

Development Management Sub Committee

Wednesday 2 March 2022

Application for Planning Permission in Principle 21/04210/PPP

**at land 369 metres Northeast of , 210 Craigs Road,
Edinburgh.**

Residential development, ancillary retail use, active travel route, open space, landscaping, access, services and all associated infrastructure.

Item number

Report number

Wards

B01 - Almond

Summary

The principle of residential development is contrary to policy Hou 1 part 1 of the Edinburgh Local Development Plan as the proposed development is not an allocated site or located within the urban area and fails to comply with the criterion identified with Policy ENV 10. The proposal is not considered to be a sustainable development in accordance with the principles set out within the SPP.

The proposal will be detrimental to the setting of the Category B Listed Building and Garden Designed Landscape (GDL), contrary to LDP Env 3 and Env 7.

The application fails to demonstrate compliance with Edinburgh Local Development Plan Policies Tra 1, Tra 2 and Tra 8, in terms of transport and accessibility with specific reference to the reliance on private car usage.

The application fails to demonstrate that a good level of amenity can be achieved through compliance with Edinburgh Local Development Plan Policy Des 5 in terms of potential noise and odour impacts from nearby uses.

The proposal does not comply with Policy Del 1 as suitable provision cannot be identified to mitigate the impact of the additional 500 homes on local education infrastructure.

In summary, the proposal is not in accordance with the Local Development Plan. It is not sustainable development in accordance with the principles set out within the SPP. The proposal harms the setting of the nearby listed water tower and fails to meet the requirements of Section 59 of the Planning (Listed Building and Conservation Area) (Scotland) Act.

Links

<u>Policies and guidance for this application</u>	HES, HESSET, LEN03, LEN07, LEN08, LEN09, LEN10, LEN12, LEN16, LEN21, LEN22, LDES01, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LHOU01, LHOU06, LTRA01, LTRA02, LTRA07, LTRA08,
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Report

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Recommendations

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

Background

2.1 Site description

The application site is located between allocated housing sites HSG 19 (Maybury) and HSG 20 (Cammo) located towards the north-western edge of Edinburgh. The site is designated as Green Belt in the Edinburgh Local Development Plan.

The site is a single agricultural field that extends to 20 hectare/59 acres, of which 50.6 acres is development area.

The site is bounded to the north by a Garden and Designed Landscape (GDL) associated with Cammo House, within which, the Category B Cammo Tower (reference LB 28039) and Mauseley Hill are features within a wider Special Landscape Area (SLA). A ditch leading east to the Bughtlin Burn, mature trees and stone walling separate the site from Cammo Estate.

The Bughtlin Burn runs from east to west along the boundary between the adjacent field and HSG 20, before heading north along the western edge of the HSG 20 site. Whilst large parts of Cammo Estate function as a public park, its southernmost area is not owned by the City of Edinburgh Council and remains in agricultural use.

A paddock and The City of Edinburgh Council's amenity site at the former Braehead Quarry, which is now used for topsoil storage, stands to be west of the site, between the site and Turnhouse Golf Course.

Craigs Road and the allocated land associated with HSG 19 (Maybury) bound the site to the south where construction is underway.

The site is characterised by a downwards slope, falling from south to north, with the high point located within a former paddock located off Craigs Road (65m AOD), and the low point in the north-eastern corner (30m AOD), where there is a small localised area prone to semi-permanent surface water ponding.

The site is approximately 800 metres from the Edinburgh Gateway rail / tram station. There is also a petrol station located about 800 metres from the site and the Gyle Shopping Centre is approximately 600 metres away.

The site is about 800 metres from the new Maybury Primary, Nursery & Health centre (opening August 2023), and approximately 1400 metres from Craigmount High School.

It is an approximately 20-minute walk to Edinburgh Park and a 10-minute cycle to Gogarburn.

2.2 Site History

There is no relevant planning history for this site.

Main report

3.1 Description of the Proposal

Proposal

The application seeks Planning Permission in Principle for a new residential development, ancillary retail use, active travel route, open space, landscaping, access, services and all other associated infrastructure.

The indicative masterplan proposes up to 500 new family homes in a range of house and flat types, 50% of which would be affordable.

The masterplan adopts a landscape first approach. The key landscape design principles include the creation of substantial landscaping along Craigs Road to the south and a robust edge along the western boundary creating a threshold to the greenbelt and informal public open space.

Landscaped open space and woodland covering 40% of the site is proposed comprising one three-hectare public park with LEAP play equipment and two 0.5 hectares small public parks with LAP play equipment, along with a community growing space.

The proposed 'North Park' would be linear park which would create a northern edge to the development with SUDs integrated into low lying ground to promote new habitats and biodiversity, which would be overlooked by residential development edge.

The proposed 'Paddock' would be a small parcel of land contained in former field boundaries to the south of the site which would create open space and play areas. Linear parks are proposed through the site, focusing views towards Mauseley Hill and Cammo Tower.

The 20m wide sewer wayleave and protected historical view corridor (Linear Open Space and South Avenue) aim to provide useable open space and viewpoints from higher ground.

Around 1,820 new trees are proposed to be planted as part of the proposal. The proposal aims to retain existing perimeter trees and reinforce existing woodland and planting on the areas of steeply sloping ground and introduce avenues of trees to reduce build development massing.

The indicative masterplan proposes a hierarchy of streets with perimeter blocks with active frontages and a landscaped public realm. The proposed density graduates from north-east to south-west and to respect the existing contours of the land, with higher density development within areas of lower lying ground to the south east, in closer proximity to the proposed public transport route.

The masterplan proposes to realign the north to south Active Travel Route through the site (Cammo Walk), connecting HSG 20 and the development site to the HSG 19's Craigs Road cycleway / footway, "Green Corridor" footway / cycleway, Maybury Primary and Edinburgh Gateway rail / tram station. Along with an east to west cycleway / footway through the site. It also includes an informal footpath network and running routes through the site.

The principal vehicular access is provided via the fourth arm of the Bughtlin Roundabout on Maybury Road, with a primary vehicular access route through the site facilitating the provision of a new bus route. New bus stops and bus penetration through site (Lothian 31), with bus gate and emergency access to Craigs Road access are proposed.

The application is supported by the following documents available to view on the Council's Planning and Building Standards Public Access Portal:

- Planning Statement;
- Design and Access Statement;
- Pre-application Consultation Report;
- Utilities Capacity Assessment;
- Flood Risk Assessment and Drainage Strategy;
- Transport Assessment;
- Affordable Housing Statement;
- Energy and Sustainability Statement;
- Sustainable Development Strategy;
- Landscape Report;
- Tree Survey;
- Solar Glare Hazard Study and
- Aerodrome Safeguarding Feasibility Study;

Environmental Impact Assessment

An Environmental Impact Assessment was submitted to support the application, which scoped in the following topic areas:

- Cultural Heritage;
- Landscape and Visual Impact Assessment;
- Preliminary Ecological Appraisal;
- Air Quality;
- Noise and Vibration;
- Ecology and Nature Conservation;
- Water Environment;
- Traffic and
- Disruption due to construction.

3.2 Determining Issues

Due to the proposals relating to a listed building(s), this report will first consider the proposals in terms of Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997:

- Is there a strong presumption against granting planning permission due to the development harming the listed building or its setting?
- If the strong presumption against granting planning permission is engaged, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh it?

This report will then consider the proposed development under Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Do the proposals comply with the development plan?

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

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

In the assessment of material considerations this report will consider:

- the Scottish Planning Policy presumption in favour of sustainable development, which is a significant material consideration due to the development plan being over 5 years old;
- equalities and human rights;
- public representations and
- any other identified material considerations.

3.3 Assessment

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

- a) the proposal will impact upon the setting of a listed building or historical environment;
- b) the principle of the development is acceptable in this location;
- c) the proposal is acceptable in scale, design and landscape impact;
- d) the proposal will have any archaeological implications;
- e) the proposal is acceptable in terms of accessibility, connectivity or has any road safety implications;
- f) the proposal will achieve a good level of residential amenity for future occupiers and not adversely affect the amenity of neighbouring sites;
- g) any impact upon local infrastructure by the proposed development can be mitigated and the proposal delivers adequate affordable housing provision;
- h) any adverse impacts upon air quality can be mitigated;
- i) the proposal will increase flood risk;
- j) the proposal will be to the detriment of the natural environment;
- k) the proposal will result in an unacceptable loss or damage to existing trees
- l) the proposal meets sustainability standards;
- m) any other material considerations;
- n) the proposal is in line with Scottish Planning Policy and any emerging policy and
- o) any comments received in public representations have been addressed.

a) Setting of Listed Building or Historical Environment

Section 59 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 states: "In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

The Courts have clarified that Section 59(1) means that there is a strong presumption against granting planning permission for development which would harm a listed building or its setting. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

Historic Environment Scotland's guidance on Managing Change sets out the principles that apply and how it should inform planning policies. HES's document (Managing change in the Historic Environment - Setting) states that 'setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced. Setting is the combination of landscape character, visual amenity and historic cultural importance.

LDP Policy ENV 3 (Listed Buildings- Setting) states development affecting the setting of a listed building will be permitted only if not to detrimental to the architectural character, appearance or historic interest of the building, or to its setting.

The Water Tower is Category B listed (reference LB 28039) and has a rural setting currently, although this rural setting has recently been partly altered by the development of new housing in the area. As setting also includes the rationale for locating a historic asset it is noted in the listing that, along with its practical function, it is likely that the Water Tower also served an aesthetic purpose: it closes the vista along the path past the stables. Indicating that the rural setting and its location was the reason for the location and the character of that setting is rural agricultural open landscape where the Water Tower was carefully placed.

The impact of further development will diminish setting of the listed building. As such, the proposal is contrary with HES guidance and LDP Policy Env 3. There is a strong presumption against granting planning permission for development which would harm the setting of a listed building. This presumption is engaged, and there would not be significant public advantage for delivery of the scheme at this location which would warrant rebuttal.

LDP Policy Env 7 (Historic Garden and Designed Landscapes) states development will only be permitted where there is no detrimental impact on character of the site, its setting or upon features which contribute to its value.

This proposal is located immediately to the south of Cammo, which is included in the Inventory of Gardens and Designed Landscapes in recognition of its national importance. The designed landscape has outstanding historical interest, scenic and nature conservation interest.

Historic Environment Scotland (HES) was consulted on the proposal and have raised concern that the development will impact on views from two important features of the historic designed landscape - from the ruined Cammo House along the southern avenue and secondly, views from Mauseley Hill, a wooded knoll in the south park of the GDL, from which there are extensive views, including views to the south in the direction of the proposed development, both part of the original early 18th century design.

Whilst the mature woodland within the GDL and intervening topography (Mauseley Hill) would provide screening of the proposed development from much of the designed landscape HES state their disagreement with the findings in the submitted EIA.

The layout of the proposed 'green corridor' within the development on the alignment of the Southern Avenue from Cammo House. The Southern Avenue, leads from the south front of Cammo House to focus on the distant Pentlands. Originally forming the principal approach to Cammo House, some sections of the formal avenue which line this vista survive and it continues to be a key vista out from the designed landscape.

However, the development, located on rising ground to the south, would still be visible in views along the Southern Avenue despite proposed mitigation. HES raise concern that the green corridor is not wide enough to provide meaningful mitigation on impacts on this principal view out of the GDL.

Similarly, Mauseley Hill acts as both a prominent landscape feature in views into the GDL, forming a focal point within the southern parkland and as a viewpoint: from its summit there are extensive views in all directions: views to the north across the GDL, views over Turnhouse Golf course to the east and over arable farmland to the south towards the Pentland Hills. The proposed development would introduce new residential development into a currently undeveloped part of the surrounding landscape.

The EIA states the development has been designed to mitigate the impact on the setting of this landscape feature by setting development off the southern boundary of the GDL in order to provide a buffer between the development and the estate, along with parkland and trees included along the northern edge and throughout the site to soften the visual mass of the residential properties.

However, despite this mitigation, HES consider that the development would have a significant adverse impact on the open views over open agricultural lands towards the Pentland Hills to the south.

In terms of views towards Mauseley Hill, the impacts of the proposal are illustrated in a series of visualisation submitted in support of the application. Whilst the development proposes the creation of a 'scenic viewpoint towards the southern side of the site looking north towards Mauseley Hill to ensure key views north towards the Water Tower would not be affected, HES state that the proposal would still have a significant effect on the understanding, experience and appreciation of the prominent landscape feature set in open parkland and providing views over undeveloped farmland and the Pentland Hills to the south.

