational provision both in terms of quantity and level than is found in the wider countryside of the Regional Park. However, this has to be balanced against the overall desire to retain the feeling of remoteness from urbanisation found in the Country Park.

A key strategy of the Bonaly Management Plan is "*To improve accessibility to the Country Park for all users and potential users*". Another is "*To develop the role of the Country Park as a destination for visitors to Edinburgh and the Lothians*". The proposed development would encourage both of these.

Another of its aims is "*To create woodland features across the Country Park that sit sympathetically with the landscape and that have a varied and natural appearance*" and the potential to plant small trees and hedges in and around the site will go a small way towards helping this.

It is hoped that by creating a bespoke camping facility within an enhanced landscaped area, with the planting of indigenous species in the form of hedgerows and small trees, the site will be a valuable asset to the recreational aspirations of the area as well as to its landscape character and wildlife habitat.

## Landscape Assessment

It is not possible to carry out a full landscape visual impact assessment for the proposal at present as it is in principle only, however a general assessment can be made at this stage, bearing in mind the general form and materials of the buildings is known.

The site is close to the City Bypass and it is low down on the foot slopes of the Pentland Hills. It sits to the south side of a small ridge and is partially screened to the south east by woodland around Bonaly Tower Farm.

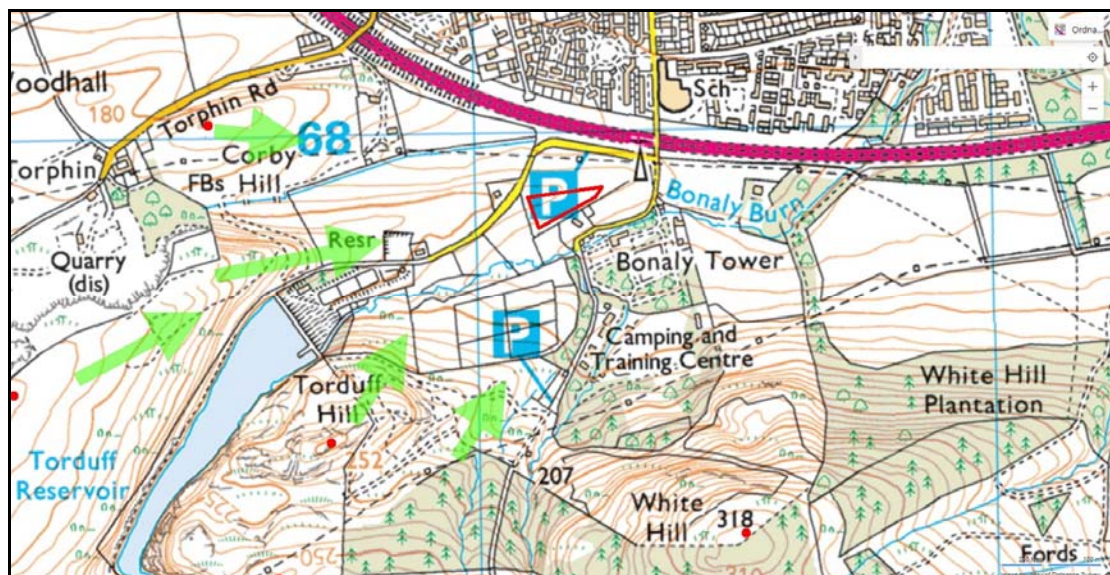


Figure 15: The site context topography, local summits and main areas of visibility

Most visual impacts will be restricted to close views from sections of Torduff Road and from the area of the hills immediately above and to the west and south west of the site due to the topography and existing and proposed planting (see figure 15 above).

The site's topography will prevent any views from the Edinburgh side. Views to the north east from Torduff Hill will be the most affected, and views from the east slopes of Warklaw Hill. The view from above Torduff Reservoir, looking back to the City has the site in the middle foreground. The development will be noticeable, but this will not be a negative impact. The planting, once matured, will create a logical link between the wooded areas to the north and south as seen in the figure 16 below.

The use of naturally coloured stained timber sides, and green or naturally stained timber shingles for roofs will ensure that the visual impact will be a very 'soft' one.





