

Development Management Sub Committee

Wednesday 25 November 2020

Application for Planning Permission 16/04861/FUL at Land Adjacent To 132, Glasgow Road, Newbridge. Erection of 132 dwellings with associated roads, SUDS, landscaping & ancillary works, formation of vehicular accesses to the A8 Glasgow Road and Hillwood Rise (Amended description)

Item number

Report number

Wards

A01 - Almond (Pre May 2017)

Summary

The application for full planning permission (as revised) proposes 132 dwellings and complies with the Local Development Plan proposal HSG 5 to deliver housing on this site. The proposal meets with many of the aspirations of the West Edinburgh Strategic Design Framework. The overall design is of an appropriate standard providing much needed mixed style of housing with affordable housing provision for the city. Amenity issues for existing and future residents have been addressed through the supporting statements and appropriate mitigation can be achieved on site.

Overall, the proposals comply with the Edinburgh Local Development Plan and the non-statutory guidance. There are no material considerations that outweigh this conclusion.

Links

[Policies and guidance for this application](#)

LHOU10, DEVWEF, NSGD02, LEN09, LDPP, LDEL01, LDES04, LDES01, LDES02, LDES03, LDES05, LDES06, LDES07, LDES08, LDES09, LEN12, LEN16, LEN20, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LTRA02, LTRA03, LTRA04, LTRA08, LTRA09,

Report

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Recommendations

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

Background

2.1 Site description

The application site lies immediately to the east of Ratho Station village and approximately 1km to the east of the Newbridge roundabout.

The Edinburgh Local Development Plan identifies the majority of the application site as allocated housing site, proposal HSG5. The north eastern corner of the site comprises Edinburgh Green Belt and is safeguarded for the future relocation of the Royal Highland Showground.

The northern edge of the site is flanked by the A8 Glasgow Road. Edinburgh Airport runway lies immediately beyond with the Royal Highland Showground to the north east. The land to the east and south of the site is designated as part of the Edinburgh Green Belt, this comprising arable agricultural land with small areas of mature woodland.

The site is broadly triangular in shape and measures 4.381 hectares. It is currently used for informal recreation purposes. The central part of the site comprises grassland with semi-mature woodland to the northern, eastern and southern edges. The site was implemented as Millennium Woodland planting c.2000, the trees vary in quality and range in height from 4 to 12 metres.

A number of mature trees lie on the western boundaries of the site with Ratho Station Park. The total area of woodland planting on site exceeds two hectares, almost 50% of the application site. The north eastern corner of the site, lying to the east of the existing woodland boundary, comprise arable agricultural land. The prevailing levels of the site fall gently from south to north towards the A8.

The existing settlement to the west of the site comprises low rise suburban development. The Ratho Station Park which includes playing fields, children's playground and car parking, lies between the application site and existing settlement area and is designated in the Edinburgh Local Development Plan as Open Space.

The site is currently in the ownership of The City of Edinburgh Council.

2.2 Site History

26 March 2009 - Outline Planning Permission refused for residential development, a care home, sheltered housing, a new community centre and associated landscaping and engineering works (Application reference 08/04171/OUT). This includes both the current application site and adjacent land immediately to the east .

31 July 2013 - Planning Permission in Principle for residential development (including affordable housing) , care home, land for community facility, associated access and landscape works - Minded to Grant subject to legal agreement (Application reference:- 10/02737/PPP).

13 January 2016 - Proposal of Application Notice for land at 132 Glasgow Road, Newbridge, for the erection 132 residential dwellings, associated infrastructure and ancillary works (Application reference:- 15/05177/PAN).

Neighbouring Sites

9 October 2015 - Proposal of Application Notice lodged for residential development including affordable housing and ancillary development for adjacent land immediately to the east (Application number:- 15/04707/PAN).

06 June 2018 - Application withdrawn for the development of new access road + associated landscaping (Application reference:- 16/06019/FUL).

Main report

3.1 Description Of The Proposal

The proposed scheme was amended in response to consultee requests and advice from the Planning Authority, various design changes have taken place since the application was submitted. These have included forming of a connecting road to Hillwood Rise, dwelling type substitution, orientation of buildings and the introduction of a noise barrier.

Scheme 3 December 2019

The application (as revised) proposes the development of 132 dwelling units in the form of 96 houses and 36 apartments. The proposed development layout fills the triangular site and will require clearance of many of the existing trees and vegetation; with the exception of existing mature trees to the western edge of the site on the boundary with the park, namely oak, Norway maple and ash, and the tree belt along the north boundary, these are identified for retention. The proposal involves removing the existing tree belt along the eastern side of the site and replanting a new tree belt at approximately ten metres in depth, on allocated greenbelt land outside the application boundary.

The development would be accessed via a left turn only by traffic heading westwards along the A8 Glasgow Road with a connecting road linking along the eastern edge of the development into Hillwood Rise. An acoustic barrier is proposed along the northern boundary of the site, south of the existing woodland buffer. This is proposed as a live willow screen to a height of 4.5 metres.

The central element of the housing proposal would be flatted apartments to a height of three storeys focussed on the existing Ratho Station Park. To the south of the site the housing would be principally detached housing. The northern half of the development site would accommodate some smaller terraces of four dwellings, interspersed with detached dwellings, completed with a three-storey apartment block on the north western corner overlooking the SUDs pond.

The proposed housing mix is as follows;

Houses

14 x 2 bed

27 x 3 bed

37 x 4 bed

4 x 5 bed

Apartments

18 x 2 bed

32 affordable dwelling units

Houses

11 x 2 bed

3 x 3 bed

Apartments

18 x 2bed

The dwellings would be finished in a mix of Rothesey blend facing brick and white dry dash dolowhite render, topped with Russell Highland mockbond grey roof tile. The proposed boundary treatments includes a mix of 1.8 metre timber open boarded screen fence and post and rail boundary fences in the rear gardens. The front gardens would predominately be screened by hedging with some interspersed 1.8m high screen walling where rear gardens meet corner junctions.

The SUDs would be accommodated to the northwest of the site within a mounded landscape feature, adjacent to the flats allocated as affordable housing.

All the houses have private rear gardens in excess of 9 metres. Some of the ground floor apartments have allocated private space with the upper flats taking amenity from the existing park.

The development focusses on providing a connecting link to the existing Ratho Station Park to satisfy public open space requirements. The proposal includes a 3 metre shared pedestrian cycle route to link the new development to the existing village centre, and enhancing the park existing facility with some tree planting, lighting and upgrading of boundary treatments.

Scheme 2

The application (as revised) proposes the development of 137 dwelling units in the form of 106 houses and 31 apartments

Scheme 1

The original scheme was for 131 units and did not allow for a route through Hillwood Rise to connect to Ratho Station. The proposed access road would have been constructed over allocated Green Belt land to the north east corner of the site. The original scheme involved further tree loss than currently proposed.

Supporting Documents

In support of the application the applicant requested an EIA screening opinion from CEC. On conclusion that an EIA was not required the following supporting documents were submitted and have been updated to reflect the revisions carried out:

- Pre application consultation report;
- Planning Statement;
- Tree Survey;
- Preliminary Ecology Assessment;
- Bat Survey;
- Design and Access Statement;
- Visual Survey;
- Transport Survey;
- Site Investigation Report;
- Flood Risk Assessment;
- Noise Assessment;
- Air Quality Assessment;
- Archaeology Assessment;
- Proposed accommodation schedule and
- Sustainability Statement.

Revised Plans and updated information was submitted on 7 January 2020, the application was re-advertised and a new consultation exercise was undertaken.

3.2 Determining Issues

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

Do the proposals comply with the development plan?

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

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

3.3 Assessment

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

- a) the principle of the development is acceptable;
- b) the proposed design and layout are acceptable;
- c) access arrangements are acceptable in terms of road safety and public transport accessibility;
- d) the amenity of neighbours or occupiers of the new development;
- e) landscape impact, landscape details and open space provision;
- f) the proposal will detrimentally affect flooding;
- g) the impact upon trees;
- h) other material considerations and
- i) material representations or community council comments raise issues to be addressed.

a) Principle

The Edinburgh Local Development Plan (LDP) Policy HOU 1 promotes the delivery of housing on sites allocated in the plan. Proposal HSG 5 identifies a larger 5ha site for housing with an estimated capacity of 50-100 dwellings, and community facilities (either provided on the site or elsewhere in Ratho Station).

Proposal HSG 5 identifies that environmental concerns such as the proximity of the site to nearby sources of noise, including aircraft noise must be addressed through a comprehensive master plan for the site and proposals should accord with the West Edinburgh Strategic Design Framework. The finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

The allocation of the site within the Local Development Plan establishes the principle of the use of the site for housing subject to considerations of the policies within the LDP and any other material considerations.

The principle of housing was previously accepted through the minding to grant of planning permission in principle on the site of application 10/02737/PPP which included development of up to 121 dwellings, including affordable housing. That permission also included a care home and provided land for a community facility to be delivered next to the playing field. The legal agreement has not been concluded on this proposal.

The boundary of the site on the north eastern corner of the site encroaches into land currently identified as green belt, no development is proposed within this land as part of this application. The development boundary allows for landscaping to take place within this area. In terms of policy ENV 10 the works are landscaping and do not detract from the landscape quality of rural/urban edge characteristics of the site.

Housing Proposal HSG 5 within the LDP states that the site has the opportunity to deliver housing and community facilities. Proposal HSG 5 further clarifies that these facilities could be provided either on site or elsewhere within Ratho Station. The LDP Action Programme sets out how the infrastructure and services required to support the growth of the city will be delivered. This document has been reviewed during the course of the application. No actions are identified within the Action Programme in relation to the delivery of a community facility within Ratho Station. There is no identified need to appraisal linked to HSG 5 to support the inclusion within the LDP. It is therefore accepted that the community facility is not required as a direct result of the development of this site for housing.

The principle of housing is acceptable on the site subject to complying with the policies of the Local Development Plan and the West Edinburgh Design Framework.

b) Design and layout

Policy Des 1 supports development which will create or contribute to a sense of place. The application was reviewed at pre-application stage by the Edinburgh Urban Design Panel on 27 January 2016. The panel offered a range of advice including the development of an appropriate landscape structure to help link the site to both the wider landscape and the existing settlement. It advised that the forming and strengthening of the links to the existing village core will play an important part of place making led design. The applicant has sought to include many of the suggestions of the Panel within the proposed development. A full report of the Panel can be found in the consultation section.

Housing Proposal HSG 5 of the Edinburgh Local Development Plan advises that a comprehensive masterplan for the site should accord with the provisions of the West Edinburgh Design Framework. The application is supported by a Design and Access Statement which sets out the design approach to the site.

The proposed layout of the site follows the key principles set out in the West Edinburgh Strategic Design Framework (WESDF). The proposal satisfies RS 1 of the WESDF in that the existing football pitch at Hillwood Road is a focal point for the extended village. A mix of housing types and sizes including affordable housing is proposed with the flats fronting onto the area of open space meeting the aspirations of WESDF RS3. It is considered that the proposal includes a satisfactory mix of terrace, detached, semi-detached and apartments of varying sizes is appropriate in this location.

The housing layout is orientated such that should the Royal Highland Showground be relocated to the east of the site (as proposed by LDP Policy Emp 5) that a frontage can be created and a woodland buffer will be established in accordance with WESDF policy RS4 and RS5.

It is noted that the applicant is removing the established woodland from the eastern buffer, which is a positive characteristic of the site, and replanting this on land outside the application boundary, which is out-with the applicant's control. Whilst a buffer of around 20m would be welcome the applicant has proposed around a ten-metre buffer. This will take around 20 years to become established. In the meantime, the eastern end of the site will be visible from fleeting glimpses when travelling along the A8.

The development deviates from the indicative layout set out in the WESDF in that it introduces a new access road from Glasgow Road on the east side of the development. The applicant has advised that this is required due to landownership issues. The inclusion of an access within this location is considered to be an acceptable solution to support access and egress into this site.

Local Development Plan Policy Des 9 provides guidance for sites on the edge of the Green Belt. The policy identifies that proposals should conserve and enhance the landscape setting of the city. The applicant has sought to do this by proposing a new woodland edge along the eastern boundary of the development site. The proposed development will create an appropriate greenbelt edge.

The development will have connecting links to the existing village. The development is focussed on the existing park with a three- storey flatted block providing the centre piece of the development. The overall layout of the development follows the urban grain of the existing Ratho Station village with a mix of short terraced housing with some detached and semi-detached dwellings interspersed. The proposed housing density is higher than the existing Ratho Station Village.

Local Development Plan policy Hou 4 encourages an appropriate density of each site having regard to the characteristics of the surrounding area. The proposed density of the development site is higher than the existing settlement and will be approximately 28 dwellings per hectare. The density of development is considered acceptable within this location.

To ensure a place led approach the proposal includes a connecting link to the village, with upgraded footpaths and cycle network, including a footpath through the proposed new woodland. The proposed road infrastructure would adopt a linear form which dissects the site contours. To create local distinctiveness the EUDP suggested careful use of materials, both colour and texture, in close proximity to the greenbelt boundary east and south. The application proposes a mix of Rothesey blend facing brick and white dash render, this edge will be screened following the establishment of the new landscape boundary.

LDP Policy Des 2 supports comprehensive development of the wider area as provided for by the West Edinburgh Strategic Design Framework. Whilst the principles of the development, including the proposed site access, deviate from that framework it will not prevent the development of the site to the east for the Royal Highland Showground.

LDP Policy Des 4 considers the impact of new development upon the setting and character of the existing village. The development will form an urban edge to the existing park changing the semi-rural edge to the village. The height of the flats at three storeys will provide a defined edge and will be of a more suburban character than the existing village.

It will however sit within the landscape form of the site and the east west built form will largely follow the site contours and complete the village, focussed around the park.

Policy Des 7 supports a comprehensive and integrated approach to layout design of buildings, streets, footpaths, cycle-paths, public and private open spaces, services and SUDs. The application makes provision for footpaths and cycle-paths connecting the site to the existing settlement. These are integrated into the design layout. Transport has requested further detailed information on footpath and cycle-path layouts, a condition is recommended to ensure that the appropriate dimensions are achieved. The inclusion of a vehicle access into the existing village is addressed below.