Whilst it would still be possible to understand, experience and appreciate the Cammo GDL, HES consider that the proposed development would have more impact on the setting of the heritage asset than that set out in the EIA Report. The development would have an adverse impact on a series of key views to the south towards the Pentlands which are an important element of the setting of the Cammo GDL, especially views along the principal vista, the Southern Avenue and views towards and from Mauseley Hill, which are both significant surviving elements of original landscape design.

In terms of compliance with LDP Policy Env 7, the development would have detrimental impact on character of the site, its setting upon features which contribute to its value and therefore the proposal contravenes the policy. HES does not object to the proposals as they do not raise historic environment issues of national significance.

Overall, the proposal is contrary with HES guidance and LDP Policy Env 3 in terms of its impact upon the setting. There is a strong presumption against granting planning permission for development which would harm the setting of a listed building. This presumption is engaged, and there would not be significant public advantage for delivery of the scheme at this location which would warrant rebuttal. The development would have detrimental impact on character of the site, its setting upon features which contribute to its value and therefore the proposal contravenes LDP Policy Env 7.

b) Principle of Development

The site is defined as within the Green Belt within the Edinburgh Local Development Plan (LDP).

The proposal is for planning permission in principle for a housing development at Craigs Road, Maybury. The proposal is within the greenbelt and is adjacent to a safeguarded waste management facility, two proposed housing sites and a Historic Garden and Designed Landscape (Cammo House).

The overarching strategy of the LDP seeks to control new growth to four Strategic Development Areas with defined controlled greenfield land release. This controlled release of land through the LDP has allowed for the development of allocated sites HSG 19 and 20, both sites have the benefit of planning permission.

Policy Hou 1 of the (LDP) relates to the location of housing development and consists of two parts. The first part gives priority to housing development in the urban area as defined in the LDP.

The application site lies in the green belt as defined in the LDP and so is not supported by part 1 of Policy Hou 1. Should there be a deficit in the maintenance of the five-year housing land supply, the site may be assessed in terms of part 2 of Policy Hou 1.

Part 2 sets criteria for development in the green belt should a deficit in the maintenance of the five -year housing land supply be identified as evidenced through the housing land audit. Housing Land Supply is considered in detail in the 'Other Considerations' section of this report. But, in summary, when measured against the development plan housing land requirement and housing supply target, there is no shortfall in the effective housing land supply.

LDP Policy Env 10 (Development in the Green Belt and Countryside) is applicable and controls development in the Green Belt and Countryside.

Within the Green Belt and Countryside, development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area:

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

The proposal does not meet with any of above the criterion and as such is contrary to LDP Policy Env 10. The development's impact upon the landscape and rural character is assessed the relevant section of this report. As the application is for planning permission in principle, the impact upon environmental quality and amenity is not known at this time.

Principle of Development Conclusion

The principle of residential development is contrary to policy Env 10 and Hou 1 part 1 of the LDP. Hou 1 Part 2 is not considered to be invoked as the Housing Land Audit demonstrates that there is more than sufficient effective land available for development in the City for Edinburgh to meet the current housing land requirement set by the first Strategic Development Plan (SDP).

c) Scale, Design and Landscape Impact

LDP Policies Des 1 - Des 8 set a requirement for proposals to be based on an overall design concept which draws on the positive characteristics of the surrounding area with the need for a high quality of design which is appropriate in terms of height, scale and form, layout, and materials. This includes access to the site, consideration of existing trees and future planting, footpath/cycleway links through the site and to existing areas, amenity issues and the creation of open space.

The policies seek a comprehensive and integrated approach to the layout of buildings, streets, footpaths, cycle paths, public and private open spaces. The incorporation of existing features including archaeology, trees, woodland, landscape character, views and biodiversity can enhance a developments sense of place and contribute to the wider habitat and green network, and where it is demonstrated that existing characteristics and features worthy of retention are incorporated and enhanced through the design.

The indicative masterplan shows the built environment of 500 houses. This application is for planning in principle and includes indicative landscape and design information only. The design, including layout and height, density, mix and materials would be assessed in any AMC applications.

If permission is granted, design matters, including layout, scale, form and materials should be covered by condition requiring these matters to be the subject of further applications.

Design, Layout and Landscape Infrastructure

Various open spaces are proposed, from the larger linear park to the north, wooded edges to the north and west, the integrated SUDs area, the 'Paddock' park to the south and linear greenspace along the Scottish Water protected route, along with smaller parcels throughout the site and Southern Avenue. Overall, if delivered successfully have the potential to deliver diverse and accessible greenspaces, with a variety of uses and habitats to benefit people and nature. Consideration has been given to the natural surveillance of these areas.

However, the landscape framework, in particular the woodland planting, does not appear to be consistent with the landscape details in the aerodrome safeguarding feasibility study, which suggests small groups of trees, spacing between trees, and certain species, rather than woodland belts as shown in the landscape plans.

In terms of connections, various informal and formal pathways/active travel routes are proposed within the development and connecting out with the development, including informal paths within the parkland and woodland, linking to Cammo country park; Cammo Walk Core Path, linking north and south; or the linear green space and path linking through to West Craigs which would be welcomed. The detailed specification of these proposed paths is not confirmed at this stage and would need to be detailed with any future application.

Given this application is for Planning Permission in Principle, there is no detail on the delivery methods at present. A detailed Landscape Site Plan and Management Plan would be required with any future application detailing the long-term management and maintenance of proposed open spaces as this will be essential to the quality and success of the resulting green-blue infrastructure. If delivered, the landscape structure is acceptable and would create a well connected and permeable site, encouraging movement around the site into the surrounding countryside.

Character of Landscape

LDP Policy ENV 10 (Development in the Green Belt and Countryside) states the important role of the green belt in terms of landscape setting and countryside recreation. The key test for proposals in the greenbelt is to ensure the development does not detract from the landscape quality and rural character of the area.

The Development is in the Green Belt and therefore important to the setting of the city. The landscape strategy has been informed from the initial concept for the masterplan, which aims to preserve the setting adjacent to the Designed Garden Landscape.

The site has a rural open agricultural character where it is not flat but rising to a ridgeline with some vegetation, a characteristic found elsewhere in Edinburgh so is an important characteristic rural ridge. Whilst the aim is to contain the built development within the site, alongside generous open space provision, development of the site would alter the existing rural character through the introduction of urban residential development of this scale.

The introduction of urban residential development across the ridge would break the open character of the site. The existing rural character would be eroded, which contravenes the aims of LDP Policy Env 10.

Existing Views and Visual Amenity

An LVIA has been submitted showing the impact of the proposed development on the surrounding landscape and analyses 15 key viewpoints established during the scoping exercise.

The site can be seen from several local viewpoints and some more distant places as a rural area of open landscape, sloping in nature. The existing views across the site are open there are few man-made vertical influences except the Water Tower and the mast. There is an interplay between the various historic assets including the Tower and the Historic Garden and Designed Landscape and how they contribute to the character indicating a character which shows historic influences. The ability to see further into the distance from some views provides interest and a sense of place.

The visual amenity is provided by the rural nature of the view reaching into the distance to the Pentland Hills. From the Core Path at Cammo Walk the view is significantly altered from a rural to a more urban view and the skyline is dominated by development. This characteristic can be appreciated from Maudsley Hill, and although a small proportion of the view it changes the rural character of the ridge and from Cammo Walk.

The introduction of the built development becomes a focus in the views as evidenced in the submitted viewpoints. From the surrounding landscape the development damages the views as development is seen to coalesce in the landscape from Corstorphine Hill.

Significant in-curtilage tree and landscape planting is proposed throughout the site, aiming to mitigate the visual impact of development, define vistas and areas of open space, and enhance existing areas of woodland.

However, the mitigation proposed would not mitigate the damage because the open landscape has been lost and along with it, clear views to the Pentland hills. The rural nature can only partly be created through tree planting and in winter these trees would lose their leaves and the houses would be visible. Given the proposed density and volume of housing proposed, it would not be possible to mitigate the impact of the development on these views through screening.

Overall, the character of the landscape would be altered adversely from an open agricultural to an urban character. In this location that rural character is important to separate the city from other development and provide the rural setting to the historic assets in the area. The characteristic of a rural ridge line would irreversibly be changed.

The application has failed to demonstrate that there would be no adverse impact on the landscape setting and the visual impact of the development has not been demonstrated to a satisfactory level. Whilst the development would provide new access paths and open space within it, the adverse impact on the open rural character of the area and the perception of the rural ridgeline within this area would be eroded.

d) Archaeological Implications

LDP Policy Env 9 (Development of Sites of Archaeological Significance) aims to ensure that no significant archaeological features are likely to be affected by the development.

As the site has been identified as occurring within an area of archaeological and historic significance. Accordingly, this application must be assessed against LDP Policies Env 8 (Protection of Important Remains) & Env 9 (Development of Sites of Archaeological Significance).

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.

If minded to grant, a condition is recommended to secure this programme of archaeological works to ensure compliance with LDP Policy Env 9 Development of Sites of Archaeological Significance.

e) Accessibility, Connectivity and Road Safety

Active Travel

The site is bisected by Cammo Walk, a road currently closed as part of Covid-19 measures. This road is used as an active travel route for cyclists and pedestrians, and forms part of the strategic active travel route and green corridor between HSG 20 Cammo and HSG 19 Maybury heading south.

The application proposes to realign the active travel route which would be maintained and enhanced through the site by providing increased passive surveillance and lighting creating a more accessible environment.

The integrated landscape informs movement through the site. This reinforces pedestrian and cycle permeability and movement patterns through the site and provides opportunities for improved pedestrian and cycle permeability to the east, west and north to Cammo Park.

The masterplan identifies the opportunity to enhance pedestrian and cycle permeability through the site and provide more permeable connections to the west and north to Cammo Park. The informal paths head north into Cammo Park and east towards Cammo.

To maintain the continuous nature of the active travel route through the site, an underpass is to be considered at its crossover with the new public transport route. Concern has been raised in public representations regarding the safety of the introduction of an underpass. If granted, the layout would be a matter specified in condition, and it is unlikely that an underpass would be supported as an appropriate means of crossing the road.

The proposed active connections are welcomed and would create beneficial active and sustainable links between the established, allocated and approved development within west Edinburgh. Detail on the deliverability of these connections would be required.

Connectivity, Public Transport and Car Usage

The Council's Transport Objectives are set out in the Local Development Plan. These state that development should:

- Minimise the distances people need to travel;
- Promote and prioritise travel by sustainable means, i.e., walking, cycling and by public transport and

- Minimise the detrimental effects of traffic and parking on communities and the environment.

LDP Policy Tra 1 (Private Car Parking States) states major development which would generate significant travel demand will be permitted on suitable sites in the city centres. Where a non-City Centre site is proposed, the suitability of a proposal will be assessed having regard to accessibility by modes other than car, the contribution the proposal makes to the Local Transport Strategy objectives and the effect on travel patterns and car use, and the impact of the existing road and public transport network.

A Transport Assessment was submitted as part of the application.

In this instance, the proposal fails to demonstrate that the proposed site is sufficiently accessible by modes other than the car. The submitted Transport Assessment appears to rely on significantly lower predicted car mode share and higher alternative modes than observed elsewhere.

The site is not well served by public transport, given the current limited bus service.

The applicant has advised that there is a proposed Roads Construction Consent (RCC) being progressed for Craigs Road/Maybury Road junction improvement with works anticipated to be completed by September 2022. This would allow Lothian Buses to divert the 31 through West Craigs via Craigs Rd / Turnhouse Rd with three new bus stops on Craigs Rd and Turnhouse Rd, anticipated to be operational with the 31 service.

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

- Identified local and city wide individual and cumulative transport impacts can be timeously addressed in so far as this is relevant and necessary for the proposal;
- Any required transport infrastructure in Table 9 and in the general site-specific development principles has been addressed as a relevant to the proposal.
- The other cumulative impact of development proposals throughout the SES plan area has been taken into account in so far as relevant to the proposal.

Whilst the West Edinburgh Transport Appraisal (WETA) model has been utilised in support of application, the submitted transport assessment has failed to demonstrate that the transport impacts can be timeously addressed. In this instance the application fails to demonstrate that suitable transport infrastructure can be provided to mitigate the local and cumulative impact of the additional 500 homes on the local road network and public transport network. As such, the proposal is contrary to LDP Policy Tra 8.

