

# Development Management Sub Committee

**Wednesday 3 March 2021**

## **Application for Planning Permission in Principle 20/03219/PPP**

**at Land to South West of Meadowfield Farm, Turnhouse  
Road, Edinburgh.**

**Mixed use development including business and  
employment uses (use classes 4, 5 and 6); residential  
(class 9) and sui generis flatted development (including  
affordable and student accommodation), hotels (class 7),  
ancillary uses including retail (class 1), financial and  
professional services (class 2), food and drink (class 3 and  
sui generis), non-residential institutions (class 10),  
assembly and leisure (class 11) and associated works  
including car parking, servicing, access and public realm.**

**Item number**

**Report number**

**Wards**

B01 - Almond

## **Summary**

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The application represents a National Development proposal in Edinburgh, situated with close proximity to the A8 Corridor, Edinburgh Airport and Edinburgh Gateway Station.

The nature of the proposed development including significant level of business and residential use is not supported by National Planning Policy (NPF 3), the SDP and Local Development Plan (LDP) specifically LDP Policy Emp 4, Edinburgh Airport, which seeks to guide proposals for airport expansion. The requirements of this policy have not been met, as the proposal is not supported by an agreed Airport masterplan, does not have functional or locational links to the airport, nor does it accord with the West Edinburgh Strategic Design Framework (WESDF).

The proposed masterplan, parameters plans and design code have not been developed to take account of the particular characteristics of the site and its context, nor has it been demonstrated that placemaking objectives would successfully be achieved to deliver a sustainable community.

The masterplan proposals have not adequately demonstrated how LDP Policy safeguards relating to the site including Proposals GS7, Diversion of the Gogar Burn and T9, Gogar Link Road would be delivered in relation to the development.

The application proposal is premature and extensive pre-application advice offered to the applicants has not been followed.

The application has been appealed for non- determination to the DPEA. The Committee is asked to confirm that they would support the recommendations as outlined within the report to support the Council position at appeal.

By virtue of the proposed application being for a development which conflicts with a National Development and the West Edinburgh Direction for major housing developments, the application would have been referred to Scottish Ministers.

It would have been the recommendation that this application be Refused. There are no material considerations which outweigh this conclusion.

## Links

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<a href="#"><u>Policies and guidance for this application</u></a>	LDPP, LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LEN03, LEN09, LEN12, LEN15, LEN16, LEN20, LEN21, LEN22, LEMP01, LEMP04, LEMP06, LEMP08, LEMP09, LEMP10, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LRET07, LRET11, LTRA01, LTRA02, LTRA03, LTRA04, LTRA07, LTRA08, LTRA10, LHOU08, LRET06, NSG, NSESBB, NSGD02,
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# Report

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### **Recommendations**

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- 1.1 It is recommended that the Committee note the conclusions within this report and agree as the basis of the submission to support the Council position at Appeal.

### **Background**

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#### **2.1 Site description**

The application site (30.4 hectares) is defined by Edinburgh Airport and the Gogar Burn to the north west and the Edinburgh-Fife railway to the north east. The southern site edges are defined by the Castle Gogar Estate and Castle Gogar Drive (a tree lined avenue), the Edinburgh Tram Depot and Myreton Drive which provides access between the depot and the Gogar Roundabout. The Edinburgh Gateway Station, providing connections to tram and heavy rail, lies to the south east.

The majority of the site comprises operational land for Edinburgh Airport including the 12/30 'Crosswind' runway which was decommissioned in 2018. The site largely comprises grassland with areas of hard standing, access tracks, plant and equipment associated with the operation of the airport, these enclosed by a perimeter security fence.

The topography of the main part of the site falls gradually from south to north, with the southern edges of the site rising sharply from the Gogar Roundabout and the Tram Depot. Spoil mounding is situated within the airport land to the north west of the site. This is mostly grass covered.

In terms of adjacent uses, the Castle Gogar Estate lies to the south west. This comprises the Category A listed Castle Gogar (LB 27092, Date of Listing: - 14 July 1966) which is set within mature trees and woodland. The Castle is in residential use, with further modern residential properties lying to the west. Operational airport land is situated to the north west, this partially used for car parking and ancillary airport uses including aircraft storage. The Local Development Plan allocated housing site HSG19 Maybury/West Craigs lies to the north east on the opposite side of the railway, with development expected to commence during 2021.

The application site lies substantially within the airport boundary as defined in the LDP with the land designated as Special Economic Area. LDP Transport Proposal T9 outlines the requirements for the Gogar Link Road, this supporting long term development in West Edinburgh and connecting Eastfield Road to the Gogar Roundabout via the International Business Gateway. The LDP identifies an indicative alignment and safeguard which crosses the southern part of the application site.

The Gogar Burn, which is partially culverted beneath the site, flows via the Castle Gogar Estate, to the south western edges. This is designated as Local Nature Conservation Site (LNCS) with Areas of Importance for Flood Management lying in the vicinity of the Burn to the south west.

LDP Greenspace Proposal GS7 identifies an enhancement and diversion of the Gogar Burn with indicative alignment crossing the site from north to south. The proposal seeks to reduce flood risk in west Edinburgh, improve water quality and enhance biodiversity.

## **2.2 Site History**

18 January 2021 - Application lodged for the formation of a new access road and active travel route from the east of the Airport terminal Building to the Gogar Roundabout. Proposed road alignment overlaps with north eastern extents of this application. Application pending consideration. (Reference: - 21/00217/FUL)

06 November 2019 - Notice of Planning Application (PAN) agreed for a new airport access road from the east of the terminal building at Edinburgh Airport to Gogar Roundabout. The PAN extents overlap with the north eastern part of the site (Reference: - 19/04534/PAN)

15 March 2016 - Notice of Planning Application (PAN) agreed for mixed use development at site 100 metres east of 194 Glasgow Road. The PAN extents comprise the eastern part of the IBG allocation, both abutting and overlapping with this proposal in the vicinity of Myreton Drive (Reference: - 16/00927/PAN)

### Land to the west

11 September 2019 - Application for Edinburgh International Business Gateway (IBG) Phase 1, comprising mixed use development including business + employment uses, hotels, residential and ancillary uses at land to the east of Eastfield Road called in by Scottish Ministers. Hearing sessions took place February 2020, with application currently under consideration by Scottish Ministers (Reference: - 15/05580/PPP, DPEA reference:- NOD-EDB-003)

### Land to the north east

14 October 2014 - Proposal of Application Notice (PAN) submitted for residential development and ancillary retail (Class 1), Class 2 (300sqm in total) including landscape, access and services and all related ancillary development at site 100 Metres North East Of 19 Turnhouse Road (Reference: 14/04156/PAN);

20 April 2017 - Application for Planning Permission in Principle was refused for 'Residential development, up to a maximum of 1400 units, and ancillary commercial (Class 1 retail and Class 2 financial and professional) including landscaping, access and services and all other ancillary development' at Site 100 Metres North East Of 19 Turnhouse Road Edinburgh. In summary the application was refused for reasons including loss of green belt, landscape impact, transport infrastructure delivery, drainage and flood risk, insufficient environmental assessment information and failure to outline a comprehensive design approach (Reference: 16/04738/PPP);

26 September 2019 - Appeal against refusal of application 16/04738/PPP was allowed by Scottish Ministers for 'residential development, up to a maximum of 1,400 units, and ancillary commercial (class 1 retail and class 2 financial and professional), including landscaping, access and services and all other ancillary development' at 100 metres north-east of 19 Turnhouse Road, Edinburgh (Appeal reference: PPA-230-2207);

25 May 2020 - An application for Approval of Matters Specified in Conditions of planning permission in principle 16/04738/PPP in respect of conditions 1, 2, 3, 4 and 5 for a masterplan for the site was approved (Reference: 19/05599/AMC).

10 November 2020 - Planning permissions granted for pedestrian and cycle bridge over the railway with associated landscaping at land to the south west of Meadowfield Farm, Turnhouse Road (Reference: - 20/01148/AMC).

## **Main report**

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### **3.1 Description of the Proposal**

#### Scheme 1

Planning Permission in Principle (PPP) is sought for a mixed use scheme redevelopment of the south eastern section of the former Edinburgh Airport Crosswinds runway and associated land. The application identifies the following mix of uses and development quantum: -

- Classes 2, 4, 5 and 6 - Business/Employment, Offices, General Industrial and Storage or Distribution - up to 95, 200 sqm floorspace.
- Class 9 Residential, Sui Generis Flatted development and student accommodation - This would represent up to 2,500 residential units including 25% affordable.
- Class 7 Hotels - 1 x 4 star and 2 x 2 2 star up to 883 bedrooms, 1 x aparthotel with up to 131 units
- Classes 1, 2, 3, 10 and 11 - Ancillary uses including retail, financial and professional services, food and drink, non-residential institutions and assembly and leisure - up to 8,200 metres floorspace

- Associated infrastructure works including car parking (up to 1410 spaces in a multi storey or decked parking), servicing, access, public realm and landscaping.

The proposal referred to as 'Elements Edinburgh' aims to create a unique Scottish 'digital community' as a location for investment from global companies, as well as support local growth from Scottish companies in the digital sector. The proposal seeks to attract both start up and established digital businesses that support collaboration and inclusivity to create an inclusive working and learning environment.

An 'illustrative' masterplan establishes a site structure based around 35 principal plots (some sub-divided). These comprise 18 residential led, 9 commercial, 4 hotel, 3 car parking and 1 retail leisure.

A suite of Parameters Plans defines the following on a site wide basis: -

- Illustrative Land Use Plan
- Landscape Framework
- Active Travel Parameters Plan
- Movement and Access Parameters Plan
- Frontage Hierarchy Parameter Plan
- Height Parameters Plan
- Development and Phasing Plan
- Landscape Phasing

With guidance contained in the Design and Access Statement, these seek to establish Design Coding in relation to site layout and built form. These are intended to set site specific and precise design rules to guide the physical development of each place.

The Design and Access Statement define a series of five-character areas including the Elements Gateway, Tower Plaza, the Elements Hub, Rain Garden Corridor and Woodland Edge. These would be supplemented with three strategic Landscape elements include the Gogar Burn Park, the boundary road and a series of residential 'green fingers'. Land for the potential future diversion of the Gogar Burn is identified to the north western edges of the site.

The proposed development would be served by a single point of vehicular access, this established via the Gogar Roundabout situated at the south eastern corner of the site. A potential vehicular access to provide a link to Edinburgh Airport is also identified the north east of the site.

Potential active travel connections are identified to the north west via a corridor running parallel to the Gogar Burn, to the south eastern edge via the Castle Gogar Estate, to the north east via the existing railway bridge leading to Meadowfield Farm and the West Craigs housing development, and to the south east which would also link the Maybury/ West Craigs housing development via Edinburgh Gateway.

The application is supported by a number of documents which are available to view on the Planning and Building Standards Online Services:

- Pre- Application Consultation Response;
- •Design and Access Statement;

- Energy Statement;
- Heat Network Feasibility Study;
- S1 Sustainability Form;
- Planning Statement;
- Transport Assessment;
- Tree Condition Report;
- Flood Risk Assessment (Updated) and
- Surface Water Management Plan (Updated).

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

- Socio-economic;
- Transport and Access;
- Air Quality;
- Climate Change and Resilience;
- Biodiversity;
- Material Assets and Waste;
- Noise and Vibration;
- Landscape and Visual Impact Assessment;
- Cultural Heritage;
- Archaeology;
- Water Environment and
- Ground Conditions.

Additional information has recently been submitted by the applicant in response to consultation responses from the Transport Authority and in relation to Education provision. However, due to the submission of the appeal this information has not been addressed as part of this report.

### **3.2 Determining Issues**

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

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states that in considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority 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.

Do the proposals comply with the development plan?

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

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

### 3.3 Assessment

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

- a) The principle of development is acceptable.
- b) The proposed masterplan concept and design parameters are acceptable.
- c) The proposal would achieve coordinated development.
- d) The proposals raise issues relating to transport and accessibility.
- e) The proposals raise issues relating to strategic water management.
- f) Other matters:- Strategic Landscape Impact, Setting of listed buildings, Archaeology, Flooding and Drainage, Air Quality, Noise, Land Contamination, Airport Safeguarding, Amenity.
- g) The proposal would raise infrastructure contribution.
- h) The proposed EIA is acceptable.
- i) Issues raised in representations have been addressed.

#### **a) Principle of Development**

##### Policy Context

##### Scottish Planning Policy - NPF3

The National Planning Framework (NPF) identifies National Developments in Scotland. The purpose of National Development status is to establish the need for these developments. 'Strategic airport enhancements' which includes Edinburgh Airport are identified as National Developments.

NPF3 supports the expansion of Edinburgh Airport as defined in its current Masterplan, which in turn is supported by the Edinburgh Local Development Plan (LDP). A Draft Masterplan was prepared in 2016 by Edinburgh Airport and continues to show the application site as part of the airport for use as ancillary development until 2040. This has not been approved by key stakeholders and should therefore be given little or no weight in the determination of this application. It is understood that the Airport have been preparing a revised masterplan, but this has not been formally presented to the Council.

SPP clearly states that NPF is the spatial expression of the Government Economic Strategy. The NPF sits at the top of the development plan hierarchy and must be taken into account in the preparation of strategic and local development plans. The National Planning Framework therefore holds considerable weight, which in turn is reflected and implemented through the statutory status of the development plan.

Scottish Government are currently working on the replacement NPF4, but this is not expected to be in draft form until September 2021 at the earliest.

### Strategic Development Plan (SDP)

The Spatial Strategy contained within SESPlan, the Strategic Development Plan, identifies 13 Strategic Development Areas (SDA's) including West Edinburgh, these form the main focus for future growth. These are intended to maintain and develop the areas established role as the Regional Core and Capital City.

The approved SDP identifies Edinburgh Airport within the West Edinburgh Strategic Development Area. It notes that the strategic enhancement of Edinburgh Airport has been identified as a national development with the National Planning Framework. It also notes that the area is an attractive location for inward investment and as well as airport expansion proposals including the development of a new multi-modal station at Gogar, the relocation of the Royal Highland Centre, the creation of an International Business Gateway (IBG) and the resolution of the Gogar Burn flooding issues.

### LDP Policy Emp 4 - Edinburgh Airport

LDP Policy Emp 4 outlines specific planning policy requirements in respect of Edinburgh Airport and the application site. The purpose of this policy is to guide proposals for airport expansion in accordance with NPF3 and the WESDF. This policy covers proposals for airport and related uses that require planning permission.

The policy states that proposals for the development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the LDP Proposals Map. The approved master plan will inform this process. Proposals for ancillary services and facilities will only be permitted where it can be demonstrated that these have strong and direct functional links with the airport and are compatible with the operational requirements of the airport.

All development proposals within the airport boundary must accord with the WESDF and other relevant LDP policies. Supporting information will be required to demonstrate how proposals will contribute to meeting the mode share targets in the WESDF.

The site is not allocated for development beyond specific airport use within the current LDP.

### West Edinburgh Strategic Design Framework (WESDF) 2010

The WESDF establishes a vision for West Edinburgh, articulating LDP objectives and providing detailed guidance for specific development proposals including International Business Gateway and the expansion of Edinburgh Airport. Strategic design principles are also established in relation to landscape and public realm, buildings, movement and infrastructure.

The application site is only referred to in the operational context of Edinburgh Airport. It is not addressed as part of this guidance.

## Emerging City Plan position

The Choices for City Plan 2030 published in January 2020 formed a consultation paper which set out various 'choices' for strategy, policies, proposals of the replacement plan in form of preferred and reasonable alternative options.

Choice 14C outlines an option for the Airport's contingency runway, the 'Crosswinds runway' to be allocated for the development of alternative uses next to Edinburgh Gateway interchange. This includes an option that it could include a substantial proportion of business and industry space and new housing.

However, it is important to recognise that at this stage the proposal carries no weight as a material consideration. Comments on Choices are currently being considered and will help inform the preparation of the proposal local development plan. It would be premature to conclude that the Crosswinds runway will be an allocation in the proposed plan, which is not currently expected to be approved by Planning Committee until the end of 2021. Even if the site is proposed for development within the plan, the plan will then be subject to a statutory period for representations and the subsequent examination.

## West Edinburgh Study

The Council with its partners has commissioned a West Edinburgh Study. The purpose of this two phase study is to look at West Edinburgh spatial strategy for inclusive growth. The Phase 1 report will identify 5 spatial options for West Edinburgh. The Phase 2 report will identify a preferred strategy. It is anticipated that the outputs of the study will be key elements in the allocation of sites within City Plan 2030.

However, given the current status of this study, this is not considered as a material consideration in the determination of this application.

The proposed masterplan proposals have identified the following mix of uses which are assessed as follows: -

### Business + employment uses (Classes 2, 4, 5 and 6)

The application identifies a range of business and employment uses including Class 2 - Financial and Professional Services, Class 4 - Business, Class 5 - General Industrial and Class 6 - Storage or distribution uses of up to 95, 200 square metres floorspace.

The illustrative land use plan identifies 9 plots for commercial led development - these mainly situated to the north of central hub, and to the northern edges of the site. Those around the central hub identify commercial retail/leisure uses at ground floor level.

No detailed further breakdown of these uses has been supplied, although the application summary outlines a new mixed-use community described as West Edinburgh's 'Digital Quarter' with digital enterprise as a driving function.

It is assumed that most digitally based business would generally fall under the umbrella of Class 2, Financial or Professional Services or Class 4 Business Use which would enable:- a) use as an office; b) research and development of products and processes;

c) for any industrial process which can be carried out in residential area without detriment to amenity of noise, vibration, smells and fumes.

In terms of assessing the acceptability of Class 4 uses, LDP Policy Emp 1, Office Development, part b) states that high quality office developments including major developments, will be supported in strategic business centres identified on the Proposals Map at Edinburgh Park/South Gyle, the International Business Gateway and Leith preferably as part of business led mixed use proposals.

Other locations are only acceptable where it is demonstrated that sites in the locations identified are unavailable or unsuitable and are in accessible mixed-use locations. The LPD refers to the International Business Gateway (IBG) as being one of a number of special economic areas which are considered to be areas of national or strategic economic importance, providing or with the potential to provide a significant number of jobs. However, although the application site lies in close proximity to the eastern parts of the IBG, it lies out with this boundary and therefore criterion b) of Policy Emp 1 does not apply.

The proposal contains a significant volume of office floorspace and LDP does not support significant office development outwith the strategic business areas. The IBG is still at planning stages (PPP application for IBG Phase 1 currently with Scottish Ministers) and it is likely be many years before this is completed. The applicant has not demonstrated that other sites including IBG, Edinburgh Park/South Gyle are unavailable or unsuitable. The application is therefore contrary to LDP Policy Emp 1.

Representations have made comment regarding the proposed nature of the 'Digital Hub' stating the argument that this proposal will meet unaddressed demand from the digital sector is flawed. Digital businesses are not part of a recognisable use class, from a planning perspective. The definition of digital business covers many companies occupying mainstream office space. The digital businesses that are envisaged could easily be accommodated at Edinburgh Park and IBG, as part of mainstream office space.

LDP Policy Emp 4, Edinburgh Airport states that proposals for ancillary services and facilities will be permitted where it can be demonstrated that these have strong and functional links with the airport and are compatible with the operational requirements of the airport. This policy designation may support the development of some Class 5, General Industrial and Class 6, Storage and Distribution, where such links with the airport can be demonstrated. The site is not allocated for business and industrial use as defined by LDP Policy Emp 8. This policy identifies and aims to retain a range of employment site across the city where new and existing businesses can operate, expand and relocate.