The applicant is committed to upgrading the existing park in consultation with CEC Parks and Services, a condition/ legal agreement is recommended to ensure a future management plan is agreed between CEC and the applicant.

Policy Hou 6 of the LDP seeks to ensure that 25% of the development should be delivered as affordable housing. The developer has worked with the affordable housing team to provide 33 homes (25%) within the development for affordable housing. The amended scheme has an improved mix of tenure with 73% being delivered for social rent. This is an increase on the previous proposals and is welcomed in this high priority tenure. However, the housing mix is not reflective of the mix across the main-stream housing. The mix of housing types and tenures is supported by an RSL and on balance the affordable housing is supported by the Council Housing Management and Development section.

It is concluded that the proposed layout and design of the site is an appropriate response to the village expansion and responds to many of the recommendations of the WESDF and the Edinburgh Urban Design Panel Report. The proposals comply with the design policies of the Edinburgh Local Development Plan and the Edinburgh Design Guidance.

c) Transport

LDP Policy Tra 1 encourages major travel generating development to have access to the site by modes other than the car. The development is within 700m walking distance to the Glasgow Road east and west bus routes, less than the 20 minute maximum walking time. The airport is a 45 minute walk from where residents can connect to the Tram route. The development layout makes provision for cyclists and pedestrians.

The main objections to the development proposal arise from the revised scheme 2 which proposed connections from the new development into Ratho Station Village. This connection is considered vital to assist in creating a sustainable, connected community as set out in the West Edinburgh Strategic Design Framework. The local facilities are located to the west of the site and the development proposes enhanced footpath and cycle links to connect the proposed development to the existing shops, school and transport hub. A connection from the development site was identified within the WESDF in a more northern location. The inclusion of the access between the site and the village is now located within the southern corner.

A number of the comments are concerned about the access being used as a short cut to avoid the Newbridge roundabout. Whilst the concerns are acknowledged it is considered important to ensure that the new development becomes an integrated part of the village.

The Edinburgh Urban Design Panel highlighted the importance of new street patterns being fully integrated with the wider network, strengthening the link to the existing village core is an important part of a place making led design.

It is important to note that the access into the village is not the main access into the development site and a new access is included from Glasgow Road. This is contrary to the guidance within the WESDF. The alternative would be that all the traffic for the site would be routed through the existing housing development which would raise even greater concerns within the community. The scheme now proposed which includes 2 access options for the development is considered to provide an acceptable solution.

The layout includes integrated cycle routes and pedestrian routes connecting the site to the village centre. Provision is made for 215 car parking spaces, which does not exceed the 224 maximum car parking standard for the site. Electric vehicle charging and disabled car parking is accommodated in the layout. Cycle parking provision can be met within the curtilage of the dwellings, all dwellings can access their rear gardens without going through their properties. The flatted blocks have internal cycle storage. To ensure that adequate cycle parking is provided for all users a condition is recommended requesting further details.

There is currently car parking at the hammer head of Hillwood Rise, 2 disabled bays and 8 regular spaces. These will be reduced to allow for the connecting road. Many of the properties along Hillwood rise have off street parking, Hillwood Terrace has a bank of on-street car parking spaces. In addition to the local objections in respect of the link to Hillwood Rise, local residents are concerned regarding increased risk to highway safety at this part of the site and the loss of on-street car parking.

The Transport response is set out fully in the consultation section. In summary they advise that the applicant will be required to design, procure and construct a Toucan Crossing on the A8 (Glasgow Road) at a location to ensure residents of the new development can safely access public transport services on the A8 in accordance with LDP policies Del 1 and Tra 1 and Local Transport Strategy. A suitably worded planning condition is therefore recommended.

The applicant will be required to contribute the following financial sums;

Contribute the sum of £2,000 to progress a suitable order to introduce a no left turn (peak hour) on the A8.

Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary.

Contribute the sum of £2,000 to promote a suitable order to introduce a 20pmh speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council.

Transport also recommended that the applicant prepare a travel plan for future occupants of the development. An informative is recommended.

The amendment to the scheme to include the vehicle access into the existing village of Ratho Station supports the integration of the two communities. The proposed direct access is considered acceptable in road safety issues and provides a main access to the development of the site.

d) Amenity of neighbours or occupiers of the new development

Local Development Plan policy Des 5 aims to protect the amenity of neighbouring residents and ensure that future occupiers have acceptable level of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook.

Amenity of Existing Residents

The proposal will not impact upon the Daylight Privacy or Sunlight of the existing dwellings on adjacent Hillwood Terrace or Hillwood Rise. There is concern from local residents, however, about the loss of on street parking along this road. Concerns have been raised regarding light pollution, however, this will be no more than existing street lighting impacts. street lighting would be addressed as part of the Roads Construction Consent (RCC) process. The proposed development represents an urban expansion of the village of Ratho Station through an allocated site within the LDP.

Residents have raised concern with regards to construction noise, this is not a material planning consideration.

Occupiers of the New Development

The proposal provides for private open space in the form of private gardens to the new dwellings and access to an enhanced area of open space and park.

The layout of the development allows for adequate daylight privacy and sunlight to be provided to the proposed dwellings and their gardens. There are level changes in the centre of the site which are dealt with by retaining walls, some of those plots will have part of their back gardens overshadowed. There are some areas within the northern part of the site in midwinter where the gardens will be overshadowed.

The proposed development is supported by a Daylight and Sunlight Study dated November 2019, which models the impact of the proposed acoustic fence along the northern boundary of the site upon the amenity of the proposed dwellings. The fence would be 4.5m in height, lower than the height of the existing, tree belt and as such the assessment demonstrates that the acoustic fencing will enable the north facing windows of the three storey block to the lounge and bedrooms to meet the requirements for average daylight factor. The applicant proposes that a willow fence approach will help to soften this edge.

Noise

LDP proposal HSG 5 identifies that the proximity of the site to both Edinburgh Airport and the A8 Glasgow Road imposes challenging environmental constraints on the site. There is a requirement to reduce the noise from both the sources and mitigation should be carefully integrated into the site design.

In support of the amended scheme, the applicant has submitted a Noise Assessment dated 21 March 2019, with further update received October 2019 to reflect the revised site layout, including the introduction of an apartment block in the north west corner of the site. The study includes the proposed internal Noise Sensitive Receptors and gardens and external amenity areas contained within the application site.

The study also considers impact of the development upon residential developments within approximately 150m of the site and existing noise sensitive receptors along the A8.

The British Standard BS 8233:2014 Guidance on Sound Insulation and Noise reduction for Buildings provides guidance for control in and around buildings. The standard sets out acceptable noise levels for new and refurbished buildings and amenity areas according to their use.

For external areas BS8233:2014 specifies a desired level of 50dB_{Aeq,t} and an upper guideline level of 55dB_{Aeq,t}. It is acknowledged within the Standard that these guidelines may not be achievable in urban areas adjoining the transport network. It further notes that in such a situation, developments should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.

Mitigation measures have been proposed within the development to meet the BS noise standards. An acoustic screen is proposed at 4.5 m high and will not be visible from the A8, positioned behind the existing tree belt. The visual impact of such a screen from the private gardens will be softened given its design as a willow fence.

Acoustic glazing and ventilation providing a reduction of approximately 40dB_{rw} will be installed in the dwellings in the northern area of the site.

The assessment concludes that the proposed development will result in a reduction of up to 2.2 dB at existing noise sensitive receptors as a result of slowing down of traffic from 60mph to 40mph. Daytime and night time internal criteria will be met in habitable rooms within the proposed new dwellings.

The assessment concludes that whilst most of the dwellings gardens and external space across the site meet the upper guideline of 55dB_{Aeq,T}, the properties proposed along the northern side of the site, will experience noise levels in the garden which will exceed the BS8233:2014 upper guideline of 55dB by 1dB in small areas of the garden with the majority of the garden area meeting the criteria. The Noise Report concludes that the assessment is based on the worst case scenario of predicted 2021 WETA traffic.

The proposed barrier will provide little or no screening to aircraft noise from planes on the ground at the airport or from planes flying overhead. The noise report advises that these occurrences will be short duration and are not anticipated to exceed 57 dB LAeq,16hr.

It is noted that Environmental Protection identify that an LAeq, 16hr noise level of 55dB(A) in an external area may lead to serious annoyance for the majority of people.

The further noise assessments have satisfied Environmental Protection that freight noise from the railway line to the south will not have an impact on the proposed development.

In conclusion Environmental Protection recommend that the proposed mitigation measures are sufficient to protect future occupants from the surrounding noise sources. A condition is recommended to ensure that all necessary mitigation measures are incorporated into the development prior to occupation of the dwellings.

Air Quality Assessment

The applicant submitted an updated Air Quality Assessment dated 8th March 2019 which considers the impact of emissions from local road traffic generated by the proposed development on existing residential receptors close to the development. The pollutants considered are nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀ and PM_{2.5}). The assessment has been undertaken in accordance with the Institute of Air Quality Management (AGM) and Environmental Protection UK (EPUK) guidance, DEFRA Technical Guidance for Local Air Quality Management (LAQM) and considers the compliance with air quality standards as set out in regulations. The assessment examines the potential for conflict with measures to improve air quality within the AQMA as described in the CEC Air Quality Action Plan (AQAP) and Annual Progress Report.

The assessment concludes that the impact of the proposed development is predicted to be slight adverse at three receptors and negligible at all receptors. There is a marginal reduction in predicted annual mean NO₂ concentrations at ten receptor locations, achieved by the changes in speed limit of 60mph to 40mph. The impact descriptor is slight beneficial at two receptors.

The predicted concentration of each pollutant at proposed future receptors within the development are below the relevant AQOs. In summary the assessment concludes that the overall impact of the proposed development on local air quality is assessed as not significant, and the site is considered suitable for residential uses.

SEPA accept the results of the report. The development proposals include a range of measures designed to encourage sustainable travel including the installation of a Toucan crossing to facilitate pedestrian access to bus stops for city bound transport and other amenities from the site. There are two city car club spaces proposed within the development. There are 20 EV charging points at a ratio of 1 to 6 units. The applicant advises that future residents will be issued with a Green Travel Plan. Conditions are recommended to ensure such provisions are implemented to help reduce the impact of the development upon local air quality.

Contaminated Land

The site was previously pastoral farmland before being planted out as woodland and has not been developed in recent history. The applicant has submitted a Site Investigation Report. A condition is recommended to ensure that contaminated land is fully addressed.

Conclusion

In conclusion, subject to the specified acoustic interventions, the proposal will provide a satisfactory residential amenity for the future occupants of the development.

e) Landscape impact, landscape details and open space provision

LDP Policy Des 9 provides guidance on new development situated at the edge of the urban area. A clear demarcation between town and country is important to the defensibility of the Green Belt and its objectives.

The landscape of the site and surrounding area is defined as lowland farmland. The landscape is fragmented by built development and transport infrastructure. Neither the application site nor the immediate landscape are subject to landscape designations.

The application is supported by a Landscape and Visual Impact Assessment which assesses the impact of the development from two key points on the A8 Glasgow Road. The assessment concludes that the character will change but that the site is of low scenic value. The changes will be marginal and will be fleeting glimpses when travelling along the A8, partial glimpses through the hedgerow and the new access.

In mitigation of the landscape changes the application proposes a planting edge, minimum of ten meters in depth along the eastern edge of the development providing a buffer to the green belt edge. The development includes footpath links through this edge which provides for links into the surrounding countryside.

The application includes details of upgrading Ratho Station Park and landscaping of areas through the development. In accordance with LDP policy Hou 3 adequate open space provision is provided within the layout, principally as private gardens, communal space around the flats and ease of access to the upgrade Ratho Station Park.

The landscape proposals also include the willow acoustic barrier along the north of the site, SUDs pond at the north eastern corner and new tree planting. New tree planting is proposed to combine with the existing along the northern boundary.

In conclusion it is considered that the application will not detrimentally impact upon the local landscape and that adequate mitigation planting is proposed that meets with the satisfaction of Edinburgh Airport whilst aiming to improve upon local biodiversity. The applicant will be required to enter into an appropriate legal agreement to secure the planting buffer may be achieved and maintained in the long term. A condition and appropriate legal agreement is recommended to ensure that the upgrade of Ratho Station Park is fully implemented to the satisfaction of CEC Parks and Services.

Trees

LDP policy Env 12 aims to protect trees or woodlands worthy of retention unless for good arboricultural reasons. The application site was planted up as a millennium woodland around 2000. The woodland plantation tree species include goat willow, birch, hawthorn, alder, Scot's Pine, larch, sycamore, hazel, ash and lime. There has been self-colonised scrub growth in this area. The site was allocated for housing approximately 10 years ago at which time the woodland was less established.

The application is supported by a Tree Survey and Inspection Report dated May 2016. A further Tree Survey and Arboricultural Constraints Report was submitted in August 2018. The report finds the tree cover of the site is characterised by a relatively small number of large mature trees which stand as obvious individual specimens, set amidst large area of semi-mature woodland plantation and swathes of developing scrub growth. The latter comprise many hundred individual trees all of similar species age and character. The report identifies 16 individual mature trees of trunk diameter in excess of 300mm.

The proposal (as amended) will result in a loss of the millennium planted woodland and shrub on the site which currently provides a distinctive edge to the existing village of Ratho Station.

To re-establish this rural edge the landscape architect has sought to achieve appropriate landscape structure, however it is acknowledged that this will take approximately 20 years to become established and is outside the application boundary. This mitigation will need to be secured through a legal agreement and condition.

Mature trees will be lost along the southern boundary of the site to accommodate private gardens, this will impact upon the designated green belt edge and goes beyond the parameters of the development principles set out in the West Edinburgh Strategic Design Framework. The submitted drawings are annotated such that decisions will need to be made on site between the arboriculturalist and contractor having regard to health and safety of the trees.

The allocation of the site for housing has been long established and the formation of the millennium woodland has taken place in the knowledge that the site was allocated for housing. The woodland within this area has therefore been at risk for some time. On balance the proposed development of the site with a new woodland to the eastern edge is considered to be an appropriate solution to allow the development of the allocated site to proceed.

f) Flooding

Policy Env 21 of the Local Development Plan aims to ensure that new development does not result in increased flood risk for the site being developed or elsewhere. Although the site is out with the SEPA Flood Map the application site is adjacent to a small watercourse and consequently the site may be at risk from flooding.