Transport Scotland was consulted on the proposal and has requested a condition be attached if permission be granted to ensure that the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network.

LDP Policy Tra 2 relates to car parking provision and takes into consideration the accessibility of the site to public transport stops on routes well served by public transport, to shops, schools, centres of employment, cycle and public transport. Assessment against this policy considers the character of the proposed use and its correlation with car ownership.

The policy aims to ensure car parking provided is tailored to local circumstances, including location, public transport accessibility, economic needs, fulfilling the wider strategy of encouraging sustainable non-car modes.

Whilst the level of proposed parking is not stated in this planning permission in principle application, to support lower car mode share, it is considered essential that parking provision is markedly less than 100%. As such, the LDP Policy Tra 2 objective of lower provision will be difficult to achieve given the limited public transport options that currently exist.

LDP Policy Tra 7 (Public Transport Proposals and Safeguards) does not permit proposals which would prejudice the implementation of public transport proposals.

Proposal T17 relates to the improvement to Craigs Road to increase capacity/bus priority. Consideration will need to be given to the impact of the proposed developed upon proposal T17. Although the proposal is unlikely to affect the safeguard, further information would need to be submitted to fully assess its impact.

Overall, whilst the proposed active travel links are welcomed, the application fails to demonstrate that the site can promote sustainable travel modes limiting the reliance on car usage. The site is not well served by public transport, given the current limited bus service, nor is it likely to encourage walking and cycling given the distance to existing retail, services and employment facilities.

There are no confirmed practical measures to significantly reduce the use of private cars to and from the site. As such, the proposal fails to comply with LDP Policies Tra 1, Tra 2, Tra 7 and Tra 8. The Roads Authority recommends refusal of the application.

f) Residential Amenity

LDP Policy Des 5 (Design-Amenity) supports proposals that have no adverse impact on neighbouring developments and will achieve a good level of occupier amenity.

Odours

The proposal will introduce residential receptors closer to the composting facility to the west of the site currently exists. The applicant has conducted a detailed survey into the potential odour impact that may arise from the neighbouring composting facility.

The applicant's survey has identified that many of the proposed units will likely be affected by the odours emanating from the composting facility. This could have an adverse impact on any future residents' amenity.

Environmental Protection recommend that the application is refused due to the poor level of amenity that will be afforded to future residents affected by odours.

Noise

The neighbouring composting facility has several potential noise sources that will impact future residents if not mitigated either by creating distance through development design and layout, or suitable barriers. Furthermore, transport noise has also been identified as a noise source which will require mitigation.

As an application for planning permission in principle, insufficient detail is included at this stage to demonstrate there will be no impact on amenity due to noise. Environmental Protection cannot support the development until this is demonstrated.

A Noise Impact Assessment (NIA) has demonstrated that noise can be mitigated by careful building layout and design and appropriate insulation being incorporated. Environmental Protection is satisfied that suitable noise mitigation could be achieved using acoustic glazing, along with an acoustic barrier or bund between the road, composting facility and proposed development. These details will need to be considered at approval of matters specified in condition stage.

The applicant has submitted a Ground Investigation Report which is currently being assessed by Environmental Protection. If minded to grant, conditions are recommended to ensure any remediation requirements require to be approved by the Planning & Building Standards service.

Open Space

Hou 3 (Private Green Space in Housing Development) requires developments to have adequate provision of green space, exceeding 20%.

The application proposes approximately 40.5% of the site to be open space/woodland, including playparks, gardens and linear parks. This exceeds the requirements for Edinburgh Design Guidance, ensuring a good quality living environment for future occupiers.

Residents of Neighbouring Sites

This application is for planning in principle and includes indicative landscape and design information only. Matters pertaining to the impact upon neighbouring residential amenity will be assessed at detail planning stage.

Overall, whilst the proposal aims to achieve a good provision of open space, the proposal fails to comply with LDP Des 5 in terms of residential amenity due to a lack of supporting information. If minded to grant, conditions are recommended to ensure these matters are fully considered and addressed.

g) Local infrastructure and Developer Contributions

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) states that proposals will be required to contribute towards infrastructure provision where relevant and necessary to mitigate any negative additional impact (either on an individual or cumulative basis) and where commensurate to the scale of the proposed development.

The application proposes the development of up to 500 dwellings on a site that is not identified as a housing proposal in the adopted local development plan 2016. Accordingly, its impact, including the cumulative impact with other developments, has not formed part of any previous assessment on the impact of housing growth on the learning estate.

Education

Early Learning and Childcare and Primary School Infrastructure

The proposed site currently straddles the Corstorphine Primary School and Cramond Primary School catchments that feed into Craigmount High School and the Royal High Secondary School respectively.

This site will be aligned to a new primary school being delivered as part of the current LDP (2016) on HSG 19. The new primary school has been designed to be built in two phases with an overall capacity of 630 pupils and 128 ELC places. The first phase will deliver a two-stream primary school with a capacity of 420 pupils and the nursery. The second phase will add an additional 210 pupils. Phase one is expected to be delivered for August 2024 and the second phase will be delivered at the appropriate time.

The new school in HSG 19 has been designed to accommodate pupils expected to be generated from HSG 19 and HSG 20, cumulatively the sites are expected to generate 650 pupils.

There is no spare capacity in the new school located in HSG 19 to accommodate the pupils expected to be generated from this proposed development. The new school would have to be designed to 26-28 classes to accommodate the 113-144 additional pupils expected to be generated from the proposed development. As such, The Learning Estate Planning Team does not consider the proposed new school can be extended beyond the 21 classes planned without seriously compromising the indoor and outdoor learning environment.

The Education Appraisal for the Proposed LDP City Plan 2030 identifies the requirement for new primary schools to support housing growth in West Edinburgh. Five new primary schools, with ELC places, are required:

- 2 x 21 class primary school
- 1 x 15 class primary school
- 1 x 14 class RC primary school
- 1 x 7 class primary school

It is expected that four of the above schools will serve Emp 6 IBG, H61 Crosswinds, H62 Land adjacent to Edinburgh Gateway and H63 Edinburgh 205. These sites are located to the west of the Edinburgh-Dundee railway line. The seven-class primary school will serve H59 Land at Turnhouse Road (SAICA) and H60 Turnhouse Road and is located to the south of HSG 19.

The new primary school at HSG 19 is located to the south of the site offering little scope to realign some of its catchment area to a new primary school at the Turnhouse sites to accommodate the proposed development.

With regards to denominational primary school places, it is the Council's experience that travel distances can affect the uptake such places and in order to reduce accommodation pressure at a denominational school it may be necessary to prioritise baptised RC pupils, however this will increase rolls and accommodation pressure at non-denominational primary schools. The nearest existing denominational primary school is St Andrew's RC Primary School which shares a site with Fox Covert Primary School and is approximately 1.7 miles from the proposed site. A six-class extension has been delivered at this site which is expected to be used flexibly to respond to the demands of both schools.

The proposed development requires the equivalent of a single stream, seven-class primary school, to accommodate the maximum number of primary pupils expected to be generated on a 2-ha site.

Secondary School Infrastructure

The Secondary School Roll Projections show that there is no spare capacity in Craigmount High School. Accordingly, additional secondary places would be required to support the number of pupils expected to be generated from the proposed development.

The Learning Estate Planning Team will be engaging with school communities in West Edinburgh, including Craigmount High School, between February and May 2022 to develop a strategy for the learning estate in West Edinburgh. The engagement process will seek the views of the affected communities and inform future statutory consultations. One of the three main issues being considered is whether Craigmount High School should be extended to accommodate pupils from the new primary school at Maybury or if it should feed to a new West Edinburgh High School.

As noted above, a new primary school would be required to support the primary pupils expected to be generated from the proposed development. A new primary school would need to be aligned to a high school. At this time, before engaging with affected communities and carrying out a statutory consultation, it is too early in the process to determine what secondary school pupils from the proposed development would be aligned to.

Overall, additional education infrastructure across all stages is required to support the proposed development.

The proposed development cannot solely rely on education infrastructure identified as part of the proposed LDP City Plan 2030, on land that is not owned by the Council, where its delivery cannot reasonably be provided by the applicant because it requires the agreements of other landowners and the programme for delivering the necessary education infrastructure has not been finalised. Furthermore, the cumulative education impacts still to be finalised through the examination process and adoption of the plan and adoption of its first action programme.

Accordingly, in relation to education infrastructure, until sites to deliver the necessary learning estate infrastructure are confirmed, the proposed development cannot be supported at this time.

The proposal therefore does not comply with Policy Del 1 as suitable provision cannot be identified to mitigate the impact of the additional 500 homes on local education infrastructure. The applicant has sought further engagement with the Planning Authority on the provision of education infrastructure to serve the site. If Committee are minded to approve the application further assessment of education provision will be required and the application reported back to the Development Management Sub Committee for consideration of the options.

Healthcare

LDP Policy Hou 10 states that planning permission will only be granted where there are associated proposals to provide any necessary health facilities relative to the impact and scale of development proposed.

The Action Programme sets out that new sites in West Edinburgh will be accommodated in a new practice co-located with the new Maybury Primary School within LDP Site HSG19. The location and provision of medical services for the proposed developments in West Edinburgh have been agreed with the Health and Care Partnership which consists of the Council and NHS Lothian.

The Council would a contribution towards the new facility at a cost per dwelling to be secured via a Section 75 legal agreement.

Affordable Housing

LDP Policy Hou 6 (Affordable Housing) states that planning permission for residential development consisting of 12 units of more should include provision for affordable housing amounting to 25% percent of the total number of units.

This application is for a development consisting of up to 500 homes and as such a requirement for a minimum of 25% (125) homes to be of approved affordable tenures. The Planning Statement supplied with the application states that 'the applicants have made a commitment to 50% affordable housing provision on-site, which is welcomed.

The developer has entered early dialogue with the Council and Registered Social Landlord (RSL) on the design, mix and location(s) of the affordable housing. An integrated and representative mix of affordable housing should be delivered on site.

Through the Planning Statement, the applicant has advised that the RSL Dunedin Canmore Housing Association (DCHA) have been identified to deliver the affordable housing on site and that negotiations between the applicant and DCHA in regards to the mix of the affordable housing to be delivered have resulted in more affordable houses and 3-bedroom affordable housing than were proposed initially and this is welcomed.

Overall, the proposal complies with LDP Policy Hou 6 (Affordable Housing) providing excess of the 25% requirement. The applicant has made a commitment to provide affordable housing, and this will be secured by a Section 75 Legal Agreement.

A further Affordable Housing Statement would be required with any future application to secure the units in line with the Housing need and standards.

h) Air Quality

LDP Policy Env 22 (Pollution, Air, Water and Soil Quality) aims to ensure that no development will result in significant adverse effects for health, environment or air quality and appropriate mitigation measures can be provided to minimise the adverse impacts. Reducing the need to travel and promoting the use of sustainable modes of transport are key principles identified in the local development plan.

Environmental Protection object to this application on the grounds of air quality and has raised concern with the scale of development and the cumulative impact of developments in the West of Edinburgh on local air quality.

The applicant has submitted a detailed Air Quality Impact Assessment (AQIA). The AQIA identifies various methods of mitigation, including all new houses being fitted with EV chargers, and all apartments will have access to fast EV chargers.

To comply with Env 22, detailed plans demonstrating mitigative measures identified in the AQIA will need to be incorporated into any final design.

i) Flood Risk

Policy Env 21 (Flood Prevention) states that planning permission will not be granted for development that would increase a flood risk or be at risk of flooding itself, impede the flow of flood water or prejudice existing or planning flood defence systems.

A Flood Risk Assessment (FRA) has been completed and it is based on appropriate methods and its representation of flood risk at the site is in line with all other evidence that is currently available. The FRA has been used to inform the site masterplan and no development is proposed along the northern boundary.

The Councils Flood Prevention Team has reviewed the submitted information and satisfied with the proposed mitigation. A Section 7 Agreement SUDS maintenance agreement between CEC and Scottish Water will be required.

SEPA have raised no objection to application on the grounds of flood risk and support the absence of development along the northern boundary.

Overall, the proposal has been designed to mitigate against flood risk and is in compliance with Policy Env 21.

j) Natural Environment

LDP Policy Env 16 (Species Protection) aims to ensure development will not be to the detriment to the maintenance of a protected species and suitable mitigation is proposed. In accordance with Policy Des 3 (Development Design) and the Edinburgh Design Guidance, developments protect and enhance biodiversity, as part of development design.