**Figure 16: A panoramic view from above Torduff Reservoir with site outlined red**

The most significant impact on views into the site could potentially be from any car parking within the site, however there are already car parking sites nearby and so this would not be out of keeping. Car parking should therefore be kept minimal and should be positioned behind pods or landscaped areas. Careful consideration of the siting of these areas and the use of low cover planting will relieve this. Parking surfaces will be loose material or grass reinforcing mesh/matting.

The site will be most visible when viewed from above Torduff Reservoir, from elevated positions to the south west, however the design and the landscaping around it will help to naturalise it into the landscape and to tie it in with the tree/hedge lined road. It is expected that the overall effect will be a positive one.

Elevated views from White Hill to the south are less of an issue due to the woodland around Bonaly Tower, as well as the wooded slopes of the hill itself.

The development will not damage or detract from the overall character and appearance of the Special Landscape Area. It will have an impact, because it will look different to a grass field, but this will be a positive impact and one that would be appropriate to the character of the area. It will be visible but it will not detract from existing views.



**Figure 17: The site from the slopes of Torduff Hill to the south west**

The location is at the fringe of the City, adjacent to a major trunk road (Edinburgh City Bypass, A720), and with an electricity transmission line

crossing the site. The general area has dispersed development across it, both towards the reservoir and at Bonaly Tower, and the proposed development would not look out of place in this context (see figure 17 above).

It is concluded that there will be some visual impact but that this can be accommodated in the existing landscape character, it will not adversely affect any views, and that it can make a positive contribution to local landscape.

### **Cultural Heritage Issues**

Archaeology - it is not known if there are any archaeological remains expected to be present in the area and the applicant is prepared to follow any recommendations from the City Archaeological Service.

Setting of Listed buildings - The listed buildings on Bonaly Road, at Bonaly Tower are category A listed and the setting of these requires to be protected. The distance between the development and the A listed building, the low impact nature of the development, and the topography between the sites is such that there will be no impact on the setting of the listed building. This is therefore not seen to be an issue.

### **Wildlife/biodiversity Issues**

The Bonaly Burn is a local nature conservation site, however, the burn does not cross the site but passes by it, to the south. The low key nature of the development is such that there will be no cross boundary impacts, and as a result there will be no impact of the development on the nature conservation site. The proposed planting will hopefully benefit the local wildlife especially birds and insects.

Site waste will be regularly collected and disposed of in an appropriate manner. Foul water will be treated and will enter the system via a natural soak-away.

### **Site drainage and flooding**

As this is a green field site, run-off be managed in such a way to be no worse than the existing situation. Any vehicle surfaces will be formed in a loose material and rain water will drain to ground in the same manner as it does at present. Pods will not have foundations but will sit on compacted stone plinths and corner slabs. If required this can be managed through the use of porous paving and filter trenches around the car park area, subtly incorporated to reduce the rate of run-off. The inclusion of significant trees and hedges will assist in water management through interception and transpiration.

Camping sites are deemed to be vulnerable sites according to SEPA's Flood Risk and Land Use Vulnerability Guidance, however the site is well separated from those areas liable to flooding as indicated on the SEPA flood maps. It is an elevated and sloping site.

## Site Design

The proposed entrance to the site may have a low curved stone wall backed with hedging to provide a modest feature on Torduff Road. Signage will be to a minimum but sufficient to announce the site's presence. The site will not be immediately visible from the road access, which will run a short distance parallel to Torduff Road, separated by hedge planting, before entering the site, minimising its local impact. The majority of the access road will already be in place.

The west boundary wall will be maintained and some planting will be carried out, although not to a great extent or height as this provides the site with a view westwards towards the Pentland Hills. The camping pods will be arranged along the hillside from west to east in two rows, exact details are still to be drafted. The layout will be scattered rather than regimented.



There will be a mix of pod sizes, but they will be of timber construction with timber shingle roofs or felt tile roofs (slate could be considered). The main fenestration will be at the front gable end and this will be generally orientated towards the hills, at varying angles. The units will appear scattered rather than in orderly columns. Bearing in mind that the site is around 0.5 hectares, 10 pods would have around 500 square metres each. Clearly there are other ancillary surfaces and two other buildings to be incorporated, but it is clear that there is ample space for a low density layout.