However, no policy case has been presented for this as part of the application, nor has any specific provision for Class 5 and Class 6 uses been identified as part of the illustrative masterplan. These uses present particular challenges in relation to placemaking and protecting residential amenity. Any agreed masterplan would need to demonstrate how such uses could be successfully integrated as part of a mixed use development and would be compatible with adjacent uses

The Council's Economic Development Team have commented that the lack of any specifically identified plots for industrial (class 5/6) space within the masterplan is of concern from an economic development perspective. Given the significant and growing pressures on the supply of industrial space in Edinburgh, for a site of this magnitude and in this strategic location to be brought forward without any committed industrial space, the application cannot be supported.

They have also remarked that, whilst the desire of the applicant to retain flexibility is recognised, the application as structured would introduce a large degree of uncertainty, with the approach being too unspecific in terms of use classes.

#### Residential uses - Houses (Class 9), Sui- Generis flatted development, student accommodation

The application proposals identify up to 2,500 residential units (flatted development) of which up to 25% (625 units) would be allocated for affordable housing.

The illustrative land use plan identifies residential led development across 18 plots, these forming the predominant use across the development and being concentrated in the southern and north western part of the site. Some of the plots, principally those around the central hub identify retail/leisure uses at ground floor level. The majority of the residential led plots located towards the peripheries of the site would be oriented towards landscaped open space and the Castle Gogar Estate. However, several plots would also be situated in close proximity to the operational extents of the Airport and the Tram Depot.

LDP Policy Hou 1, Housing Development, states that priority will be given to the delivery of housing land supply as detailed in Part 1 of the Plan including the sites allocated in the plan, and on other sites in the urban area (this referring to all the LDP area outwith the Green Belt and Countryside Policy Area), provided proposals are compatible with other policies in the plan.

LDP Policy Hou 1 makes it clear that priority will be given to the delivery of housing sites within the Plan. The LDP does not allocate this site for housing. Other sites within the urban area are supported but only where proposals are compatible with other policies in the Plan. As the proposal is contrary to LDP Policy Emp 4, Edinburgh Airport, it is also contrary to policy. Hou1.

LDP Policy Hou 2, Housing Mix, outlines that the Council will seek a mix of house type and sizes where practical to meet a range of housing needs, including those of older people and people with special needs, and having regard to the character of the surround area and its accessibility.

Supporting information only states that the development will comprise a mix of 1, 2 and 3 bedroom flats. An Affordable Housing Statement has been submitted. In terms of affordable tenures, 70% would be for social rent and discussions have started with Registered Social Landlords in this regard. Whilst this approach may have the ability to meet a particular range of housing needs, there is concern that this mix is only composed of flatted development. A broader range of housing typologies and tenure, may achieve a more balanced, sustainable community.

LDP Policy Hou 8 sets out requirements relating to student accommodation. No information has been provided regarding proposed levels of student accommodation, nor have details been provided to potential locations within the site. The LDP outlines that such developments should be close to the universities and colleges and public transport. The Council will also take account the nature of the locality in terms of the mix of land use and housing types, the existing and proposed number of students on the locality.

Given the absence of any details relating student accommodation, there is insufficient information to determine whether the requirements of this policy have been met or this could be supported as part of the overall development mix.

The site falls within a wider area that is subject to a Direction issued by Scottish Ministers in March 2016. This direction requires notification of applications for major housing developments to Scottish Ministers.

### Hotels (Class 7)

The application proposals identify four hotels (1 x 4 star and 2 x 2 star up to 883 bedrooms, 1 x aparthotel with up to 131 units) these clustered in the south eastern part of the site. This would be delivered within the first phase of development.

LDP Policy Emp 10 states that hotel development will be permitted within the boundaries of Edinburgh Airport, the International Business Gateway and other locations within the urban area with good transport access to the city centre.

Notwithstanding the requirements of LDP Policy Emp 4, the proposal for hotel development would broadly address requirements of the current LDP policy being situated within the boundaries of the Airport, with the south eastern part of the site being well placed in relation to Tram and Heavy Rail connections and the A8 bus corridor providing direct links to the city centre.

The provision of some hotel development would therefore accord with the development plan. However, it has not been fully demonstrated how these would successfully integrate with an agreed site-wide masterplan, forming the basis for a long term phased development of the site, which contributes towards both place and community.

### Ancillary uses - Class 1 - Retail, Class 2 - Financial and professional services, Class 3 - Food and Drink, Class 10 - Non-residential institutions, Class 11 - Assembly and Leisure.

The application identifies 8,200 square metres floorspace for retail and leisure uses. This would include local shops (food and non-food), restaurants and cafes, as well as community facilities such as gyms, GP surgeries, nurseries/ creches etc.

The illustrative land use plan indicates these uses situated to the ground flood level of larger blocks, with the exception of a single freestanding block to the northern edge of the site.

The LDP does not currently identify the site as retail centre or commercial centre. LDP Policy Ret 6 sets out requirements relating to Out-of-Centre Development. The applicant has stated that the retail element of the proposed development is intended to provide a range of facilities and services to satisfy the everyday needs of the new residential and business community on site. This policy recognises that in exceptional circumstances, there may be retail proposals which can justify an out of centre location, for example to meet the needs of a growing population or gap in provision can be demonstrated. The applicant has indicated that the proposed retail development is intended to support the new community only, rather than service a wider catchment.

Whilst the applicant asserts that this level of retail development would not detract from or impact on the vitality and viability of the retail facilities currently available at the Gyle Shopping Centre, Corstorphine Town Centre or Edinburgh City Centre, this has not been demonstrated through a retail impact assessment or sequential test. A number of representations have highlighted these issues, and the potential of the development to undermine adjacent retail centres.

LDP Policy Ret 7, Entertainment and Leisure Developments, identifies preferred locations for entertainment and leisure development, ensuring that such proposals make a positive contribution in terms of type of use and quality of design and are in accessible locations. The site does not form a preferred location for such development at the current time.

LDP Policy Ret 11 establishes requirements relating to food and drink establishments, although this mainly focusses on changes of use. This policy recognises that the provision of such establishments in areas where people live is a recognisable component of urban living.

In general terms, it is acknowledged that retail, financial and professional services, food and drink, entertainment and leisure and assembly and leisure uses could make an important contribution towards effective placemaking within a large mixed use development. However, these would need to be fully understood in the context of an agreed site wide masterplan and relate to a long-term phased approach for the site.

The extent of such uses would need to be considered as part of further masterplanning and assessed against relevant planning policy and guidance.

#### Associated works including car parking, servicing, access and public realm

The illustrative land use plan identifies three plots within the site for car parking, the purpose of which is to serve the proposed residential and business uses. It is envisaged these would be developed as multi-storey or decked car parking.

Masterplan documentation including Movement and Access Parameters Plan, Active Travel Parameters Plan and Landscape Framework set out detailed proposals in respect of servicing, access and public realm. These matters are assessed in sections of the report relating to master planning and transport.

## Summary

The current National Planning Framework (NPF 3) identifies the application site is of strategic importance to Edinburgh Airport. No masterplan has been brought forward by the Airport that alters the importance of this land for the airport. Therefore, at the present time the nature of the proposed development is contrary to the existing NPF and is not supported by National Planning Policy, the SDP and Local Development Plan (LDP) specifically LDP Policy Emp 4, Edinburgh Airport, which seeks to guide proposals for airport expansion.

The requirements of this policy have not been met. Firstly, the proposal is not supported by an agreed Airport masterplan. There is an out-of-date Draft Masterplan dating from 2016 but this has not been approved by key stakeholders and should therefore be given little or no weight in the determination of this application. Secondly, the extent to which the proposal development has functional or locational links to the airport has not been demonstrated. The application is also contrary because it does not accord with the West Edinburgh Strategic Design Framework (WESDF). The application site is only referred to in the operational context of the airport with no provision is made for this development within this guidance.

Notwithstanding the requirements of LDP Policy Emp 4, proposed housing development is not supported by the requirements of LDP Policy Hou 1. Similarly, large scale office development in this location is not supported by LDP Policy Emp 1.

Whilst the provision of some hotel development could accord with the development plan, it has not been demonstrated how these would successfully integrate with an agreed site-wide masterplan, forming the basis for a long-term phased development of the site, which contributes towards both place and community. Inconsistencies between the uses identified in the application proposal and masterplan proposition are also noted, e.g. No provision has been identified for Classes 5 and 6 business uses, or student accommodation.

As proposed, the application is significantly contrary to the principles of the Local Development Plan.

Pre-application advice was offered to the applicants in respect of the emerging development plan position. The applicants were advised that this proposal would be considered premature if lodged in advance of the emerging City Plan 2030. It is critical that any proposal for the redevelopment of the former Crosswinds site seeks to align with the vision and policies of the new plan and the requirements of National Planning Framework 4 (NPF 4).

## **b) Masterplan Concept and Design Parameters**

### Masterplan Concept

The West Edinburgh Strategic Design Framework, 2010, establishes a vision for West Edinburgh providing guidance in relation to specific development sites, landscape and public realm, buildings, movement, infrastructure. The guidance also supports key LDP policies relating to West Edinburgh including Emp 4

The application site is only referred to in the operational context of Edinburgh Airport. It is not addressed as part of this guidance as this does not form an allocated development site as part of the current LDP.

Early design proposals were presented to the Edinburgh Urban Design Panel on 27 November 2019. The Panel identified the following issues:-

- Make sustainable design the unique selling point of this development with a strong emphasis on delivering a healthy environment for residents.
- Create a framework for organic growth of a diverse residential community.
- Overcome boundary constraints and improve connectivity to surrounding area.
- Prioritise modal shift from car travel to walking, cycling and use of public transport.
- Effective control of car parking;
- Stronger emphasis on effective placemaking.
- The placemaking vision could be more ambitious. Given its proximity to a major transport hub, the development represents an opportunity to showcase Transport Oriented Design, yet the current approach has failed to exploit this potential.

The Panel felt there was considerable scope to further articulate these issues as part of the overall development vision.

The proposal was subject to Planning Pre-Application Advice between August 2019 and June 2020, with further detailed advice offered in respect of master planning.

The applicant has prepared an 'illustrative' masterplan which establishes a site structure based around 35 principal plots, this based around a Central Hub - a public piazza at the heart of the development providing high quality public realm, a civic centre and gathering space. An area of parkland would define the south western edge of the site, along the Gogar Burn and Castle Gogar Estate.

The illustrative masterplan is supported by a suite of Parameters Plans which define the masterplan on a site wide basis. The Design and Access Statement contains a range of guidance, seeking to establish Design Coding in relation to site layout and built form. These are intended to set site specific and precise design rules to guide the physical development of each place.

The Design and Access Statement defines a series of five-character areas including the Elements Gateway, Tower Plaza, the Elements Hub, Rain Garden Corridor and Woodland Edge. These would be supplemented with three strategic landscape elements include the Gogar Burn Park, the boundary road and a series of residential 'green fingers'. Land for the potential future diversion of the Gogar Burn is identified to the north western edges of the site.

In respect of the advice offered by the Edinburgh Urban Design Panel, the applicants have not demonstrated how the various issues raised by the Panel have been considered as part of the design process, particularly in respect of creating a diverse residential community, overcoming boundary constraints and improving connectivity to the surrounding area and exploiting the potential to showcase Transport Oriented Design.

The masterplan proposals have been developed to a high level of detail, however, a range of concerns have been identified regarding the masterplan concept and parameters based approach.

Although some contextual analysis has been undertaken, it is not clear how the design approach has been derived from comprehensive analysis and in turn how this has informed the masterplan proposal. Minimal reference has been made to the existing policy context particularly that relating to West Edinburgh including the requirements of current guidance e.g. WESDF, WELF and WETA. It would also have been expected that detailed analysis would also have been undertaken in relation to existing and emerging use patterns, development typologies and the characteristics of West Edinburgh.

There is a concern that the masterplan proposal is predicated around a design concept that has not adequately considered the strategic context and the constraints of the site.

Critically, the requirements of LDP Proposals relating to the site - GS7 Gogar Burn Diversion and T9 Gogar Link Road have not been fully explored as part of the application. It is also unclear how the masterplan proposals have sought to respond to adjacent uses and development sites, how connections beyond the site boundaries would be secured and how the proposal would seek to integrate with the City's Green Network. The need to address such issues is critical in ensuring the development assimilates with its context and the wider city.

Whilst the potential for parkland in the vicinity of the Gogar Burn could be a positive move, other aspects of the proposed landscape framework and the provision of strategic open space are weakly developed.

A layering of the various constraints affecting the site, could have helped provide a solid base from which to develop effective master planning.

The site layout has been based on an urban grid, this aligning with the vista to the Airport Control Tower and Castle Gogar. Whilst this may have some validity, the urban grid is also arbitrary in relation to surrounding features and conditions, e.g. other strategic views and viewing corridors. There is also concern that some of the resultant plots may not lend themselves to coherent forms of development.

The landscape structure for the site has also been limited by the proposed levels of development, resulting in a weak landscape setting. With the exception of the proposed Gogar Burn Parkland, strategic landscape and open space would be largely be based on narrow corridors and margins to the site edges. A robust landscape structure and green network could mitigate the impacts of climate change, facilitate the development of green/blue and active travel infrastructure and aid biodiversity.

The use of narrow corridors enclosed by a dense form of development could result in high levels of overshadowing with impacts to residential amenity. The masterplan proposals have not demonstrated how high quality, private and publicly accessible open space, particularly for housing development, would be successfully achieved.

A range of visualisations and development exemplars have been presented as part of the Design + Access Statement. However, many of these portray a development of an urban character more akin to a city centre or densely developed urban location rather than a largely open site located at the urban/rural edges of a city. In view of this, it is not considered that such a development proposition and aspirations are necessarily appropriate for the context.

PAN 83 sets out best practice and guidance in respect of master planning. This sets out that successful master planning should be undertaken as part of a collaborative, iterative process. It is acknowledged that the applicant has a vision for the site and a level of engagement with communities and stakeholders has taken place, but there is also concern to how accurately the context of the social, environmental and economic context of the site has been interpreted and that the proposal has not demonstrated a full appreciation of the policy context.

It is recognised that an approach based around the use of design parameters and design coding can be an effective means of shaping high quality development, particularly at Planning Permission in Principle stage. However, there was minimal discussion regarding form and detail of this at pre-application stage and how this might work in practice. However, given that the masterplan is predicated around a design concept which is not supported, it would be considered premature to endorse a series of prescriptive design rules intended to guide the physical development of each part of the development.

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

It is not apparent that the masterplan design concept has sought to draw upon the positive characteristics of the surrounding area, contribute to a sense of place which draws upon these positive characteristics. In the form presented, the masterplan proposition is of an inappropriate design and would be potentially damaging to the character and appearance of the area around it.

LDP Policy Des 3 - Development Design - incorporating and Enhancing Existing and Potential Features states that development proposals should demonstrate that existing characteristics and features worthy of retention on a site and surrounding area should be identified, incorporated and enhanced through design.

The masterplan concept has not sought to draw upon the positive characteristics of the surrounding area including the landscape character, views from the site, the presence of the Gogar Burn, the castle Gogar Estate and Category A listed Castle Gogar.

LDP Policy Des 7, Layout Design - part a) requires that a comprehensive and integrated approach be taken to the layout of buildings, streets, footpaths, cycle paths, public and private open spaces, services and SUDS features.

A comprehensive design approach has been presented as part of the application, this is not underpinned by an appropriate design concept or agreed design framework. An appropriate level of design integration between building layout, streets, footpaths and cycle paths, public and private open spaces and SUDS has not yet been demonstrated.

In summary, the application is premature. Given its current allocation in the LDP, the development of the site is not currently supported by a Site or Place Brief. A proposal of this nature has to be approached strategically in the broader context of West Edinburgh. As presented, the proposed masterplan concept fails to address requirements of LDP Policies Des 1, Des 3, Des 7 and the Edinburgh Design Guidance. The proposed masterplan and levels of development are predicated around a concept that does not adequately consider the site constraints. There are multiple concerns in relation to the layout, placemaking and how effective connectivity with adjacent areas would be achieved. There is no clear strategy for the proposed mix of uses and density of development with concern that the masterplan concept is development led rather than 'place led'.

#### Building Heights, Massing and Density

A Height Parameters Plan has been presented as part of the Masterplan. This identifies maximum height parameters\* of 7 metres (2 storey), 15.5 metres (5 storey), 23.5 metres (7 storey), 30 metres (10 storey).

\* Number of storey's based on a conventional 3 metres floor to ceiling height.

The majority of the site would be in the range of 5-7 storeys, with 7 storeys predominating across much of the site, with some stepping down at the north west and south west edges. The 10 storey elements are identified as part of the central hub and tower plaza to the west. These are described in the Design + Access Statement as major landmark features.

Although these are maximum parameters, it is apparent that these could translate into a substantial scale of development as borne out by the LVIA and other visualisations contained in the Design + Access Statement. Particular issues arising from the LVIA are discussed as part of Strategic Landscape Impacts.

In terms of general character, the site lies at the western edge of the city in proximity to the rural edge. The relatively open nature of the site affords expansive views to open countryside and landscape features. The prevailing scale of development in the locality is generally low rise with larger buildings located in a strong landscape setting, e.g. Edinburgh Park and RBS Gogarburn. A number of larger buildings are also located in the vicinity of the Airport Terminal situated c.2km to the north west.

LDP Policy Des 1, Design Quality and Context, states that a proposal should demonstrate how it will contribute towards a sense of place. Design should be based on an overall concept that draws upon positive characteristics of the surrounding area.

No clear rationale has been provided for the proposed scale and height of development has sought to reference local character and how these would contribute to a sense of place. There are concerns that the masterplan as proposed would result in a dense form of urban development based around a new central hub, more typical of a city centre location. A development of this stature and scale could significantly change the dynamic of the city and it is unclear to how this development would complement the role of other established hubs in west Edinburgh including The Gyle, Edinburgh Park, and the future role of IBG Phase 1.

Whilst some stepping down in the scale of buildings is evident to the south western and north western edges, a 7 storey height of development has been largely maintained along the northern site edges to the railway line. This would be substantially greater in scale, to the recently approved residential development at Maybury/West Craigs situated immediately to the north. The elevated nature of the southern part of the site could also exacerbate the impact of height to buildings in this location.

The proposed masterplan and height parameters would be contrary to LDP Policy Des 4, Development Design - Impact on Setting, parts a) b) and c) in that it has not been demonstrated that proposed height and form would have a positive impact on its surroundings, including the character of the surrounding townscape and landscape and impact on existing views. In distant views the development is too high, bulky and fails to respond to the characteristics of development in West Edinburgh. The position of built form has failed to fully respond to features of the site including topography.

In respect of housing density, LDP Policy Hou 4 states that the Council will seek an appropriate density of development on each site having regard to a) its characteristics and those of the surrounding area; b) the need to create an attractive residential environment and safeguard living conditions within the development; c) the accessibility of the site includes access to public transport. Particularly, the masterplan proposal has not demonstrated how the proposed form of residential development would reflect the characteristics and those of the surrounding area or has the need to create an attractive residential environment and safeguard living conditions within the development, been demonstrated as per parts a) and b) of the policy.

In order to assess the acceptability of building heights in this context it is necessary to consider LDP Policy Des 11, Tall Buildings. This states that permission will only be granted for development which rises above the building height prevailing generally in the surrounding area where; a) a landmark is created that enhances the skyline and surrounding townscape and is justified by the proposed use; b) the scale of building is appropriate in its context or c) there would be no adverse impact on important views of landmark buildings, the historic skyline, landscape features in the urban area and landscape setting of the city including the Firth of Forth.

It has not been demonstrated how the proposed masterplan would seek to enhance the surrounding townscape, that the scale of buildings would be appropriate in the context and that the development would not have an adverse impact on the landscape setting of the city. Whilst there may be scope for higher building within the site but this has not been justified.

Importantly, the height parameters which have been presented are not based on an agreed site masterplan proposition or LVIA. These issues would need to be fully explored as part of a comprehensive master planning exercise.