An Ecology Report has been submitted in support of the application. This considers any likely impacts on protected species, including badgers.

The landscape scheme for the site supports the objectives of Des 3, by including the creation of these new habitats and retention of the woodland habitats.

If minded to grant, a condition is recommended that any detailed application should include a Landscape and Ecology Management Plan (LEMP). The LEMP should include details of habitats to be retained/enhanced and species specific enhancements within the development, together with details of long-term management.

Furthermore, a Construction Environmental Management Plan should be include mitigation for biodiversity as detailed in the EIA.

k) Trees

LDP Policy Env 12 (Trees) ensures development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Protection Order or on any other tree or woodland worthy of retention unless necessary for good arboriculture reasons. This policy recognises the important contribution made by trees to character, biodiversity, amenity, and green infrastructure.

The site is surrounded by trees which are significant in terms of arboriculture, habitat connectivity and landscape amenity. A tree survey was submitted as part of the application which confirms that all of the 19 trees are located around the site boundary, the majority recorded as class C, with two trees recorded as condition class B. There are no condition class A trees on or abounding the site. There is no Tree Protection Order in place for the trees.

The proposal intends to retain the mature trees where possible to provide containment from existing development as well as reducing the visual impact. In addition, new tree, and landscape planting along the edges of the development are proposed to enhance the rural edge of the site and further mitigate visual impact. Around 1,820 new trees are proposed to be planted as part of the proposal.

As an application for planning permission in principle, the tree survey does not consider the final development layout. An updated Tree Survey, Constraints Plan, Tree Protection Plan and Woodland Management Plan would need to be prepared as part of any detailed masterplan and application.

l) Sustainability

LDP Policy Des 6 (Sustainable Buildings) sets out criteria by which proposed development should meet to ensure sustainability. Given this is planning permission in principle details, in terms of carbon technologies, urban drainage, recycling facilities and sustainable materials, are not known at this time.

The applicant has highlighted that they aim to meet energy and heat demand through renewables which is welcomed. The proposal intends to adopt sustainable solutions to supplement mains grid electricity for heating; including Solar, Air Source, Ground Source, and in plot battery storage.

In this instance, it is not demonstrated that the site is a sustainable location for development given its dependency on car use and limited public transport options confirmed at this time. Whilst the applicant proposes committing to 100% EV provision, with all new houses fitted with EV chargers, and all apartments will have access to fast EV chargers, further detail is required to ensure the proposal supports sustainable modes of active travel.

Overall, the proposal fails to demonstrate compliance with Policy Des 6.

m) Other Considerations

Waste

The Council's Waste Team were consulted on the proposal. A Waste and Servicing Strategy will be required with any detailed application once the proposed design and site layout is known.

Edinburgh Airport

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. If minded to grant, various conditions are recommended requiring details on the height, location, form and materials of the proposed buildings, along with details of the proposed SUDs, landscaping plan, lighting and a Bird Hazard Management Plan in order to avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport.

Environmental Impact Assessment Report

An EIA Report has been provided alongside the application. This provides an assessment of the impact of the development in environmental terms. The scope of the EIA Report is acceptable, the content comprehensive and the methodologies. Sufficient information has been submitted in the EIA Report to allow a balanced judgement to be made regarding resulting impacts. Therefore, this report not only provides an assessment of the proposal in planning terms, it has also considered the conclusions of the EIA Report.

n) Scottish Planning Policy and Emerging Policy

Section 25 of the Town and Country Planning (Scotland) Act 1997 (the "1997 Act") 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.

However, the Courts have clarified that given the development plan is more than 5 years old the presumption in favour of sustainable development is a significant material consideration. Scottish Planning Policy (SPP) paragraph 33 states:

"Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material

consideration. Decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in this SPP. The same principle should be applied where a development plan is more than five years old."

Housing Land Supply

The spatial strategy of SESplan identifies five sub regional areas. Within these, further development will be focused in 13 strategic development areas, acting as the primary locations for growth and investment. These are identified in Policy 1A The Spatial Strategy: Development Locations and include West Edinburgh as part of a Regional Core. Policy 5 Housing Land of SESplan provides that each local development plan is to allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period. Policy 6 Housing Land Flexibility goes on to say that each planning authority is to maintain a five years' effective housing land supply at all times.

The final sentence of Paragraph 125 of Scottish Planning Policy states:

"Where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up-to date, and paragraphs 32-35 will be relevant."

The Courts have determined, in respect of housing development proposals, that if a housing land supply shortfall is established within the development plan area, then a tilted balance applies to determining whether the proposals are sustainable development. The presumption in terms of the tilted balance is that the proposals are sustainable development, unless they are significantly contrary to the other sustainability guiding principles set out in Scottish Planning Policy paragraph 29.

In addressing the requirements of the SPP it is therefore essential to establish the housing land supply position. In a report to the Planning Committee on 1 December 2021 the latest Housing Land Audit and Completions Programme (HLACP) 2021 was reported. Committee accepted the conclusions within the report which identified.

- there is more than enough effective land available for development in the City for Edinburgh to meet the current housing land requirement set by the Strategic Development Plan for south East Scotland;
- the five- year completions programme (previously referred to as the five-year effective land supply) is now 47% above the five- year completions target;
- based upon current rates of delivery, there is enough land in Edinburgh to last for eight years.

In considering this further the capacity of the housing land supply and the anticipated programme of completions within the HLACP were agreed as reasonable with Homes for Scotland.

The 2021 HLACP demonstrates that the five-year completions programme (previously referred to as the five year effective land supply) is above the remaining housing land requirement set by the development plan and is more than sufficient to meet the remaining housing supply target to 2026. Therefore, when measured against the development plan housing land requirement and housing supply target, there is no shortfall in the effective housing land supply.

Housing completions rates are currently above the annual average target set by the development plan. At current rates of completion, the supply of effective housing land in Edinburgh is enough to last for 8.7 years.

When considering the evidence of the HLACP, there is an effective housing land supply and the tilted balance towards sustainable development is not engaged. In addition, paragraph 125 of the SPP identifies that housing policies would be considered out of date where a shortfall exists. Whilst there is no shortfall identified the LDP has reached its five-year date and therefore the sustainable development principles require to be addressed.

Sustainable Development Principles within the SPP

In terms of the presumption in favour of development that contributes to sustainable development Paragraph 28 of Scottish Planning Policy states:

"The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost."

Paragraph 29 of Scottish Planning Policy then sets out the thirteen guiding principles, having regard to any related development plan policies, on determining whether overall the proposed development is sustainable. In considering each of these principles in turn the following assessment is made:

- (i) giving due weight to net economic benefit; - the proposals would generate economic benefits in terms of construction investment and employment.
- (ii) responding to economic issues, challenges and opportunities, as outlined in local economic strategies; - the development would assist in the delivery of affordable housing as part of the wider Council strategy to provide additional affordable housing across the city, however this would be applicable to any site across the local plan area over 12 units and is not unique to this site
- (iii) supporting good design and the six qualities of successful places; - the proposals are for a planning permission in principle and any application for approval of matters specified in condition would address these requirements.
- (iv) making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities; the site is located on the edge of the existing settlement boundary and does not contribute to regeneration or support exiting town centres services. The development would release additional greenbelt land for housing development. However, the site is adjacent to the housing site HSG19 which was released from the greenbelt within the current LDP. This would enable linkages into new infrastructure being completed on the HSG 19 site.

- (v) supporting delivery of accessible housing, business, retailing and leisure development; the site would be capable of connections to the active travel routes within the HSG19 site. However, there would be an increase in the use of private cars due to the separation from services.
- (vi) supporting delivery of infrastructure, for example transport, education, energy, digital and water; financial contributions would be required to deliver education provision within the area. It is understood that this may raise challenges in terms of current education capacity within the area.
- (vii) supporting climate change mitigation and adaptation including taking account of flood risk; any energy efficiency measures would be considered as part of the detailed planning submission. There are no flood risk matters arising from the development of the site.
- (viii) improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation; the proposal includes opportunity for linkages to wider areas of countryside recreation and will deliver new areas of strategic landscaping.
- (ix) having regard to the principles for sustainable land use set out in the Land Use Strategy; the land use strategy of the current LDP directs new housing to sites which best meet a range of assessment criteria including landscape impact, green belt boundaries, accessibility to public transport and infrastructure capacity. The site is located within the greenbelt. Any development of this site has the potential to undermine the greenbelt boundaries of the strategy.
- (x) protecting, enhancing and promoting access to cultural heritage, including the historic environment; Cammo designed landscape located to the north of the application site is noted for its outstanding historic interest. The development of this site would erode its setting and further intrude on the setting of the Water Tower.
- (xi) protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment; Whilst the development would provide new access paths and open space within it is the adverse impact on the open rural character of the area and the perception of the rural ridgeline within this area that would be eroded.
- (xii) reducing waste, facilitating its management and promoting resource recovery; any proposals would be required to comply with household waste management standards set by the Council.
- (xiii) avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality; the proposed development does not raise any matters in terms of water or soil quality. Concerns have been raised in relation to the impact of the development on air quality.

The development would meet several the sustainability principles due to the nature of promotion of good design and sustainability that it embedded within the Planning System. However, on balance there is an adverse impact on the landscape character of the area and the loss of greenbelt which conflicts with the land use strategy of the City. Overall, it is considered that the adverse impacts would outweigh the presumption in favour of development that contributes to sustainable development as outlined within Scottish Planning Policy.

SPP and the Emerging Plan City Plan 2030

The Planning Committee approved proposed City Plan 2030 on the 29th September 2021 for its statutory period of representation. The period for representation has now concluded and the submissions are being considered. While the proposed City Plan is the settled will of the Council, it has not yet been submitted to Scottish Ministers for examination.

Paragraph 34 of the SPP outlines that:

"Where a plan is under review, it may be appropriate in some circumstances to consider whether granting planning permission would prejudice the emerging plan. Such circumstances are only likely to apply where the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan making process by predetermine decisions about scale, location or phasing of new developments that are central to the emerging plan. Prematurity will be more relevant as a consideration the closer the plan is to adoption or approval."

The application being considered proposes to release greenbelt land and deliver approximately 500 residential units. In considering the implications of paragraph 34 it is important to assess the implications of the release of greenbelt land and the impact on the land use strategy of the plan. City Plan 2030 Proposed Plan adopts a strategy of delivering new housing on and maximising the use of brownfield land rather than greenfield land. It also proposes no new greenbelt land to meet the housing demand.

Background analysis was done in the preparation of the City Plan 2030 including a housing study and a landscape assessment. The site forms part of a larger area; Landscape Character Area 6 Cammo (CAA 31) fringe farmland - the landscape assessment notes:

CAA 31 forms a distinct ridge, extending from the high point of Lennie Hill, which lies to the west. This ridge has a complex knolly landform, which is accentuated by clumps of gorse and rough grass.

It is locally prominent in views from Cammo, Barnton and from the A8 and A902. Development within this CAA would necessitate considerable ground modification and would be visually intrusive. It would also adversely affect the setting of the Cammo Inventory site, which lies to the north. In addition, this ridge will provide an important undeveloped backdrop to allocated developments at Maybury and Cammo. There is no scope for development in this CAA.

Therefore, the grant of any planning permission to develop on greenbelt land has the ability to undermine the strategic strategy of the plan. Any decision taken at this time could prejudice the further direction and process of the emerging plan. In this case it is appropriate to add weight to the strategy of the emerging plan when read together with the SPP.

Transition to National Planning Framework Four (NPF 4)

NPF 4 - Draft National Planning Framework 4 is being consulted on at present. As such, it has not yet been adopted. Therefore, little weight can be attached to it as a material consideration in the determination of this application.

o) Public Comments

119 letters of representation were submitted in relation to the proposal. 118 of these letters were in objection to the proposal and one letter was a neutral representation. There were no letters in support of the application.

A petition was also submitted to the Council containing 893 names and addresses of residents in objection to the proposal.