On 9 November 2016 and 19 October 2018 SEPA raised objection to the proposal on the grounds of lack of information in relation to flood risk. The applicant submitted a Flood Risk Assessment dated 5 December 2018 in support of the application. SEPA continued to object on 15 January 2019. The main issue is in respect of a watercourse on the north western corner of the site.

Updated information was received from the which sought to address SEPAs concerns regarding the risk of flooding onto Glasgow Road and clarify levels. This included a swale feature proposed south of the A9 to assist directing ponded water towards the proposed drainage underneath the A8. The proposals have been amended to a position to satisfy SEPA and the objection is withdrawn.

CEC Flooding have reviewed the scheme and are now satisfied with the proposed development arrangements. It will be the developer's responsibility to ensure that the proposals for underground storage tanks can be achieved and appropriate adoption from Scottish Water. Any amendments to the drainage solution would be may material and result in the submission of a further planning application.

h) Other Material Considerations

Biodiversity

Local Development Plan policy Env 16 has respect for species protected under European or UK law. The applicant has submitted an extended phase 1 habitat survey dated 8 November 2018, and a bat survey. The survey reports that no field signs of badger were recorded, no sign of otter were recorded and there was no incidental evidence of water vole recorded. There is no ancient woodland within the site, the nearest one being 300metres away, the survey concludes that development of the site should not affect the ecological structure of the ancient woodland.

The survey identifies that the site has habitats with varying degree of ecological value. There are hedgerow habitats along the site boundaries and the plantation broadleaved woodland offers moderate ecological value. The ecological report recommends that hedgerow and woodland habitats should be retained where practicable in order to preserve their ecological value and maintain connectivity to the surrounding green network. Mitigation will be required where there is loss with compensatory planting.

No amphibians were recorded on site and whilst there is low risk of reptiles a watching brief is recommended. The ecology survey identified birds on the site within the red and amber list. It is recommended that all construction work on the site is carried out outside the bird breeding season (March to August), where this is not possible an onsite ecologist should oversee the work.

No bats were observed at the time of the survey; however every effort should be made to retain the five trees identified as providing suitable habitats. There was a lack of evidence of badgers on the site, however a further badger survey would be required within 12 months of the original.

If Committee are minded to grant planning permission repeat habitat surveys should be carried prior to the commencement of development.

Sustainability

LDP policy Des 6 sustainable buildings aims to reduce resource use and moderate the impact of development on the environment. The applicant has submitted a sustainability statement in support of the application. The site is within 20 minutes walking distance of Glasgow Road bus stop. The layout includes enhanced linkage of the development to the surrounding footpaths and Ratho Station village. The proposal will include photo-voltaic panels, low energy specifications in respect of boilers and water conservation will be submitted with the building warrant. The proposal meets the essential criteria in terms of energy needs and therefore satisfies LDP policy Des 6.

Archaeology

Ratho Station has a standing stone, a designated Scheduled Ancient Monument. This is situated outside the development site, close to Newbridge roundabout, the setting is not affected by the development. Policy RS7 of the WESDF is therefore met. Archaeology has advised that the site has potential for significant archaeology and has therefore recommended that a programme of archaeological works is undertaken prior to development.

It is recommended that an appropriate condition is attached to ensure that a programme of archaeological works is undertaken to the satisfaction of Archaeology. This will see a phased archaeological programme. The results of which would allow for the production of appropriate mitigation strategies to be drawn up to ensure the protection and/or the excavation and recording of any surviving archaeological remains.

h) Infrastructure

In accordance with Local Development Plan Policy Del 1 the applicant will be required to satisfy the infrastructure requirements as set out in the Action Plan. In addition to the transport requirements noted above, the following is required;

Education

The applicant will be required to enter into a legal agreement to contribute to Education Infrastructure at a cost of £3,216 per flat and £16,186 (as index linked form Q4,2017). Additional funds are required for land at £476 per flat and £2042 per house (not index linked). Based on the proposed scheme a sum of £1,669,632 (index linked) and a land contribution of £213,168 are required.

Affordable Housing

The applicant will be required to enter into a legal agreement to ensure that a minimum of 25% of the proposed units are affordable housing.

Health Care

The Local Development Plan Action Plan was updated in January 2019. With reference to the Local Development Plan Primary Care Appraisal the Ratho Health Care provision was completed in 2018 and no further contributions are to be sought.

i) Material representations or community council comments raise issues to be addressed

Scheme 1

The original scheme received 1 letter of support from Ratho Community Council, one letter of objection from Spokes and one letter of comment from Edinburgh Airport.

Scheme 2

The revised scheme 2 received 61 letters of representation, 5 support, 1 comment and 51 objections.

Scheme 3

The revised scheme 3 received 63 letters of representation, 5 comments and 57 objections. Ratho and District Community Council support the proposal subject to recommended transport upgrades and additional community facilities.

In summary the representations received relate to the following;

Support

- Support in principle, new homes wanted, will improve the facilities of Ratho village;
- Proposal will reduce speed limit from 70mph to 40mph which will ease traffic on the A8;
- welcome the loss of the unmanaged vegetation over to new homes and
- Access from the A8 will aid access in and out of the site, although access should be allowed through Ratho Station it should not be the sole access for the 124 dwellings.

Objection

Traffic, Highway Safety and Access

- the revisions through scheme 2 and 3 have generated a very strong concern regarding access through Hillwood Rise; concern that the development will result in rat running to avoid Newbridge roundabout (addressed in section 3.3e)
- the proposal will result in a significant increase in traffic on the surrounding road network already over capacity, there is currently excessive on street parking and narrow roads (addressed in section 3.3e)
- the increased traffic from the development will impact upon the safety of cyclists, pedestrians, pets and school children, and children playing in the streets (addressed in section 3.3e)
- the development will result in significant car parking by visitors on residential roads adjacent to the site, (addressed in section 3.3e)
- concern regarding access for emergency vehicles as surrounding roads are too narrow, (addressed in section 3.3e)

- further information is required regarding the upgrading of the surrounding roads and traffic interventions on Glasgow Road are required, including a signalised junction on the A8 and improved pedestrian access across the A8, strategies to keep heavy traffic, lorries and vans from rat running through the village, village roads in very poor repair with pot holes (addressed in section 3.3e)
- public transport improvements are required to support the new development (addressed in section 3.3e)
- the traffic surveys with regards to the new access road through Ratho Station were done during the day and should be done in the evening when everyone is at home (addressed in section 3.3e)

Ecology

- Loss of significant landscape features and rural appearance of the area (addressed in section 3.3f)
- Loss of forest area (addressed in section 3.3g)
- Impact on local wildlife (addressed in section 3.3h)

Amenity

- loss of green outdoor area popular with dog walkers, runners and local residents (addressed in section 3.3d)
- proposal will effectively double the size of the village putting a stain on local services (addressed in section 3.3d)
- currently lack of amenities in the village, 1 local store and a post office/café, will lead to driving out of the village for services (addressed in section 3.3d)
- More people will result in more noise and more traffic (addressed in section 3.3d)
- Noise and light pollution (addressed in section 3.3d)
- change in outlook/overlooking/overshadowing/loss of privacy/impact of footpaths on resident's amenity (addressed in section 3.3d)
- increase in environmental pollution (addressed in section 3.3d)

Design

- the development will resemble army barracks a design out of step with the existing properties (addressed in section 3.3c)

infrastructure

- the proposal will impact on local facilities, schools, doctors, dentist, shop (addressed in section 3.3 k)
- impact on drainage (addressed in section 3.3k)

Non-material

- The Council should compensate the residents for ruining their quality of life and affecting house prices;
- More houses will bring more trouble and crime.
- Local roads not maintained properly during snow periods.
- Impact on construction.

Conclusion

The application site falls within the West Edinburgh Direction and any application requires referral to Scottish Ministers who will decide whether to call the proposals in for determination.

The application for full planning permission (as revised) proposes 132 dwellings and complies with the Local Development Plan proposal HSG 5 to deliver housing on this site. The proposal meets with many of the aspirations of the West Edinburgh Strategic Design Framework. The overall design is of an appropriate standard providing much needed mixed style of housing with affordable housing provision for the city. Amenity issues for existing and future residents have been addressed through the supporting statements and appropriate mitigation can be achieved on site.

The proposals comply with the Edinburgh Local Development Plan and the non-statutory guidance. There are no material considerations that outweigh this conclusion.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. The following noise protection measures to the proposed development, as defined in the ITP Energised 'Noise Assessment' report (Ref EDI_888), dated 02/10/2019:
 - The Proposed Development shall include a 4.5 m high acoustic barrier between the remaining landscape buffer and the proposed houses in the north of the Proposed Development. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 32 kg/m² as a minimum (detailed in Appendix F of the noise assessment).
 - The Proposed Development shall include a 1.8 m high acoustic barrier between the proposed houses. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 12 kg/m² as a minimum.

- Glazing units serving the habitable rooms overlooking the A8 Glasgow Road shall have a minimum sound reduction level of 43 dB_{rw} double glazing with acoustic ventilation (specific units highlighted on figure 2 of the noise assessment).
- All roofs shall have a minimum 100mm mineral wool insulation on plasterboard installed prior to occupation.

Shall be carried out in full and completed prior to the development being occupied.

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

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

3.
 - i) Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
 - ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
4. The residential parking space highlighted on drawing number 02/01/K dated January 2018 shall be served by 7Kw (32amp) Type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied.

All private driveways shall be served by at least a 13- amp 3Kw (external three pin-plug) with capacity in mains for 32 - amp 7Kw electric vehicle charging sockets. They shall be installed and operational in full prior to the completion of the development.

5. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Planning Authority. The submitted plan shall include details of:
- monitoring of any standing water within the site temporary or permanent sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)
 - management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'
 - reinstatement of grass areas
 - maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow
 - which waste materials can be brought on to the site/what if any exceptions e.g. green waste
 - monitoring of waste imports (although this may be covered by the site licence)
 - physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
 - signs deterring people from feeding the birds.

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

6. No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Planning Authority, details must comply with Advice Note 3 'Wildlife hazards' (available at <http://www.aoa.org.uk/operations-safety/>). These details shall include:
- any earthworks
 - grassed areas
 - the species, number and spacing of trees and shrubs
 - details of any water features
 - drainage details including SUDS - Such schemes must comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)
 - others that you or the Authority may specify and having regard to Advice Note 3: Wildlife Hazards.

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

7. Development shall not commence until details of the Sustainable Urban Drainage Schemes (SUDS) have been submitted to and approved in writing by the Planning Authority. Details must comply with Advice Note 3 'Wildlife Hazards'. The submitted Plan shall include details of:
 - Attenuation times
 - Profiles & dimensions of water bodies
 - Details of marginal planting

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

8. Prior to the commencement of development, a plan detailing satisfactory drainage requirements, approved first by SEPA, shall be submitted to the Planning Authority for approval. The approved works will be implemented prior to the occupation of the first dwelling.
9. Prior to the commencement of works detailed plans shall be submitted for approval by the Local Authority which show a road layout that complies with the Edinburgh Street Design guidelines (ESDG) with respect to the following;
 - a) Corner radii - the maximum on local roads is 3m, with 6m on secondary roads (e.g. A8 junction).
 - b) Footways adjacent to end on parking bays should be a minimum of 2.5m.
 - c) The streets should be designed to 20-mph standard.
 - d) The remote paths throughout the development (e.g. those linking to Ratho Station Park) should be a minimum of 4m in width to allow for shared cycle-pedestrian use.

The plan approved shall be fully implemented prior to the occupation of the first dwelling house.

10. Prior to the commencement of works the applicant shall submit a plan for the approval of the Planning Authority to include a minimum of 76 cycle parking spaces and a minimum of 6 Motorcycle parking spaces; (1 per 25 units). The plan hereby approved shall be fully implemented prior to the occupation of the first dwelling.
11. Sample/s of the proposed materials shall be submitted to and approved in writing by the Planning Authority before work commences on site.
12. Full details of the proposed upgrade to Ratho Station Park and associated management plan shall be agreed with CEC Parks and Services and subsequently submitted to the Planning Authority for agreement prior to the commencement of works on the site.

13. Prior to the commencement of works on the site the applicant is required to design, procure and construct a Toucan Crossing on the A8 (Glasgow Road) at a location to be confirmed by the Planning Authority, the design of which to be approved in writing by the Planning Authority prior to commencement of any works on the development site and fully commissioned prior to occupation of any dwelling house.

Note that the design will likely require the upgrading of the street lighting in the vicinity of the crossing and speed activated advanced warning signs on each approach.

Reasons: -

1. In order to protect the amenity of the occupiers of the development.
2. In order to safeguard the interests of archaeological heritage.
3. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
4. To reduce impact upon local air quality.
5. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the application site.
6. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the application site.
7. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)
8. To ensure the development does not lead to localised flooding.
9. In order to safeguard the interests of road safety.
10. To ensure adequate on-site provision for the parking of sustainable modes of transport.
11. In order to enable the planning authority to consider this/these matter/s in detail.
12. In order to ensure a satisfactory level of amenity for existing and proposed residents and ongoing maintenance of the open space.
13. To ensure that the residents of the new development can safely access public transport services on the A8.

Informatives

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement, including those requiring a financial contribution payable to the City of Edinburgh Council, has been concluded in relation to transport infrastructure.

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

2. Consent shall not be issued until a suitable legal agreement has been concluded to make a financial contribution to Children and Families to alleviate accommodation pressures in the local catchment area.

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

3. Permission should not be issued until the applicant has entered into a suitable legal agreement to ensure that affordable housing is provided in accordance with Council policy.

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

4. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
5. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
6. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
7. The applicant is advised that 600mm freeboard should be added to finished floor levels.
8. The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building.

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

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

Cranes

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

Lighting

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

9. The applicant should note that the Council will not accept maintenance responsibility for underground water storage/attenuation.
10. The applicant should note that new road names will be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity.
11. In accordance with the Council's LTS Travplan 3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport.
12. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed.

The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details.

13. Given the lapse of the of time the applicant is advised of the need to update the necessary ecology surveys prior to the commencement of works.