The other buildings likely required would be a small site office, accommodated within a converted pod and a bar-b-que pod, generally round or octagonal, and possibly partially open sided. There may also be a small waste/recycling enclosure near to the access. Vehicle surfaces will be designed to have minimal impact, being loose material (stone or wood chips) and/or reinforced grass areas. Cycle parking may be incorporated into each pod site or a secure enclosure may be required. Cycle parking for 20 cycles is anticipated (200%). If possible, an electric car charging point will be installed, and incorporated into the layout.



The planting to the south boundary will be strengthened, in particular close to the neighbouring dwelling house. Significant planting will also be carried out along the ridge and to the south side of it. The maintenance and enhancement of the boundary beech/hawthorn hedging to Torduff Road and Bonaly Road will further enhance the setting.



### **Access and Parking and services**

The site is readily accessible via adopted public roads from the city centre. Torduff Road is connected via Bonaly Road and Woodhall Road to Colinton Road (B701).

A regular bus service terminates just a short walking distance to the north adjacent to the Bonaly Store at the Bonaly Avenue/Road junction.

Facilities for secure cycle storage will be provided in the subsequent detailed planning application(s). The existing building on the south boundary is likely to be used for cycle storage and waste/recycling bin storage. The applicant is proposing to incorporate a cycle hire facility within the development site.

The site will have a low impact on traffic levels. The access is to be from the north end of the west boundary, taken from Torduff Road. There will be an existing road into the adjacent site and a spur will be taken from this into the camping site. It will be of loose material, compacted hardcore material or strengthened with nylon grass protection mesh/matting.

Car parking details are yet to be finalised. There would either be a central parking area or else there would be single spaces adjacent to each unit, as happens on a camping site. One space per unit plus a small drop off area would be anticipated. An electric car charging point is desirable if possible.

The site will have the existing mains water supply upgraded, and an electricity connection is already available. Drainage will be via a private treatment plant and soak-away.

The site has very good mobile communications service.

## 6. Conclusion

The critical determining issues will be the location of the accommodation pods in the green belt and the Pentland Hills Regional Park, and in particular policies **Env 10**, **ENV 11**, and **Env 17**.

The Regional Park is a special landscape area as well as a very important recreational asset to the City. The development will preserve and enhance the setting of the park by limiting development to a small number of eco-friendly, and landscape friendly pods set within a naturally landscaped setting near to the edge of the urban area. It will not undermine the principles of the Regional Park, and will enhance access to it and enjoyment of it. It will draw more people out to this location where the landscape virtues of the regional park can be appreciated and readily accessed on foot, bike or by horse/pony. It is an opportunity to provide an alternative City Break in the countryside, and one which will satisfy the current trend in holiday making.

This is a use that will be suited to the urban fringes of the green belt, allowing visitors to enjoy the Regional Park whilst also having the opportunity to visit the City via good public transport and cycle links. It will not undermine the principles of the green belt. It will transform the landscape of the site but it will not have a negative impact on the area as a whole. It will remain in keeping with the landscape setting of the Bonaly area, and the recreational nature of the PHRP as is evident from other nearby uses and features.

It is therefore concluded that this is a positive recreational resource which will interact well with the purpose and nature of the Regional Park and with existing activities and which in terms of a visual impact will incorporate some very positive attributes.



## **6. Appendices**

### **List of all relevant policies of the Edinburgh LDP - 2016**

**Policy Des 1 Design Quality and Context** - Planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a sense of place. Design should be based on an overall design concept that draws upon positive characteristics of the surrounding area. Planning permission will not be granted for poor quality or inappropriate design or for proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance.

**Policy Des 4 Development Design - Impact on Setting** - Planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to:

- a) height and form
- b) scale and proportions, including the spaces between buildings
- c) position of buildings and other features on the site
- d) materials and detailing

**Policy Des 5 Development Design - Amenity** - Planning permission will be granted for development where it is demonstrated that:

- a) the amenity of neighbouring developments is not adversely affected and that future occupiers have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook
- b) the design will facilitate adaptability in the future to the needs of different occupiers, and in appropriate locations will promote opportunities for mixed uses
- c) community security will be promoted by providing active frontages to more important thoroughfares and designing for natural surveillance over all footpaths and open areas
- d) a clear distinction is made between public and private spaces, with the latter provided in enclosed or defensible forms
- e) refuse and recycling facilities, cycle storage, low and zero carbon technology, telecommunications equipment, plant and services have been sensitively integrated into the design

**Policy Env 3 Listed Buildings - Setting** - Development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the architectural character, appearance or historic interest of the building, or to its setting.