### Landscape, Open Space and Public Realm

The West Edinburgh Landscape Framework 2011 establishes an illustrative framework and strategic landscape design principles these aligning with the WESDF. Although the application site is not specifically addressed, this study refers to the broader landscape context of West Edinburgh with specific landscape recommendations made in relation to the IBG, Gogar Burn Improvements, A8 Corridor and the Gogar Link Road - all of which relate to the development of this site.

Open Space 2021; Edinburgh's Open Space Strategy outlines various extensions to the city's Green Network, these being reflected into the current LDP policy proposals. This does not identify any specific requirements relating to the application site with the majority of the area forming an operational part of Edinburgh Airport.

However, the potential redevelopment of this site for alternative uses could represent a significant opportunity to further develop multi-functional green networks and strengthen the landscape structure to provide a high-quality setting for development.

Pre-application advice stated that any proposed development should seek to include a 2 hectare parkland, designed to the Council's large greenspace standard, this being accompanied by a clear hierarchy of open spaces. In addition to the Council would be seeking increased tree cover for most forms of development in the future to address climate change, this being additional to delivering requirements for useable open space.

The Landscape Framework comprises the following components:-

- Gogar Burn Parkland (3.83 ha) to the south western edge of the site. This would provide a multi-functional large greenspace this including an active travel corridor. Width varies from approximately 95 metres reducing to 20 metres.
- Rain Garden Corridor (0.97 ha) including active travel corridor through the centre of the site.
- Central hub space (1.68 ha) - a predominantly hard landscaped space of approx. 135 metres diameter.
- Plaza space (0.46ha) - an urban plaza situated in the eastern part of the site.
- Entrance Road Setting (1.67 ha)
- Setting to residential blocks (1.31 ha)
- Residential green fingers (1.34 ha)
- Airport Buffer (1.51 ha)
- Street trees identified along key routes, principally those around the central hub

The existing alignment of the Gogar Burn would be maintained, and this is not proposed for de-culverting. Land (identified as landscaped open space) has been safeguarded for the potential diversion of the Burn to the north western edges of the site.

In terms of the landscape design concept, the development of parkland in the vicinity of the Gogar Burn would be viewed as a positive response to Castle Gogar and Castle Gogar Estate. Notwithstanding broader concerns relating to connectivity beyond the site boundaries, the introduction of two active travel routes running east to west across the site, including the Rain Garden Corridor would also be seen as logical steps to the potential development of the site.

NatureScot (SNH) have welcomed the broad objectives and aspirations set out in the design statement and the intention to deliver a connected, sustainable development, based around defined character areas and a hierarchy of multi-functional open spaces, including the large informal parkland.

However, there is concern that key opportunities for the site have been missed and these should have been fully considered as part in the Landscape Framework. These include: -

- Improvement to the geomorphology, ecological and landscape potential of the Gogar Burn and its buffer zone. This would include full consideration of LDP Proposal GS7;
- Improvement to the landscape setting to Castle Gogar and opening this to the public as part of an interconnected park;
- Integration of the development as part of wider green networks;
- The development of multi-functional landscape corridors, incorporating active travel routes to link adjacent development sites and transport hubs;
- The creation of framed views to features in the landscape including the Pentland Hills, Corstorphine Hill and the Forth Bridges;
- Considering the visual impact of development in its strategic landscape context and delivery of a strong landscape setting for development as part of the overall vision;
- Provision of high-quality usable open space, including private greenspace, to maximise residential amenity.
- The use of strategic landscape measures to provide effective buffers between incompatible uses, e.g. airport operations, the railway and industrial activities.

The absence of clear strategy for enhancement of the Gogar Burn and a technical assessment to support the future diversion of the Burn (LDP Proposal GS7) are fundamental issues which must be addressed in relation to the development of the site and these have not been put forward as part of this application. A project to divert the Burn could achieve multi-functional benefits, in relation to flood prevention, the enhancement of water quality and biodiversity, the delivery of open space and landscape and active travel corridors. In the absence of any measures to enhance the Burn, a key risk is that this watercourse becomes further degraded and this is further discussed in the Strategic Water Management and Trees, Ecology and Protected Species sections the report.

In summary, the landscape framework has been prepared by competent consultants and the planting and hardworks proposals have been developed to an appropriate level of detail. However, the overall development proposition, masterplan concept and design parameters are not supported. The detail of the landscape framework has been prepared in response to a client brief and did not evolve as part of an iterative master planning process.

There are concerns regarding the hierarchy, nature and potential quality of spaces across the site. The proposed level of planting in key areas of the development would fail to establish a strong landscape setting or a multi-functional green network. The opportunities presented for strategic water management through the re-alignment of the Gogar Burn have not been explored.

### Sustainability

LDP Policy Des 6, Sustainable Buildings, sets out criteria for assessing the sustainability of new development. The applicants have completed the Council's S1 Sustainability Form to demonstrate compliance with this policy.

The applicant has outlined their ambition that the proposed development will be designed in line with the BREEAM Outstanding and Passivhaus building standards. A low carbon energy strategy has been appraised for the site which seeks to maximise the use of natural low carbon energy options available and reduce demand on energy from the grid for both heating and powering the site. The strategy includes exploring the potential for applying a district energy network across the site to maximise the benefits of the mixed-use nature of the proposed development.

Whilst the Council welcome that such measures are being considered, it is felt that broader sustainability credentials for the development have not yet been fully considered in relation to the masterplan concept. For example, it has not been demonstrated that the site layout could be readily adapted to accommodate the Gogar Burn diversion in the future.

### **c) Co-ordinated Development**

LDP Policy Des 2, Co-ordinated Development, states that Planning Permission will be granted for development which will not compromise: -

- a) The effective development of adjacent land or
- b) The comprehensive development and regeneration of a wider area as provided for in a masterplan, strategy or development brief approved by the Council.

The Council encourages a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks or masterplans to identify the full potential for creating successful place, particularly to ensure a cohesive network of streets and spaces including green/blue networks are to be created.

In relation to part a) of this policy, there is concern that the masterplan prepared as part of the application has not yet fully addressed LDP requirements relating to the site. These include LDP Proposal T9, Gogar Link Road, which is required to support development in West Edinburgh. An indicative alignment for this route crosses the southern part of the site. The future realignment of the Gogar Burn, as defined in LDP Proposal GS7, also has a significant bearing on the development of the site.

However, at the current time detailed requirements to deliver these projects are not fully understood. Both will have implications for the effective development of adjacent land, and it is essential these proposals form key components of any future development framework or agreed masterplan. The masterplan proposal has not adequately demonstrated how effective linkages, to adjacent landholdings would be achieved.

The masterplan prepared as part of the application is also limited in scope. In order to ensure effective planning of the wider site, it would be expected that master planning should seek to embrace adjacent landholdings to the south east and south west, particularly the former which will provide the key linkage from the site to Edinburgh Gateway.

Critically, the proposed reduction in the operational extents of the airport, arising from the decommissioning of the runway, has not been agreed as part of an updated Airport masterplan, as stipulated by LDP Policy Emp 4. This application only embraces approximately 50% of the former operational runway. The proposed City Plan may consider alternative uses for the full extents of the runway and adjacent land as a potential development allocation. Were this to be eventually allocated for development, this would involve formally redefining the airport boundary. This would need to be supported by a revised National Planning Framework (NPF4).

In its current form, the interface between the application proposal and the operational extents of the airport to the north west remain unresolved. The relationship between any residential uses and airport activities requires will careful consideration as part of site master planning, being accompanied by effective mitigation, e.g. through an appropriate development layout, buffer zones in the form of open space and landscaping.

Part b) of the policy states that permission will not be granted for development which will comprehensive development as provided for in a masterplan, strategy or development brief approved by the Council.

The application site is allocated in the LDP as a Special Economic Area, which stipulates support for ancillary services and facilities with strong and direct functional links to the airport. The land is not allocated as a strategic development proposal, nor does LDP Policy Emp 4 support the range of uses identified in this application.

Given the current planning status of the land, the application proposal is not currently supported an approved masterplan, strategy or development brief.

The applicant was advised that any application submitted in advance of City Plan being finalised would be premature. As proposed, the application and supporting masterplan would be contrary to LDP Policy Des 2, Co-ordinated development, parts a) and b).

## **d) Transport and Accessibility**

### Strategic Transport Issues

The proposed development has been assessed in relation to the West Edinburgh Transport Appraisal Refresh Study (WETA). The WETA Refresh was completed in 2016 and took into account a number of changes in west Edinburgh, particularly in relation to a number of planned developments. The proposed development was not identified in the WETA Refresh Study and therefore transport impacts arising from the development and required mitigation were not assessed.

The Transport Assessment submitted as part of the application has carried out a rerun of the WETA model to include the proposed development. The conclusion in the Transport Assessment is that the proposed development traffic would have limited impact on the already congested network. However, it is unclear whether the proposed WETA mitigation package would be sufficient to address those impacts, both in terms of capacity and delivery. Therefore, the proposed development has not adequately demonstrated that mitigation measures will be implemented to address the adverse impacts on the network.

LDP Policy Tra 1 - Location of Major Travel Generating Development, states that applicant should demonstrate the location proposed is suitable with regard to access by walking, cycling and public transport and that measures will be taken to mitigate any adverse effects on networks and bring accessibility by and use non-car modes up to acceptable levels if necessary.

LDP Policy Tra 8 - Provision of Transport Infrastructure, requires that development proposals relating to major sites which would generate significant amounts of traffic, shall demonstrate through an appropriate transport assessment and proposed mitigation that 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

Given the conclusions of the Transport Assessment and the absence of clear transport mitigation, the proposal therefore fails to address requirements of LDP Policies Tra 1 and Tra 8 a).

### Movement and Access Principles

The illustrative masterplan has been supported by parameters plans relating to Movement and Access and Active Travel.

The principal vehicular access for the site would be from the Gogar roundabout to the south east, this forming a 'Boundary Road' to the north eastern edges of the site, with a 'Boulevard' diverging to the south west.

The parameters plans outline a street hierarchy comprising primary, secondary and inner access spurs with a bus loop routed around the central part of the site. The street hierarchy is overlain with a network of primary, secondary and tertiary active travel routes with an Active Travel Hub identified to the north eastern edge of the site.

The primary active travel route would extend across the south western part of the site, this linking Edinburgh Gateway via the Gogar Burn Parkland to the north west corner forming a potential link into Edinburgh Airport. A further secondary route would pass through the centre of the site to converge with the primary route leading to the north west.

A potential future extension of the 'Boundary Road' to Edinburgh Airport is identified to the north east corner of the site. This now forms a separate application proposal identified as the Airport Eastern Access Road. Further potential connections from the site are identified via the existing railway overbridge to West Craigs (Meadowfield Farm) to the north east and Castle Gogar Estate to the west. The application proposal indicates that such connections to adjacent land would be established in due course.

However, at this stage, there is concern to how these connections would be delivered. All relate to land or assets which are outside the control of the applicant. The nature of the Airport use has resulted in the site being largely inaccessible to the public for 70 years, as such does not readily connect with the adjacent urban context. Furthermore, the presence of strong edges to the site including the railway to the north east, the nature of adjacent uses, land ownership and planning constraints present challenges in terms of ensuring effective connectivity

There is a risk that in the event of these various links not being secured as part of this application or as part of an agreed movement strategy, the connectivity of both the development and locality may be compromised in the long term.

There are also concerns regarding reliance on a single point of vehicular access. Whilst this could be positive from the perspective of traffic generation, this could also place additional pressure on the Gogar roundabout. Bus services would also be reliant on use of a loop around the site, until such a time that an onward public transport link could be realised. This would fail to exploit opportunities that could be presented by direct links serving IBG, Eastfield Road and the Airport.

The Scottish Government's Designing Streets policy and the Edinburgh Design Guidance identifies that streets must consider place before movement, with travel prioritised in order of walking, cycling, public transport then car. The design of streets and spaces should also seek to reflect the unique character and distinctiveness of Edinburgh.

Whilst the parameters plans identify a dense active travel network within the site, with areas of traffic-free public realm, it is not apparent how the proposed streets and spaces reflect the unique character and distinctiveness of Edinburgh. There are concerns that the proposed street geometry appears imposed to suit the development concept rather than seeking to provide effective linkages with the surrounding context. The notion of a 'boulevard' has not translated strongly into the masterplan concept - this could have formed a stronger driver for placemaking and the basis for the principal access through the site.

The proximity of the Edinburgh Gateway transport hub represents a major opportunity for the development in terms of accessibility. However, the masterplan proposal would result in the majority of the development being separated from this facility by the arrangement of the proposed access road serving the site.

The proposed connecting routes are weak across this road and would not be supportive of pedestrian and cycle use due to the requirement to cross carriageways in several of locations. This would be prejudicial to the continuity of the off-road network.

### Gogar Link Road

LDP Table 9, Transport Proposal and Safeguards, Road Access and Capacity, identifies Proposal T9, Gogar Link Road as being required to support long term development in West Edinburgh. The LDP Proposals Map shows an indicative route immediately to the south west of the application site, this linking Gogar Roundabout and Eastfield Road via IBG and the Castle Gogar Estate.

The LDP suggests this route would be largely single carriageway through IBG with some widening to allow public transport priority. The link may be bus/cycle/pedestrian only.

The feasibility and options for the Gogar Link Road were further considered as part of the WETA Refresh Study 2016, with this route intended to improve network resilience to Edinburgh Airport and to open up development opportunities in west Edinburgh. A proposed alignment for the link road, skirting the south western edge of the application site, emerged from the WETA Refresh Study as the best option to address the different requirements of development and the airport whilst providing an efficient network with flexibility for public transport provision, walking, cycling and general road users. However, at the time the WETA Study was prepared, the Crosswinds runway was still operational and therefore limited options to where the route could be placed.

The EIA for the application identifies that the Gogar Burn and Castle Gogar and Estate are significant environmental receptors relating to the site. The Council would generally concur with these findings. As such, the routing of an access road to the south western edge of the site may result in adverse environmental impacts to the Gogar Burn, the setting of Castle Gogar and woodland, biodiversity and historic assets within the Castle Gogar Estate. The presence of a road in this location may also be detrimental to placemaking objectives.

The closure of the Crosswinds runway now presents an opportunity to further consider the detailed alignment of the Gogar Link Road. In view of this, it was requested as part of pre-application discussions that alternative routes be explored including a principal street or boulevard placed more centrally, to the Crosswinds site, this providing through access serving both IBG and the Airport. This has been explored as part of the Design and Access Statement but only identifies a single preferred option, e.g. the Boundary Road to the north western edge of the site.

There is concern that options to deliver the Gogar Link Road are being ruled out prematurely and the proposed masterplan concept would effectively limit a wider range of options from being further explored.

The proposed development configuration and layout would align a potential Airport Eastern Access Road, (this promoted separately by Edinburgh Airport and not identified in the WETA Refresh Study) to the north eastern edge of the development. It is considered this would promote a north/south direction of travel over access to IBG and Eastfield Road lying to the west.

The proposed alignment would lead to a focus on access to the Airport rather than IBG and this is likely to be to the detriment of public transport and active travel links to the IBG site. It should be noted that whilst the extension of the Boundary Road to the Airport does not form part of this application, its alignment is determined by this current application.

The proposed alignment of the Boundary Road and extension to the Airport, will potentially form a link to the airport freight area, situated to the north west of the application site. Whilst there would be some potential benefits to such an alignment, for example to remove good vehicles from the West Craigs development it will lead to a potential new route for general traffic between Maybury Road, Craigs Road and the Gogar Roundabout. The WETA alignment, although creating such a link, is less likely to lead to significant additional traffic on that route.

The proposed access road, the Boundary Road to the north eastern edges of the site is not considered to meet the requirements as set out in the West Edinburgh Transport Appraisal (WETA) Refresh Study 2016. Also, the Council does not generally support new road construction or road improvements aimed at increasing capacity on the road network.

It is critical that objectives of LDP Proposal T9 Gogar Link Road can be realised, i.e. development of a link between the Gogar Roundabout and Eastfield Road via IBG, and this is not prejudiced.

The proposed development layout and that of the boundary road to the north eastern edge of the site would prejudice the road network improvements and public transport improvements as listed in the LDP Table 9. The proposal has fails to address requirements of the WETA Refresh Study 2016 and would also be contrary to LDP Policies Tra 7 Public Transport Proposals and Safeguards, Tra 8 Provision of Transport Infrastructure part b), Tra 9 Cycle and Pedestrian Network part a) and LDP Policy Tra 10, New and Existing Roads.

The proposal would also fail to address the requirements of LDP Policy Des 2, Coordinated Development, parts a) in that the proposed development layout could prejudice the development of adjacent land.

### Parking

A maximum of 1409 car parking spaces are identified across the proposed development (these comprising 935 private residential, 125 affordable residential, 247 business/employment, 102 hotel/apart hotel).

The masterplan identifies two decked and one multi-storey car park to meet the demand for car parking for both businesses and residents. These would be combined with around 150 on-street parking spaces. Some residential parking will be provided on street and within residential courtyards. However, the majority will be centralised in the three car park locations.

The residential parking rate is proposed to be provided at a rate of around half of the maximum rates in the Council's Parking Standards to reflect the availability of transport choices on site and the type of accommodation proposed which will be flatted accommodation. Overall, this will reduce the overall car-parking ratio for residential units to around one space per two units.

Approximately 30 City Car Club spaces are identified across the development and it is proposed to implement as part of the initial phase of development to ensure they become embedded as a genuine travel option for the local community.

LDP Policy Tra 2, Private Car Parking is supportive of development proposals where proposed car parking provision complies with and does not exceed the parking levels set out in Council Guidance.

It is recognised that the site enjoys excellent connectivity to tram and heavy rail services at Edinburgh Gateway, and the Gyle Centre which forms of the focus for bus services. This would allow for the overall parking provision within the development to be reduced below the maximum rates identified in the Council's Parking Standards 2020.

As proposed the development would address requirements of LDP Policy Tra 2 and the Council's Parking Standards 2020. Overall parking provision would be approximately 30% of the potential maximum set out in the Council's Standards including residential provision of 47%, hotel provision of 20%, retail/ leisure provision of zero and business/commercial provision of 100%.

## **e) Strategic Water Management**

### Impact to the Gogar Burn including LDP Proposal GS7

The Gogar Burn, a tributary of the River Almond, crosses the site south western part of the site before flowing westwards towards the Airport terminal. A 180 metres section of the burn is culverted in the vicinity of Castle Gogar, this being undertaken as part of the development of the modern airport during the 1950's.

The masterplan proposals identify that the course of the Gogar Burn would be retained as existing, this being incorporated into the proposed Gogar Burn Parkland, lying to the south western edge of the site.

The LDP recognises that the culverting of watercourses can exacerbate flood risk and have a detrimental effect on biodiversity. Pre-app advice stated that the de-culverting and potential future diversion of the Gogar Burn must be a key driver for the development layout and it would be expected that land be identified to deliver this proposal. The potential for de-culverting to take place as an initial stage was also discussed.

Whilst the proposed Gogar Burn Parkland would benefit the users and owners of the development, no de-culverting has been proposed as part of this application. The absence of such measures would fail to enhance in-stream biodiversity, ecological or flood function.

LDP Greenspace Proposal GS7 identifies an enhancement and diversion of the Gogar Burn with a potential realignment crossing the north western part of the application site. Such a project would offer benefits of reducing flood risk, improving water quality and enhancing biodiversity. This proposal is a long running aspiration originally developed by the Gogar Burn Partnership and was incorporated into relevant documents, including development plans.

A potential realignment for the Gogar Burn has been identified in the Masterplan as part of the Landscape Framework, this crossing proposed landscaped areas to the north western edges of the site. Although only presented indicatively, this suggests a corridor of 10-30 metres width.