Financial impact

4.1 The financial impact has been assessed as follows:

The application is subject to a legal agreement for developer contributions.

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

Scheme 3

A revised application was received and advertised in the Edinburgh Evening News on 17 January 2020.

A further 15 letters of representation were received, 2 support and 13 objections.

Objections from neighbours remain, supported by Councillor Work and Christine Jardine MP, in respect of the connecting road linking the development through Hillwood

Rise to Ratho station village. Concerns regarding the loss of existing car parking spaces along Hillwood Rise, and the risk of increase traffic to children, elderly, cyclists and pets.

Scheme 2

Additional information was received with respect to landscape and access details in September 2018.

The revised application was advertised on 21 September 2018.

A further 61 letters of representation were received, 5 letters of support, 51 letters of objection and 1 letter of comment.

Objections were received from Cllr Kevin Lang, Cllr Louise Young, Cllr Norman Work, Christine Jardine MP and Alex Cole-Hamilton MSP; in summary they accept the principal of housing but object to the change in application through scheme 2 requiring the connecting road linking the development to the village as this will result in rat-running from Glasgow road to avoid New bridge Roundabout, this link is against developer wishes and if complying with the 2010 West Edinburgh Design Framework then the proposal should drop the access from the A8. The proposed traffic calming measures will not provide a suitable solution.

The reason for support are largely as scheme 1 with enthusiasm for new housing in this locality.

Scheme 1

The application was advertised on 21 October 2016.

One letter of support from Ratho Community Council, one letter of objection from Spokes and one comment from Edinburgh Airport.

A full assessment of the representations can be found in the main report in the Assessment Section.

The comments from Ratho and District Community Council can be found in the consultation section.

Background reading/external references

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

**Statutory Development
Plan Provision**

The site is an allocated housing site in the Edinburgh Local Development Plan, HSG 5.

The Local Development Plan Action Programme of January 2019 identifies Transport requirements to deliver HSG 5.

The West Edinburgh Strategic Design Framework is also a material consideration.

Date registered

10 October 2016

Drawing numbers/Scheme

1a, 2c-72c,

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Elaine Campbell, Team manager

E-mail: elaine.campbell@edinburgh.gov.uk

Links - Policies

Relevant Policies:

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

The West Edinburgh Planning Framework seeks to protect and enhance the national interests in West Edinburgh by setting out a strategic context for investing in transport and development, to facilitate improvement of the environment, living conditions, accessibility and overall quality in the area, and to safeguard and nurture the long term potential for West Edinburgh to become an internationally competitive business location

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

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.

Relevant policies of the Local Development Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 1

Application for Planning Permission 16/04861/FUL At Land Adjacent To 132, Glasgow Road, Newbridge Erection of 132 dwellings with associated roads, SUDS, landscaping & ancillary works, formation of vehicular accesses to the A8 Glasgow Road and Hillwood Rise (Amended description)

Consultations

Edinburgh Urban Design Panel

Executive Summary

The proposal for review is a housing development to the east of Ratho Station village.

The Panel welcomes the opportunity to review the proposal at this early stage of the design process and consider this site to offer an opportunity to deliver a place specific design which will connect and build on the character of the existing Ratho Station village.

Main Report

Introduction

The site known as West Mains or Hillwood Road lies immediately to the east of Ratho Station village and approximately 1km to the east of Newbridge Roundabout. The northern edge of the site is adjacent to the A8, Glasgow Road, Edinburgh Airport runway lies beyond this with the Royal Highland Showground to the north east. The land to the east and south of the site is designated as Green Belt and comprises arable agricultural land.

The site is broadly triangular in shape and occupies 4.58 hectares. The main part of the site to the west comprises recreational grassland with semi-mature woodland to the northern, eastern and southern edges. This was implemented as Millennium Woodland planting c. 2000.

The existing settlement to the west of the site comprises low rise suburban development, this being mainly post-war terraces and semi-detached housing. The Ratho Station Park which includes playing fields, children's playground and car parking lies immediately to the west of the site and is designated in the Local Plan as Open Space.

The Rural West Edinburgh Local Plan Alteration (RWELP) 2011 identifies the site as Strategic Housing Allocation Proposal, HSP 4. This allocation is reflected in the Second Local Development Plan (LDP) 2014 which identifies the site as Housing proposal, HSG 5. This suggests an estimated capacity of 50-100 units with an opportunity for community facilities (either provided on site or elsewhere in Ratho Station).

This is the first time that the proposals have been reviewed. No declarations of interest were made by any Panel members in relation to this scheme. This report should be read in conjunction with the pre meeting papers which provide illustrative materials of the proposals and site analysis. This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations who are represented at the Panel forming a differing view about the proposals at a later stage.

Masterplan and Landscape Framework

The Panel noted that the development of this site will almost double the size of the existing settlement and therefore will change the character of Ratho Station village. Therefore, it is important that the design coming forward is a place led response.

The Panel supported the appointment of a Landscape professional at this stage of the design process as an appropriate landscape structure could help link the site to both the wider landscape and existing settlement.

The existing amenities for Ratho Station village are located on Ratho Station Road to the west of the site. The Panel noted that the proposed site presented a design challenge as to how the new development will connect and add to the existing village core. Improved connectivity to this area is therefore vital and the Panel encouraged both the improvement of both Ratho Station Road and the introduction of good east west connections to be made.

In terms of the proposed edge condition to the A8 Glasgow Road the Panel understood the rationale of not reinforcing the established spatial pattern to this road. The proposal to back properties to the road was considered an appropriate design approach in this case. However, the design of the edge will have to be carefully considered with respect to both visual and acoustics requirements.

The edge to the east and south requires careful consideration given it will form an edge to the greenbelt. The Panel encouraged a soft, less dense approach to these edges with the colour and texture of building materials carefully considered to sit with the landscape edge.

Given the change in level across the site, sectional information should be provided in support of a planning application to allow the design to be fully understood in the context.

The Panel recognised the Design Team's aspiration to achieve a design led approach for the site which fully embraces the Scottish Government's Policy document Designing Streets and the Council's Street Design Guidance and promotes place before movement.

The Panel encouraged the design team to consider a courtyard layout to some areas of the site.

Open Spaces

The use and design of the proposed open spaces will form a key element of the design and therefore a clear understanding of how these spaces will be used and maintained should form part of the information submitted as part of a planning application for the site. Of particular concern is how the central park will be used as this green space will sit at the heart of the village.

The environment (sunlight, noise etc) of the green spaces should be considered at an early stage of the design process to inform where these spaces are best located and designed given the challenging environmental constraints on this site. For example the private gardens adjacent to the A8 Glasgow Road have north facing back gardens and south facing front gardens. Sunlight analysis to these space will help to inform the best design for these spaces to ensure they are usable pleasant spaces.

Environment

The proximity of this site to both Edinburgh Airport and the A8 Glasgow Road imposes challenging environmental constraints on the site. These constrains require to be fully considered as part of design concept and layout for the site.

There is a requirement to reduce the noise from both the A8 Glasgow Road and Edinburgh Airport. The proposal should fully consider this constraint and integrate any mitigation into a design for the site.

Sunlight and daylight to both the residential units and external spaces require to be fully analysed and tested. This will help to inform the orientation, siting and layout of the residential blocks and green spaces.

Connectivity and Movement

The local facilities are located to the west of the site. Therefore, it is important that the new street patterns are fully integrated with the wider network and connect easily and safely to the existing shops, schools, transport hubs etc. This should be fully considered as part of the proposals. The forming and strengthening of the links to the existing village core will play an important as part of a place making led design.

Another important consideration is how pedestrians and cyclist cross safely and easily over the very busy A8 Glasgow Road. Consideration should also be given as to how this connection links to both the bus stop and cycle route. It was noted that an existing section 75 agreement is in place for this site to cover the above works.

The Panel were not convinced that a new vehicular access road to the east of the site is required. The need for this should be fully considered as part of the design development.

The Panel supported the linking to the existing pedestrian/cycle network around the site.

Sustainability

The Panel noted that it has been proven that if the design is based on sustainable criteria for it will achieve better place making. Therefore the Panel encouraged the design team to consider this as part of the development of the design for the site.

Local Centre and Facilities

This proposal will change the demographic makeup of the existing area. The Panel noted that a study should be carried out to ensure that local facilities like the school can accommodate this change.

The Panel noted that this village may not just function as a commuter area and that there is an opportunity for some members of the community to live and work in Ratho Station.

This opportunity for the community should be considered in the development on the design.

Affordable Housing

The Panel noted that affordable housing will be provided. The Panel advocate a 'tenure blind' approach for the design of the affordable housing. It should be ensured that this housing is fully integrated into the overall layout for the site.

Recommendations

In developing the design, the Panel supports the following aspects and therefore advocates that these should remain in the proposals:

The Landscape led approach for the masterplan.

Linking to the existing cycle/pedestrians route to be developed

Providing affordable housing on the site

In developing the proposals the Panel suggests the following matters should be addressed:

The design should fully embrace the Scottish Government Place making and the Council's Designing Streets guidance.

The environmental site constraints.

The edge designs particularly to the Green Belt.

Reconsider the new vehicular access to the site.

Consider a sustainable approach for the site.

Reinforce the connections and linkages particularly to the existing facilities and across the A8.

Archaeology

Archaeological evidence has also demonstrated that the Ratho Station/Newbridge area has been the focus of intensive occupation for over 6000 years. The most obvious example is the nationally important monuments of Ratho Station standing stone and Huly Hill, an upstanding prehistoric burial mound and stone circle situated on and dominating the eastern side of Newbridge. This prehistoric monument, which is likely to date from the early 2nd millennium BC, was constructed within the centre of a stone circle which is likely to date from the earlier Neolithic period (3rd millennia BC).

Recent excavations at Newbridge, in particular those undertaken by Headland Archaeology at Interchange Park (2001) and AOC Archaeology at the former Grampian Foods factory in between 2003 & 2016, have provided new and direct evidence for the nature of this prehistoric occupation and later Roman and medieval occupation. The excavated remains included isolated prehistoric pits and post-holes, a post-defined enclosures, round -houses, a ring-ditch cemetery and a nationally important Iron Age chariot burial dating to c. 450BC. The 2007/8 excavations by AOC have also revealed the remains of a Roman Road which may be linked to the Roman 2nd century AD milestone discovered in 1699 to the North of this site at Ingliston. A second Roman carved stone fragment (that of the body of a Roman Eagle) is incorporated within the fabric of the south gable of West Ingliston Farmstead.

Based on the historical and archaeological evidence the site has been identified as occurring within an area of archaeological significance. Accordingly this application must be considered under the terms of Historic Environment Scotland Policy Statement 2016 (HESPS), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh's Rural West Edinburgh Local Plan Policy E30 and ELDP Second proposed plan (2014) policy ENV9.

As stated the site has the potential for containing significant archaeological remains dating back to prehistory, including possibly evidence for a Roman/medieval Road, the precursor to the modern day Glasgow Road. Having assessed the likely archaeological impact of development it has been concluded that it has potentially significant, but overall low-moderate archaeological impact.

It is therefore recommended that a programme of archaeological works is undertaken prior to development. In essence this will see a phased archaeological programme, the initial phase being a 10% archaeological evaluation of the site linked to a programme of metal detecting. The results of which would allow for the production of appropriate mitigation strategies to be drawn up to ensure the protection and/or the excavation and recording of any surviving archaeological remains.

It is recommended that the following condition is attached to ensure that this programme of archaeological works is undertaken:

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

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

Archaeology updated comment

Further to your consultation request I would like to make the following comments and recommendations concerning this amended (2018) application for the erection of 133 dwellings with associated roads, suds and ancillary works. These have remained essentially the same as my earlier response of the 20th October 2016 but have been updated in terms of policy and reviewed in terms of recent work in the area

Archaeological evidence has also demonstrated that the Ratho Station/Newbridge area has been the focus of intensive occupation for over 6000 years. The most obvious example is the nationally important monuments of Ratho Station standing stone and Huly Hill, an upstanding prehistoric burial mound and stone circle situated on and dominating the eastern side of Newbridge. This prehistoric monument, which is likely to date from the early 2nd millennium BC, was constructed within the centre of a stone circle which is likely to date from the earlier Neolithic period (3rd millennia BC).

Recent excavations at Newbridge, in particular those undertaken by Headland Archaeology at Interchange Park (2001) and AOC Archaeology at the former Grampian Foods factory in between 2003 & 2016, have provided new and direct evidence for the nature of this prehistoric occupation and later Roman and medieval occupation. The excavated remains included isolated prehistoric pits and post-holes, a post-defined enclosure, round -houses, a ring-ditch cemetery and a nationally important Iron Age chariot burial dating to c. 450BC. The 2007/8 excavations by AOC have also revealed the remains of a Roman Road which may be linked to the Roman 2nd century AD milestone discovered in 1699 to the North of this site at Ingliston. A second Roman carved stone fragment (that of the body of a Roman Eagle) is incorporated within the fabric of the south gable of West Ingliston Farmstead.

Based on the historical and archaeological evidence the site has been identified as occurring within an area of archaeological significance. This application must therefore be considered therefore under terms Scottish Government's Our Place in Time (OPIT) and Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and CEC's Edinburgh Local Development Plan (2016) policies ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

As stated the site has the potential for containing significant archaeological remains dating back to prehistory, including possibly evidence for a Roman/medieval Road, the precursor to the modern-day Glasgow Road. Having assessed the likely archaeological impact of development it has been concluded that it has potentially significant, but overall low-moderate archaeological impact.

It is therefore recommended that a programme of archaeological works is undertaken prior to development. This will see a phased archaeological programme, the initial phase being a 10% archaeological evaluation of the site linked to a programme of metal detecting. The results of which would allow for the production of appropriate mitigation strategies to be drawn up to ensure the protection and/or the excavation and recording of any surviving archaeological remains.

It is recommended that the following condition is attached to ensure that this programme of archaeological works is undertaken:

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

Waste Services comment

The requirements from our point of view relate to:

Compliance with Waste Strategy

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

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

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

I would assume that the waste collection for the flats shown will be by communal bins, so that the residents are not responsible for presenting the waste on the street on the correct collection days, and removing the containers afterwards. Assuming that this is the case, the waste collection teams will require safe and efficient access to these, and therefore cognisance must be taken of my comments below in relation to operational viability. While there is mention of bin stores, I am unable to identify their location or size, and would need to ensure that they are suitable for the correct arrangement of bins.