**Policy Env 8 Protection of Important Remains** - Development will not be permitted which would:

- a) adversely affect a scheduled monument or other nationally important archaeological remains, or the integrity of their setting
- b) damage or destroy non-designated archaeological remains which the Council considers should be preserved in situ.

**Policy Env 10 Development in the Green Belt and Countryside** - Within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area:

- a) For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.
- b) For the change of use of an existing building, provided the building is of architectural merit or a valuable element in the landscape and is worthy of retention. Buildings should be of domestic scale, substantially intact and structurally capable of conversion.
- c) For development relating to an existing use or building(s) such as an extension to a site or building, ancillary development or intensification of the use, provided the

proposal is appropriate in type in terms of the existing use, of an appropriate scale, of high quality design and acceptable in terms of traffic impact.

- d) For the replacement of an existing building with a new building in the same use provided:
  - 1) the existing building is not listed or of architectural / historic merit;
  - 2) the existing building is of poor quality design and structural condition,
  - 3) the existing building is of domestic scale, has a lawful use and is not a temporary structure; and
  - 4) the new building is of a similar or smaller size to the existing one, lies within the curtilage of the existing building and is of high design quality.

**Policy Env 11 Special Landscape Areas** - Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas shown on the Proposals Map.

**Policy Env 12 Trees** - Development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Preservation Order or on any other tree or woodland worthy of retention unless necessary for good arboricultural reasons. Where such permission is granted, replacement planting of appropriate species and numbers will be required to offset the loss to amenity.

**Policy Env 15 Sites of Local Importance** - Development likely to have an adverse impact on the flora, fauna, landscape or geological features of a Local Nature Reserve or a Local Nature Conservation Site will not be permitted unless it can be demonstrated that:

- a) the reasons for allowing the development are sufficient to outweigh the nature conservation interest of the site
- b) the adverse consequences of allowing the development for the value of the site have been minimised and mitigated in an acceptable manner.

**Policy Env 16 Species Protection** - Planning permission will not be granted for development that would have an adverse impact on species protected under European or UK law, unless:

- a) there is an overriding public need for the development and it is demonstrated that there is no alternative
- b) a full survey has been carried out of the current status of the species and its use of the site
- c) there would be no detriment to the maintenance of the species at 'favourable conservation status'
- d) suitable mitigation is proposed

**Policy Env 17 Pentlands Hills Regional Park** - Development which supports the aims of the Pentlands Hills Regional Park will be permitted provided it has no unacceptable impact on the character and landscape quality of the Park.

**Policy Tra 2 Private Car Parking** - Planning permission will be granted for development where proposed car parking provision complies with and does not exceed the parking levels set out in Council guidance. Lower provision will be pursued subject to consideration of the following factors:

**Policy Tra 3 Private Cycle Parking** - Planning permission will be granted for development where proposed cycle parking and storage provision complies with the standards set out in Council guidance.

**Policy RS 6 Water and Drainage** - Planning permission will not be granted where there is an inadequate water supply or sewerage available to meet the demands of the development and necessary improvements cannot be provided.



#### **Other documents material to the determination**

- Scottish Planning Policy [June 2014]
- Non-statutory guideline - Development in the Countryside and Green Belt - Oct 2017
- Review of Local Landscape Designations - The City of Edinburgh Council, Prepared for the City of Edinburgh Council by Land Use Consultants January 2010



**Horses to the west side of the site**

## **Review of Local Landscape Designations [extract]**

22 candidate Special Landscape Areas (cSLAs) were identified in the approved Review of Local Landscape Designations (Feb 2010). The candidates are based upon landscape character assessment and evaluation of relative landscape value following the methodology set out in 'Guidance on Local Landscape Designations' published by SNH and Historic Scotland (2004). Candidates will be designated through the forthcoming Local Development Plan and will replace the existing local landscape designations: Areas of Great Landscape Value (AGLV) and Areas of Outstanding Landscape Quality (AOLQ). In the interim the Review will constitute a material consideration in the determination of planning applications. cSLAs are accompanied by 'Statements of Importance', which set out their key characteristics and attributes.