SEPA has commented that a feasibility study prepared with the Airport and other stakeholders would be beneficial to establish requirements for a potential diversion project.

The EIA Report (Water Environment P6) does acknowledge that: 'Further assessment of this option is required to assess the feasibility.' However, the potential delivery of a project to divert the Gogar Burn would also appear to be discounted by the applicant in the Design & Access Statement (page 27) which states that:- 'if diversion was to be safeguarded on the Crosswinds masterplan, it would bisect the site, and consequently trigger the need for an extensive road bridge for transport to get between the plots of the development. Additionally, given this will be a large open flowing channel in the middle of residential development, significant consideration and infrastructure would need to be put in place to ensure safety of residents etc.'

There is concern, that in the absence of a feasibility study, there is no guarantee that a project to divert the Gogar Burn could be delivered in the future, with a safeguarded corridor which may not be fit for purpose. LDP Greenspace Proposal GS7 presents a significant opportunity to develop a Green Blue Network as part of a multi-functional river corridor.

SEPA have objected to the absence of a strategic approach to water management, required to inform the development of project to divert the Gogar Burn. They also object to the application in that it will not help to deliver the strategic approach necessary to deliver development which will enable the whole city to meet the challenges of climate change.

NatureScot (SNH) also note and highlight the issue of the Gogar Burn, and while do not object to this aspect of the proposal, suggest that this aspect does not meet the policy objectives of LDP Proposal GS7. They continue to support the LDP objective to restore the river for the benefit of biodiversity, flood alleviation etc. and recommend that sustainable solutions for the Gogar Burn should be explored further, particularly in light of the climate change emergency.

It was highlighted at pre-application stage, that the Council and SEPA would not support any development proposal would could 'lock' the Gogar Burn into its current location (this application would result the Burn being locked into a critical section where it runs under the A8).

Were the application site to develop as per the masterplan proposal this would effectively preclude any the implementation of LDP Proposal GS7 and the future realignment of the Burn.

The proposal would be contrary to LDP Proposal Des 3, Incorporating and Enhancing Existing and Potential Features, in that it does not enhance the existing burn. The proposals do not propose any de-culverting of the Burn. SPP states that such proposals should seek to 'open existing culverts, restore natural features and characteristics' and 'promote protection and improvement of the water environment' also seeking benefits including restoration of degraded habitats.

In summary, the application proposal has failed to demonstrate that LDP Proposal GS7 could be delivered in the future and this has not been supported by a feasibility assessment prepared with stakeholders. The proposals would also fail to address relevant requirements of LDP Policy Des 3.

**f) Other matters:- Strategic Landscape Impact, Setting of Listed Buildings, Archaeology, Drainage and Flood Risk, Air Quality Management, Noise, Land Contamination, Noise, Setting of Listed Buildings Ecology, Protected Species and Trees, Amenity of neighbours and future occupiers are addressed.**

#### Strategic Landscape Impact

The site lies at the western edge of the city in close proximity to the rural edge and green belt, where a number of landscape characters converge. The relatively open nature of the site affords expansive views to open countryside and landscape features. The prevailing scale of development in the locality is generally low rise with larger buildings generally located in a strong landscape setting, e.g. Edinburgh Park and RBS Gogarburn.

The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) as part of the EIA Report. This outlines the visual impact of the proposed development from 15 viewpoints looking towards the site. These were agreed as part of the EIA Scoping exercise, although findings did not inform further pre-application discussion relating to design and master planning. Modelling has been based upon maximum building heights in block form, this excluding landscape mitigation.

Strategic viewpoints including Lennie Hill, Corstorphine Hill, Craigie Hill and Newmills Road demonstrate that that the proposed development would be not be in keeping with the characteristics of those views, with the proposed height and scale being substantially greater than other large-scale development in West Edinburgh.

Views from the RBS Bridge and Gogarmuir Road, which form the western approaches to the city, illustrate that the proposed scale and height of development would rise above the tree line of the Castle Gogar Estate and impinging upon view of Corstorphine Hill.

The viewpoints from Turnhouse Road and Meadowfield Farm illustrate that the maximum height parameters would result in substantial height and bulk, with the proposed density structure of development only delivering limited viewing corridors through the site.

This would limit potential viewing opportunities to features in the surrounding landscape including the Pentlands, Castle Gogar and the Castle Gogar Estate.

The viewpoints from Gogar Roundabout illustrate that southern part of the application site is elevated and with development in this location therefore being more visually prominent. This could exacerbate the sense of height and bulk, particularly for the scale of development proposed.

The Landscape Assessment concludes that the impact on landscape character is not significant but there are some significant landscape impacts. These could be beneficial had the design of development allowed for landscape views and the surrounding landscape to be protected, but instead due to the volume of development the landscape is adverse due to the loss of views from and across the site.

The applicant also notes that the effect of development will not be significant on the site and recognise the 'loss of open character'. They also state that 'loss of views' would be inevitable but the extent of the loss of views and open character is determined by the design of development. The masterplan approach has not adequately considered the potential to achieve views through the site and create viewing corridors to the surrounding landscape. The Edinburgh Design Guidance outlines key aims for new development including the need to reinforce its surroundings by conserving and enhancing the character and appearance of the landscape, including protecting the city's skyline and locally important views. It also highlights the importance of understanding the unique characteristics of the city and the context within which it is located.

The applicant assesses there are some adverse and significant effects due to the development. However, it does not allude to the loss of certain characteristics in the views and the effect on the setting of the city. The LVIA demonstrates that the proposal has not responded to these characteristics, e.g. loss of views to the Pentlands and Corstorphine Hill.

LDP Policy Des 9, Urban Edge Development, applies to all new development situated at the edge of the urban area.

The LVIA and Landscape Assessment have not demonstrated that the proposed development would conserve and enhance the landscape setting and special character of the city, as stipulated in part a) of the policy. The proposal would out of scale with adjacent landscape characters, by virtue of its height and bulk.

The proposed masterplan and landscape framework have not demonstrated how the landscape proposals and setting of development would contribute to multi-functional green networks by improving amenity and enhancing biodiversity, as per part c) of the policy.

### Setting of Listed Buildings

The Category A listed, Castle Gogar which includes cottage, gate house stables and outbuildings (LB 27092, Date of Listing: - 14 July 1966) is situated to the south western edge of the application site.

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

Historic Environment Scotland (HES) and City Archaeology Officer have commented that the proposal would not result in a significant impact on the setting of the A listed castle. HES are broadly content with the conclusion laid out in the EIA Report that the impacts would not be significant. They also note that the castle's setting has also been limited by the subdivision of the surrounding estate with property boundaries, structural planting and mature vegetation. HES welcome proposed mitigation including additional screening, the reduction in scale of built development closer to the castle and the production of a construction management plan.

However, whilst the proposal may broadly address the requirements of LDP Policy Env 3 and would not result in adverse impact to the setting of the castle and its historic significance, there is concern that the proposed masterplan concept represents a missed opportunity to enhance the setting of the castle. Issues relating to the historic setting of the castle have been raised in representations and it is not considered that the proximity of the development to the castle (approximately 30 metres at its closest point) and potential impacts have been fully explored as part of the development of the masterplan.

The masterplan approach has limited the opportunities to further enhance the setting of the castle. The LVIA states there would be a minor adverse and not significant effects of Gogar Castle but does recognise the setting is already compromised. The historic course of the Gogar Burn previously meandered through the airport land to the east of the castle prior to being culverted in the 1950's, this forming part of its historic setting within the wider landscape.

The views to and from the castle have not been prioritised in the masterplan design. The presence of Castle Gogar could serve as a stronger focal point, being utilised in viewing corridors both through and within the site. The de-culverting, re-alignment and restoration of the Gogar Burn and design of the parkland could also enhance the setting of the castle within the landscape.

### Archaeology

The City Archaeological Officer has commented that such a proposal would require significant ground breaking works in relation to construction and landscaping. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 20th Century associated with the former RAF Turnhouse to prehistoric remains. In addition, the historic course of the Gogar Burn which passes through the site may contain further paleoenvironmental evidence. It is recommended that should the application be approved, further archaeological investigation should be secured through condition.

## Drainage and Flood Risk

A Flood Risk Assessment (FRA) and Surface Water Management Plan have been submitted as part of the application. The Water Environment and Climate Change chapters prepared as part of the EIA also consider matters relating to drainage and strategic water management.

CEC Flood Prevention have advised that the requirements of Council's Self Certification scheme have been addressed and the application proceed to determination. The site could be developed in the form presented without increasing the level of flood risk, including the Areas of Flood Management along the existing course of the Gogar Burn to the south western edge of the site. However, they have queried the relationship with LDP proposal to re-align the Gogar Burn and queried whether the application would infringe on the future plans. These issues are considered on the Strategic Water Management section of the report.

SEPA have commented that although the application considers issues, including flood risk, this is only within the immediate vicinity of the site to which the application applies. SEPA have previously stressed that options for development that 'lock' the Gogar Burn into its current location can only compromise options for this watercourse to be part of a city-wide approach to flood risk reduction, water management and green/blue infrastructure.

SEPA have objected to these aspects of the planning application as they consider it will not deliver the strategic approach necessary to deliver development which enabling the whole city to meet the challenges of climate change. Therefore, SEPA have not commented on the Flood Risk Assessment (FRA) as a consequence of their objection as the flood risk would have to be re-assessed. This will require to be done in the context of a proposal which will allow the Gogar Burn to be an active part of the city's strategy for reducing overall flood risk and managing surface water.

The Flood Risk Assessment submitted as part of this application broadly addresses LDP Policy Env 21, Flood Protection, part a) in that it would not increase a flood risk or be at risk of flooding itself. However, the relationship of this application proposal with the Gogar Burn, raises some fundamental issues, not least that the granting of planning permission in the absence of a clear, deliverable strategy relating to flood risk and water management could preclude the future diversion of the Burn as identified through LDP Proposal GS7. The development of this site and diversion of the Gogar Burn represent a major opportunity to improve strategic water management and address Climate Changes objectives.

## Air Quality Management

LDP Policy Env 22 seeks to ensure that development will only be permitted where there will be no significant adverse effects for health and appropriate mitigation can be provided to minimise any effects.

The issue of Air Quality was scoped into the Environmental Impact Assessment and the scope of the Air Quality Impact Assessment was agreed with the Council and SEPA prior to submission of the application.

The Air Quality Impact Assessments considers that the impact of both the construction phase and the operational phase of the development to be Not Significant.

Both Environmental Protection and SEPA have expressed concern regarding car parking numbers of up to 1,410 spaces across the site with particular reference to local Air Quality management Areas.

Some mitigation for air quality impacts have been considered in the transport section of the EIA, for instance, two car-free, pedestrian and cycle routes proposed. The proposed development will maximise use of public transport and the majority of the development will be within a maximum walking distance standard of 400 metres to a bus stop and 800 metres to a railway station and tram stop. 250 electric car parking spaces will also be provided across the development.

However, up to 1,410 car parking spaces are required across the site, to be accommodated through off-street parking/ in plot and in multi-storey car parks. This includes 1,060 spaces for the proposed residential units. This is a significant amount of private parking provision in an area within close proximity to existing AQMA.

SEPA and Environmental Protection have objected to the scheme on the basis of the potential impact of the proposal on air quality which is directly attributed to the level of parking proposed on the site. LDP Policy Env 22 allows for appropriate mitigation to be brought forward to address air quality concerns. If the Committee were minded to approve the application a condition could be included which reserves the level of car parking on the site for the submission of any AMC applications and supported by a Travel Plan for each phase of development. However, given the scale of development and the phasing proposed it would be difficult to control the overall parking numbers. As it stands the level of car parking proposed is considered to have a direct impact on air quality and there is insufficient certainty on a maximum number of parking spaces.

### Noise

The application site is adjacent to a number of uses which raise the potential for conflict with the proposed residential developments in relation to noise. This includes the heavy rail line and the operational land of Edinburgh Airport. A Noise Impact Assessment (NIA) has been submitted by the applicant and has been considered by Environmental Protection in the assessment of the proposals. The NIA identifies areas of land within the site that will not be suitable for residential development as they breach World Health Organisation outdoor levels.

The masterplan submitted for consideration places residential development at the western most edge of the site adjacent to the operational land of the airport. This raises significant concerns in terms of amenity for residential properties and the ability to control any noise disturbance. It is accepted that the site falls outwith the lowest noise contour ranges for the airport. The applicant has advised that design techniques could be used to mitigate the potential noise impacts on the residential plots with the buildings themselves acting as acoustic barriers.

Due to the permitted development rights enjoyed by Edinburgh Airport there would be limited control over any operational use of land adjacent to the proposed residential plots within this area of the site. As discussed above, without any certainty from an updated airport masterplan there is a direct conflict in terms of amenity.

Environmental Protection have also raised concern about the potential conflict between certain use classes and residential within the development site itself. The submitted NIA has not addressed the internal conflicts within the site and any future applications would need to be supported by further NIA.

It is considered that the proposal as submitted cannot be supported under the terms of LDP Policy Des 5 - Development Amenity due to the impact of noise on residential amenity.

### Land Contamination

Any matters relating to contaminated land can be appropriately dealt with through the use of planning conditions.

### Airport Safeguarding

Edinburgh Airport has commented on the application in relation to aerodrome safety. It is considered that the proposals could conflict with safeguarding criteria unless any planning permission granted is subject to conditions relating to Bird Hazard Management and Landscaping. In particular it is noted that no building should be permitted to exceed 75.49m AOD. Any building or structure exceeding this must be independently assessed by EAL at the earliest opportunity to allow mitigation solutions to be sought.

### Trees, Ecology and Protected Species

The principal area of tree cover and ecological interest lies to the south western edge, this comprising the mature woodland of the Castle Gogar Estate. Riparian 'wet woodland' along the banks of Gogar Burn, which forms part of the Local Nature Conservation Site (LNCS), is noted as the main area of biodiversity value. Ecological surveys undertaken as part of the EIA have established that the wider site has limited biodiversity value due to past uses and management.

Biodiversity enhancements have been outlined in the EIA Report, Design Statement and landscape plans. These include green-blue infrastructure, open space and inclusion of habitats and species which benefit biodiversity. These proposals would need to be fully assessed against airport restrictions, to ensure viability.

However, the most significant biodiversity enhancements within the site would be the restoration of the Gogar Burn and this is not proposed. The application does not include significant long-term positive effects for biodiversity, which would be achieved by reinstating this section of burn, further enhancing this Local Biodiversity site.

A Tree Survey has been prepared which has established that tree would not be adversely affected by the development. Ecological surveys have established species present and use of the site.

At this time no further surveys are recommended, other than those prior to construction. Further details would need to be addressed in a CEMP. In line with industry standards, further survey work would need to be undertaken if construction has not commenced in 18 months.

In summary, the proposal would address requirements of LDP Policies of Env 12 Trees, Env 15 Sites of Local Importance (LNCS) and Env 16 Species Protection. However, significant biodiversity enhancement would not result as a restoration of the Gogar Burn, as outlined through LDP Proposal GS7 is not proposed.

## **g) Infrastructure Contributions**

### Affordable Housing

Policy Hou 6 (Affordable Housing) in the LDP states that residential developments consisting of 12 or more units should include provision for affordable housing amounting to 25% of the total number of units. As the application is for a planning permission in principle the exact delivery of the affordable housing has not been defined at this time.

A Section 75 agreement will be required to secure 25% affordable housing on the site.

### Education

LDP Policy Del 1 (Developer Contributions) requires contributions to the provision of infrastructure to mitigate the impact of development. The Action programme and Developer Contributions and Infrastructure Delivery supplementary Guidance sets out contributions required towards the provision of infrastructure.

The Council's Communities and Families section have assessed the proposals in terms of the impact on education infrastructure. This site falls within Sub- Area W-1 of the 'West Edinburgh Contributions. The assessment has been made on the basis of 1250 flats which are of 2 bedroom or more. The 1250 one bed flats have been discounted for any education appraisal.

The Council's Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery' identifies the education infrastructure actions for the West Education Contribution Zone as below:

- Additional secondary school capacity - 420 pupils (West Edinburgh)
- Additional secondary school capacity (St Augustine's RC HS)
- New 21 class primary school and 120 nursery (Maybury)
- Primary School classes (Gylemuir PS)
- RC Primary School classes (St Andrew's Fox Covert RC PS or St Joseph's RC PS)

West Edinburgh has experienced significant growth and the education infrastructure actions identified within the current Action Programmed are not sufficient to accommodate the increase in cumulative number of pupils expected in the area as a result of the development.

### *Primary School*

In order that the impact of the development can be mitigated, the developer will be required to contribute to a new primary school at the adjacent East of Milburn Tower development. The pupil generation from the East of Milburn Tower site (429 primary pupils) in addition to the 137 pupils generated by this proposed development will increase the required capacity of this new school to 566 pupils (21 classes).

The estimated cost of a 21-class primary school in Edinburgh is £18,893,343 (based on uplift of costs Q4 2020 for delivery of new 14 class Victoria and Frogston primary schools) with a further requirement for:

- A 2 hectare site estimated in value to be £4,750,000 (based on the estimated costs for Maybury primary school as identified in the Council's Action programme);
- land remediation costs estimated to be £3,241,760.

Based on the number of pupils expected to be generated as a proportion of the capacity of a new 3 stream school this equates to a total primary contribution from this development of £5,846,443.

If the additional primary school was added to the Action Programme, the proportion of the established 'per house' and 'per flat' contribution rates which can be attributed to the current primary school actions will not cover the cost of delivering the infrastructure that would now be required to mitigate the cumulative impact of development within the contribution zone.

In accordance with the provisions of the supplementary guidance, the developer is required to make a contribution that is sufficient to ensure that the revised set of infrastructure requirements can be delivered.

The developer is therefore required to contribute £5,846,443.

### *Secondary School*

The Education Infrastructure Appraisal sets a rate of £32,678 per pupil which is based on the costs of delivering new secondary school provision (but excluding land costs). However, based on the cost of delivering the new Queensferry and Castlebrae High Schools, this is revised to £34,617 (Q4 2020).

The generation of additional pupils in West Edinburgh will require a new secondary school. Accordingly, in addition to the above per pupil rate, contributions are required for a 4.2 hectare site for a 900 capacity high school. Based on the land value and remediation costs attributed to the 2 hectare Maybury Primary School site (£4.75m + £3,241,760), this would equate to an additional contribution of £18,647 per pupil (land costs not indexed).

It is considered that the application of the above rates which are applicable to all new secondary provision would be appropriate for this development. As this site is projected to generate 62 secondary pupils, the developer is required to contribute £3,302,395.

In summary, due to the in principle nature of the application the exact residential numbers are unclear. Therefore the education assessment has had to make a judgement on an application for 1,250 flats of 2 or more bedrooms. A more detailed assessment of the provision of education infrastructure requirements is being prepared as part of the preparation of City Plan 2030. It is not possible to provide a per residential property rate of contribution due to this unplanned residential site coming forward outwith the plan led system. Therefore in order to ensure appropriate educational infrastructure should planning permission be approved the development must be limited to no more than 1250 flats with 2 or more bedrooms.

The development will be required to make the following contributions secured through a Section 75 Agreement:

Primary education infrastructure = £5,846,443  
Secondary education infrastructure = £3,302,395

With these figures, infrastructure is indexed at Q4 2020 but this excludes land costs which are not indexed.

### Transport Infrastructure

The Transport Infrastructure required to support new development within West Edinburgh is underpinned by WETA. The proposed development was not included in that refresh and therefore the transport impacts and required mitigation were not assessed under WETA. The Transport Assessment submitted as part of the current application has carried out a rerun of the WETA model to include the proposed development. The conclusion in that Transport Assessment is that the additional proposed development traffic has limited further impact on the already congested network. However, it is unclear whether the proposed WETA mitigation package will be sufficient to address those impacts.