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

Key points are:

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

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

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

Operational Viability

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

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

Transport Scotland comment

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

Transport Scotland's response is made on the understanding that the traffic generated by the application site has been incorporated as part of the traffic modelling undertaken for the West Edinburgh Transport Appraisal (WETA), and that it's associated traffic impact on the trunk road network has therefore been taken into consideration in the provision of a contribution towards the associated works at Newbridge Junction.

Environmental Assessment

The applicant has submitted an updated noise impacts assessment which has been assessed by Environmental protection. The applicant has submitted the updated noise impact in response to the previous consultation response provided by Environmental Protection. Environmental Protection have provided comments on a Planning Permission in Principle (10/02737/PPP) for a residential lead development on this site. The following comments were made in relation to that PPP application.

'As stated the site is also affected by transport noise from the A8 road and airport in close proximity. The applicant undertook a detailed site noise monitoring assessment and the acoustic report provided (also from The Airshed) indicated that the proposed buildings would require protection to meet the internal noise requirements set out by PAN 56. This planning guidance states internal sound levels for day/night time to be achieved within bedrooms and living rooms of new developments. Due to the elevated levels of road traffic noise, acoustic window glazing is required on some facades facing the A8. Furthermore, due to the location of the airport runway there is potential for aircraft noise to affect the residential units at the north end of the site. Therefore, some increased acoustic insulation maybe required in the roof construction to deal with aircraft noise penetrating bedrooms from above. The final design specification should be reviewed to ensure that the construction is sufficient to deal with these noise issues. Finally, the noise levels in any external residential garden space should also be at a level which allows residents to enjoy the use of that outdoor space. WHO noise guidance states that 55db should be the target for outdoor amenity enjoyment. At the north end of the site the acoustic report indicates that a 3m high bund with acoustic fencing is necessary to help protect the residential units from A8 traffic noise. Again, as this is a PPP application the final design of such features will need to be submitted for approval and a condition to this effect will be recommended. This department also recommends that any garden space for residential units closest to the A8 be placed on the south side of the building so that the gardens are given more acoustic protection by the building mass. Also it is recommended that bedroom windows should not be on the façades facing the A8 and airport runway where possible.'

The applicants noise impact assessment has proposed a number of mitigation options in the form of various acoustic barriers none of which include what was previously proposed in the 2010 planning application which proposed a 3m bund with acoustic fencing;

3 m barrier along the northernmost residential properties;
3.5 m barrier along the northernmost residential properties;
4 m barrier along the northernmost residential properties;
3.5 m barrier along the northernmost residential properties, additional 3.5 m barrier north of the SUDS area and 1.8m close boarded fence/walls;
3.5 m barrier along the northern redline boundary, additional 3.5 m barrier north of the SUDS area and 1.8m close boarded fence/walls;
4 m barrier along the northern redline boundary, additional 4 m barrier north of the SUDS area and 1.8m close boarded fence/walls;
4.5 m barrier along the northern redline boundary, additional 4.5 m barrier north of the SUDS area and 1.8m close boarded fence/walls.
Non-WETA 3.5 m barrier along the northernmost residential properties; and
Non-WETA 4 m barrier along the northernmost residential properties.

The applicant has also made reference to the following from BS8288 - 'For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. However, it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.'

The 2010 residential lead development had proposed the use of a 3m earth bund with acoustic barrier erected at the top. This would be demonstrating a design to achieve the lowest practicable levels along with not including amenity space inside the airport noise contours.

However, it should also be noted that the World Health Organisation Guidelines for Community Noise also makes reference regarding external amenity space.

'To protect the majority of people from being seriously annoyed during the daytime, the sound pressure level on balconies, terraces and outdoor living areas should not exceed 55 dB LAeq for a steady, continuous noise. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound pressure level should not exceed 50 dB LAeq. These values are based on annoyance studies, but most countries in Europe have adopted 40 dB LAeq as the maximum allowable level for new developments (Gottlob 1995). Indeed, the lower value should be considered the maximum allowable sound pressure level for all new developments whenever feasible.'

This was highlighted in the previous consultation response provided by Environmental Protection.

In all scenarios presented in the amended noise impact assessment the following plots appear to have the entire garden area breaching the higher-level external noise criteria; Plots 10, 11, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 27, 26,25,31, 30, 29, 28, 27, 26, 25

and 24. The following plots have approximately 50% of the gardens affected by transport noise; plots 1, 2, 8 and 9.

Railway noise from the Edinburgh to Linlithgow railway; which lies approximately 100m to the south of the proposed development site was found to be a marginal contributor to ambient noise levels than traffic noise from the A8 Glasgow Road and aircraft noise from Edinburgh Airport. Railway noise was therefore not included in the modelling exercise. Rail noise could be a significant factor especially when freight is using the line. The applicant has still not taken this into consideration or investigated the use of the track any further.

It is noted that the applicant had submitted details of an acoustic 120 Economy Green barrier woven willow and mesh, it not clear where this would be located. Over all the mitigation measures proposed are not adequate and furthermore lack detail. Environmental Protection are required to recommend conditions to Planning. To do this Environmental Protection require specific details on any proposed mitigation measures. For example, details on minimum glazing units and trickle ventilation are required and should include the specification of glazing (thickness) and locations highlighted on a submitted drawing with reference number. This would be the same for any other proposed noise mitigation measures such as acoustic barriers and bunds.

The level of car parking on the site is excessive 214 parking spaces for 124 dwellings. It is noted that the site is located in close proximity to the Glasgow Road Air Quality Management Area. This has been declared due to high levels of pollution caused by transport. Car parking numbers should be reduced. The development is reasonably well located to take advantage of local amenities and public transport network. The applicant will be required to provide a minimum of 36 (7Kw type two) electric vehicle (EV) charging points as required in the Edinburgh Design Standards. Environmental Protection recommend that 100% provision is provided. It is noted that the drawing number 02/01/K dated January 2018 highlights the location of only twenty charging points. The applicant must install all thirty-six EV charging points. They must be fully installed and operational prior to occupation. The applicant is proposing 98 driveway spaces, these must all be served with a 7KW (Type 2) 32amp electric vehicle charging point and be fully operational prior to occupation. It is noted that the installation of twenty chargers is below the minimum requirement as detailed in the Edinburgh Design Standards so therefore no addition mitigation is being proposed for a site located near the Glasgow Road AQMA.

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

Therefore, Environmental Protection recommend the application is refused due to the poor standards of external amenity that will be achieved by this development. The applicant has not considered all the possible mitigation measures available to reduce the noise from transport and rail noise down to acceptable levels. This may include a combination of an earth bund and acoustic barriers; however Environmental Protection require specific details on these mitigation measures and we need to be confident that the supporting noise impact assessment is robust enough. The applicant may also need to consider the layout of the site and the individual units this could have positive impacts for acoustics and local air quality impacts. Environmental protection believes the level of

carparking is excessive and only installing the minimum number of EV charging points is not something that can be supported.

Environmental Assessment updated response

Following submission of the April 2019 noise impact assessment Environmental Protection raised concerns due to the poor standards of external amenity that will be achieved by the original proposals.

As part of the April 2019 assessment, further noise modelling was undertaken by the applicant, using baseline data measured in 2016 and projected 2017 traffic data. The use of this data resulted in difficulties in verification of the noise model against measured levels, such that there was insufficient confidence in proposed mitigation measures. The mismatch between measured and predicted levels resulted in predicted future noise levels within the site above the agreed target noise levels. Environmental Protection could not support the application based on this assessment.

The applicant therefore undertook a further baseline noise measurement and such that noise model predictions may be updated and correlated with 2019 surveyed traffic flows. An addendum including the updated noise assessment was submitted in May 2019.

Further to the submission of the May 2019 addendum Environmental Protection raised concerns about the potential exceedance of the noise criteria within gardens located within Edinburgh Airport noise contour. The applicant has subsequently amended their design such that no gardens are located within the Edinburgh Airport noise contour.

The previous assessment included the assessment of impacts upon existing noise sensitive receptors as it was previously agreed that the speed on the A8 Glasgow was going to be reduced to 40mph. The speed on the A8 Glasgow road has now been reduced to 40mph and any further noise reduction this has now been considered. The reduction in speed on this road has reduced noise levels affecting the site.

The Proposed Development includes a 4.5 m high acoustic barrier between the remaining landscape buffer and the proposed houses in the north of the Proposed Development. The location, extent and geometry of the noise barrier is shown on drawings 'Indicative Noise Barrier Sketch' dated 21 May 2019 with its exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019). This barrier will provide protection to the proposed outdoor amenity.

The habitable rooms on some facades of the proposed dwellings located immediately south of the A8 Glasgow Road will need to include acoustic glazing in habitable rooms (Livingroom and bed rooms) providing a reduction of approximately 43 dBRw to external noise levels and acoustic passive ventilation - providing a minimum reduction of 43 dBRw to external noise levels. Exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019). Environmental protection shall recommend a condition is attached to ensure the noise mitigation measures are included.

Some of the proposed dwellings in the north of the site are orientated such that their gable ends face the A8. There will be no windows for habitable rooms in the gable ends and these facades have therefore been excluded from predictions of internal noise levels. exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019).

Predicted garden and external amenity area noise levels provided in Figure 2 are shown to meet the 55 dBLAeq,16hr upper guideline level in all gardens. It is noted that some areas of the gardens of the properties in the northern part of the site are predicted to exceed the criteria by up to 1 dB. Gardens and external amenity areas with areas predicted to exceed the 55 dB LAeq,16hr criterion are shown in Figure 2. The applicants proposed acoustic barriers both the 4.5 and 1.8m acoustic barriers will ensure outdoor amenity space is protected.

Noise from overflying planes are predominantly transmitted to the proposed properties via the roof. The applicant has proposed a sound reduction index of a typical pitched roof, comprising tiles on felt with 100 mm mineral wool on a plasterboard ceiling of $R_w = 43$ dB which will ensure noise from aircraft will not adversely impact amenity.

There are no proposed gardens within Edinburgh Airport 57 dB LAeq,16hr noise contour.Noise from passing trains has been re assessed and will not adversely impact the amenity of future tenants.

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

It is understood that the levels of car parking on the site remains at over 200; it was deemed excessive at 214 parking spaces for 124 dwellings with the original plan that was submitted. It is noted that the site is located in close proximity to the Glasgow Road Air Quality Management Area. This has been declared due to high levels of pollution caused by transport. Car parking numbers should be reduced. The development is reasonably well located to take advantage of local amenities and public transport network. The applicant will be required to provide a minimum of 36 (7Kw type two) electric vehicle (EV) charging points as required in the Edinburgh Design Standards. Environmental Protection recommend that 100% provision is provided. It is noted that the drawing number 02/01/K dated January 2018 highlights the location of only twenty charging points. The applicant must install all thirty-six EV charging points. They must be fully installed and operational prior to occupation. The applicant was proposing 98 driveway spaces, these must all be served with a 7KW (Type 2) 32amp electric vehicle charging point and be fully operational prior to occupation. It is noted that the installation of twenty chargers is below the minimum requirement as detailed in the Edinburgh Design Standards so therefore no addition mitigation is being proposed for a site located near the Glasgow Road AQMA.

Therefore, Environmental Protection offer no objection however Environmental Protection still believes the level of carparking is excessive and only installing the minimum number of EV charging points is not something that it can support. If consented Environmental Protection will require the following conditions to be attached;

1. *The following noise protection measures to the proposed development, as defined in the ITP Energised 'Noise Assessment' report (Ref EDI_888), dated 02/10/2019:*

o The Proposed Development shall include a 4.5 m high acoustic barrier between the remaining landscape buffer and the proposed houses in the north of the Proposed Development. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 32 kg/m² as a minimum (detailed in Appendix F of the noise assessment).

o The Proposed Development shall include a 1.8 m high acoustic barrier between the proposed houses. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 12 kg/m² as a minimum.

o Glazing units serving the habitable rooms overlooking the A8 Glasgow Road shall have a minimum sound reduction level of 43 dB_{rw} double glazing with acoustic ventilation (specific units highlighted on figure 2 of the noise assessment).

o All roofs shall have a minimum 100mm mineral wool insulation on plasterboard installed prior to occupation.

shall be carried out in full and completed prior to the development being occupied.

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

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

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

ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

3. *The residential parking space highlighted on drawing number 02/01/K dated January 2018 shall be served by 7Kw (32amp) Type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied.*

4. *All private driveways shall be served by at least a 13- amp 3Kw (external three pin-plug) with capacity in mains for 32 - amp 7Kw electric vehicle charging sockets. They shall be installed and operational in full prior to the development being occupied.*

Environmental Assessment updated comment

The applicant has submitted slightly amended design which has increased the density on the site, however this is not significant. The supporting materials regarding noise, air quality (electric vehicles) and contaminated land have not and do not need to be amended. Therefore, the last comments submitted by Environmental Protection remain valid.

Following submission of the April 2019 noise impact assessment Environmental Protection raised concerns due to the poor standards of external amenity that will be achieved by the original proposals.

As part of the April 2019 assessment, further noise modelling was undertaken by the applicant, using baseline data measured in 2016 and projected 2017 traffic data. The use of this data resulted in difficulties in verification of the noise model against measured levels, such that there was insufficient confidence in proposed mitigation measures. The mismatch between measured and predicted levels resulted in predicted future noise levels within the site above the agreed target noise levels. Environmental Protection could not support the application based on this assessment.

The applicant therefore undertook a further baseline noise measurement and such that noise model predictions may be updated and correlated with 2019 surveyed traffic flows. An addendum including the updated noise assessment was submitted in May 2019.

Further to the submission of the May 2019 addendum Environmental Protection raised concerns about the potential exceedance of the noise criteria within gardens located within Edinburgh Airport noise contour. The applicant has subsequently amended their design such that no gardens are located within the Edinburgh Airport noise contour.

The previous assessment included the assessment of impacts upon existing noise sensitive receptors as it was previously agreed that the speed on the A8 Glasgow was going to be reduced to 40mph. The speed on the A8 Glasgow road has now been reduced to 40mph and any further noise reduction this has now been considered. The reduction in speed on this road has reduced noise levels affecting the site.