### **Candidate Special Landscape Area: Pentlands (cSLA 09)**

#### **Landscape characteristics and qualities:**

The Pentland hills form a dramatic backdrop to the city of Edinburgh. They are one of the most prominent features of the city skyline and dominate the surrounding landscape. The hills rise from flanking woodland and farmland to merge into the rugged upland summits of the hill range and represent a significant recreational resource. The Pentlands cSLA provides an identifiable setting and containment to the city and surrounding settlements of Juniper Green, Currie and Balerno.

South of the main built-up area and Water of Leith, the foreground setting to the Pentland Hills sweeps upwards through rolling landform. In the west of the cSLA, the landscape is characterised by a regular layout of 18th - 19th century fields, enclosed by drystone dykes, hedgerows, tree lines and shelterbelt planting. To the east, the landscape is more open in character featuring moorland, hillside golf course, knoll landform and exposed rock at Torphin Quarry, alongside planting of designed landscape origin. This includes the notable wedge of plantation, parkland and woodland extending into the urban area at Dreghorn and the 'T' Wood at White Hill.

At the foot of the main side slopes, gorse and sparse tree cover line narrow, incised burns, which drain from the hills. Several of these watercourses feed the man-made reservoirs of Threipmuir, Harlaw, Bonaly and Clubbidean, which occupy localised dips in landform to the north of the main ridge. Raised bog at Bonaly Common and mixed farmland enclosures of crops, improved grassland and unimproved pasture upslope, give way to open hill and heather moorland beyond the head dyke; marking a transition in land management practice. In the northeast, the narrow band of flanking foothills steepens dramatically to the prominent crags and scree slopes at Caerketton.

The well managed agricultural landscape and reservoirs, backed by the hill range are of high scenic value and offer a sense of isolation. Despite impacting upon their immediate situation, the presence of pylons tends to be diminished by the scale and backcloth of the wider landscape. The hills provide a natural landform barrier to the major road network of the A702 and A70. Whilst the city by-pass reduces tranquillity within the North Pentland Slopes, its impact on views is reduced by the complexity of the surrounding scenery and its partial concealment through roadside planting and cuttings.

Despite their modest elevation, rising to just less than 500 m within the cSLA, the Hills command a prominent position above the surrounding coastal margin and gently undulating lowlands. The hills' elongated ridge forms a distinctive profile when viewed from the by-pass and main approaches to Edinburgh, its urban hills, ridgelines, open spaces and western neighbourhoods. Hilltops such as Allermuir Hill (493 m AOD) and Caerketton Hill (450 AOD), offer extensive panoramas across Edinburgh, the East and West Lothian Plateaux and Firth of Forth towards Fife and the Ochils.

To the south and east views extend across the Southern Uplands, Moorfoots, North Esk valley and Lammermuir Hills. The full hill range is the product of Devonian volcanic rocks and sandstones and extends across some 25 km from northeast to southwest outwith the cSLA. The Pentlands form two parallel ridge lines, cut by minor burns and separated by an internal valley containing the Loganlea and Glencorse Reservoirs, which drain to the River North Esk

to the south. The higher summits of the Pentlands have a rugged and wild character of knolls and windswept heather moorland, which contrasts with lower wooded glens and farmland.

There is a wealth of cultural influence across the landscape ranging from literary associations to features such as areas of rig and furrow, prehistoric forts, Swanston Village Conservation Area, the Inventory listed designed landscape of Mallery House and remnant policy landscapes of Dreghorn Castle, Bonaly, Harmer and Cockburnhill.

Recreation and enjoyment are a significant element of the landscape, which provides for a range of outdoor activities. The upland summits within the cSLA form part of the Pentland Hills Regional Park, which includes Bonaly Country Park to the northwest and Hillend Country Park to the northeast in Midlothian.

The area is hugely popular with visitors, and is used for skiing, fishing, mountain biking, walking, running, horse riding, besides grouse shoots on moorland to the west and Military training at Castlelaw. A number of road and path links provide valued access routes into the area and hills beyond from the Water of Leith and city limits. The main access points include Bonaly, Dreghorn and Harelaw Reservoir within Edinburgh, and Hillend and Flotterstone in Midlothian.



**View towards the site from Buckstone**