Before any development could be supported on this site a clear understanding of the transport implications would be required and any mitigation full understood and costed. No mitigation has been brought forward by the applicant.

### Tram

The Finalised Developer Contributions and Infrastructure Delivery supplementary Guidance sets out the circumstances where a tram contribution will be sought for new development where the provision of the tram will assist in the mitigation of the transport impacts of the development. Due to the planning permission nature of the application and the number of possibilities of development build out an exact cost cannot be attributed at this stage. The contribution has been judged on a number of scenarios as follows :

95,000m<sup>2</sup> of Classes 2, 4, 5 and 6 - Business/Employment, Offices, General Industrial and Storage or Distribution

- Class 2 - £6,574,000
- Class 4 - £6,574,000
- Class 5 - £4,382,667
- Class 6 - £1,460,889

Therefore the total contribution would be between £6,574,000 and £1,460,889 for the 95,000m<sup>2</sup> depending on mix.

8,200m<sup>2</sup> of Classes 1, 2, 3, 10 and 11 - Ancillary uses including retail, financial and professional services, food and drink, non-residential institutions and assembly and leisure:

- Class 1 - £609,009
- Class 2 - £609,009
- Class 3 - £1,289,636
- Class 10 - £251,080
- Class 11 - £251,080

Therefore the total contribution would be between £1,289,636 and £251,080 for the 2,500m<sup>2</sup> depending on mix.

Hotel:

- 883 room hotel Class 7 - £2,656,678
- 131 aparthotel - £401,143 (aparthotel is treated as hotel)

2,500-unit Class 9 Residential, Sui Generis Flatted development and student accommodation:

- Residential - £3,460,000
- Student - £7,521,739 (highly unlikely to be 2,500 student bed)

Summary:

- 95,000m<sup>2</sup> mix - maximum £6,574,000
- 8,200m<sup>2</sup> mix - maximum £1,289,636
- 883 bed hotel - £2,656,678
- 131 aparthotel - £401,143
- 2,500 residential - £3,460,000
- Student accom - cannot estimate (example 200 bed - £612,857)

## Healthcare

LDP Policy Del 1 (Developer Contributions) requires contributions to the provision of infrastructure to mitigate the impact of development. The Action Programme and Developer Contributions and Infrastructure Delivery Supplementary Guidance sets out contributions required towards the provision of infrastructure.

New healthcare practice to mitigate impact of new residential development in West Edinburgh (Maybury, South Gyle, Edinburgh Park, IBG) is identified within the Supplementary Guidance - this guidance provides a contribution level of £1,050 per dwelling (£2,625,000). A Section 75 Agreement will be required to secure this.

## **h) Environmental Impact Assessment**

### **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.

### **i) Issues Raised in Representations**

Key topics raised: -

#### EIA - addressed in part h) of the assessment

Query to the adequacy of the EIA Report and whether this has properly assessed the potential impacts of the project in accordance with the EIA Regulations.

#### Timing of submission/Prematurity - addressed in part a) of the assessment

The application is premature in light of the current review of NPF3 and consultation for NPF4 and the preparation of the proposed City Plan.

Scottish Planning Policy and the LDP place importance on ensuring that development is 'plan led' particularly when the development is substantial and/or in an area that requires strategic comprehensive planning

#### Principle of Development - addressed in part a) and c) of the assessment

The application falls under the definition of National Development, is not supported by NPF3, and could conflict. The site remains an operational part of the Airport, as outlined in NPF3.

Application is contrary to LDP Policy Emp 4, Edinburgh Airport, because it is not supported by the Airport Masterplan, it does not have functional or locational links to the airport and does not accord with the Edinburgh Strategic Design Framework (WESDF).

The application would be contrary to LDP Policy Emp 1, Office Development, in that it does not identify the application site as a preferred location for office development.

The application would be contrary to LDP Policy Hou 1, Housing Development, and does not identify the application site as a housing site;

Application as currently proposed will prejudice the effective development of adjacent landholdings, including allocated development sites and does not therefore comply with LDP Policy Des 2, Co-ordinated Development.

### Retail, Leisure and Commercial Uses- addressed in part a) of the assessment

The proposals do not accord with the clear and comprehensive framework that has been established at strategic and local level, without the submission of a retail and leisure impact assessment.

Proposals have serious potential to undermine development plan objectives for the city centre.

Proposals do not comply with LDP Policies Ret 1 Town Centres First Policy or Ret 6 - Out-of-Centre Development.

Retail and leisure elements of the proposals significantly exceed the 2,500sqm threshold set out in Scottish Planning Policy for which an impact assessment is necessary

Proposals do not comply with LDP Policy Ret 8 - Entertainment and Leisure Developments.

The argument that this proposal will meet unaddressed demand from the digital sector is flawed. Digital businesses are not part of a recognisable use class, either from a planning or specification perspective.

### Transport/Connectivity - addressed in part d) of the assessment

The Transport Assessment submitted is fundamentally flawed lacking in proper scoping, analysis and critical interrogation. It is not fit for purpose for a development of the size in such a critical location:

No detailed junction capacity assessment has been undertaken on the existing external network.

No specific mitigation has been proposed as part of the Transport Assessment. Given that 100% of the development traffic accesses the site from the Gogar roundabout, it is considered a fundamental omission and serious flaw.

TA does not provide details of bus services which may serve the development.

The application site was not included within the WETA Refresh Study (2016) and therefore the impacts arising in terms of additional trip demand on the surrounding highway, public transport and active travel networks and any required resultant mitigation has not been assessed.

Proposal is reliant on WETA and contributions for others to provide necessary transport infrastructure, and assumes the necessary transport infrastructure will be in place prior to development coming operational.

The applicant heavily relies upon realising aspirational mode share targets from day one in order to justify their assertion that the emerging development proposals will have a minimal impact.

Proposals do not demonstrate compliance with LDP Policy Tra 1, Location of Major Travel Generating Development.

The application is contrary to LDP Policy Tra 8, Provision of Transport Infrastructure, in that it is premature, is not aligned with and has not been subject to a proper cumulative assessment in the context of the WETA Refresh Study.

Connectivity of the site by active travel modes to surrounding transport hubs and neighbouring land uses is reliant upon delivery of infrastructure beyond the red line boundary of the site and not within control of the applicant.

No car parking strategy or parking management plan has been provided as part of the application.

The proposal will compromise the delivery of the Gogar Link Road and LDP Proposal T9. The access proposals for the application show the realignment of this route to serve the application site only.

Applicant has failed to provide reasoned justification for level of parking proposed for the residential uses.

Concern regarding the future potential crossing of new route with Castle Gogar Drive;

#### Master planning and design- addressed in part b) of the assessment

The layout of the masterplan is both arbitrary in concept and diluted in implementation. Given the whole site is effectively a 'blank slate' it is not clear why particular constraints have been designed into the masterplan at this stage.

The masterplan will create an insular development which is disconnected from existing and proposed developments and transport hubs. It is focused around an artificially defined, monolithic central space which is inward looking and remote from Edinburgh Gateway Station.

The Design Guidance is not fit for purpose and would not safeguard the creation of a quality place.

The 'Elements' hub is an artificial focal point, whilst the remainder of the masterplan does not adhere to the concept of 'spokes'.

Design response does not fully recognise the sensitivity of the railway boundary edge to the north eastern edge of the site.

Concern regarding scale of development at the southern edge of the site, particularly given the elevation of these plots.

#### Cultural Heritage - addressed in part f) of the assessment

The application has failed to consider the full potential impact of the site's proximity to the Category A listed, Castle Gogar, including the impact on its setting,

### Landscape and Visual Character - addressed in part b) and f) of the assessment

LVIA has not considered likely landscape/townscape and visual effects on the development of new housing at West Craigs.

Maximum design parameters as set out in the EIA Report would have a significant and adverse effect on the townscape qualities at West Craigs, particularly the area to the south of Turnhouse Road.

If maximum height parameters as proposed in the application are maintained, this could have a detrimental impact on the delivery of adjacent sites.

Proposals are contrary to LDP Policy Des 4, Impact on Setting, in that they will result in adverse impact to the surroundings, including the character of wider character and landscape, and impact on exiting views.

Proposals are contrary to LDP Policy Des 5, Amenity, in that neighbouring developments would be adversely affected in relation to noise, daylight, sunlight, privacy and immediate outlook.

Proposal is contrary to LPD Policy Des 7, Layout Design, which require proposals to take a comprehensive and integrated approach to the layout of buildings, streets, footpaths and cycle paths.

### Neighbour Amenity - addressed in part b) and f) of the assessment

The proposal would result in a significant reduction in privacy given proximity of new buildings. Combined with their proposed heights at 4 to 6 storeys, this would result in a sense of overbearing and significant overlooking of Castle Gogar and its grounds to an unacceptable degree.

The proposal would create a public park immediately adjacent to the eastern boundary of Castle Gogar resulting in invasion of privacy and concerns for security.

Proximity of residential blocks to IBG East may raise potential amenity issues, particularly if noisy and/or anti-social commercial uses come forward for that development;

### Public Engagement

A neighbouring property most directly impacted by the proposals, did not receive direct communication as part of the pre-application community consultation exercise. Applicant had the opportunity to go above and beyond statutory minimum requirements, which the regulations recommend;

## **Conclusion**

The application represents a National Development proposal in Edinburgh, situated with close proximity to the A8 Corridor, Edinburgh Airport and Edinburgh Gateway Station.

The nature of the proposed development including significant level of business and residential use is not supported by National Planning Policy (NPF 3), the SDP and Local Development Plan (LDP) specifically LDP Policy Emp 4, Edinburgh Airport, which seeks to guide proposals for airport expansion. The requirements of this policy have not been met, as the proposal is not supported by an agreed Airport masterplan, does not have functional or locational links to the airport, nor does it accord with the West Edinburgh Strategic Design Framework (WESDF).

The proposed masterplan, parameters plans and design code have not been developed to take account of the particular characteristics of the site and its context, nor has it been demonstrated that placemaking objectives would successfully be achieved to deliver a sustainable community.

The masterplan proposals have not adequately demonstrated how LDP Policy safeguards relating to the site including Proposals GS7, Diversion of the Gogar Burn and T9, Gogar Link Road would be delivered in relation to the development.

The application proposal is premature and extensive pre-application advice offered to the applicants has not been followed.

The application has been appealed for non- determination to the DPEA. The Committee is asked to confirm that they would support the recommendations as outlined within the report to support the Council position at appeal.

By virtue of the proposed application being for a development which conflicts with a National Development and the West Edinburgh Direction for major housing developments, the application would have been referred to Scottish Ministers.

It is recommended that this application be

### **3.4 Conditions/reasons**

#### **Conditions:-**

#### **Reasons:-**

1. The proposed development is contrary to the existing National Planning Framework 3 and is not supported by National Planning Policy, the Strategic Development Plan and the Local Development Plan (LDP) specifically LDP Policy Emp 4, Edinburgh Airport. The proposal is not supported by an agreed Airport masterplan nor has the extent to which the proposal development has functional or locational links to the airport been demonstrated. The application does not accord with the West Edinburgh Strategic Design Framework (WESDF) 2010.

Proposed housing development is not supported by the requirements of LDP Policy Hou 1 Housing Development and large scale office development in this location is not supported by LDP Policy Emp 1 Office Development.

2. The proposed development would be contrary to Local Development Plan (LDP) Policy Des 2, Co-ordinated Development, parts a) and b) and would fail to deliver coordinated development approach in West Edinburgh.

The application proposal has not adequately demonstrated how effective linkages to adjacent landholdings, including those required by LDP Proposal T9, Gogar Link Road, would be achieved or the means by which LDP Proposal GS7, Gogar Burn Diversion would be delivered. The application is premature and may compromise the effective strategic planning of West Edinburgh.

3. The proposed development would be prejudicial to the implementation of Local Development Plan Proposal GS7, Diversion of the Gogar Burn and contrary to Policy DES 3. It has not been adequately demonstrated through the proposed masterplan and supporting information how the Gogar Burn Diversion be delivered in the future or how objectives relating to the reduction of flood risk, improving water quality and enhancing biodiversity would be achieved.
4. The proposed development would be contrary to Local Development Plan Policies Tra 7 Public Transport Safeguards, Tra 8 Provision of Transport Infrastructure, Tra 9 Cycle and Footpath Network and Tra 10 New and Existing Roads, in that it would be prejudicial to the implementation of LDP Proposal T9, Gogar Link Road and the objectives of the WETA Refresh Study 2016. The proposed site access arrangements would not form part of a coordinated transport infrastructure proposal to link Gogar Roundabout, with the IBG and Eastfield Road, which promotes public transport, active travel and road network improvements as outlined in the LDP.
5. The proposed development would be contrary to Local Development Plan Policies Tra 1 Location of Major Travel Generating Development and Tra 8 Provision of Transport Infrastructure, part a). Given the conclusions of the Transport Assessment and the absence of clear transport mitigation, the proposals have not adequately demonstrated that mitigation measures will be implemented to address the adverse impacts on the network.
6. The proposed masterplan concept would be contrary to Local Development Plan Policies Des 1 Design Quality and Context, Des 3 Development Design - Incorporating and Enhancing Existing and Potential Features, Des 7 Layout Design, part a) and the Edinburgh Design Guidance. The masterplan design concept has not sought to draw upon the positive characteristics of the surrounding area including the landscape character, views from the site, the presence of the Gogar Burn, the Castle Gogar Estate and the listed Castle Gogar. The proposed layout of buildings, streets, footpaths, cycle paths, public and private open spaces and SUDS features are not supported by an appropriate design concept or an agreed design framework.

7. The proposed masterplan concept would be contrary to Local Development Plan Policies Des 4 Development Design - Impact on Setting, parts a) b) and c), Des 9 Urban Edge Development, part a), Des 11 Tall Buildings and the Edinburgh Design Guidance. It has not been demonstrated that the proposed height and form, scale and proportions and position of built form on the site would be appropriate to the context and that the development proposal would not result in an adverse impact on the landscape setting of the city and views.

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

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

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

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

## **Equalities impact**

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

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

## **Sustainability impact**

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

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

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

Pre-application discussions took place on this application.

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

The application was advertised via the Council's Planning Portal on 18 August 2020, with a 30 day period for comments to take account of the Environmental Impact Assessment.

9 letters of representation have been received, these all comprising objections. These included representations made on behalf of landowners and developers with interests in the locality of the site. Comments were also received from the Castle Gogar Residents Association.

Comments received from Ratho and District Community Council and Cramond and Barnton Community Council are both treated as a Statutory Consultee to the application.

## Background reading/external references

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

**Statutory Development  
Plan Provision**

Strategic Development Plan  
West Edinburgh Strategic Design Framework (WESDF)  
Guidance - Developer Contributions and Infrastructure  
Delivery  
LDP Action Programme  
Edinburgh Design Guidance

LDP Status  
Special Economic Area - LDP Policy Emp 4 - Edinburgh  
Airport  
Local Nature Conservation Site - Gogar Burn  
Area of Importance for Flood Management - Gogar  
Burn and adjacent land in vicinity of Castle Gogar  
LDP Greenspace Proposal GS7 - Diversion of Gogar  
Burn  
LDP Transport Proposals and Safeguards T9 - Gogar  
Link Road

**Date registered** 6 August 2020

**Drawing numbers/Scheme** 1 - 11,

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

Contact: Francis Newton, Senior Planning Officer  
E-mail: francis.newton@edinburgh.gov.uk

**Links - Policies**

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**Relevant Policies:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LDP Policy Emp 1 (Office Development) identifies locations and circumstances in which office development will be permitted.

LDP Policy Emp 4 (Edinburgh Airport) sets out criteria for development proposals at Edinburgh Airport and requires they accord with the West Edinburgh Strategic Design Framework.

LDP Policy Emp 6 (International Business Gateway) sets out uses that will be supported in principle for the development of an International Business Gateway within the boundary defined on the Proposals Map.

LDP Policy Emp 8 (Business and Industry Areas) protects identified areas for business, industrial and storage development.

LDP Policy Emp 9 (Employment Sites and Premises) sets out criteria for development proposals affecting business and industrial sites and premises.

LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

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

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

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

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

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

LDP Policy Ret 7 (Entertainment and Leisure Developments - Preferred Locations) identifies the City Centre, at Leith and Granton Waterfront and town centres as the preferred locations for entertainment and leisure developments.

LDP Policy Ret 11 (Food and Drink Establishments) sets criteria for assessing the change of use to a food and drink establishment.

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

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

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

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

LDP Policy Tra 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.

LDP Policy Tra 10 (New and Existing Roads) safeguards identified routes for new roads and road network improvements listed.

LDP Policy Hou 8 (Student Accommodation) sets out the criteria for assessing purpose-built student accommodation.

LDP Policy Ret 6 (Out-of-Centre Development) identifies the circumstances in which out-of-centre retail development will be permitted.

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

**NSESBB Non-statutory guidelines** Part B of 'The Edinburgh Standards for Sustainable Building' sets principles to assess the sustainability of major planning applications in Edinburgh

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

# Appendix 1

## **Application for Planning Permission in Principle 20/03219/PPP**

### **At Land To South West Of Meadowfield Farm, Turnhouse Road, Edinburgh**

**Mixed use development including business and employment uses (use classes 4, 5 and 6); residential (class 9) and sui generis flatted development (including affordable and student accommodation); hotels (class 7); ancillary uses including retail (class 1), financial and professional services (class 2), food and drink (class 3 and sui generis), non-residential institutions (class 10), assembly and leisure (class 11); and associated works including car parking, servicing, access and public realm.**

## **Consultations**

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### **Edinburgh Urban Design Panel**

#### 1 Recommendations

The Panel welcomes the opportunity to comment on this proposal at an early stage in the design process and recognises potential to create a vibrant, high density, mixed use development. The applicant's commitment to showcase low-carbon design solutions is also welcomed.

In taking forward the design, the Panel recommends that the following issues should be addressed:

- o Make sustainable design the unique selling point of this development with a strong emphasis on delivering a healthy environment for residents;
- o Create a framework for organic growth of a diverse residential community;
- o Overcome boundary constraints and improve connectivity to surrounding areas;
- o Prioritise modal shift from car travel to walking, cycling and use of public transport;
- o Effective control of carparking;
- o Stronger emphasis on effective placemaking.

#### 2 Planning Context

Pre-application discussions commenced October 2019. A Proposal of Application Notice (Reference: 19/05303/PAN) was received by the Council on 01 November 2019.

The proposal is for mixed use development likely to comprise Commercial floorspace (Class 1 - Shops, Class 2 - Financial and Professional Services, Class 3 - Restaurants and Cafes, Sui Generis - such as public houses, Class 4 - Business, Class 6 - Storage and Distribution, Class 7 - Hotels, Class 10 - Non-residential institutions and Class 11 -

Assembly and Leisure) Residential (including affordable housing and flats), associated infrastructure, car parking and landscaping.

Masterplan proposals are at an early stage of development with quantum of commercial and residential floorspace to be confirmed.

#### Site Description

The PAN proposal site (29 hectares) is defined by Edinburgh Airport to north west and the Edinburgh - Fife railway to the north east. The southern site edges are defined by the Castle Gogar Estate and Castle Gogar Drive (a tree lined avenue), the Edinburgh Tram Depot and Myreton Drive which Edinburgh Urban Design Panel: Crosswinds - proposed mixed-use development provides access between the depot and the Gogar Roundabout. The Edinburgh Gateway Intermodal Station providing connections to tram and heavy rail lies to the south east.

The majority of the site comprises operational land for Edinburgh Airport including the former 12/30 'Crosswind' runway which was decommissioned in 2018.

#### Planning Policy

The proposal site lies substantially within the airport boundary as defined in the LDP with land designated as Special Economic Area.