The Proposed Development includes a 4.5 m high acoustic barrier between the remaining landscape buffer and the proposed houses in the north of the Proposed Development. The location, extent and geometry of the noise barrier is shown on drawings 'Indicative Noise Barrier Sketch' dated 21 May 2019 with its exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019). This barrier will provide protection to the proposed outdoor amenity space along with other 1.8m acoustic barriers between the proposed units. These barriers will also provide a degree of protection to the proposed residential units.

The habitable rooms on some facades of the proposed dwellings located immediately south of the A8 Glasgow Road will need to include acoustic glazing in habitable rooms (Livingroom and bed rooms) providing a reduction of approximately 43 dBRw to external noise levels and acoustic passive ventilation - providing a minimum reduction of 43 dBRw to external noise levels. Exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019). Environmental protection shall recommend a condition is attached to ensure the noise mitigation measures are included.

Some of the proposed dwellings in the north of the site are orientated such that their gable ends face the A8. There will be no windows for habitable rooms in the gable ends and these facades have therefore been excluded from predictions of internal noise levels. exact location highlighted in Figure 2 (dated 16/5/2019) of the ITP Energised Noise assessment referenced EDI_888 (report dated 02/10/2019).

Predicted garden and external amenity area noise levels provided in Figure 2 are shown to meet the 55 dBLAeq,16hr upper guideline level in all gardens. It is noted that some areas of the gardens of the properties in the northern part of the site are predicted to exceed the criteria by up to 1 dB. Gardens and external amenity areas with areas predicted to exceed the 55 dB LAeq,16hr criterion are shown in Figure 2. The applicants proposed acoustic barriers both the 4.5 and 1.8m acoustic barriers will ensure outdoor amenity space is protected.

Noise from overflying planes are predominantly transmitted to the proposed properties via the roof. The applicant has proposed a sound reduction index of a typical pitched roof, comprising tiles on felt with 100 mm mineral wool on a plasterboard ceiling of $R_w = 43$ dB which will ensure noise from aircraft will not adversely impact amenity.

There are no proposed gardens within Edinburgh Airport 57 dB LAeq,16hr noise contour.Noise from passing trains has been re assessed and will not adversely impact the amenity of future tenants.

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

It is understood that the levels of car parking on the site remains at over 200; it was deemed excessive at 214 parking spaces for 124 dwellings with the original plan that was submitted. It is noted that the site is located in close proximity to the Glasgow Road Air Quality Management Area. This has been declared due to high levels of pollution caused by transport. Car parking numbers should be reduced. The development is reasonably well located to take advantage of local amenities and public transport network. The applicant will be required to provide a minimum of 36 (7Kw type two) electric vehicle (EV) charging points as required in the Edinburgh Design Standards. Environmental Protection recommend that 100% provision is provided. It is noted that the drawing number 02/01/K dated January 2018 highlights the location of only twenty charging points. The applicant must install all thirty-six EV charging points. They must be fully installed and operational prior to occupation. The applicant was proposing 98 driveway spaces, these must all be served with a 7KW (Type 2) 32amp electric vehicle charging point and be fully operational prior to occupation. It is noted that the installation of twenty chargers is below the minimum requirement as detailed in the Edinburgh Design Standards so therefore no addition mitigation is being proposed for a site located near the Glasgow Road AQMA.

Therefore, Environmental Protection offer no objection however Environmental Protection still believes the level of carparking is excessive and only installing the minimum number of EV charging points is not something that it can support. If consented Environmental Protection will require the following conditions to be attached;

1. The following noise protection measures to the proposed development, as defined in the ITP Energised 'Noise Assessment' report (Ref EDI_888), dated 02/10/2019:

- The Proposed Development shall include a 4.5 m high acoustic barrier between the remaining landscape buffer and the proposed houses in the north of the Proposed Development. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 32 kg/m² as a minimum (detailed in Appendix F of the noise assessment).

- The Proposed Development shall include a 1.8 m high acoustic barrier between the proposed houses. The location, extent and geometry of the noise barrier is highlighted in Figure 2 of the noise assessment. The barrier shall be constructed continuously ensuring there are no air gaps, either between the boards or at the barrier base a dry mass density of 12 kg/m² as a minimum.

- Glazing units serving the habitable rooms overlooking the A8 Glasgow Road shall have a minimum sound reduction level of 43 dB_{rw} double glazing with acoustic ventilation (specific units highlighted on figure 2 of the noise assessment).

- All roofs shall have a minimum 100mm mineral wool insulation on plasterboard installed prior to occupation.

shall be carried out in full and completed prior to the development being occupied.

2. Prior to the commencement of construction works on site:

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

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

ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

3. The residential parking space highlighted on drawing number 02/01/K dated January 2018 shall be served by 7Kw (32amp) Type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied.

4. All private driveways shall be served by at least a 13- amp 3Kw (external three pin-plug) with capacity in mains for 32 - amp 7Kw electric vehicle charging sockets. They shall be installed and operational in full prior to the development being occupied.

SEPA comment

We object to this planning application on the grounds of a lack of information in relation to flood risk and surface water drainage. We will review this objection if the issues detailed in Section 1 and 2 below are adequately addressed.

1. Flood Risk

1.1 We have reviewed the information provided in this consultation and it is noted that, although the site appears to lie out with the SEPA Flood Map, the application site is adjacent to a small watercourse and consequently the site may be at risk of flooding.

1.2 Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale. SEPA holds a wealth of information on past small catchment flooding in Scotland which has led to significant impacts upon people and property.

1.3 We previously provided pre-application advice in February 2016 (PCS/144525) and this remains unchanged. No topographic information has been provided for the small watercourse compared with existing/ proposed site levels. As such we cannot confirm whether the development and associated SUDS infrastructure are out with 1:200 year flood extent associated with this small watercourse. No information has been provided on the location/ condition of any culverted sections of the watercourse and should capacity be exceeded or become blocked there is no information on the associated flow-paths. Therefore we object to this planning application on the grounds of a lack of information in relation to flood risk.

1.4 We would request the above information detailed in paragraph 1.3, in order to better understand the potential flood risk to the site.

1.5 Should this information not address our flood risk concerns, we may require a detailed Flood Risk Assessment be provided in support of the planning application.

1.6 There is an existing sewer which crosses the site. The Engineering Layout Sheet - 2 of 3 drawing (ref. no. ENG/004/02, dated August 2016) notes that this sewer is to be removed or grouted and abandoned. We would support this as we would have been unable to support development located on top of this structure if it was to remain operational.

1.7 We recommend that contact is made with your Flood Prevention Authority to glean any information/local knowledge that they may possess.

2. Surface Water Drainage

2.1 Due to a lack of information on surface water drainage we object to this application. The objection could be removed if appropriate information as detailed in paragraph 2.3 and 2.4 below is provided in order to demonstrate that a satisfactory Sustainable Drainage System (SUDS), with no unacceptable adverse impact on the water environment, can be accommodated on site.

2.2 We note from drawings ENG/004/01 (Engineering Layout Sheet 1 of 3) and ENG/004/02 (Engineering Layout Sheet 2 of 3) that there is a proposed surface water sewer throughout the site, which drains to the proposed SUDS basin prior to discharging

to the combined sewer. It is unclear from the drawings how two levels of treatment shall be achieved by the proposed SUDS. We require clarification the other levels of SUDS to be used (e.g. porous paving, swale, filter trench).

2.3 Applicants should be using the Simple Index Approach (SIA) Tool to determine if the types of SUDS proposed are adequate, and submit the SIA output with their proposals to demonstrate the suitability of SUDS proposals for the site.

2.4 Comments should be requested from Scottish Water where the SUDS proposals would be adopted by them and, where appropriate, the views of the local authority's roads department and flood prevention unit should be sought on the SUDS strategy in terms of water quantity and flooding issues. This would not be a role for SEPA's flood risk hydrology function.

2.5 Further guidance on the design of SUDS systems and appropriate levels of treatment can be found within CIRIA's C753 manual entitled The SUDS Manual at www.ciria.org. Advice can also be found in the SEPA Guidance Note LUPS GU12 Planning Advice on Sustainable Drainage Systems (SUDS) and SEPAs regulatory method WAT-RM-08 for SUDS. Further information can also be found in the Water Assessment and Drainage Assessment Guide produced by the Sustainable Urban Drainage Scottish Working Party (SUDSWP).

3. Air Quality

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

Greenhouse gas emissions

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

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

3.4 Greenhouse gas emissions from road traffic are expressed as grams of carbon dioxide emitted per kilometre travelled (g/km), therefore every additional km travelled will increase the emissions of greenhouse gases. Road transport emissions account for 72.4% of all transport emissions of greenhouse gases and cars account for over half road

emissions. "The Climate Change (Scotland) Act 2009 sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set in secondary legislation". Section 5 of the Scottish Government's Climate Delivery Plan describes the issue in detail.

Cumulative effects of development

3.5 When considered in isolation, a single development will appear to have a negligible impact on local air quality. However, when the same development is considered alongside other developments in the area, the cumulative impact could be more significant - particularly along main commuter routes.

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

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

Detailed advice for the applicant

4. Flood Risk

Caveats & Additional Information for Applicant

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

4.2 We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>. Please note that this document should be read in conjunction Policy 41 (Part 2).

4.3 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.

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

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

5. Surface Water Drainage

5.1 Please note that we have lodged an objection to this application due to a lack of information to assess the acceptability of your proposals for surface water drainage. For this type of development, two levels of sustainable drainage (SUDS) surface water treatment will be required. We would request the submission of a scaled annotated site plan which demonstrates that an appropriate surface water (SUDS) scheme can be accommodated within the site layout. We also request the submission of the Simple Index Approach (SIA) Tool output to be submitted, as detailed in paragraph 2.3.

SEPA further comment

Thank you for your consultation email, in reference to Flood Risk Assessment (Nov2018) [dated 06/12/2018 on your planning portal], which SEPA received on 14 December 2018.

We appreciate that you were able to extend the consultation deadline until 16 January. Please note that this letter relates to flood risk. See our letter of 19 October 2018 for advice on other issues.

Advice for the planning authority

We object to this planning application on the grounds of a lack of information related to flood risk. We will review this objection if the issues detailed in Section 1 below are adequately addressed.

Flood risk

Executive Summary Outlining Policy Context

We maintain our objection to the proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy.

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

Technical Report

We most recently responded to this application on the 19 of October 2018. We objected due to lack of information and requested further information on flood risk. In the first instance, we requested topographic information but highlighted that if this information was insufficient we would request a detailed Flood Risk Assessment (FRA).

A FRA has been submitted in support of the application. Hydrological analysis has been undertaken and we would highlight that there are uncertainties with these flows due to the small catchment area of the watercourse in the north-western corner.

It is stated in section 3.5, of the FRA, that "water will inundate the area upstream of the culvert until overland flow onto Glasgow Road at a level of 37.36mOD occurs." Review of the topographic information supplied shows that the relief level of Glasgow Road is 38.36mAOD. The drawing titled "Levels Layout" indicates that ground levels will be lowered below existing ground levels and the minimal finished floor levels is set at 38.80mAOD. We would request that the flood extent is shown on a site plan, indicating the area of inundation up to the relief level of Glasgow Road, and that no built development, including SUDs, should be within this area. We would also request that finished floor levels are set a minimum of 600mm above the relief level of Glasgow Road.

We would strongly recommend that a cut off drain is incorporated into the design to capture surface water runoff from the field to the south of the proposed development.

Summary of Technical Points

In summary, we wish to receive clarification on the following points before we would consider removing our objection to the proposed development:

Flood extent is shown on a site layout

No built development within the flood extent, including SUDs

Finished Floor Levels set a minimum of 600mm above the relief level of Glasgow Road

Caveats & Additional Information for Applicant

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

We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk

Assessments and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>. Please note that this document should be read in conjunction Policy 41 (Part 2).

Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.

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

SEPA further comment

Executive Summary Outlining Policy Context

We maintain our objection to the proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy.

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

Advice for the planning authority

1. Flood risk

Technical Report

1.1 We previously responded to this application on the 19th of October 2018 and most recently on the 15th of January 2019. We maintained our objection and requested the following; flood extent is shown on a site layout, no built development within the flood extent including SUDs and finished floor levels set a minimum of 600mm above the relief level of Glasgow Road.

1.2 A letter from Terrenus Land & Water has been submitted since our previous response. Within this letter the flood extent has been shown on a site location plan.

1.3 We are unable to support built development, including SUDs within this flood extent and therefore continue to request that the SUDs basin is located outwith the area of inundation as shown within the topographic survey provided.

1.4 We continue to strongly recommend that a 600mm freeboard is applied to finished floor levels.

Summary of Technical Points

1.5 In summary we wish to receive clarification on the following points before we would consider reviewing our objection to the proposed development:

- o No built development within the flood extent, including SUDs.

Detailed advice for the applicant

2. Flood risk

Caveats & Additional Information for Applicant

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

2.2 We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>. Please note that this document should be read in conjunction Policy 41 (Part 2).

2.3 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.

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

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

SEPA further comment

Advice for the planning authority

We are now in a position to remove our objection to the proposed development on flood risk grounds. Notwithstanding the removal of our objection, we would expect Edinburgh Council to undertake their responsibilities as the Flood Prevention Authority.

1. Flood Risk Technical Report

1.1 We most recently responded to this application on the 11th of April 2019. We maintained our objection and requested that no built development within the flood extent, including SUDs.

1.2 Since our previous letter further information has been submitted from Terrenus in the form of a letter dated the 8th of March 2019. It is proposed that a swale feature is installed to the south of the A8 Glasgow Road to direct any ponded water towards the proposed drainage underneath the A8. This will reduced the area of inundation and therefore the proposed SUDs feature will be outwith the flood extent.

We continue to strongly recommend that a 600mm freeboard is applied to finished flood levels.

Detailed advice for the applicant

2. Flood risk

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

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

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

SEPA updated comment

We have previously provided advice on the planning application and understand we have been reconsulted for input on revised site designs. These alterations comprise a change in the number and composition of the proposed dwellings (as described in the Design and Access Statement dated December 2019). It also appears that a swale feature which was proposed to direct ponded water to the culvert below Glasgow Road is not included on the current drainage design (Drawing No. 2381-20-4 Rev D).