Material Considerations

- Contrary to Green Belt Policy- addressed above in Section 3.3b;
- Constitutes urban sprawl- addressed above in Section 3.3b;
- Overdevelopment- addressed above in Section 3.3b;
- Loss of green space- impact on character and health and wellbeing- addressed above in Section 3.3c and f;
- Loss of corridor to countryside- addressed above in Section 3.3c;
- Impact on views to Tower- addressed above in Section 3.3a and c;
- Loss of trees/hedges- addressed above in Section 3.3k;
- Impact on wildlife and biodiversity- addressed above in Section 3.3j;
- Lack of school and health infrastructure and facilities- addressed above in Section 3.3g;
- Increase in traffic congestion and impact upon road safety on Maybury Road and Barton Junction- addressed above in Section 3.3e;
- Air Quality and pollution- addressed above in Section 3.3h;
- Lack of public transport services in area- addressed above in section 3.3e;
- Lack of safe routes- addressed above in Section 3.3e;
- Inclusion of underpass and potential anti-social and dangerous routes- addressed above in Section 3.3e;
- Impact on neighbouring amenity- addressed above in Section 3.3f; and Potential smell from waste facility and impact on occupier amenity- addressed above in Section 3.3f.

Non-material considerations

- Appearance of Cammo and West Craig developments.
- Potential construction noise and existing construction noise due to existing construction works at adjacent sites.
- Existing anti-social issues in area.

Corstorphine Community Council

- Contrary to LDP Env 10 and erodes greenbelt;
- Not identified for future development in LDP or City Plan 2030;
- Contrary to LDP Des 9 Urban Edge Development;
- Contrary to City Plan Env 18;
- Site not West Edinburgh Strategic Development covered by City Plan 2030;
- Loss of Open Space/ LDP Env 18;
- Increase in traffic congestion and car reliance due to dangerous active travel options;
- Impact upon Air Quality;
- Contrary to Tra 1, Tra 8 and City Plan policies Inf 3 and Inf 4;
- Lack of amenities;
- Doesn't meet 20-minute neighbourhood in terms of access to amenities; and
- Low density development and single use not welcomed.

Cramond and Barnton Community Council

The Community Council recognises -

- i. Edinburgh's substantial housing needs, especially for affordable housing;
 - ii. the current proposals would provide a significant number of affordable homes, with design details complying with 'net zero' principles; and
 - iii. the policy principle set out in para. 33 of Scottish Planning Policy - i.e. the presumption in favour of development that contributes to sustainable development.
- Erode Greenbelt and contrary to LDP Env 10;
 - Impact on landscape character, SLA and Historic Garden and Designed Landscape;
 - Contrary LDP Policy Env 22 Pollution and Air, Water and Soil Quality;
 - Continued use of composting site and odours;
 - Proposed City Plan Policies Env 33 Amenity, Env 34 Pollution and Air, Water and Soil Quality and Inf 17 Safeguarding of Existing Waste Management Facilities;
 - Loss of Prime Agricultural Land;
 - Contrary to LDP Policy Tra 1(d) Location of Major Travel Generating Development and Tra 8 Provision of Transport Infrastructure;
 - Contrary to Proposed City Plan Policies Inf 3 Infrastructure Delivery and Developer Contributions and Inf 4 Provision of Transport Infrastructure;
 - Concern that trenches excavated on site remain in situ- request for CEC to take enforcement action to remedy;
 - Capacity of Strategic Sewer- The River Almond strategic sewer overflows at several points between Cammo and Cramond pumping station during severe rainfall events. This development would pose additional loading on the strategic drainage infrastructure which is operating over-capacity at times;
 - Request for CEC to adopt a infrastructure first approach and traffic management measures; and
 - Improve Housing layout to reduce impact.

Conclusion

The application for Planning Permission in Principle for residential development that proposes approximately 500 new houses in the Green Belt is contrary to the strategic strategy of the Edinburgh Local Development Plan (LDP).

The principle of residential development is contrary to policy Env 10 and Hou 1 part 1 of the LDP. Hou 1 Part 2 is not considered to be invoked as the Housing Land Audit and Completions Programme (HLACP) demonstrates that there is more than sufficient effective land available for development in the City for Edinburgh to meet the current housing land requirement set by the first Strategic Development Plan (SDP).

The proposal is not considered to be a sustainable development in accordance with the principles set out within the Scottish Planning Policy (SPP).

The proposal will be detrimental to the setting of the Category B Listed Building and Garden Designed Landscape (GDL), contrary to LDP Env 3 and Env 7.

The application fails to demonstrate compliance with LDP Policies Tra 1, Tra 2 and Tra 8, in terms of transport and accessibility. The proposal is likely to be car dependent with limited sustainable transport modes promoted in the application.

The application fails to demonstrate that a good level of amenity can be achieved through compliance with Edinburgh Local Development Plan Policy Des 5 in terms of potential noise and odour impacts from nearby uses.

The proposal does not comply with Policy Del 1 as suitable provision cannot be identified to mitigate the impact of the additional 500 homes on local education infrastructure.

In summary, the proposal is not in accordance with the Local Development Plan. It is not sustainable development in accordance with the principles set out within the SPP. The proposal harms the setting of the nearby listed water tower and fails to meet the requirements of Section 59 of the Planning (Listed Building and Conservation Area) (Scotland) Act.

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

3.4 Conditions/reasons/informatives

Reasons:-

1. The principle of residential development is contrary to policy Hou 1 part 1 of the Edinburgh Local Development Plan as the proposed development is not an allocated site or located within the urban area and fails to comply with the criterion identified with Policy ENV 10. The proposal is not considered to be a sustainable development in accordance with the principles set out within the SPP.

2. The proposal will be detrimental to the setting of the Category B Listed Building and Garden Designed Landscape (GDL), contrary to LDP Env 3 and Env 7.
3. The application fails to demonstrate compliance with Edinburgh Local Development Plan Policies Tra 1, Tra 2 and Tra 8, in terms of transport and accessibility with specific reference to the reliance on private car usage.
4. The application fails to demonstrate that a good level of amenity can be achieved through compliance with Edinburgh Local Development Plan Policy Des 5 in terms of potential noise and odour impacts from nearby uses.

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:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

The application fails to demonstrate compliance with sustainability standards as per 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

119 letters of representation were submitted in relation to the proposal. 118 of these letters were in objection to the proposal and one letter was a neutral representation. There were no letters in support of the application.

A petition was also submitted to the Council containing 893 names and addresses of residents in objection to the proposal.

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**

Edinburgh Local Development Plan

Date registered

6 August 2021

Drawing numbers/Scheme

01-05,

Scheme 1

David Givan

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Sonia Macdonald, Planning Officer

E-mail: sonia.macdonald@edinburgh.gov.uk

Links - Policies

Relevant Policies:

Relevant Government Guidance on Historic Environment.

Managing Change in the Historic Environment: Setting sets out Government guidance on the principles that apply to developments affecting the setting of historic assets or places.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 1

Application for Planning Permission in Principle 21/04210/PPP

**at land 369 metres Northeast of , 210 Craigs Road,
Edinburgh.**

**Residential development, ancillary retail use, active travel
route, open space, landscaping, access, services and all
associated infrastructure.**

Consultations

Waste Services response

As this is to be a residential development, waste and cleansing services would be expected to be the service provider for the collection of any household domestic and recycling waste produced.

Waste strategy agreed at this stage Y/N N

I have looked at the drawings available in the planning portal file, we would require further input to the points raised below in conjunction with our current instruction for architects and developers guidance, available at <https://www.edinburgh.gov.uk/wasteplanning> , to ensure waste and recycling requirements have been fully considered.

- 1. Confirmation on the waste strategy, can you confirm how many flats/houses are proposed here?*
- 2. A swept path analysis for a 12m vehicle in line with our guidance. Please note there can be no overhang from the road surface, over grass or shared surfaces/pathways.*
- 3. Number of properties using each bin store if there is flats, we require a breakdown so we can provide you with the number of bins required.*
- 4. Confirmation that all the points raised in our guidance have been adhered to.*

In view of these factors I would ask that the Architect/developer contact myself directly claire.bolton@edinburgh.gov.uk or waste@edinburgh.gov.uk at the earliest point to agree their options so that all aspects of the waste & recycling service are considered.

Edinburgh Airport response

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:

Height Limitation on Building and Structures

No building or structure shall exceed the heights stated in the PPP application, and as such no development shall commence until the location, height, layout, form and materials of buildings and structures within the proposed development have been submitted to and approved in writing by the planning authority in consultation with Edinburgh Airport.

Reason: Buildings/structures in the proposed development may penetrate the obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and could endanger aircraft movements and the safe operation of the aerodrome;

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 maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow*
- o management of any flat/shallow pitched/green roofs on buildings or solar panel structures within the development site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'*
- o physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste.*

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. Consideration should also be given to installing bird deterrent netting on the flat roofs to prevent loafing/roosting.

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

Submission of SUDS Details

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

- 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/>)

Submission of Landscaping Scheme

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

- 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/>)*

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

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

We would also make the following observations:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes' (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.

Transport Scotland response

The Director advises that the conditions shown overleaf be attached to any permission the council may give.

CONDITIONS to be attached to any permission the council may give:-

Unless otherwise agreed in writing by the Planning Authority, after consultation with Transport Scotland, the number of residential units hereby permitted within the development shall not exceed 500.

REASON(S) for Conditions :-

To ensure that the scale of development does not exceed that assessed by the supporting Transport Assessment, and to ensure that the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network .

Scottish Water response

Audit of Proposal

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 Capacity Assessment

Scottish Water has carried out a Capacity review and we can confirm the following:

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

Waste Water Capacity Assessment

There is currently sufficient capacity for a foul only connection in the Edinburgh Waste Water Treatment works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Any mitigation apportioned to this site as part of an overall strategic assessment will be communicated to the developer directly.

Please Note

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.

Asset Impact Assessment

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

1525mm combined sewer in the site boundary

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal to apply for a diversion.

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

Surface Water

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

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification 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.

Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department.

If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.

Next Steps:

All Proposed Developments

All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

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

NatureScot response

We are content that our EIA scoping advice has been largely addressed. Further comments are given below.

Summary

This development, if delivered well, could contribute to a development with access to greenspace within the site and beyond, as well as travel connections within and beyond the site. However, there are some queries over the deliverability of the landscape framework, in particular the woodland, and we would advise that the Council should be content with the proposal and detail of these plans.

Background

It's noted that this is not an allocated site within the current Local Development Plan and therefore has not been considered strategically in terms of western growth of the city, and the necessary role that green networks and active travel should play in the sustainable growth of this part of the city. As such, any proposed development here would have to show how it would connect with other development in this area and promote more active and sustainable lifestyles.

Appraisal

Landscape and Green Infrastructure

Various open spaces are proposed, from the larger parkland and trees to the north and west, SUDs area, to the smaller park and linear greenspace along the Scottish Water protected route. The landscape report highlights the overarching principles for these open spaces as well as a description of the function and habitat of these different character areas. We recommend that the council secures the landscape intentions for these various areas, particularly the various proposed uses of these spaces, such as recreation, play, and food growing.

It's noted that the proposed greenspace will largely be low maintenance habitats, groups of trees, wildflower meadow and SUDs 'dry' wetland, which have been informed and assessed in terms of air safety, the results of which are acknowledged. The detail of the habitat creation or species to be planted has yet to be confirmed but should largely follow the intentions and indicative species in the landscape report. However, the landscape framework within the report, in particular the woodland planting, does not appear to be consistent with the landscape details in the aerodrome safeguarding feasibility study, which suggests small groups of trees, spacing between trees, and certain species, rather than woodland belts as shown in the landscape plans. We therefore advise that the council is confident with the detail of the proposed landscaping and what will be achievable, in terms of delivering the landscape mitigation for the development.

It's also noted that detail of ongoing maintenance and management has yet to be decided but the intention is to factor the site. We recommend that the council is satisfied that this is achievable and long term maintenance and management can be secured.

In terms of connections, various informal and formal pathways/active travel routes are proposed within the development and connecting outwith the development. For example informal paths within the parkland and woodland, linking to Cammo country park; Cammo Walk core path linking north and south; or the linear green space and path linking through to West Craigs. The detailed specification of these proposed paths is not confirmed at this stage and we recommend that the council secure these proposed connections going forward.

Protected species

We now have our protected species advice on our website as standing advice notes and these should be referred to for further advice in relation to surveys, mitigation and licensing.

<https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/planning-and-development-protected-animals>.

Cramond+Barnton Community Council response

Cramond and Barnton Community Council is making this submission as a statutory consultee. While the site is outwith CBCC's statutory boundaries, it is adjacent to these and the proposed development would have significant impacts on the local landscape and countryside character, strategic and local roads network and other aspects of the local environment and amenities enjoyed by our community.