LDP Transport Proposal T9 outlines the requirements for the Gogar Link Road, this is required to support long term development in West Edinburgh and connecting Eastfield Road to the Gogar Roundabout via the International Business Gateway. The LDP identifies an indicative alignment and safeguard which lies across the southern part of the proposal site.

The Gogar Burn which enters the western part of the site is designated as Local Nature Conservation Area with Areas of Importance for Flood Management lying within the vicinity of the Burn to the south west. LDP Greenspace proposal GS7 identifies an enhancement and diversion of the Gogar Burn with an indicative alignment crossing the site from north to south. This proposal seeks to reduce flood risk in west Edinburgh, improve water quality and enhance biodiversity.

#### Declarations of Interest

Nicholas Taggart stated that 7N Architects where he currently works, has historically been engaged on the IBG project adjacent to this site. He also stated that he was not involved directly in this project. Charles Strang stated that he had worked on the West Edinburgh Strategic Design Framework. The above was discussed by the Chair and the Panel. It was agreed to record the above statements as part of the Panel's note but that neither constituted a conflict of interest. This report should be read in conjunction with the pre-meeting papers.

#### General

This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations represented at the Panel forming a differing view of proposals at a later stage.

#### 3 Panel Comments

The Panel's detailed comments are as follows:

##### Overview

The Panel notes the proposed development of a 60%/40% mix of residential/leisure+commercial use, enabling development of 2700 homes of mixed tenure and accommodation for 5,600 workers, equivalent to the population of a small town. The Panel recognises the potential to create a vibrant, high density, mixed use development and welcomes the applicant's commitment to showcase low-carbon technology, taking into account recent declarations of Climate Emergency.

There is concern, however, that the principle of mixed-use development at this location is compromised by the site's relative isolation due to boundary constraints. The Panel also queries whether this location, next to a busy international airport, might discourage the target market of urban-aware, eco-thinking digital businesses, employees and flat-dwellers.

The applicant is therefore encouraged to become an industry leader in delivering low and zero-carbon design, making sustainable design the unique selling point of this development with a strong emphasis on delivering a healthy environment for residents. Potential measures include setting ambitious targets for mitigating and adapting to climate change, applying Passivhaus Standards to building design and using innovative solutions for dealing with airport noise and pollutants. Consideration should also be given to deculverting the Gogar Burn.

In taking forward this application, the Panel also urges greater emphasis on:

- o Establishing the framework for organic growth of a diverse residential community
- o Strategic transport considerations
- o Placemaking, including integration with the surrounding context.

A diverse community

The Panel supports the proposed range of housing tenures and recognises a need for high-density flatted accommodation, in contrast to lower density housing such as that proposed at nearby Maybury and the Garden District. There is considerable concern, however, at the proposed focus on creating a live-work environment for a digital community of predominantly young people. In the Panel's view this development should offer realistic lifestyle choices for every age group, including accommodation for families, elderly people and downsizers.

It should also promote organic growth, marketing this development as a new community with appropriate facilities, services and management controls. For example, the applicant should commit to providing a primary school as an essential community asset. The applicant is encouraged to follow Secure by Design guidance on new residential development and is invited to seek further advice on security issues from Police Scotland in due course.

Strategic transport considerations

The Panel noted significant barriers to movement between this site and neighbouring land uses as a result of being bounded by the airport, the mainline railway, the Gogar Castle estate, and semi-industrial land. There needs to be a significantly stronger focus on overcoming these constraints to create additional spatial/structural connections to, for example, Maybury and the Edinburgh International Business Gateway (EIBG).

Promoting modal shift from car travel to walking, cycling and use of public transport should be the starting point for this low-carbon development. The Panel noted that residents needing to travel by car could face significant traffic congestion on surrounding roads. The applicant is encouraged to prepare an Accessibility Plan that sets targets for

journeys to and from the site by car and public transport. Consideration should be given to enabling convenient access to public transport and shared mobility (carsharing, bikesharing, lift-sharing, and on-demand travel services).

The proposed connection to the Edinburgh Gateway rail station should be re-configured to ensure train passengers are provided with legible, direct and attractive walking and cycling routes between the station and the new neighbourhood.

Measures to accommodate and control car parking are another key priority. The Panel holds mixed views on multi-storey carpark provision. While reducing the need to park cars at ground level, they are often unpleasant environments that demand robust security measures to counteract criminal and anti-social behaviour. Multi-storey carparks should therefore have concierges and CCTV.

The Panel is also concerned that the new neighbourhood could become a magnet for drivers seeking to park cars, particularly air travellers in search of cheap long-stay parking. Alongside measures to encourage modal shift, parking controls must be enforced to protect the needs of residents and other local users.

### Placemaking

The Panel notes that the masterplan is in a very early stage of development. It strongly supports the proposed integration of residential, commercial and leisure uses. The commitment to a hierarchy of scale in public open space is also supported.

However, the Panel considers the following issues have yet to be addressed to deliver effective placemaking:

- o There needs to be a legible street hierarchy, configured around connections and key desire lines to important destinations (including Edinburgh Gateway Station, EIBG and Maybury);

- o The masterplan needs to demonstrate a significantly stronger response to the surrounding context - for example:

- A Heritage Statement should be prepared that addresses the importance/significance of heritage assets, particularly Gogar Castle (a noticeable feature in the wider landscape) and its setting. The masterplan must demonstrate that it has been informed by the Heritage Statement. For example, it may be appropriate for the block layout to be informed by the setting of the Castle.

- Make use of landscape design to knit the masterplan into the wider context. The interface at boundaries/edges of the site is currently unresolved. Opportunities should be explored to make use of the area to the north west of the site, depicted on the map as dark green. The applicant should also seek greater control over the boundary with the airport.

- o There needs to be a clear rationale for: the orientation of blocks and plots; the articulation of public/private space; the mix and distribution of uses; street design including, where necessary, on-street parking; building heights; plot parameters; servicing arrangements; and design of public open space.

- o The masterplan needs a clear phasing strategy ensuring that early phases function well in isolation from the whole, which may require the proposed sequence of gateway first, then hub, to be reconsidered.

### Scottish Water

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

## *Water Capacity Assessment*

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

*There is currently sufficient capacity in the MARCHBANK 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*

*This proposed development will be serviced by EDINBURGH PFI Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity currently so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water via our Customer Portal or contact Development Operations.*

## *Please Note*

*This site might cause significant impact on PFI assets. This must be assessed once the information on additional load and the PFI site affected are known at PDE stage. 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 and abandoned Scottish Water assets.*

*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. Please note the disclaimer at the end of this response.*

## *Drinking Water Protected Areas*

*A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.*

## *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.*

#### *Next Steps:*

*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.*

#### *Non Domestic/Commercial Property:*

*Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk)*

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

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

*If you are in any doubt as to whether the discharge from your premises is likely to be trade effluent, please contact us on 0800 778 0778 or email [TEQ@scottishwater.co.uk](mailto:TEQ@scottishwater.co.uk) using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system.*

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

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

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

## **Flood Planning interim comment**

*This application has largely satisfied the self-certification scheme. Could you ask the applicant to address/clarify on the following concerns please.*

- 1. Could arrows be used to annotate the pre-overland flows.*
- 2. Some of the figures throughout the reports are difficult to assess/read, specifically figure 3.9 from the FRA.*
- 3. In the model results for a 1:200 plus 40% CC event there are several MH's noted as flooding, on cross reference with FFL there seems to be some cause for concerns, could this be assessed and expanded on.*
- 4. Confirmation of who will ultimately adopt the related infrastructure.*

*We are aware that a masterplan has been developed in regards to the possible realignment of the Gogarburn, are planning content that this application does not infringe on these future plans.*

### **Cramond+Barnton Community Council comment**

*The Community Council:*

- 1. has major reservations about the traffic impact on the surrounding principal road network;*
- 2. believes the development is premature against a required review of Edinburgh hotels and office needs as a result of Covid-19 behaviour; and*
- 3. considers that the Traffic Assessment does not provide a substantive answer to the traffic problems that could be generated.*

*Introduction.*

*This note provides the considered views of the Cramond and Barnton Community Council (CBCC). Although this development is not within the geographic area of CBCC, and whilst CBCC would therefor not wish to comment on the detail of the layout, configuration or environmental impact of the development it has concerns about the justification for and intensity of the development. In particular, it has major reservations about the traffic impact on the surrounding principal road network, the proposed Edinburgh Airport Eastern Access Road (EAEAR or the Gogar Link Road) and the Park and Ride Tram site at Ingleston. We therefor recommend that consent is withheld until these matters have been resolved to preclude detriment.*

*Strategic Justification.*

*The Crosswinds application is premature until further progress is made on National Planning Framework 4, City Plan 2030, the West Edinburgh Study and a review of Edinburgh's hotels and offices needs as a result of Covid-19 behaviour. Whilst it is appreciated that infrastructure developments require to be considered against a long term horizon, it seems inconceivable that emerging practice trends on the use of office space will not have some impact on future need projections.*

*Traffic Impact.*

*A "Traffic Assessment" has been submitted as one of the application documents. This does not provide a substantive answer to the traffic problems that could be generated by*

*this development but does provide a scoping tool and seeks the Council's agreement to the approach to be taken. It does point to anticipated problems at the junction between the EAELR and the principal road network at the Gogar Roundabout and the spread of these problems to the Maybury Junction, where a junction Improvement is suggested to provide amelioration. This measure is not included within the planning application and construction of the Crosswinds development should not be consented until and unless this has been built and opened. Notwithstanding, the analysis still concludes significant delays to traffic on the principal road network around the Gogar and Maybury Junctions, which are unacceptable.*

*The proposals for parking spaces within the site are constrained to below the council's maximum parking allocations. Because of the restricted nature of the internal road layout, the analysis discounts displaced parking becoming a problem. However, the risk remains that displaced parking from office and retail elements may park on the EAELR to the detriment of good access to the airport, and that displaced parking may also take place at the Ingleston Park and Ride. This would be particularly attractive for business users, giving all day free parking and a convenient transport link between the P&R site and the Crosswinds development. A clearer strategy matching supply and demand for parking for such an ambitious development at such a strategically significant location should be developed.*

*Conclusion.*

*Consent should not be granted until and unless the points above are resolved to no detriment.*

### **Economic Development comment**

*The approach of seeking planning permission in principle for a development incorporating a mix of class 1/2/3/4/5/6/10/11 space totalling 103,400 sqm is not supported. It is considered that this needs to be specified in a more granular form.*

*In particular, the lack of any specifically identified plots for industrial (class 5/6) space within the masterplan is of concern from an economic development perspective. Given the significant and growing pressures on the supply of industrial space in Edinburgh, for a site of this magnitude and in this strategic location to be brought forward without any committed industrial space cannot be supported.*

*Given the scale of this development and the high-level nature of the masterplan, it has not been attempted to carry out a detailed assessment of the economic impacts of the development. Rather, specific issues have been set out below.*

*The approach of seeking planning permission in principle for a development incorporating a mix of class 1/2/3/4/5/6/10/11 space totalling 103,400 sqm is not supported. These use classes span multiple different markets with different supply and demand dynamics and the application as currently structured would result in a situation where the nature of the commercial space that is to be delivered within this development is extremely elastic. The application as current structured would give rise to a situation where (for example) the development could deliver two extremes of 0 sqm of class 4 space or 103,400 sqm of class 4 space. This would introduce a huge degree of uncertainty. While the desire of the applicant to retain flexibility is recognised, it is*

*considered that this approach is too unspecific. It is suggested that the 103,400 sqm class 1/2/3/4/5/6/10/11 space be separated out into class 1/2/3, class 4/5/6, and class 10/11 space.*

*There is a pressing need for land for the development of new industrial space in Edinburgh. Given the need for proximity to Scotland's motorway network, this space is primarily required on the west of the city. This need will be greatly increased by proposals in the emerging City Plan 2030 to release much of the city's existing urban industrial space for redevelopment. Given these pressures, a development of 30 hectares in this strategic location that does not incorporate a significant specified element of industrial (class 5/6) space cannot be supported from an economic development perspective. In particular plots such as 5 and 6 that are adjacent to the railway and the tram depot respectively are considered to be especially well-suited to industrial uses.*

### **Edinburgh Airport comment**

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

#### *Height Limitation on Buildings and Structures*

*No building or structure [including antennas and additional roof equipment] of the development hereby permitted should exceed 75.49m AOD/AMSL. Any building or structure exceeding this must be independently assessed by EAL at the earliest opportunity to allow mitigation solutions to be sought.*

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

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

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

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

- o monitoring of any standing water within the site temporary or permanent*
- o sustainable urban drainage schemes (SUDS) - Such schemes shall comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).*
- o management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'*
- o reinstatement of grass areas*
- o maintenance of planted and landscaped areas, particularly in terms of height and species of plants that are allowed to grow*

- o which waste materials can be brought on to the site/what if any exceptions e.g. green waste
- o monitoring of waste imports (although this may be covered by the site licence)
- o physical arrangements for the collection (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste
- o signs deterring people from feeding the birds.

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

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

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

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

#### *Submission of Landscaping Scheme*

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

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

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

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

#### *Submission of SUDS Details*

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

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

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

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

*We would also make the following observations:*

#### *Cranes*

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

#### *Lighting*

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

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

#### **Network Rail comment**

*Whilst Network Rail has no issues with the principle of the proposed development, we would have to object to the proposal unless the following conditions were attached to the planning permission, if the Council is minded to grant the application:*

*1. The applicant must provide a suitable trespass proof fence of at least 1.8 metres in height adjacent to Network Rail's boundary and provision for the fence's future maintenance and renewal should be made. Details of the proposed fencing shall be submitted to the Planning Authority for approval before development is commenced and the development shall be carried out only in full accordance with such approved details.*

*Reasons: In the interests of public safety and the protection of Network Rail infrastructure.*

*2. No development shall take place on site until such time as a surface and foul water drainage scheme has been submitted to and approved in writing by the Planning Authority. Any Sustainable Urban Drainage Scheme must not be sited within 10 metres of the railway boundary and should be designed with long term maintenance plans which meet the needs of the development. The development shall be carried out only in full accordance with such approved details.*

*Reason: To protect the stability of the adjacent railway lines and the safety of the rail network.*

*3. No development shall take place on site until such time as a scheme of landscaping has been submitted to and approved in writing by the Planning Authority. The scheme shall include hard and soft landscaping works, boundary treatment(s), details of trees and other features which are to be retained, and a programme for the implementation/phasing of the landscaping in relation to the construction of the development. Where trees/shrubs are to be planted adjacent to the railway boundary these should be positioned at a minimum distance from the boundary which is greater than their predicted mature height. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. Network Rail can provide details of planting recommendations for adjacent developments. All landscaping, including planting, seeding and hard landscaping shall be carried out only in full accordance with such approved details.*

*Reason: To control the impact of leaf fall on the operational railway.*

*4. No development shall take place on site until such time as a noise impact assessment has been submitted to and approved in writing by the Planning Authority. The noise impact assessment shall include an assessment of the potential for occupants of the development to experience noise nuisance arising from the railway line. Where a potential for noise disturbance is identified, proposals for the attenuation of that noise shall be submitted to and approved in writing by the Planning Authority. Any such approved noise attenuation scheme shall be implemented prior to the development being brought into use and shall thereafter be retained in accordance with the approved scheme.*

*Reason: To ensure that occupants/users of the development do not experience undue disturbance arising from nearby noise sources.*

*Network Rail would also recommend that the following matters are taken into account and are included as advisory notes, if granting the application:*

*Buildings should be situated at least 2 metres from Network Rail's boundary. The applicant must ensure that the construction and subsequent maintenance of proposed buildings can be carried out without adversely affecting the safety of, or encroaching upon, Network Rail's adjacent land.*

*Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.*

*o Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a "possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.*

### **Affordable Housing comment**

*Note a willingness to provide 25% homes of approved affordable tenures but I couldn't spot an 'Affordable Housing Statement' setting out the proposed approach to its delivery. Can you ask the applicant to submit this? It was asked for during the pre-application discussions.*

*The Council's planning guidance on Affordable Housing states that applicants are requested to submit, as part of their planning application, an Affordable Housing Statement to allow for quicker assessments of proposals. An "Affordable Housing Statement" will be a public document available on the City of Edinburgh Council's Planning Portal. It should set out the approach to the following points:*

- o The location and phasing of the affordable homes;*
- o The tenure type - note the applicant should make provision for a minimum of 70% of the affordable housing on site to be social rent;*
- o The applicant is requested to enter into an early dialogue 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.*

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>.

## **Affordable Housing comment updated**

### *1. Introduction*

*I refer to the consultation request from the Planning service about this planning application. Housing Management and Development are the consultee for Affordable Housing. The proposed affordable 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's guidance on 'Affordable Housing' sets out the requirements of the AHP, it 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 2500 homes over a 25-year period and as such the AHP will apply. There is an AHP requirement for a minimum of 25% homes of approved affordable tenures.*

*The applicant has submitted an Affordable Housing Statement which commits to provide 25% on site affordable housing and this will be secured by a Section 75 Legal Agreement. This approach could deliver 625 new affordable homes and will assist in the delivery of a mixed sustainable community.*

*The development is anticipated to be built out over three phases over a 25-year period. Each phase will be expected to contain 25% affordable housing to ensure that the development does not either overly concentrate or "back-load" the affordable housing contribution.*

*As this is a PPP application there is limited detail about the affordable housing provision that will be delivered. The applicant should engage with the Council at an early stage to agree the detailed approach to delivery, tenure, mix and location of the affordable homes in each phase. The proposed approach should be explained within a further Affordable Housing Statement submitted for consideration and approval as part of relevant applications for the Approval of Matters Specified in Conditions.*

*The approach will be expected to accord with the principles set out within the Council's guidance on 'Affordable Housing', including the following requirements:*

- o *The proportion of housing suitable for families with children included within the affordable element should match the proportion of such housing on the wider site and a representative mix of house types and sizes should be provided;*
- o *Several affordable housing locations should be identified so that large groupings of the same tenure type are avoided;*
- o *At least 70% of the affordable housing requirement should be delivered for social rent, the highest priority tenure;*
- o *The applicant should have identified and engaged with Registered Social Landlords to deliver the affordable housing and make sure that the proposal reflects their design standards as well as guidance such as Housing for Varying Needs;*
- o *Affordable housing should be situated close to local amenities, services and public transport. It should be "tenure blind" and well-integrated with housing for sale;*
- o *An equitable and fair share of vehicle and cycle parking for affordable housing, consistent with the relevant parking guidance, should be provided.*

### **3. Summary**

*The applicant has made a commitment to provide 25% on site affordable housing and this will be secured by a Section 75 Legal Agreement. This approach could deliver 625 new affordable homes and will assist in the delivery of a mixed sustainable community.*

*The development is anticipated to be built out over three phases over a 25-year period. Each phase will be expected to contain 25% affordable housing to ensure that the development does not either overly concentrate or "back-load" the affordable housing contribution.*

*The applicant should engage with the Council at an early stage to agree the detailed approach to delivery, tenure, mix and location of the affordable homes in each phase. The proposed approach should be explained within an Affordable Housing Statement submitted for consideration and approval as part of relevant applications for the Approval of Matters Specified in Conditions.*

### **Archaeology comment**

*A detailed background to the site's archaeological and cultural heritage is contained in the accompanying EIA Vol 2 Chapters L & M produced by Litchfield. In summary, the site currently occupies the SE section of Edinburgh Airport overlying and incorporating part of the Crosswinds / Auxiliary airstrip. Historically this area formed part of the important historic RAF Turnhouse constructed during World War I and which continued in active service through the Cold War though in a much-reduced capacity from the 1960/70's. Prior to this the are formed part of the medieval Parish of Gogar situated between the medieval village to the South of the Burn and Meadowfield Farm adjacent. Just completed (Sept 2020) excavations by CFA at Meadowfield Farm have confirmed evidence for its occupation going back to its medieval (14th century) origins. In addition, as well as medieval evidence the excavations have significantly produced two cannonballs probably relating to the 1650 battle between Cromwell and Leslie known as the Field of Flashes.*