We were able to remove a previous flood risk objection to the application (letter dated 23 April 2019 under PCS/164990) on the basis of the installation of the swale. This measure was described by Terrenus Land & Water Ltd in their letter of 08 March 2019. Whilst we have no additional comments on the amendments to the layout of the dwellings, as the swale no longer forms part of the proposal we object to the application on the grounds of lack of information. This feature was necessary to reduce the area of water inundation to the North West of the site and therefore ensure the proposed SuDS feature will be outwith the flood extent.

If an amended drainage design is issued showing the reinstatement of the swale, we will be happy to reconsider our position. Please note it also appears that the new foul drainage pipe work (between MH F100 and F7) is to be routed beneath bunding proposed around the SuDS feature and we recommend that this be reconsidered. Access and maintenance of this foul drainage pipework may become difficult if bunding is proposed on top. The council Flood Officers should comment on these proposals.

Please refer to our previous responses for further advice pertinent to this proposal.

Ratho + District Community Council comment ' Scheme 1

Ratho & District Community Council supports this application but wishes to comment on the following related issues:

a) Access into and egress from the development on Glasgow Road is proposed on the basis of turn left into the site only and turn left out of the site only. The Community Council recommends that consideration be given to the provision of a fully signalised junction thus enabling controlled right turn and left turn access to/egress from the development.

b) The existing footbridge (DDA non-compliant) enabling safe pedestrian access to the north side of Glasgow Road is located some considerable distance from the development site. The Community Council therefore recommends that consideration be given to the provision of a signalised pedestrian crossing adjacent to the proposed development thus allowing safe access to city-bound bus services.

c) The Community Council supports the need for improved community facilities in Ratho Station and recognise that this need will increase by the addition of 133 new dwellings in that community.

Edinburgh Airport comment

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

Submission of a Bird Hazard Management Plan

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

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

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

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

Height Limitation on Buildings and Structures

No building or structure of the development hereby permitted shall exceed 30m AGL.

Reason: Development exceeding this height would penetrate the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger aircraft movements and the safe operation of the aerodrome. See Advice Note 1 'Safeguarding an Overview' for further information (available at <http://www.aoa.org.uk/operations-safety/>).

Submission of SUDS Details

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

- o Attenuation times*

- o Profiles & dimensions of water bodies
- o Details of marginal planting

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

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

We would also make the following observations:

Cranes

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

Lighting

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

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

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

Edinburgh Airport updated comment

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

Submission of a Bird Hazard Management Plan

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

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

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

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

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

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

Submission of Landscaping Scheme

No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Planning Authority, details must

comply with Advice Note 3 'Wildlife hazards' (available at <http://www.aoa.org.uk/operations-safety/>). These details shall include:

- o any earthworks
- o grassed areas
- o the species, number and spacing of trees and shrubs
- o details of any water features
- o drainage details including SUDS - Such schemes must comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)
- o others that you or the Authority may specify and having regard to Advice Note 3: Wildlife Hazards.

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

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

Submission of SUDS Details

Development shall not commence until details of the Sustainable Urban Drainage Schemes (SUDS) have been submitted to and approved in writing by the Planning Authority. Details must comply with Advice Note 3 'Wildlife Hazards'. The submitted Plan shall include details of:

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

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

Reason: To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)

We would also make the following observations:

Cranes

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

Lighting

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

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

Scottish Water comment

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

Water

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 within boundary

According to our records, the development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at 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.

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 normally accept any surface water connections into our combined sewer system.

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

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

Waste Services initial comment

Waste Management Responsibilities

The Waste and Cleansing Services will be responsible for managing the waste from households and any Council premises only. I am assuming this would include this development.

Compliance with Waste Strategy (Domestic Waste Only)

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

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

For high density properties such as the apartments, we would recommend communal waste containers for landfill waste, mixed recycling for paper and packaging, glass, and food. Since there are four terrace houses in between the two bin stores, these properties would find it most convenient to use the bin stores. The number of bins required is calculated on the number of properties using each bin store, so if 11 properties (9 flats and 2 of the terrace houses) are to use each bin store, there would need to be 2 residual 1280L, 2 mixed recycling 1280L, 1 glass 360L and 1 food 240L. Information showing the dimensions of the communal containers has already been provided for your information

in the Architect Instructions, which should be used to ensure bin stores are of an adequate size.

However, it should be noted that due to changes within the service over the next three years, the communal bin requirements will change, and you should review these with us prior to starting work.

It is usually most appropriate for townhouses to have individual kerbside collections. This provides each property with landfill (140 litres); mixed recycling (240 litres), glass (box), food bin and kitchen caddy. Brown bins are not part of the standard set any longer, since residents will have to register and pay for the garden waste service separately. All of these must be presented at the agreed location on the day of collection before a specified time and removed thereafter. They must otherwise be stored within the curtilage of the property at all times.

Developers can either source their own bins in line with our requirements, or can arrange for us to do so and recharge the cost - this will probably be most convenient for them. We require 12 weeks' notice for bin orders, in order to arrange for the ordering, manufacture and delivery of bins.

Although there is no details of any commercial aspect, for completeness, it would be the responsibility of any third party commercial organisations using the site to source their own trade waste uplifts and comply with legislation, in particular the Waste (Scotland) Regulations which require the segregation of defined waste types to allow their recycling.

Operational Viability

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

There are some issues on the swept path analysis provided, where the overhang encroaches on the verge or footpath, and there is no clear exit at the bottom of the site. Other issues have been identified, and an agreement on the waste strategy would be subject to these issues being addressed.

I would recommend further contact with me to ensure adequate provision of segregated household waste bins include all of the above and suitable access for the refuse collectors is arranged.

SEPA comment

Advice for the planning authority

We object to this planning application on the grounds of a lack of information in relation to flood risk. We will review this objection if the issue detailed in Section 1 below are adequately addressed.

Flood Risk

We previously commented on this site in November 2016 and no additional information has been submitted to address our concerns. As such we have included our previous comments below and recommend we are re-consulted once this additional information has been submitted.

We have reviewed the information provided in this consultation and it is noted that, although the site appears to lie out with the SEPA Flood Map, the application site is adjacent to a small watercourse and consequently the site may be at risk of flooding.

Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale. SEPA holds a wealth of information on past small catchment flooding in Scotland which has led to significant impacts upon people and property.

We previously provided pre-application advice in February 2016 (PCS144525) and this remains unchanged. No topographic information has been provided for the small watercourse compared with existing/ proposed site levels. As such we cannot confirm whether the development and associated SUDS infrastructure are out with 1:200 year flood extent associated with this small watercourse. No information has been provided on the location/ condition of any culverted sections of the watercourse and should capacity be exceeded or become blocked there is no information on the associated flow-paths. We would request this information to better understand the potential flood risk to the site. Should this information not address our flood risk concerns, we may require a detailed Flood Risk Assessment be provided in support of the planning application.

There is an existing sewer which crosses the site. The Drainage Layout drawing (ref. no. 2381-20-2 B, dated 06/04/2018) notes that this sewer is to be removed or grouted and abandoned. We would be unlikely to support development located on top of this structure if it was to remain operational.

We recommend that contact is made with your Flood Prevention Authority to glean any information/ local knowledge that they may possess.

Drainage

We provided an email to all local authorities on 30 March 2017 confirming that from May 2017 our standing advice for SUDS would be extended to include major developments and that we would no longer be providing site specific SUDS advice on major developments, excluding EIA. We therefore refer your authority to our standing advice on SUDS.

Detailed advice for the applicant

Flood Risk

Caveats & Additional Information for Applicant

The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative

and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.

We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from www.sepa.org.uk/flooding/planning_flooding.aspx. Please note that this document should be read in conjunction Policy 41 (Part 2).

Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from http://www.sepa.org.uk/flooding/planning_flooding/fra_checklist.aspx

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

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

SEPA Comment 5 November 2020

Thanks for sharing the email from Taylor Wimpey East Scotland, which includes an updated Drainage Layout (Drawing No. 2381-20-6 Rev F), in response to our letter of 23 January 2020. We have considered this, in conjunction with our flood risk team, and can confirm that we can remove our objection to the planning application on this basis. We note the SUDS pond has been moved outwith the functional floodplain and away from the swale to the north.

Flood Prevention comment

We have looked at the application and have the following comments.

o Planning Committee on 30 March 2017 approved the permanent implementation of the certification procedure in the assessment of the flooding impact of new development during the planning application process.

o The applicant has not completed a self-certification checklist or declaration for this application covering the design of the surface water network. The checklist should be completed to provide a summary of the information submitted in support of the application. As this development is classed as a major development under Planning

definition then an independent consultant is required to check the design and submission. They must then sign the required declaration for inclusion with the application prior to issue to CEC Flood Prevention. Template attached.

o The applicant has not completed a declaration for this application covering the flood risk assessment. As this development is classed as a major development under Planning definition then an independent consultant is required to check the design and submission. They must then sign the required declaration for inclusion with the application prior to issue to CEC Flood Prevention. Template attached.

o Could the applicant provide an updated version of drawing 2381-20-2 or similar drainage layout drawing, showing the connection into the Royal Highland Showground drainage system.

o Could the applicant confirm they have permission to connect into the Royal Highland Showground Drainage system?

o We note on drawing 1702-204-002 (dated 03/05/18) that the proposed surface water discharge rate is 8l/s. This is accepted by CEC flood prevention.

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

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

o Please stipulate who will adopt and maintain the surface water network, including any SUDS

o CEC's default position is to achieve 600mm freeboard above 200+30% climate change flood levels for finished floor levels in buildings. This is in line with SEPA who request 600mm freeboard independent of climate change (Technical Flood Risk Guidance for Stakeholders- SEPA requirements for undertaking a Flood Risk Assessment).

o Initially we would request that the finished floor level (FFL) is raised to achieve 600mm freeboard, but we appreciate that this is not always possible based upon topography and other elements of design. A justification should be provided in the documents to describe why the FFL cannot be raised.

o If the FFL cannot be raised then the applicant should work through the Environment Agency Accounting for Residual Uncertainty methodology (formerly known as fluvial freeboard guide) to demonstrate that a lower freeboard is applicable based upon the confidence of the data used in production of the FRA. The minimum freeboard that CEC Flood Prevention will accept is 300mm.

o Can you describe the process used to determine the peak flood level of 38.36mAOD?

Flood Prevention updated comment

The applicant has not provided a Surface Water Management Plan (SWMP) report. A SWMP should be provided in line with the self-certification scheme - details of which can be found at the link in my signature below. A self-certification checklist and declaration should be provided to support the application. I have attached copies of the checklist and declaration to be completed by the applicant. Once this has been submitted, I can review and provide comment on the documents already submitted on the portal.)

Flood Prevention updated

All information has now been submitted as requested. There is no flood risk remaining.

Communities+Families comment

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

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

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

Assessment and Contribution Requirements

Assessment based on:

36 Flats

96 Houses

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

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

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

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

If the appropriate infrastructure and land contribution is provided by the developer, as set out below, Communities and Families does not object to the application.

Total infrastructure contribution required:

£1,669,632

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

Total land contribution required:

£213,168

Note - no indexation to be applied to land contribution.

Roads Authority Issues comment

The road layout must comply with the Edinburgh Street Design guidelines (ESDG) and requires amendment with respect to;

- a) Corner radii ' the maximum on local roads is 3m, with 6m on secondary roads (e.g. A8 junction). There are many junctions with radii of well in excess of this which is not acceptable. This will be subject to swept path considerations, but the general presumption is that corner radii should comply with these design principles.;*
- b) Footways adjacent to end on parking bays should be a minimum of 2.5m (to allow for vehicle overhang);*
- c) The streets should be designed to 20-mph standard (the designer should refer to ESDG for guidance on this);*
- d) The remote paths throughout the development (e.g. those linking to Ratho Station Park) should be a minimum of 4m in width to allow for shared cycle-pedestrian use;*
- e) Car parking should be designed to have a minimal visual impact on the streetscape. Large expanses of end on parking bays in particular are not desirable;*
- f) The proposal is to provide 219 car spaces (out of a maximum of 233) which is very much at the upper end of the parking standards. This should be reviewed in line with the EDG and alternative provision/layout considered (including a possible reduction in on street parking numbers).*

In addition to the above, the following points need to be addressed;

- a) There are several areas where the footway layout is poor, with the footway ending with no obvious connection, not on desire lines, etc. The footway layout should be reviewed to ensure there is a linked and coherent footway layout throughout the site;*

- b) Several roads are shown as block paved with a footway on one side, but it is not clear if these are to function as a shared space. Generally, there should be a footway on both sides of the road where it is not a shared space arrangement. I would expect to see footways on most of the roads here, a few of the shorter cul-de-sacs can be a shared space layout. Many of the grass verges (service strips) will have to be changed to 2m wide footways;
- c) The layout of the parking bays on the road off the A8 (adjacent blocks 79-84) is nonstandard and will need further consideration;
- d) Given the increase in the number of units, we require a brief update (addendum) to the transport assessment confirming that the effect on the traffic generation is not significant;
- e) The junction at the A8 ' the island here should be a pedestrian refuge island and allow for accommodating the cycle/pedestrian path on the south side of the A8. This preferably should be a priority crossing for cycles-pedestrians at this junction;
- f) The Council may introduce a peak hour, no left turn (possibly evenings 16:00 ' 18:00) from the A8 into the development to address residents' concerns about potential rat running. This can be discussed further with the applicant to consider the implications for the development access arrangements;
- g) In addition to the above measure, the north-south road off the A8 should be re-designed to no longer be a through route. This will result in all traffic entering or egressing the site having to navigate the internal roads. Whilst this may result in a minor inconvenience to residents, it will likely further discourage any through commuter traffic from the A8;
- h) Cycle Parking; There should be a total of 76 spaces to serve the apartment blocks (2 per dwelling unit). This must include a suitable design and space for non- standard cycles (e.g. bike trailers) within the overall provision (note ' wall hanger type not acceptable). The facility must be suitable for easy access. The cycle parking stores proposed for the apartment blocks are not acceptable. The layout is poor and does not allow for proper access and will likely not be usable in the form shown;
- i) Some of the grass verges will need footway links (but see point 2(b) regarding grass service strips);
- j) The junction design proposed at the A8 will require further consideration and discussion. The existing parking lay-by on the A8 will have to be amended to take into account the new junction. The sightlines will have to be checked to ensure compliance with DBRB standards on junction visibility.