In preparing this submission, the Community Council (CBCC) has reviewed the application and consulted the community on the proposals at PAN and PPP stages. We are aware also of the growing number of objectors via the planning portal (108 objections at early October).

The Community Council recognises -

- i. Edinburgh's substantial housing needs, especially for affordable housing;*
- ii. the current proposals would provide a significant number of affordable homes, with design details complying with 'net zero' principles;*
- iii. the policy principle set out in para. 33 of Scottish Planning Policy - i.e. the presumption in favour of development that contributes to sustainable development.*

However, CBCC supports the strategic sustainable growth strategy principles set out in the proposed City Plan 2030 giving priority to brownfield sites for development over the next 10 years and safeguarding of the City's green belt and countryside, which has been increasingly important to the wellbeing of the community during the Covid crisis. In these contexts and for the reasons set out below, Cramond and Barnton Community Council believes that -

- i. any decision to approve development on this green belt site, at the current 'proposed' stage of City Plan 2030, would be premature and inevitably give rise to further applications for incremental development on neighbouring green belt land;*
- ii. the adverse impacts of this specific development significantly outweigh the development's benefits.*

In particular, and in summary, the development proposals will -

- a. erode the City's green belt, encourage further encroachment on the open countryside and replace the current robust green belt boundaries with more permeable boundaries. In so doing, the development would have significant implications for the emerging City Plan policies;*
- b. impose unacceptable impacts on local landscape character, including that of the neighbouring Special Landscape Area and Historic Garden and Designed Landscape Inventory site;*
- c. generate additional residential and service traffic, which will add to the cumulative pressures from current and proposed developments in North and West Edinburgh on local traffic networks, which frequently operate substantially at/over capacity;*

- d. *expose residents, in their homes and open space, to occasional, unacceptable and unpleasant odours from the neighbouring composting site;*
- e. *result in development of prime agricultural land, which continues to offer potential for agricultural or horticultural activity, including food growing.*

These reasons for opposing the application are described in more detail below.

In framing this objection, the CC notes that -

- i. *the Council's Decision Letter in respect of application 16/04738/PPP, which states ' The proposal is contrary to Strategic Development Plan Policy 12 and Local Development Plan Policies Env 7, Env 10, Des 9 a) and c) and Hou 1 in that the proposed development of land to the north of Craigs Road ' would undermine greenbelt objectives, the nature of the urban edge and setting of the special character of the city and the setting of the Cammo Park Estate recorded in the Inventory of Gardens and Designed Landscapes.*

Refusal of the above application was supported at Appeal (PPA-230-2207) largely for reasons of erosion of the green belt and landscape impacts;

The Community Council sees no substantial reasons why the Council should revise its previous objections to major development on this site (16/0473/PPP), which were largely supported by DPEA Reporters.

- ii. *The DPEA Reporters' Notice of Intention in respect of the above appeal (30 April 2018) states ' The appellants confirmed ' that they did not intend to construct any housing on the greenbelt and accordingly, would accept the matter being regulated by either a condition or planning obligation expressly prohibiting housing on the greenbelt.*

The current application would appear to directly contradict the above assertions.

Also in 2018, the applicants commissioned the excavation of extensive trenches across the site for archaeological investigations. The ground has still not been reinstated, resulting in blighting of the landscape with the apparent intention of giving the site the appearance of a brownfield site suitable for development.

The Community Council is now seeking action by the planning authority to require the developers to restore ground conditions and, thereby remove the hazards to public safety arising from the open and unsigned trenches (see 'Restoration of Ground Conditions and Amenity' below).

DETAILED REASONS FOR REFUSAL OF APPLICATION 21/04210/PPP

a. Erosion of Green Belt

Both the current LDP and Proposed City Plan identify the site of the proposed development as within green belt. The site's green belt status was emphasised in the planning authority's refusal of the West Craigs North component of application 16/04738/PPP.

The green belt and countryside character of this area is greatly valued by residents of Cammo, Barnton and East Craigs for its scenic values, countryside character and recreational access and will be much appreciated by the 2,500+ residents of the new Maybury and Cammo developments.

Further erosion of the green belt is strongly opposed by the local communities, as -

- o it would adversely affect the local landscape and open countryside character;*
- o result in coalescence of recent major developments at Maybury and Cammo and conflict with the green belt's purposes of preventing unrestricted growth and incremental spread of built up areas;*
- o resultant green belt boundaries would be much less robust and more permeable than the current northern and eastern boundaries along Craigs Road and Maybury Road.*

The proposed development would be contrary to -

- o the spatial strategies set out in SESPlan, the current LDP and Proposed City Plan.*
- o LDP Policies Hou 1(2b.) Housing Development and Proposed City Plan Policy 4 Housing Land Supply - which require that any new development in the green belt or countryside should not to undermine green belt objectives and should safeguard landscape character;*
- o LDP Policy Env 10 Development in the Green Belt and Countryside and Proposed City Plan Policy Env 18 Development in the Green Belt and Countryside.*

b. Impacts on Landscape Character and Designated Sites

The West Craigs North site is a key 'green' and rural component of the local landscape with the Craigs Road ridge and Pentland Hills beyond being prominent in views southwards from parts of the new Cammo Meadows and established Cammo residential estates, Cammo Estate parkland, proposed Cammo Walk green corridor and active travel route, and the Mauseley Hill and iconic Cammo Water Tower.

Development of the application site - in particular 2- and 3-storey housing and 4-storey tower on eastern parts of the site and on higher ground towards the Craigs Road ridge, will diminish views westward towards Mauseley Hill and Cammo Water Tower from sections of Maybury Road, Cammo Walk and East Craigs residential areas and be diminish the scenic values and enjoyment of the Special Landscape Area and Cammo Estate Historic Gardens and Designed Landscape Inventory Site.

It is noted that Proposed City Plan Policy Place 22 Maybury includes the principle that Development must respect the ridgeline of Craigs Road and elevated slopes within the site. CBCC considers that this principle should be applied in assessing the current application and does not accept that the proposed layout and heights of proposed homes adequately respect the Craigs Road ridgeline (see accompanying photos).

City Plan 2030 Housing Study (2020) confirms the CC's assessments of the proposed development's unacceptable impact on landscape character. It states ' No scope is

identified for development on this site due to its prominence in views from Cammo, Barnton and from the A8 and A902, the requirement for considerable and visually intrusive ground modification and its provision of an important undeveloped backdrop to the allocated developments at Maybury and Cammo.

The proposed development is, therefore, contrary to -

- o LDP Policies Des 9(a) Urban Edge Development, Env 7 Historic Gardens and Designed Landscapes and Env 11 Special Landscape Areas;*
- o Proposed City Plan Policies Env 15 Historic Gardens and Designed Landscapes, Env 19 Special Landscape Areas and Env 28 Urban Edge Development.*

c. Traffic Generation

It is recognised that current studies are being undertaken to provide enhanced active travel facilities and improve traffic management on the Maybury Road network and the efficiency of Maybury and Barnton Junctions. However, the CC does not accept that the applicants' traffic assessments and assertions that marginal increases in traffic generated by the development are insignificant, as-

- a. statistically, the additional traffic generated by the West Craigs North development at peak times [e.g. estimated 149 pcus (passenger car units) at AM peak; 142 pcus at PM peak] may appear marginal. However, this will inevitably result in additional queuing and travel delays on Maybury Road and its key junctions, which already operate near/at/over-capacity during much of the day. This congestion has significant economic and air quality impacts;*
- b. the substantial recent increases in housing allocations for West Edinburgh in City Plan 2030 are unlikely to have been fully taken into account in traffic modelling. These will generate significant additional traffic pressures on Maybury Road and its junctions;*
- c. the introduction of a new (potentially signalised) arm at the East Craigs roundabout to serve the development, alongside active travel improvements and new crossings on Maybury Road, and additional bus services (e.g. Orbital service proposed in City Plan) will cause further congestion on Maybury Road and at its key junctions;*
- d. insufficient consideration has been given to increases in courier and food delivery traffic and other traffic resulting from changing household behaviours pre-Covid and exacerbated by Covid, which are likely to be continuing.*

This application does not adequately comply with -

- o LDP Policy Tra 1(d) Location of Major Travel Generating Development and Tra 8 Provision of Transport Infrastructure.*
- o Proposed City Plan Policies Inf 3 Infrastructure Delivery and Developer Contributions and Inf 4 Provision of Transport Infrastructure.*

d. Air Quality Issues

The site is within close proximity to Braehead composting site which operates 7 days a week. The applicants' assessments include sniff tests in November and assume that the prevailing wind will keep the development site free from unpleasant smells. These are misleading, as odours from the composting operations are highest in warm weather and can build up in the area around the composting site in calm weather, with the local topography occasionally channelling unpleasant odours towards the site. Such odours would be unacceptable to residents wishing to spend time outdoors around their properties.

Hence the Community Council supports the Council's Environmental Protection Team (16/11/20) response to the Scoping Opinion Request, which stated ' Odours are another issue due to the nearby composting facility. A condition would need to be applied to ensure that before any development started the composting facility will need to cease operation, buildings demolished and SEPA permits cancelled. The site remains zoned for composting in proposed City Plan 2030 and there is no reason to assume that it is likely to be closed in the near future.

The proposed development is clearly contrary to -

- o LDP Policy Env 22 Pollution and Air, Water and Soil Quality;*
- o Proposed City Plan Policies Env 33 Amenity, Env 34 Pollution and Air, Water and Soil Quality and Inf 17 Safeguarding of Existing Waste Management Facilities.*

e. Loss of Prime Agricultural Land

The site comprises Category 2 and 3.1 prime agricultural land, which until the recent excavation of archaeological survey trenches grew arable crops. While the current West Craigs and Maybury developments may have resulted in the land at West Craigs North becoming an uneconomic unit for traditional arable farming, the land remains capable of supporting some forms of agricultural or horticultural production, including commercial or community food growing.

f. Capacity of Strategic Sewer

The River Almond strategic sewer overflows at several points between Cammo and Cramond pumping station during severe rainfall events. This development would pose additional loading on the strategic drainage infrastructure which is operating over-capacity at times.

ROADS AND TRAFFIC MANAGEMENT ARRANGEMENTS SHOULD APPROVAL BE RECOMMENDED

Should the planning authority be of a mind to approve of the current application, then the Community Council would wish the following issues to be considered as the basis of amendments to the application or conditions of consent -

- i. adoption of an 'Infrastructure First' approach - the current lack of progress by the City Council on traffic management and infrastructure improvements in North West Edinburgh, including delays in LDP Action Programme projects (e.g. Cammo Walk, Barnton Junction), do not assure the community that proposed traffic management measures intended to assist delivery of the proposed development will take place*

timeously. Should this development be approved, this should be conditional on an 'Infrastructure First' approach, with all necessary traffic management and roadworks, in particular the East Craigs Roundabout link road, being completed before house building commences;

ii. Cammo Walk Traffic Management - Ever since first sight of the HSG 20 Cammo Development and associated traffic management arrangements, the Community Council has argued that Cammo Walk between Craigs Road and Cammo Estate South Car Park should either be -

o closed to traffic to enable active travel provision, conditional on traffic lights being installed at the Maybury Road/Cammo Gardens Junction to prevent substantial community severance, resulting from the significant proportion of residents who are unwilling to, or extremely apprehensive of, using the above junction due to traffic hazards;
or

o be kept open to southbound vehicles with a separate active travel corridor.

The lack of a firm commitment by the Council on the future of Cammo Walk over the past 8+ years has led to the current, so far inconclusive, Community Participation Request discussions between Council and CBCC representatives.

Prior to any approval, the Council should make a commitment on future traffic management arrangements for Cammo Walk based on one of the two options outlined above.

The applicants' Illustrative Masterplan appears to show no vehicular access retained on Cammo Walk, whereas their separate application 21/02306/PPP shows the option of southbound traffic continuing to along Craigs Road to a new junction on Craigs Road, as opposed to joining Maybury Road via a link to the East Craigs Junction.

Should agreed traffic management arrangements for Cammo Walk retain southbound traffic between Cammo Estate South Car Park and Maybury Road, traffic arrangements should -

a. provide a Cammo Walk southbound traffic joining Maybury Road at the proposed East Craigs Roundabout link road, with a left turn (eastwards) towards the Maybury Road to prevent rat-running on Cammo Walk, but no right turn (westwards) into the West Craigs North estate and or other residential developments at West Craigs, Maybury and Turnhouse and the Turnhouse Air Freight Depot;

b. exclude any other vehicular links into the proposed development from Cammo Walk, to prevent rat-running, as in a.

iii. Housing Layout

The current layout largely restricts views across the site from Maybury Road to Mauseley Hill and Cammo Water Tower to a narrow landscape corridor and locates housing on higher land in the vicinity of Craigs Road which would be dominant in the landscape.