*Recent excavations as part of the Edinburgh Tram project at Gogar along with those just completed by AOC at West Craigs Farm and just about to be completed (Sept 2020) by*

*CFA at Meadowfield Farm, have confirmed that this area contains significant evidence for early medieval and prehistoric occupation. In addition, the Gogar Burn, in particular old river courses relating to it, may contain important paleoenvironmental evidence, charting local changes to the environment from the last Ice Age.*

*As such the site has been identified as containing occurring within and area being of archaeological and historic significance both in terms of military buried archaeology (17th-20th century) and relating to the development of the medieval and later parish of Gogar, Meadowfield Farm and potentially earlier prehistoric occupation. Accordingly, this application must be considered under terms 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 DES3, ENV3, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

#### *Historic Buildings/Landscapes*

*Having assessed the application in terms of Setting and impacts upon the adjacent listed Gogar Castle and Cammo Designed Landscape, I broadly concur with Litchfield's conclusions as set out in their EIA Cultural Heritage Chapter M that the proposed scheme will not have significant impacts upon either.*

#### *Buried Archaeology*

*The proposals would require significant ground-breaking works regarding construction, landscaping services etc. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 20th century remains associated with RAF Turnhouse to possible activity associated with the 1650's Battle of the Field of Flashes too medieval and potentially prehistoric remains.*

*Although there are some minor errors with the Litchfield's Archaeological EIA Chapter M (e.g. sites 14 and 16 are not within the site but adjacent) and it was written in advance of the results being known from the 2020 work at Meadowfield Farm and West Craigs, over all I concur with its general conclusions that the scheme is likely overall, to have a low, but significant impacts. It is essential however, that if permission is granted that an archaeological programme of work is undertaken prior to development, to fully excavate, record and analyse any surviving archaeological remains.*

*This strategy will require the undertaking of phased programme of archaeological investigation, the first phase being the undertaking of an archaeological evaluation (max 10%), with trenches targeting both the anomalies identified in Headland's Geophysical survey and the wider general area. The results of this evaluation work will inform the scope of secondary phases of investigation and analysis. Based upon the results from the adjacent sites at Gogar and Meadowfield/West Craigs, this is likely to include both set piece excavations and a wider programme of strip, map record and excavate during topsoil removal/landscaping works and possible public open-days and paleoenvironmental sampling.*

*Given the recent discovery of 17th century cannonballs and the its use as a former military airfield metal detecting surveys will also be required to be undertaken during the evaluation to both recover artefacts and assess scope for potential more detailed battlefield survey's depending on results.*

### *Public Engagement*

*As stated it is likely that archaeological investigations will reveal to important remains associated with RAF Turnhouse and possibly dating back to early prehistory. It is therefore considered essential that a programme of public/community engagement is undertaken during all subsequent phases of development. The full scope of which will be agreed with CECAS but could include: press calls, social media, site open days, viewing points, interpretation and exhibitions.*

*It is recommended therefore, that a condition be applied to any permission granted to secure this programme of archaeological works 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, metal detecting survey, analysis, reporting, publication, interpretation and 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.*

### **Historic Environment Scotland comment**

*Thank you for your consultation which we received on 25 August 2020. 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. We are broadly content that the proposed development would not result in a significant impact for our interests. However, we have some comments regarding the assessment included in the EIA Report, and they are included in the annex below.*

### *Further Information*

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

### *Annex*

### *Proposed Development*

*The proposed development comprises a mixed-use development including business, employment, residential and leisure uses. It lies within a brownfield site which was formally a runway for the adjacent Edinburgh Airport.*

### *Background*

*As noted at scoping, the development does not appear to raise issues of national significance. However, we note that the Scoping response issued by the Planning Authority (19/03959/PREAPP) suggested that the proximity of designated assets within 1km of the development (LB27092 Castle Grogar, GDL00081 Cammo Estate and GDL00286 Milburn Tower) would require further assessment in an EIA Report.*

*The site has not been identified for development in the adopted Edinburgh Local Development Plan (2016), but the Scottish Government's National Planning Framework 3 (2014) identifies the area adjacent to Edinburgh Airport for commercial and mixed use. The proposed development lies within the West Edinburgh Strategic Development Area (SDA) identified in the South East Scotland Strategic Development Plan (SESplan).*

### *Our interest*

*Our main interest in this instance is the Category A-listed Castle Grogar (LB27092) which lies approximately 70m from the proposed development boundary. Although the scheduled monument SM4572 Gogar Mains, Fort, the Garden and Designed Landscapes GDL00081 Cammo Estate & GDL00286 Milburn Tower all lie within 1km from the proposed development, given the existing topography we do not consider that the change of use of the development site from a derelict runway to a mixed use development would result in a significant impact on the setting of these assets. We are broadly content with the conclusion laid out in the EIA Report that the impacts on SM4572, GDL00081 & GDL00286 will not be significant.*

### *Environmental Impact Assessment Report*

*We have reviewed the EIA Report and are broadly content that there is sufficient information within it to reach a view for our interests.*

### *Our position*

*Although Castle Gogar (LB27092) lies within 100m of the development boundary and the wider elements of its setting, such as the Gogar burn, are still appreciable, we note that the setting of the castle has also been limited by the subdivision of the surrounding estate with property boundaries, structural planting and mature vegetation. Given the proximity of the development boundary to LB27092 Castle Grogar we agree that there is the potential for a significant impact on the setting of the group of designated buildings centred around the A-listed castle. However, we welcome that these impacts will be reduced through the application of mitigation during the phases of the development. This will include additional screening, the reduction in the scale of built development closer to the castle and the production of a construction management plan. We are content that impacts on our interests would not be significant through the application of the mitigation outlined in our proposed development.*

*We would welcome further engagement on the construction management plan and proposed landscaping within the Gogar Burn and Airport landscape buffer to further*

*inform the mitigation of impacts on the setting of the castle should it be considered helpful.*

## **SEPA comment**

### *Advice for the planning authority*

*SEPA has considered this planning application in the context of the objectives of the Edinburgh City Plan 2030 which is in the process of being developed, in parallel with the City Mobility Plan, the City Centre Transformation and the Low Emissions Zone. SEPA is working with the City of Edinburgh Council (CEC) and partners, such as Scottish Water (SW), to deliver this plan which seeks to meet the challenges of the climate change emergency while providing development which benefits all citizens. A critical factor in this are that the objectives of Scottish Government for net zero emissions of all greenhouse gases by 2045 (75% by 2030). In order to ensure this, the proposals for Edinburgh raise the bar and set a target for the city to operate on a "net-zero" carbon basis by 2030.*

*In order to make Edinburgh resilient to the consequences of climate change, as well as the city playing its part to limit its contribution to the causes of climate change, another key factor in the City Development Plan is to reduce flood risk overall, and not simply to avoid flood risk in or from new developments. This will involve a strategic, city-wide approach to flood risk reduction and water management which will inform the City Plan.*

*In our responses to 'Choices for the City Plan 2030' and its Strategic Environmental Assessment (SEA) (and in the suite of accompanying plans and initiatives and their SEA), SEPA fully endorsed these objectives and we are working with CEC and partners such as SW to deliver this plan for Edinburgh's future. We emphasised that all of these plans and initiatives must address and deliver positive benefits in two key areas:*

- o Emissions - which drive down air quality with significant impacts on human health while driving increasing climate change.*
- o Water - the overall reduction of flood risk and the need to manage fluvial and surface water through a period of anticipated unprecedented development and unprecedented climate change; a period of more intense rainfall at a time where SW will not accept surface water from new development into the combined sewer and must, in order to accommodate foul drainage from new developments, exclude as much as possible of the surface water that is currently entering the combined sewer. Delivery of key RBMP objectives should also be considered.*

*We consider that any planning application for development must demonstrate that it will help to deliver all of these objectives for emissions and water. In this context, while we support and endorse many aspects of the proposed development and the rigour of the assessment, we object to this planning application for the reasons set out below under the headings of 'Emissions' and 'Water'. Also set out are details of the modifications we consider are necessary to allow us to review our objection or the conditions on planning permission which will allow us to remove some causes for objection.*

### *Emissions*

## 1. Air Quality

1.1 The method for the air quality impact assessment was agreed with CEC and SEPA before commencement. The assessment of the operational phase of the proposed development mainly considers the potential impact of road traffic emissions on local air quality.

1.2 The air quality impact, from operational traffic, at all existing receptors is classified as 'Negligible' for all pollutants when assessing the maximum possible emission scenarios. This is applicable to both the 'Phase 3 Operational' (i.e. proposed development fully operational) and the 'Phase 3 Construction' scenarios.

1.3 On this basis, the air quality impact of both the construction and operational phases of the proposed development are considered to be Not Significant.

1.4 Once there is a proposal for a site-wide system for the generation, transmission of energy and heat; air quality impacts must be considered to ensure national air quality objectives are met and human health is protected.

1.5 Some mitigation for air quality impacts have been considered in the transport section of the EIAR, for instance, two car-free, pedestrian and cycle routes proposed. The proposed development will maximise use of public transport and the majority of the development will be within a maximum walking distance standard of 400 metres to a bus stop and 800 metres to a railway station and tram stop. 250 electric car parking spaces will also be provided across the development. We are supportive of these measures.

1.6 However, up to 1,410 car parking spaces are required across the site, to be accommodated through off-street parking/ in plot and in multi-storey car parks. This includes 1,060 spaces for the proposed residential units. This is a significant amount of private parking provision in an area within close proximity to existing AQMA.

1.7 We refer CEC to EPS & RTPI Scotland's guidance document: *Delivering Cleaner Air for Scotland - Development Planning and Development Management* for more information on how effective development can minimise impact on air quality. In particular we suggest a Travel Plan, which includes information to allow new residents to make sustainable travel choices. For example information on walking and cycling routes to local facilities, access to public transport i.e. closest bus stop and service information, closest rail station and facilities available (car/cycle parking), cycle paths through development and linkages to other paths, walking routes through the development, etc. A condition on planning permission in principle is needed. All applications for Matters Specified in Conditions (MSC) should be accompanied by proposals to provide a Travel Plan and proposals to minimise the amount of parking for private vehicles.

## 2. Energy and District Heating

2.1 As with all other aspects of this response, we have considered the proposals for energy and district heating in the context of aligning this proposal with the objectives of the Edinburgh City Plan 2030 which is in the process of being developed. This plan aims to ensure the objectives of Scottish Government for net zero emissions of all greenhouse gases by 2045 (75% by 2030) are met in Edinburgh. In order to ensure the greatest likelihood of these objectives being met, CEC has set its own target to operate on a "net-zero" carbon basis by 2030. In consequence any planning application for development in the time period leading up to these targets must demonstrate that it will help to deliver these.

2.2 There are many elements in the proposals for energy in this planning application which we consider will help deliver these objectives but there are elements we consider could be modified to give development of the whole site greater potential to meet the Net

Zero targets. Critical to this is a robust consideration of site-wide proposals for the most sustainable generation, distribution and use of energy and heat.

#### *Energy Efficiency*

2.3 Currently, the proposals in the planning application set a framework for best practice in energy efficiency, such as the PassiveHaus Standards, with the expectation that these should be taken forward in applications for matters specified in conditions (MSC). We advise that these expectations or aspirations are clearly established as conditions of any Planning Permission in Principle. MSC applications should, as a minimum, meet the best practice set out in the supporting documentation to this planning permission in principle application, but any planning permission in principle should be clear that any higher standards or advanced innovation and technology, current at the time, will be expected of MSC applications.

2.4 We object to this planning application on the grounds a lack of information on proposals for site-wide electricity and heating. We will review this objection when the appraisal detailed below (please see Section 2.7) is completed and a viable (including financially viable) option is presented and demonstrates the most realistic, feasible and achievable proposals to provide the energy efficiencies of a site-wide scheme for electricity and heat.

2.5 The "Edinburgh Elements District Heating Network Appraisal" provides a clear and in depth consideration of the options available for heat as part of the proposed development. We welcome the fact that the carbon emission impacts has been a key factor in assessing the option available for providing heat to the development. We also support the consideration that has been given to low carbon or renewable sources of heat, and the incorporation of PassivHaus standards as a means to reduce the heat demand on site which, in turn, reduces the carbon emissions from the development. This is in line with the Scottish Government's Energy Strategy which identifies energy efficiency, innovative local energy systems and renewable and low carbon solutions as key energy priorities.

2.6 Although the "Elements Edinburgh District Heat Network Appraisal" identifies a number of options for district heating in the site, and summarises that district heating is, subject to further financial investigation, feasible within the site. It is the role of the Local Authority to assess the outcomes of the energy feasibility report. However, on the basis of the information provided as part of the application, we consider that the applicant has proven that it is feasible (subject to further financial investigation) to provide district heating within the Edinburgh Elements/Crosswinds development, and, therefore, we consider that this should be incorporated as an integral part of the proposed development.

2.7 We object to there not being a proposal for district heating in this planning application. We will review this objection once the further investigations are carried out as identified in the Recommendations contained in the "Elements Edinburgh District Heat Network Appraisal" and there is a proposal for a site-wide system for the generation, transmission of energy and heat. This must be accompanied by appropriately scaled plans which demonstrate how the proposed development, its design and layout, incorporated this system for heat and energy.

2.8 Please note that we do not have a preferred option, e.g. a heat network connected to a source of waste heat. What is needed is a proposal for the maximum potential of this site to help achieve CEC's and Scottish Government's objective of net zero emissions of greenhouse gases. We recommend as an additional condition to any planning permission that MSC applications demonstrate: how they will integrate with this site-wide system and complement it; or, alternatively how they will achieve a separate system for

*electricity and heat use which will achieve greater efficiencies towards the goals of net zero emissions which will complement and not compromise the site-wide system.*

*2.9 As mentioned above we support many elements of this part of the planning application. We welcome the consideration that has been given towards incorporating energy reduction, reduced energy demand and the utilisation of low carbon energy as part of the proposed Edinburgh Elements development.*

#### *Supporting policies*

*2.10 We support the consideration given to the reducing energy demand and the heat hierarchy. In particular we support the consideration given to the ways that development on the site can reduce energy demand and consumption as well as the options available for heat on the site. Incorporating renewable energy solutions, minimising energy demand and providing district heating within these sites would be in line with the City of Edinburgh Council's Sustainable Energy Action Plan (2015-2020), Scottish Government's Energy Strategy and SEPA's Energy Framework and our priorities to reduce energy demand from new developments, recovery of surplus energy, and sustainably source remaining energy demand. It would support the delivery of the Scottish Government's ambitions for renewable energy and heat as outlined in Scottish Planning Policy "A Low Carbon Place", in particular it is consistent with Scottish Planning Policy, paragraph 154. The planning system should:*

- o Support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:*
- o 30% of overall energy demand from renewable sources by 2020;*
- o 11% of heat demand from renewable sources by 2020; and*
- o The equivalent of 100% electricity demand from renewable sources by 2020;*
- o Support the development of a diverse range of electricity generation from renewable energy technologies - including the expansion of renewable energy generation capacity - and the development of heat networks.*
- o Help to reduce emissions and energy use in new buildings and from new infrastructure by enabling development at appropriate locations that contributes to:*
- o Energy efficiency;*
- o Heat recovery;*
- o Efficient energy supply and storage;*
- o Electricity and heat from renewable sources; and*
- o Electricity and heat from non-renewable sources where greenhouse gas emissions can be significantly reduced.*

*2.11 We acknowledge that the position that Crosswinds has taken to exclude natural gas from the development is one that will support the delivery of the Scottish Government's 2019 Programme for Government commitment that residential developments granted planning permission from 2024 will be required to use low carbon or renewable heat, and that similar actions will be considered from this date for non-residential developments. This forward thinking is welcomed, and we support the clear consideration that has been given to reducing the overall energy demand, reducing the electricity consumption and greenhouse gas emissions of the development.*

#### *Waste and Material resources*

*2.12 With regards to management of waste generated within the site, we understand that consideration has been given to Policy De5 "Development Design - Amenity" in the current City of Edinburgh Council LDP. We encourage the minimisation of waste as part of the development of sites, as well as ensuring that waste can be collected from the site, in line with the Waste (Scotland) Regulations through separate collection of recyclable*

materials to maximise the opportunity to recycle and to enable the reuse materials either on site or elsewhere.

2.13 Additionally, we encourage the consideration of circular places and circular use of materials to be incorporated into the very beginnings of the design concept. This means not only considering the potential to use secondary materials in construction, but also to consider the reuse of materials on site in the future and repurposing of buildings for additional uses as well as alternative future uses.

2.14 Some information on this can be found below, please note these are provided as information rather than endorsement:

- o *planning for circular, compact, connected cities*
- o *Designing buildings for adaptable use, durable and positive impact*
- o *Planning effective transport of people, products and materials*
- o *Designing mobility assets for component and material recirculation*

*Mayor of London: Design for a Circular Economy*

*Water*

### *3. General*

3.1 As part of SEPA's ongoing work to assist CEC to deliver the City Plan 2030, we have worked with the council and partners on a range of initiatives to deliver a city (existing and with considerably additional development) which is resilient to climate change. We are working with partners such as CEC and SW to develop a strategic flood risk assessment (SFRA) which will inform the location, and design of new development. We are working with partners, on proposals for the green/blue infrastructure which is an essential part of a city-wide strategic approach to reducing flood risk and achieving a city-wide green/blue network with benefits for amenity, active travel, ecology and surface water management.

3.2 At Section 4 (Flood Risk) below is copied the relevant section of our response to the scope for the West Edinburgh Development Framework. This reiterated a long-expressed view from SEPA of the need for a strategic approach to flood risk in this part of the city, and this response was developed in our responses to Choices - the City Plan 2030 in which we set our reasons for considering the need for a city-wide, strategic approach to flood risk.

3.3 We now have an application which considers issues, including flood risk, only within the immediate vicinity of the site to which the application applies. As expressed in pre-application meetings and in correspondence such as our response to the scope for the EIA, we have stressed that options for development that 'lock' the Gogar into its current location (and this application does propose locking the Gogar into a critical section where it runs under the A8) can only compromise options for the Gogar to be part of a city-wide strategic approach to flood risk, water management, green/blue infrastructure.

3.4 We are objecting to this aspect of the planning application as we consider it will not help to deliver the strategic approach necessary to deliver development while enabling the whole city to meet the challenges of climate change.