The applicant will be required to;

- a. Design, procure and construct a Toucan Crossing on the A8 (Glasgow Road) at a location to be confirmed by Head of Planning, at no cost to the Council. Design to be approved in writing by Head of Planning prior to commencement of any works on the development site and fully commissioned prior to occupation of any dwelling house. Note that the design will likely required the upgrading of the street lighting in the vicinity of the crossing and speed activated advanced warning signs on each approach. (Reason; for residents of the new development to safely access public transport services on the A8 ' reference policies in LDP Del 1 and Tra 1 and LTS Walk1);
- b. Contribute the sum of £2,000 to progress a suitable order to introduce a no left turn (peak hour) on the A8;
- c. Contribute the sum of £2,000 to progress a suitable order to introduce waiting and loading restrictions as necessary;

d. Contribute the sum of £2,000 to promote a suitable order to introduce a 20pmh speed limit within the development, and subsequently install all necessary signs and markings at no cost to the Council.

(Note- The applicant should be advised that the successful progression of any Order is subject to statutory consultation and advertisement and cannot be guaranteed);

All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;

The applicant should note that the Council will not accept maintenance responsibility for underground water storage / attenuation;

In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;

The applicant should note that new road names will be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity;

The application has been assessed under the 2017 parking standards. (zone 3),

These permit;

Car parking spaces:

A maximum of 233 spaces (1.5 per unit for 3 rooms, 2 spaces for 4+ rooms).

Number of spaces proposed is 219, comprising 119 on street (communal) spaces and 100 garage/driveway spaces.

See point 1(f) above with regard to the overall number of car parking spaces.

Motorcycle parking spaces;

A minimum of 6 spaces required (1 per 25 units)

These should be provided on street.

Cycle parking spaces;

A minimum of 76 spaces required. These are for the apartment blocks, the houses will have suitable space within the curtilage of the unit.

The cycle parking layout is not acceptable (see point 2(h) above).

EV Spaces;

*The standards require 1 in 6 communal spaces to have EV charging points which would equate to 20 spaces for the 119 on street/parking court spaces.
The provision for the 100-private driveway/garage parking should comprise provision for suitable charging points.*

The developer is proposing 20 on street EV spaces, which is in line with the parking standards and provision for charging within the garage/driveways.

It is noted that CEC Environmental Protection have made recommendations relating to EV charging in their consultation response dated 13.02.20 these should be included in conditions or informatives as appropriate.

Note on Transport Assessment

A transport assessment has been submitted in support of the application. This has been assessed by transport officers and is considered a reasonable reflection of both the estimated traffic generated by the development and of the traffic on the surrounding road network. The submitted document is generally in line with the published guidelines on transport assessments. An addendum to the assessment has been requested to take cognisance of the increase in the number of units.

Affordable Housing comment

1. Introduction

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

Housing Management and Development are the statutory consultee for Affordable Housing. Housing provision is assessed to ensure it meets the requirements of the city's Affordable Housing Policy (AHP).

- o Policy Hou 6 Affordable Housing in the Edinburgh Local Development Plan states that planning permission for residential development, including conversions, consisting of 12 or more units should include provision for affordable housing.*
- o 25% of the total number of units proposed should be affordable housing.*
- o The Council has published Affordable Housing Guidance which sets out the requirements of the AHP, and the guidance can be downloaded here:*

<https://www.edinburgh.gov.uk/affordable-homes/affordable-housing-policy/1>

2. Affordable Housing Provision

This current proposal is for a development of 132 homes, comprising a mix of houses and flats. The applicant has stated that 33 homes (25%) will be an approved affordable housing tenure. This accords with the requirements of the AHP.

The application was first submitted in 2016. Housing Management and Development provided a consultation response in December 2018. An amended scheme and revised Affordable Housing Statement were submitted in October 2020. This consultation response reflects on the changes that have been made.

The number of homes proposed on the site has increased from 124 to 132. The number of affordable homes has increased from 31 to 33 to reflect the increased density. The mix of affordable housing tenure, type and size has also changed.

Tenure

The amended scheme has a much-improved mix of affordable housing tenures. The number of homes to be delivered by a Registered Social Landlord (RSL) is 24, all of which are expected to be delivered for social rent (73% of the affordable homes).

The previous scheme proposed 21 homes to be delivered by a RSL (12 homes for social rent and 9 for mid-market rent). This significant increase in homes delivered for social rent is welcome as this is the highest priority tenure. It exceeds the expectation of 'Affordable Housing' guidance that 70% of affordable homes should be delivered as social rent.

The applicant has recently engaged with a RSL who is willing to deliver homes for social rent on the site, but the parties are yet to enter into contract. It should therefore be noted that it is yet to be confirmed that the homes will be sold to the RSL at price that would enable social rent.

The other 9 affordable homes (27%) will be provided as Golden Share (homes sold at 80% of market value). This is acceptable as when the application was first submitted the affordable housing guidance that was in place at the time only sought to limit the proportion of affordable homes delivered as Golden Share to below 30%.

Housing Mix and Location

To meet the full range of local housing needs and create more diverse and integrated communities, the Council's guidance on 'Affordable Housing' guidance states that 'a representative mix of house types and sizes should be provided'.

The proposed affordable housing is now comprised of 18 flats (in two connected blocks of nine flats) and 15 houses. There will be 2 one-bed, 22 two-bed and 9 three-bedroom affordable homes. Most of the affordable homes will be in the north-west corner of the site with good access to the public park and public transport links.

The number of three-bedroom affordable units has increased from 8 to 9 in the amended scheme which is a welcome, although small, improvement. However, the proportion of affordable homes that are houses with a private garden rather than flats has fallen from 71% to 45% (15 out of 33 of the affordable homes), in comparison to 82% of the market homes.

The amended scheme is not in line with the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development.

It is understood that the high proportion of affordable flats is in response to concerns raised by the Council's Environmental Assessment service about having houses with private gardens in the north-west corner of the site within the airport noise contour. 18 affordable flats with a communal garden are now proposed in this location.

Housing Management and Development asked the applicant to review the proposed mix to see if a more representative mix can be achieved. However, the applicant has stated that the mix can be justified as after several years it is the solution that achieves the best fit with all the objectives and planning and environmental policy requirements. The proposed mix of affordable house types and sizes is supported by a RSL.

Overall assessment

The amended scheme does not meet the requirements of the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development.

However, the amended scheme will deliver an increased number of affordable homes on a long-standing housing site in Ratho Station. The amended scheme has a much-improved mix of tenure types, with a significant increase in homes expected to be delivered for social rent across a range of house types and sizes. The proposed mix of affordable house types and sizes is supported by a RSL.

On balance, the provision of affordable housing proposed in the amended scheme is acceptable to Housing Management and Development.

The affordable homes are required to be tenure blind, fully compliant with latest building regulations and informed by guidance such as Housing for Varying Needs and relevant design guides.

It is important to note that this response is on the basis that the future occupants of the 18 affordable flats that are now within or close to the airport noise contour will have appropriate amenity.

3. Summary

The applicant is proposing to provide the 25% (33) of on-site affordable homes in accordance with LDP Policy Hou 6. If planning permission is to be granted this should be secured through a S75 legal agreement.

The amended scheme does not meet the requirements of the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development

However, the amended scheme will deliver an increased number of affordable homes on a long-standing housing site in Ratho Station. The amended scheme has has a much-

improved mix of tenure types, with a significant increase in homes expected to be delivered for social rent across a range of house types and sizes.

On balance, and provided that future occupants of the affordable homes will have appropriate amenity, the provision of affordable housing proposed in the amended scheme is acceptable to Housing Management and Development.

Affordable Housing ' Updated Final Response

Housing Management and Development are the statutory consultee for Affordable Housing.

Housing provision is assessed to ensure it meets the requirements of the city's Affordable Housing Policy (AHP).

- Policy Hou 6 Affordable Housing in the Edinburgh Local Development Plan states that planning permission for residential development, including conversions, consisting of 12 or more units should include provision for affordable housing.

- 25% of the total number of units proposed should be affordable housing.

- The Council has published Affordable Housing Guidance which sets out the requirements of the AHP, and the guidance can be downloaded here:

<https://www.edinburgh.gov.uk/affordable-homes/affordable-housing-policy/1>

2. Affordable Housing Provision

This current proposal is for a development of 132 homes, comprising a mix of houses and flats. The applicant has stated that 33 homes (25%) will be an approved affordable housing tenure. This accords with the requirements of the AHP. The application was first submitted in 2016. Housing Management and Development provided a consultation response in December 2018. An amended scheme and revised Affordable Housing Statement were submitted in October 2020. This consultation response reflects on the changes that have been made.

The number of homes proposed on the site has increased from 124 to 132. The number of affordable homes has increased from 31 to 33 to reflect the increased density. The mix of affordable housing tenure, type and size has also changed.

Tenure

The amended scheme has a much-improved mix of affordable housing tenures. The number of homes to be delivered by a Registered Social Landlord (RSL) is 24, all of which are expected to be delivered for social rent (73% of the affordable homes). The previous scheme proposed 21 homes to be delivered by a RSL (12 homes for social rent and 9 for mid-market rent). This significant increase in homes delivered for social rent is welcome as this is the highest priority tenure. It exceeds the expectation of 'Affordable Housing' guidance that 70% of affordable homes should be delivered as social rent.

The applicant has recently engaged with a RSL who is willing to deliver homes for social rent on the site, but the parties are yet to enter into contract. It should therefore be noted that it is yet to be confirmed that the homes will be sold to the RSL at price that would enable social rent. The other 9 affordable homes (27%) will be provided as Golden Share

(homes sold at 80% of market value). This is acceptable as when the application was first submitted the affordable housing guidance that was in place at the time only sought to limit the proportion of affordable homes delivered as Golden Share to below 30%.

Housing Mix and Location

To meet the full range of local housing needs and create more diverse and integrated communities, the Council's guidance on 'Affordable Housing' guidance states that 'a representative mix of house types and sizes should be provided'. The proposed affordable housing is now comprised of 18 flats (in two connected blocks of nine flats) and 15 houses. There will be 2 one-bed, 22 two-bed and 9 three-bedroom affordable homes. Most of the affordable homes will be in the north-west corner of the site with good access to the public park and public transport links.

The number of three-bedroom affordable units has increased from 8 to 9 in the amended scheme which is a welcome, although small, improvement. However, the proportion of affordable homes that are houses with a private garden rather than flats has fallen from 71% to 45% (15 out of 33 of the affordable homes), in comparison to 82% of the market homes.

The amended scheme is not in line with the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development.

It is understood that the high proportion of affordable flats is in response to concerns raised by the Council's Environmental Assessment service about having houses with private gardens in the north-west corner of the site within the airport noise contour. 18 affordable flats with a communal garden are now proposed in this location.

Housing Management and Development asked the applicant to review the proposed mix to see if a more representative mix can be achieved. However, the applicant has stated that the mix can be justified as after several years it is the solution that achieves the best fit with all the objectives and planning and environmental policy requirements. The proposed mix of affordable house types and sizes is supported by a RSL.

Overall assessment

The amended scheme does not meet the requirements of the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development. However, the amended scheme will deliver an increased number of affordable homes on a longstanding housing site in Ratho Station. The amended scheme has a much-improved mix of tenure types, with a significant increase in homes expected to be delivered for social rent across a range of house types and sizes. The proposed mix of affordable house types and sizes is supported by a RSL.

On balance, the provision of affordable housing proposed in the amended scheme is acceptable to Housing Management and Development. The affordable homes are required to be tenure blind, fully compliant with latest building regulations and informed by guidance such as Housing for Varying Needs and relevant design guides.

It is important to note that this response is on the basis that the future occupants of the 18 affordable flats that are now within or close to the airport noise contour will have appropriate

amenity.

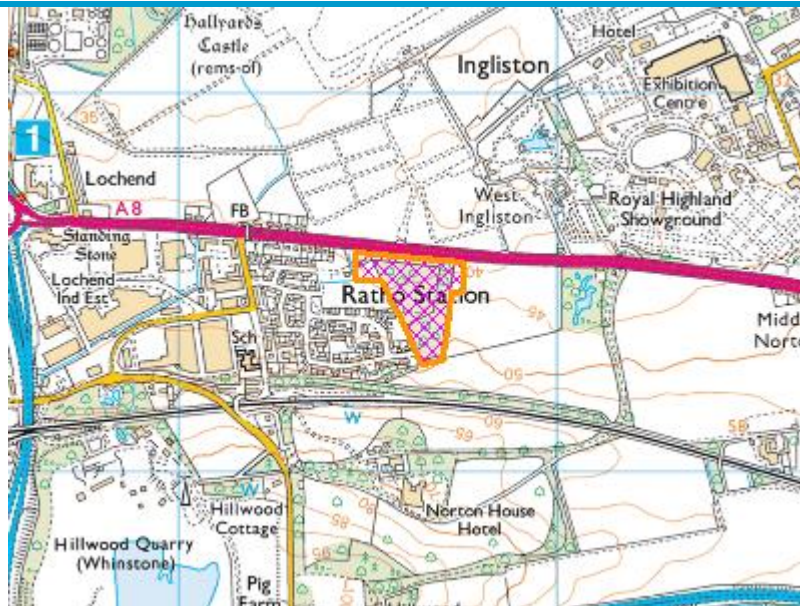
3. Summary

The applicant is proposing to provide the 25% (33) of on-site affordable homes in accordance with LDP Policy Hou 6. If planning permission is to be granted this should be secured through a S75 legal agreement.

The amended scheme does not meet the requirements of the Council's guidance on 'Affordable Housing' as the mix of affordable house types and sizes is not representative of the wider development. However, the amended scheme will deliver an increased number of affordable homes on a longstanding housing site in Ratho Station. The amended scheme has a much-improved mix of tenure types, with a significant increase in homes expected to be delivered for social rent across a range of house types and sizes.

On balance, and provided that future occupants of the affordable homes will have appropriate amenity, the provision of affordable housing proposed in the amended scheme is acceptable to Housing Management and Development.

Location Plan



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