Prior to any planning approval, the proposed housing layout should be

- a. *modified to increase views through the site from Maybury Road to the important Mauseley Hill and Cammo Tower landscape features;*
- b. *housing on high sections of the site, which would intrude on the Craigs Road ridgeline, should be removed from the proposed development layout.*

REQUEST FOR ENFORCEMENT ACTION TO REQUIRE RESTORATION OF LANDSCAPE AND AMENITY VALUES AND REMOVAL OF SAFETY HAZARDS

Should the planning authority decide to refuse this application, this will not remedy the loss of amenity and safety hazards to people accessing the site under Scotland's rights of responsible access, due to the extensive archaeological excavations across the site undertaken two to three years ago. There is no evidence of the developers' intending to infill the trenches and reinstate the previous ground levels, as a result -

- i. *productive use of the land cannot be restored until the trenches have been infilled;*
- ii. *the visual landscape qualities of the site and its values for recreational access have been substantially diminished;*
- iii. *the extensive, open and, in many cases, partially or wholly water-logged trenches, many of which are partially obscured by vegetation, pose hazards to the safety of local people who visit the site for walking or other pursuits (e.g. nature watching). For example, children have been observed in winter treading on variable levels of ice covering waterlogged trenches of 0.5-1.5 metres in depth, without recognising the hazards involved.*

Should the planning authority refuse the current planning application, CBCC would encourage it to serve an Amenity Notice, under s.179 of the 1997 Planning Act, requiring the landowners to infill all trenches across the site and reinstate ground levels; thereby, restoring some of the amenity and landscape qualities of the site and removing the safety hazards posed by the often waterlogged trenches.

Historic Environment Scotland response

Thank you for your consultation which we received on 14 September 2021. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations and for our historic environment remit as set out under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

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

Our Advice

We do not object to the proposed development. However, we have comments to make on the proposal's potential impacts on Cammo GDL. Further details are included in the Annex below.

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

Further Information

This response applies to the application currently proposed. An amended scheme may require another consultation with us.

The Historic Environment Policy for Scotland (HEPS 2019) was adopted on the 01 May 2019 and replaced the Historic Environment Scotland Policy Statement (HESPS 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps.

Affordable Housing response

1. Introduction

Housing Management and Development are the 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 application is for a development consisting of up to 500 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (125) homes of approved affordable tenures. The Planning Statement supplied with the application states that 'the applicants have made a commitment to 50% affordable housing provision on-site', which is welcomed.

The developer has entered into an early dialogue with the Council and Registered Social Landlord (RSL) on the design, mix and location(s) of the affordable housing. An integrated and representative mix of affordable housing should be delivered on site. Through the Planning Statement, the applicant has advised that the RSL Dunedin Canmore Housing Association (DCHA) have been identified to deliver the affordable housing on site. Negotiations between the applicant and DCHA in regards to the mix of the affordable housing to be delivered have resulted in more affordable houses and 3-bedroom affordable housing than were proposed initially and this is welcomed.

The affordable homes are required to be tenure blind, fully compliant with latest building regulations and further informed by guidance such as Housing for Varying Needs and the relevant Housing Association Design Guides. The affordable housing should be a representative mix of the market housing being provided across the site. The Council aims to secure 70% of new onsite housing for social rent and we ask that the applicant enters into an early dialogue with us and our RSL partner organisations regarding this.

The affordable homes should be situated within close proximity of regular public transport links and next to local amenities. An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, should be provided.

3. Summary

There is a requirement to provide 25% on site affordable housing to assist in the delivery of a mixed sustainable community:

- o The applicant will be required to submit an "Affordable Housing Statement", setting out their approach to the following points and which will be a public document available on the City of Edinburgh Council's Planning Portal.*
- o The applicant should agree with the Council the tenure type and location of the affordable homes.*
- o The applicant has entered into an early dialogue with the Council to identify a Registered Social Landlord (RSL) to deliver the affordable housing on site.*
- o The affordable housing should include a variety of house types and sizes which are representative of the provision of homes across the wider site.*
- o In the interests of delivering mixed, sustainable communities, the affordable housing policy units will be expected to be identical in appearance to the market housing units, an approach often described as "tenure blind".*
- o The affordable homes should be designed and built to the RSL design standards and requirements.*
- o The applicant will be required to enter into a Section 75 legal agreement to secure the affordable housing element of this proposal.*

SEPA response

We have no objection to this application on the grounds of flood risk.

A Flood Risk Assessment (FRA) has been completed and it is based on appropriate methods and its representation of flood risk at the site is in line with all other evidence that is currently available. We agree with the recommendation of the FRA and how it has

been used to inform the site masterplan I where no development is proposed along the northern boundary. We support the absence of development along the northern boundary.

I am still waiting for comments on air quality from colleagues. If you are content, however, to rely on comments from your own colleagues in environmental health, then we would be satisfied with this and please consider this as SEPA's response to this consultation. Should you wish SEPA's comments on air quality please let me know and send with your email the comments from your environmental health colleagues: this should provide us with a baseline which will help us respond more speedily.

Environmental Protection response

The proposed development could provide up to 500 new family homes in a range of house and flat types. West Craigs North is located between allocated housing site HSG 20 Cammo to the north and allocated housing site HSG 19 Maybury to south, with Cammo Walk / Maybury Road to east, and a paddock / residential and waste site to west. The application site is allocated Greenbelt status in the local development plan. Specifically, the site is bounded to the north by the historic gardens and designed landscape associated with Cammo House. There is a ditch leading east to the Bughtlin Burn, and parts of a stone walling separate the site from Cammo Estate. To the east and north-east, the site is bounded by Cammo walk, where the allocated housing site HSG 20, Maybury Road and the Bughtlins Roundabout are located. To the south and separated by Craigs Road, the site is bounded by the allocated housing site HSG 19, where number of developers are building. There is a commercial composting site at the former Braehead Quarry that stands to be west of the site, between the site and Turnhouse Golf Course.

The applicant has submitted various supporting general documents such as noise, air quality and odour assessments as well as site investigation reports. These reports are site specific but would need to be updated when detailed plans are submitted.

As stated, this specific piece of land is identified as greenbelt land which is differs significantly from what the neighbouring plots of land identify as under the local development plan. It is understood that the wider area including has various consents for a residential lead development. The area is currently agricultural land.

Environmental Protection would highlight concerns regarding this development including the impacts the development may have on local air quality and noise impacts on the existing and proposed neighbouring residential and importantly on the potential future residents. As this is a PPP application further details of the development will be submitted later and be controlled by condition. One of our main concerns is the cumulative impact this along with the many other committed developments in the West of Edinburgh will have on local air quality. Furthermore, this proposal will introduce residential receptors closer to the composting facility than currently exists.

The applicant has submitted a more detailed air quality impact assessment with this application which has been assessed by Environmental Protection. We do have significant concerned with the level of proposed development around this wider area. As this site is allocated Greenbelt we would support it remaining greenbelt and not

developed for high density housing. Generally, the assessment has identified various methods of mitigation albeit further specific information would be required as more detailed applications are submitted. It should be noted that Edinburgh has declared a Climate Emergency and nationally Zero Carbon targets have been set. There have also been technological advances in renewable heat and energy and with the electrification of the transport network. The applicant has highlighted that they aim to meet energy and heat demand through renewables which is something Environmental Protection would support. They also propose committing to introducing 100% electrification of vehicle spaces with rapid chargers also incorporated.

The applicant has highlighted that the site is highly accessible by all modes of travel, especially all modes of active travel, and thereby provides a place that is easy to get to (without reliance upon the car) and easy to move through. The development is located in support of 20-minute neighbourhood initiatives and encourages the use of public transport and walking / cycling towards existing and future residential amenities and employment zones, thereby decreasing dependency upon the car. This would be a suitable strategy for a site that had been allocated suitable for residential in the local development plan but not on Greenbelt Land.

Again the applicant has also stated that the proposed development supports sustainable modes of active travel and promotes site wide sustainability through a commitment that no new homes will be fitted with gas heating. Whilst there are no available district heating networks, all homes will adopt sustainable heating solutions, and will consider the use of solar, air source, ground source and in plot battery storage to supplement mains electricity for heating. Furthermore, all new houses will be fitted with EV chargers, and all apartments will have access to fast EV chargers.

The applicant has pointed out that the site is located within a highly sustainable location, well served by the existing public transport network, bus stops with frequent direct services to and from Edinburgh City Centre, Edinburgh Airport, Ingliston Park and Ride, Gogar Heavy Rail, and Tram stops. It is therefore considered that any development of the site for residential should be encouraging sustainable modes of transport for visitors and residents. This is something that Environmental Protection would need to see the applicant will need to ensure any detailed plans demonstrate that this has been incorporated into the final design.

The priority is to keep car parking numbers down to a minimum. Any size of development on this site would be a cause for concern from a local air quality perspective. However this is a large high density proposal there our concerns are significant.

Environmental Protection would strongly recommend that careful consideration is given to the proposed electric vehicle charging network on this site and how it interacts with the proposed end users. Slower chargers should be provided in the car parking areas serving spaces where staff/residents/visitors will be parking for longer than 1 hour. We would recommend that these should have a minimum 7KW (32AMP) power output with a Type 2 plug. A rapid electric vehicle charging point would also need to be incorporated to charge service vehicles for example deliveries and taxis. This will allow these vehicles to charge quickly over a short period of time.

The applicant will need to provide much more detailed information including drawings showing exactly where and what type of chargers and substations are going to be

located. Similarly, further detailed information will be required highlighting what is being proposed for meeting the heating and energy demand for the buildings. Any plans and drawings shall clearly demonstrate where and what associated plant is being proposed. The location of some plant serving air source heat pumps will also need to be carefully located as they can be a source of noise.

The applicants air quality impact assessment has also incorporated an odour assessment. The applicant has conducted a detailed survey into the potential odour impact that may arise from the neighbouring composting facility. As stated previously this proposal will introduce a significant number of new receptors closer to the composting facility. The applicants survey has identified that many the proposed units will likely be affected by the malodours emanating from the composting facility. This would have an adverse impact on any future residents' amenity and would likely lead to complaints. We are aware complaints are already made by the existing neighbouring residents who are a significant distance from the composting facility.

The applicant has also assessed the construction impacts and incorporated mitigation into a Construction Environment Management Plan. This would need to be conditioned if consented.

Environmental Protection would object to this application regarding local air quality however if consented conditions ensuring the provision identified in the air quality impact assessment being submitted and an EV Infrastructure being included as a condition or legal agreement.

Contaminated Land

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.

Noise

Noise impacts on the proposed residential properties will need to be further assessed at the detailed planning stage. The applicant will need to ensure the final design and layouts of the proposal takes into consideration the submitted noise impact assessment.

The neighbouring composting facility has several potential noise sources that will impact future residents if not mitigated either by distance or through barriers. Transport noise has also been identified as a noise source that will need mitigating. The noise impact assessment at the detailed stage will need to consider all these points further and provide specific details on noise mitigation including detailed information provided on any supporting drawings

The noise impact assessment has demonstrated noise can be mitigated by careful building layout and design and appropriate insulation being incorporated to provide a good level of protection for amenity. Environmental Protection is satisfied that noise can be mitigated however the exact specifications of the mitigation measures will need to be required in the form of a noise impact assessment when more details of the proposed development are available. Acoustic glazing will be required to protect the future

residents from transport noise. Transport noise can be assessed to a closed window standard. A large acoustic barrier and or bund may be required between the road, composting facility and proposed development. This barrier may need to be extended to ensure that the outdoor amenity areas are afforded acceptable acoustic levels. During the detailed stage we would need to know the location, height, materials, design and density of any acoustic barrier.

Commercial noise will need to be assessed allowing for an open window standard. The applicant will need to ensure that a noise impact assessment demonstrates that the final layout meets the required internal noise criteria with the windows open. If there are bed/living rooms that can't meet the standard, then the layout should be altered to relocate these sensitive rooms.

Environmental Protection would require conditions attached to any consent to ensure noise is adequately addressed and amenity is protected for the residential units. Noise impacts from the transport source and the consented commercial uses will need to be carefully considered.

Therefore, on balance Environmental Protection recommend that the application is refused due to the poor level of amenity that will be afforded to future residents affected by odours. This will also likely impact future commercial operations on this site. The local air quality impacts are also a concern. This is due to the wider impacts of committed developments not this development in isolation. If consented conditions will need to be applied to ensure contaminated land, odours, local air quality and noise are further considered as detailed in the main text;

1. Detailed site plans highlighting where the electric vehicle charging outlets and ducting will be located shall be submitted. The parking spaces must be highlighted on any drawing and shall be served by as a minimum 7Kw (32amp) Type 2 electric vehicle charging sockets. They shall be installed and operational in full prior to the development being occupied. The number of chargers installed shall be above the levels specified in the Edinburgh Design Standards.
2. Details of where rapid 50KW charging outlets shall be installed and operational prior to occupation.
3. Prior to the use being taken up, the applicant shall demonstrate how all heat and energy demand will be met onsite, the system shall be capable of meeting all demand with no fossil fuels. Details must be included in any drawings.
4. Prior to the commencement of construction works on site:
 - (a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning

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

5. Development shall not commence until a scheme for protecting the occupiers of the residential development hereby consented from transport noise has been submitted to and approved in writing by the Planning Authority; all works which form part of the approved scheme shall be completed to the satisfaction of the Planning Authority, before any part of the development is occupied.

6. Development shall not commence until a scheme for protecting the occupiers of the residential development hereby consented from the composting facility noise has been submitted to and approved in writing by the Planning Authority; all works which form part of the approved scheme shall be completed to the satisfaction of the Planning Authority, before any part of the development is occupied.

Archaeology response

The application site occupies the southern part of a high ridge located between the former West Craigs Farm and the Historic Landscape (HES Inventory Ref. GDL00081) of Cammo Estate. In addition, to the historic Cammo Estate it and occurs within a wider area identified as being of archaeological significance incorporating both Cammo and West Craigs and Meadowfield Farms to the South. The latter have been subject to an extensive programme archaeological investigation in advance of current housing developments by AOC Archaeology Group at West Craigs and by both GUARD and latterly CFA archaeology between 2019 & 2021. This includes a programme of pre-application evaluation of this site started by GUARD and completed by CFA Archaeology (CFA report 3938)

Although the final post-excavation research and not all fieldwork have yet to finalised and undertaken from these sites, the initial results from the field work from across these areas have provided regionally and nationally important evidence for occupation and use of this area dating back potentially 6000 years and including; an Late Iron Age Palisaded enclosure at West Craigs Farm, early Farming activity and occupation during the Neolithic and possible remains of a Neolithic or Bronze Age Cairn, evidence for the medieval settlement at Meadowfield Farm, as well as recording of the latter 18th -20th century Farms of Meadowfield and West Craigs (work at this site has still to be completed).

Based upon this recent work, it was required that this site be evaluated prior to determination. Started by GUARD Archaeology in 2019, the evaluation was completed by CFA in 2020 (CFA report 3938). The evaluation results indicated that significant archaeological remains appear to be limited to the higher ground, above the 50/55m contour. Within this area archaeological remains comprise a range of features including ditches, post-holes & pits spread throughout. Although undated, given the evidence from the surrounding excavations, it is considered that many of these features date to prehistory, though the large boundary ditch is likely to be post-medieval/medieval in date.

Accordingly, the site is regarded as being historic and archaeological significance. This application must therefore be considered under terms of Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), PAN 02/2011, HES's Historic Environment Policy for Scotland (HEPS) 2019 and CEC's Edinburgh Local Development Plan (2016) Policies ENV3, ENV7, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Buried Archaeology

The proposals will require significant ground-breaking works associated with development e.g. construction, new services, landscaping. These works will have a significant impact upon any surviving archaeological remains. Based upon the results of the earlier pre-application evaluations, carried out by GUARD and CFA, significant remains in would seem to be confined to the area of higher ground above the 50/55m contour line as shown on Fig 1 below. It is therefore essential that a programme of archaeological work is carried out across this area (strip, map and excavate/record) prior to development in order to fully excavate, record, analysis any archaeological remains affected and publish the results from this work.

Public Engagement

As stated, the site is likely to contain important archaeological remains dating potentially back to prehistory. It is therefore considered essential that a programme of public/community engagement is undertaken during development as part of the overall programme of archaeological works. The full the scope of which will be agreed with CECAS but could include site open days, viewing points, interpretation, social media and exhibitions.

It is therefore recommended that a condition be applied to any permission granted to secure this programme of archaeological work, based upon the following CEC condition;

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

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

Cammo Estate: Historic Landscape and Listed Buildings

As discussed above the site occupies the ridge of high ground between West Craigs Farm and the Inventory Garden and Designed Landscape of Cammo Estate. Although not physically impacting on this nationally important his historic estate, the construction of a new housing development across this ridge line will clearly have a significant impact upon its setting and in key views.

In terms of setting, I have concerns that the construction of a large new residential development across this high ridge will see further significant further loss to the setting of this historic countryside estate (dating back to the 17th century) and its listed buildings. Furthermore, although some attempt has been made to protect a key view by the creation of a narrow linear open park, the construction across this ridge line will potentially significantly impact upon views from the landscape southwards towards the Pentland Hills. As such these PPP plans could be contra to Policy ENV7.

Communities and Families response

A city-wide cumulative assessment of the impact of housing land supply from the 2020 housing land audit and estimated housing land capacity from the City Plan 2030 on the learning estate has been carried out. This Education Appraisal is a supporting document to the proposed City Plan 2030.

The Education Appraisal identifies where additional education infrastructure is necessary to support the cumulative impacts of known housing growth and identifies actions required to mitigate the cumulative impacts of housing developments. The Education Appraisal informs the City Plan 2030 Proposed Action Programme.

The application proposes the development of up to 500 dwellings on a site that is not identified as a housing proposal in the adopted local development plan 2016 or the proposed LDP, City Plan 2030. Accordingly, its impact, including the cumulative impact with other developments, has not formed part of any previous assessment on the impact of housing growth on the learning estate.

The applicant indicates between 25-50% of the proposed dwellings would be flats. Using pupil generation rates (PGR) from the Education Appraisal (2021) the proposed development would be expected to generate between 42-50 early learning and childcare (ELC) places, 130-166 primary pupils and 74-98 secondary pupils.

Early Learning and Childcare and Primary School Infrastructure

The proposed site currently straddles Corstorphine Primary School and Cramond Primary School that feed into Craigmount High School and the Royal High Secondary School respectively. This site will be aligned to a new primary school being delivered as part of the current LDP (2016) on HSG 19 - Maybury. The new primary school has been designed to be built in two phases with an overall capacity of 630 pupils and 128 place ELC. The first phase will deliver a two-stream primary school with a capacity of 420 pupils and the nursery. The second phase will add an additional 210 pupils. Phase one is expected to be delivered for August 2024 and the second phase will be delivered at the appropriate time.

The new school in HSG 19 has planning permission (reference: 21/02158/FUL) and has been designed to accommodate pupils expected to be generated from HSG 19: Maybury and HSG 20: Cammo. Cumulatively the sites are expected to generate 650 ND PS, as indicated by the table below.

<i>Housing site</i>	<i>Dwellings</i>	<i>ND PS</i>
<i>HSG 19: Maybury</i>	<i>1,780</i>	<i>517</i>
<i>HSG 20: Cammo</i>	<i>656</i>	<i>133</i>
<i>Total</i>	<i>2,436</i>	<i>650</i>

There is no spare capacity in the new school located in HSG 19 to accommodate the ND PS pupils expected to be generated from the proposed development. The new school would have to be designed to 26-28 classes to accommodate the 113-144 additional ND PS pupils expected to be generated from the proposed development. The Learning Estate Planning Team does not consider the proposed new school can be extended beyond the 21 classes planned without seriously compromising the indoor and outdoor learning environment.

The Education Appraisal for the Proposed LDP City Plan 2030 identifies the requirement for new primary schools to support housing growth in West Edinburgh. Five new primary schools, with ELC places, are required:

- 2 x 21 class primary school*
- 1 x 15 class primary school*
- 1 x 14 class RC primary school*
- 1 x 7 class primary school*

It is expected that four of the above schools will serve Emp 6 IBG, H61 Crosswinds, H62 Land adjacent to Edinburgh Gateway and H63 Edinburgh 205. These sites are located to the west of the Edinburgh-Dundee railway line. The seven-class primary school will serve H59 Land at Turnhouse Road (SAICA) and H60 Turnhouse Road and is located to the south of HSG 19 Maybury. The new primary school at HSG 19 Maybury is located to the south of the site offering little scope to realign some of its catchment area to a new primary school at the Turnhouse sites to accommodate the proposed development.

With regards to denominational (RC) primary school places, it is the Council's experience that travel distances can affect the uptake such places and in order to reduce accommodation pressure at a denominational school it may be necessary to prioritise baptised RC pupils, however this will increase rolls and accommodation pressure at non-denominational primary schools. The nearest existing denominational primary school is St Andrew's RC Primary School which shares a site with Fox Covert Primary School and is approximately 1.7 miles from the proposed site. A six-class extension has been delivered at this site which is expected to be used flexibly to respond to the demands of both schools.

The proposed development requires the equivalent of a single stream, seven-class primary school, to accommodate the maximum number of primary pupils expected to be generated on a 2 ha site.

Secondary School Infrastructure

The Secondary School Roll Projections show that there is no spare capacity in Craigmount High School. Accordingly, additional secondary places would be required to support the number of pupils expected to be generated from the proposed development.

The Learning Estate Planning Team will be engaging with school communities in West Edinburgh, including Craigmount High School, between February and May 2022 to develop a strategy for the learning estate in West Edinburgh. The engagement process will seek the views of the affected communities and inform future statutory consultations. One of the three main issues being considered is whether Craigmount High School

should be extended to accommodate pupils from the new primary school at Maybury or if it should feed to a new West Edinburgh High School.

As noted above, a new primary school would be required to support the primary pupils expected to be generated from the proposed development. A new primary school would need to be aligned to a high school. At this time, before engaging with affected communities and carrying out a statutory consultation, it is too early in the process to determine what secondary school pupils from the proposed development would be aligned to.

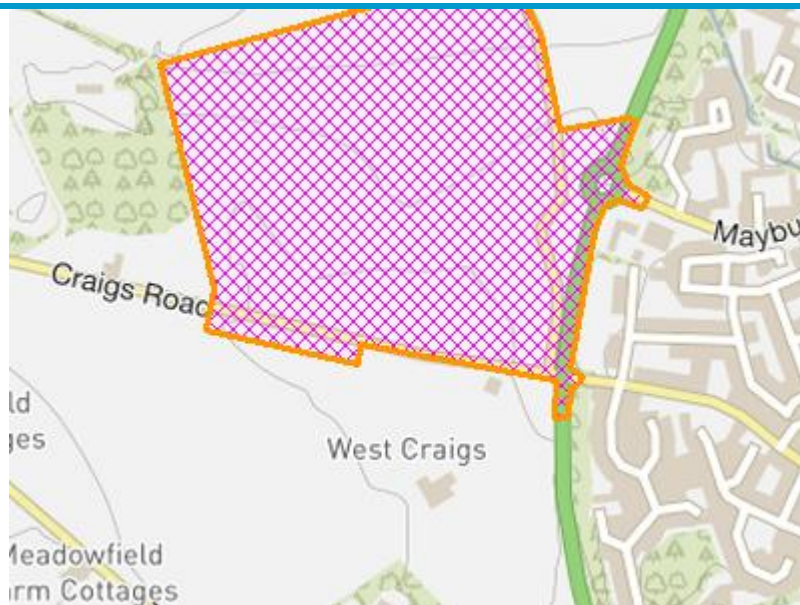
Conclusion:

Additional education infrastructure across all stages is required to support the proposed development.

The proposed development cannot solely rely on education infrastructure identified as part of the proposed LDP City Plan 2030, on land that is not owned by the Council, where its delivery cannot reasonably be provided by the applicant because it requires the agreements of other landowners and the programme for delivering the necessary education infrastructure has not been finalised. Furthermore, the cumulative education impacts still have to be finalised through the examination process and adoption of the plan and adoption of its first action programme.

Accordingly, until sites to deliver the necessary learning estate infrastructure are confirmed, the proposed development cannot be supported at this time.

Location Plan



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