3.5 We are not commenting on the flood risk assessment (FRA) which accompanies this planning application as a consequence of our objection (on the grounds of flood risk) is that flood risk will have to be re-assessed. This will require to be done in the context

*of a proposal which will allow the Gogar to be an active part of the city's strategy for reducing overall flood risk and managing surface water.*

*3.6 Set out in Section 5 (under the general title 'River Basin Management Planning') are our concerns on other impacts on the environment of locking up the Gogar and the impacts of this on other strategic aims for the city.*

#### *4. Flood Risk*

*(Copied from SEPA's 17 January 2020 response to the West Edinburgh Study. CEC Reference: West Edinburgh Study. SEPA Reference: PCS/169156.)*

*We understand that the National Planning Framework identifies the area to the west of Edinburgh for major growth. Within this strategic growth area there are areas of functional floodplain including the River Almond, Gogar Burn, Murray Burn, Water of Leith as well as the Union Canal. All of these watercourses, including their tributaries and feeders, will require careful consideration to ensure that proposed development and infrastructure is not at risk of flooding and there is no increase in flood risk elsewhere. Any increase in flood risk could result in development being unsustainable as well as limiting further development in the future. As such, we are supportive of a holistic approach to development in West Edinburgh.*

*The first principle of flood risk management, established in the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy, is the avoidance of increased flood risk. Avoidance of development in the functional floodplain, including an allowance for climate change, will ensure a successful, future ready multi-purpose space. Areas currently important for flood storage capacity and conveyance should be safeguarded for water quality management, flood attenuation, flow paths and habitat improvement as well as compatible recreational uses. These areas can form landscape features, contributing to place-making, while at the same time helping to protect the built environment.*

*Built development should be located away from functional flood plains. Functional flood plain is generally defined as areas of medium to high flood risk. The footprint of long-term settlements should also take cognisance of climate change impacts and the risk that redevelopment may require flood mitigation measures. Development should also be located away from areas susceptible to surface water and groundwater flooding. Vulnerable land uses, such as hospitals and schools, need to be located out with the 1:1,000 year flood extent as identified in SEPA Land-use Vulnerability Guidance.*

*West Edinburgh is hydrologically complex in terms of the existing flood risk as well as the structural interventions that may be required, e.g. the realignment of a watercourse, to accommodate development without incurring increased flood risk to new and existing development. We are aware that there have been on-going discussions and studies for many years regarding the realignments of the Gogar Burn at the Gyle and Edinburgh Airport. Piecemeal planning applications are limiting the scope for any future realignment. For example, SEPA was recently consulted on a proposed large-scale development that was contrary to the Local Development Plan and potentially limits the future realignment of the Gogar Burn. Should realignment not be achievable we would like to better understand the reasoning and the proposed alternatives to realignment. There have also been a strategic flood risk assessment for the Gogar Burn and Murray Burn which may form the basis of further flood studies.*

*We believe there is an opportunity here to promote close joint working relationships that could be used as an exemplar for future place-making within large scale developments.*

*SEPA published the second National Flood Risk Assessment (NFRA) in 2018 which alongside SEPA flood maps provides the latest strategic understanding of flood risk across Scotland. The NFRA provides baseline for developing Scotland's Flood Risk Management Strategies.*

*The NFRA is available online - <https://www.sepa.org.uk/data-visualisation/nfra2018/>. It provides a summary of flood risk data and the impacts of flooding. The data shows the area proposed for development as part of 2 Potentially Vulnerable Areas (PVAs). These are: Cramond Bridge and Outer Edinburgh (includes the Edinburgh airport) and Edinburgh Water of Leith. Parts of areas proposed for development are classified as 'high risk' particularly around Edinburgh Airport. The area also lies within 3 proposed 'Objective Target Areas' (OTA map attached with this letter) these include: Edinburgh Airport, Edinburgh Water of Leith and Edinburgh west.*

*SEPA's Flood Risk Management Strategies set strategic and long-term direction in managing flood risk across Scotland. The Strategy shows that a flood study will be undertaken by CEC as part of cycle 2 (2021 - 2027). The study is to focus on flood risk from the Gogar Burn. SEPA's FRM Strategies 2015 - 2021 are available online - <https://www2.sepa.org.uk/frmstrategies/>*

## *5. River Basin Management Planning (RBMP)*

*Summary of EIA documentation. Chapters C 7 N.*

*5.1 There is recognition in Section 2.9 of the location of the Gogar Burn. There is no recognition, however, of the location of a large chambered culvert which is a barrier to migrating fish species. We informed the applicants of the need to scope out options for easement of this barrier at previous meetings. While in this instance, easing a barrier to fish would be a voluntary measure, it is one we would fully support.*

*5.2 In terms of RBMP, the downgrades on this stretch to consider relate to physical condition and fish barriers (there are also water quality issues, which may be linked, but are being progressed separately).*

*5.3 We encourage the inclusion of open space and rain gardens but under the current climate emergency and biodiversity crisis, and in terms of the strategy forming for the City Plan 2020, a more ambitious approach is needed for this site with regard to blue-green network. This is a completely compromised river corridor with considerable asset fish barriers, which were changed originally to allow for airport expansion, which was not realised. These constraints are now opportunities to build in resilience and adaption capacity, resulting in a higher quality environment which could be enjoyed across the whole site and beyond. Long term maintenance of the culvert and surrounding infrastructure should be considered here against the costs and wider benefits of opening up the structure and naturalising that location as part of the wider blue green plan for the site. We note there is no mention of the culvert in any of the associated infrastructure text.*

*5.4 We note and welcome the ambition to provide a multi-functional large green space that meets the standards set out in the Edinburgh Design Guide (2017) (Ref 4) along the current Gogar Burn corridor, incorporating a new informal 'Gogar Burn Park'. Clarity over the vision for this informal zone is required. A more natural river connected to its*

*floodplain will be self-sustaining and able to function ecologically: the current channel does not meet this criteria. SEPA can support and advise here.*

*5.5 In the north western section we note the desire to create SUDS detention basins and woodland planting to screen the development from the airport and it is suggested that future diversion of the Gogar Burn could take place in this area (Proposal GS7). A feasibility study with the Airport and other stakeholders as partners would be considerably beneficial here, not least to scope out fully what could be done in partnership with others. We understand the Airport is keen to work with its neighbours.*

*5.6 Section 3.13. Clarity over the intended "embedded mitigation, in the form of landscaping" is required, and again there is no mention of mitigating the fish barrier culvert. We welcome plans to progress this earlier rather than later.*

*5.7 We welcome the ideology that the development will strive to be "sustainable" as this fits with SEPA's own statutory purpose, but detail in the plans are necessary to demonstrate what this means and how it will be achieved.*

*5.8 We recognise land will be safeguarded for a future restoration of the Gogar and parkland established. This new environment will be a benefit to both the owners and the users of the development but there will be no benefit to in-stream biodiversity and no reconnection of ecological or flood function. This must be addressed, and until it is SEPA objects to this aspect of the current planning application.*

*5.9 Chapter N3.4. There is no mention of mitigation of the asset culvert barrier on the NW of the site which will impact fish passage. This issue was clearly raised in the meeting mentioned in N3.8: this text only considers the physical environment of the Gogar, which is just one of the pressures on this water course.*

*5.10 N.13 - Further investigation is required to assess the feasibility of diverting the Gogar Burn through the route alternative to GS7. A comprehensive assessment of the effects on the water environment will be required during the design and development of the diversion proposals. This is beyond the scope of this assessment." SEPA can work with the developer on this, but the culvert does need to be included as it is a mitigatable pressure and contributes to the "bad ecological potential status".*

## **Chapter C**

*5.11 Do nothing and Original Master Plan - assessment of impacts on Biodiversity. The following text better captures the position "The water body will continue to be assessed as being Bad Ecological potential - downgraded for physical condition AND fish barriers, despite development on the site by the riparian owners".*

*Fig C6.2. The safeguarded zone need to be clarified, and its benefits for biodiversity should be assessed and included in the "evolving Masterplan" which should be the subject of an application for matters specified in condition. No accommodation for de-culverting has been included, as the fish barrier is not mentioned. Because of the in-principle need to re-consider the Gogar and the benefits of de-culverting, we do not consider it appropriate to leave this issue to an application for matters specified in conditions: it is necessary for it to form part of a modification to the current application.*

## **Ratho+District Community Council**

*While the Ratho and District Community Council has no disagreement in PRINCIPLE to the development of the former Crosswinds runway, a brown field site at Edinburgh Airport, we must OBJECT on the following grounds:*

### *Traffic Access to the development*

*The development is shown at present to have a single vehicular access point from the Gogar Roundabout which is already the site of severe congestion at peak hours and from time to time throughout the working day, without any additional traffic.*

*Mention is also made of a potential new access road to Edinburgh Airport using the same connection to the Gogar Roundabout which would also provide access for Airfreight that presently uses Turn house Road, thereby further increasing congestion at this vital junction. It should be further noted that this is the sole access to the Tram Depot.*

*It is of significant concern that a single point of access to the development would compromise the safety of residents and visitors to the development in the event of an emergency and we would suggest that provision should be made for a second and separate access point connecting directly to the main road network.*

*We also consider that prior to the approval of this application there should be a full traffic assessment of this junction, together with the wider road network in the area. We would also stress that infrastructure relating to the improved access should be in place before any development commences.*

### *Parking*

*We note that parking on site is based on a car-lite basis, proposing a total of 1,409 spaces in 3 decked carparks. There is a proposal to provide 1,060 residential parking spaces for some 2,500 units of which 500 will be 3 bedroomed. While this may be an admirable intention it does appear to be an unrealistic provision and we are concerned that overflow parking would spread to the adjacent residential areas where 24-hour parking is permitted, causing even more congestion to these areas.*

*It is also noted that there is no provision for parking for Retail units while the CEC maximum would be 581 and we consider additional parking should be incorporated into the site plans.*

*In summary the Ratho and District Community Council objects on the grounds that the traffic impact and parking requirements arising from this development must be resolved before any approval of the application can be granted.*

## **NatureScot comment**

### *Summary*

*This proposal, if delivered well and to high standards, could achieve well connected multi-functional open spaces for both people and nature. We note and highlight the issue of the Gogar Burn remaining in culvert and while we do not object to this aspect of the proposal we suggest that this aspect of the proposal does not meet the objectives of policy GS7 of the Local Development Plan. If minded to consent this development in its current form we recommend the Council considers the planning measures that will be necessary to enable successful delivery of the proposals for active travel, on-site green-*

*blue infrastructure, open spaces and the associated biodiversity enhancements or mitigation.*

### *Background and Strategic Context to the Gogar Burn*

*The Local Development Plan contains proposals for the Gogar Burn, to divert the river for the benefit of flood alleviation, water quality and biodiversity. This proposal was worked up by the Gogar Burn Partnership Group several years ago and incorporated into relevant documents, including development plans. We support these objectives of the Plan, recognising the strategic benefits for nature that can accrue through a connected habitat within and along the Burn corridor. We note that the emerging 'Choices for City Plan 2030' document aims to make Edinburgh a carbon neutral city, addressing climate change and creating a sustainable, connected city with enhanced green networks and blue-green infrastructure, and enhanced active travel routes.*

### *SNH Advice*

#### *Gogar Burn*

*We continue to support the objectives in the Local Development Plan to restore the river for the benefit of biodiversity, flood alleviation etc. This is not being taken forward in this proposal and although we recognise the technical and physical constraints in the site, we recommend that sustainable solutions for the Gogar Burn should be further explored, particularly in light of the climate change emergency and the objectives of the emerging City Plan.*

*The detail of the Gogar Burn culvert and riparian habitat connection issues aside, the proposals for a large informal Gogar Burn parkland, with appropriate tree planting and meadow creation, as well as landscaped areas and recreational routes is to be commended. See further comments below.*

#### *Green and Blue infrastructure*

*We support the broad objectives set out in the design statement and the intention to deliver a connected, sustainable development, based around defined character areas and a hierarchy of multi-functional open spaces, including the large informal parkland. The aspiration on these matters as set out in the outline plans, and as illustrated by the supporting images and precedent examples, are to be warmly welcomed. More broadly we support the intended scale, diversity and connectivity of the proposed open spaces as well as the intended use of biodiverse plantings and nature based solutions to surface water management. Set within the context of built development these aspects of the proposal could add substantial benefits to local character, community well-being and sense of place.*

*However, should the Council be minded to grant consent for the development, it will be important to ensure that the design intent and ambition for the green-blue infrastructure and open space as set out in the PPP, is successfully maintained. We advise that there is merit in securing the intent of submitted plans and supporting details, including the scale, form and function of open spaces and relevant design standards, and ensuring measures are in place to ensure appropriately high standards of detailed design, specification and on the ground delivery are secured.*

*We also emphasise the importance of long term management and maintenance of proposed open spaces as this will be essential to the successful delivery of the outcomes that are suggested in the submitted documents. We recommend that financing, governance and delivery issues relating to maintenance and management are clarified and workable solutions agreed prior to project implementation.*

*We note that the landscaping and habitats that are proposed have been informed by airport safeguarding measures, and therefore represents a realistic approach to the delivery of green-blue infrastructure on the site. We recommend that further focussed work is progressed to ensure accordance with the measures the airport require and in order to ensure that the environmental mitigation can be adequately delivered.*

*We support the integrated active travel measures within the development and the broad approach to route alignment and hierarchy as set out in the Active Travel Parameter Plan. This will help deliver a sustainable place, where people can lead healthy lifestyles and connect with local nature. However we note the wider connections proposed to surrounding destinations, particularly to the IBG site to the south, the West Craigs site to the north and Edinburgh International Airport to the east, are listed as "potential connections" and do not form part of this application. Ensuring that these wider connections are made, and that paths are designed and delivered to appropriate standards between different developments is of very high importance for the successful long term growth of this rapidly changing area of the city.*

*We therefore encourage the Council to ensure that appropriate measures are taken to establish a co-ordinated plan and route hierarchy for the Elements Edinburgh site and its neighbouring developments. It appears that further work is needed. Additionally, from our perspective we also highlight the wider benefits that could accrue for all developments in the area if these wider linkages between destinations, open spaces, habitats and natural areas were more fully considered and a joined up approach was developed. We would be keen to discuss the opportunities in relation to these matters further.*

## *Ecology*

### *Firth of Forth SPA and Forth Islands SPA*

*A conclusion of no likely significant effect on the SPAs is concluded in the EIA, due to the distance to the Forth, the distance of works from the burn within the site, and the embedded mitigation that will be required for construction by the Gogar Burn, such as surface water run-off measures and sediment and pollution prevention measures. We agree with this conclusion.*

### *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, licensing and mitigation.*

## **Transport Scotland comment**

*The Director advises that the conditions shown 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 2,493;*

*Prior to occupation of any part of the development hereby permitted, agreement shall be reached between the applicant and City of Edinburgh Council on a suitable mechanism to ensure appropriate financial contributions are made towards the agreed package of mitigation measures identified within the WETA Refresh Study, or suitable alternative package, that will satisfactorily address the traffic impact of this development on the trunk road network;*

*Unless otherwise agreed in writing by the Planning Authority, after consultation with Transport Scotland, the total number of car parking spaces hereby permitted within the development shall not exceed 1,348;*

*No part of the development shall be occupied until a comprehensive Travel Plan , relating to that part, that sets out proposals for reducing dependency on the private car has been submitted and approved in writing by the Planning Authority, after consultation with Transport Scotland as the Trunk Roads Authority. In particular, this Travel Plan shall identify Mode Share Targets, measures to be implemented, including car parking provision and management.*

#### *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;*

*To ensure the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network;*

*To ensure the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network;*

*To be consistent with the requirements of Scottish Planning Policy (SPP) and PAN 75 Planning for Transport.*

#### **Environmental Protection comment**

*Environmental Protection have provided Pre-Planning advice to the applicant on this proposal. Concerns were raised regarding contaminated land, noise, local air quality, odours as well as other specific amenity issues. This is a planning Permission in Principle application which aims to introduce several different uses although it appears to be a*

*residential lead development. The site is bounded to the north west by Edinburgh Airport, to the south by the A8 and to the east by the Railway Line. Beyond the railway line is the proposed Maybury housing development site HSG 19. To the west is Castle Gogar with a small residential unit on the grounds. Further west is the future International Business Gateway (IBG). The site is in an area of west Edinburgh where significant development is planned. This proposal alone would introduce 3,000+ new homes and over 2 million square feet of commercial business space with extended National Cycle Network and around 1416 parking spaces. This is not what Environmental Protection would consider 'carlite'.*

*The site is allocated at Special Economic Area - this being subject to LDP Policy Emp 4, Edinburgh Airport. This only supports the development and enhancement of the airport, and ancillary services/facilities where these have strong and functional links with the airport and are compatible with operational requirements. This application seems to be a residential lead development which does not appear to be in the spirit of the LDP for this area. Most of the site is located within the existing operational area of the airport which is defined by the security fence.*

*The proposed development also includes plans for most other class uses. The other main major blocks being proposed are for office and hotel use. The application includes class 1,2,3, 4,5,6,7,9,10 and 11 uses some of which are proposed on the lower floors of some of the residential blocks. Most of the non-residential uses are centralised to the east of the site nearest to the Gogar Road-about called 'Elements Gateway and Tower Plaza'. It's proposed that various forms of flatted residential units may be introduced in a combination of affordable, private residential, student and build-to-rent. All these forms of residential units will need to be assessed against the same level amenity in terms of noise, air quality and odours. The site will be supported with approximately 1416 car parking spaces that will likely be spread around in the basement areas of most of the blocks. The applicant has highlighted an emphasis on sustainable transport with what they describe as low levels of car parking and a provision for public realm.*

*The applicant has stated that sustainability is a major driver for the masterplan. It is recognised that many of the possibilities for sustainability benefits are available at this site and the masterplan offers the potential to deliver an exemplar sustainable development. Environmental Protection would highlight at this early stage the proposed number of car parking spaces is excessive and not consistent with the statement made by the applicant on sustainable transport.*

*The applicant will be aware that gas powered energy centres are no longer seen to be sustainable in the long term. The applicant must confirm to develop an all-electric district heating network. This is something that other large neighbouring developments have committed to. This will need to include the integration of onsite largescale renewable energy production linked to energy storage and electric vehicle charging infrastructure.*

*The site has various challenging neighbouring uses that have the potential to adversely impact amenity. Noise is an issue that impacts most of the boundary areas of the proposed development. There are several transport sources of noise, road heavy & light rail and aircraft located around the site. The applicant has submitted a supporting noise impact assessment to address the noise amenity concerns.*

*Odours are another issue due to the nearby composting and fire training facility. The applicant has submitted a desk-top odour impact assessment to support the application. The applicant also proposes introducing several commercial kitchens throughout the development. Some of these are possibly going to be located on the ground floors of the residential blocks. The applicant will need to provide specific information on the internal routes that the required commercial flues will need to take at the detailed planning stage.*

*It should be noted that Environmental Health have always had concerns with residential use being proposed in this wider area due to the poor levels of amenity that can be achieved. There has been significant activity in the wider area with several committed developments nearby that when assessed collectively could have an impact on the wider road network in our opinion.*

*The Garden District masterplan has been approved and extends to 615 acres on Green Belt land to the west of the bypass straddling both sides of the M8 motorway. This could deliver up to 6,200 residential properties.*

*Planning Permission in Principle at West Craigs for 1500 new homes with retail and community amenities for fields adjacent to Maybury Road to the north of Edinburgh Park has been approved and the south side now being considered which includes a significant number of residential units. To the east of the approved development site, it is proposed 250 homes to be developed.*

*The Cammo site has consent for 655 homes at Cammo Fields on land adjacent to Maybury Road to the north of Edinburgh Park. The proposals include a new community hub and public park with a mix of family housing and flats*

*A development near the airport and on the tram line for a mixed use, development combining circa 400,000 sq ft of offices, 525 hotel rooms and up to 200 residential properties was approved by council but called in by Scottish Government.*

*As stated, Environmental Protection have had concerns with the potential impacts these developments may have on the local road network and subsequent local air quality. Some of the above larger committed developments were not allocated in the LDP. Therefore, strategic transport mitigation measures may not be able to cope with the influx. The applicants air quality impact assessment has assessed the potential impacts most of the proposed/committed development would have on the local air quality.*

*It is recognised by the applicant that the site has potential access to south-east Scotland's strategic road network and Edinburgh Airport, the development site also offers potential access to local, regional and national rail services, Edinburgh's tram and bus networks, as well as walking and cycling infrastructure in and around the site and possibly wider areas. The Edinburgh Cycle Hire scheme is also emerging as an important mobility option for the site. Environmental Protection would question the need to be proposing over 1400 car parking spaces throughout the development site. It is also recognised that the neighbouring airport has substantial provisions for car parking in the multi storey car parks. The proposed development needs to demonstrate how the develop will link into the existing network. It must also be recognised that the network especially during peak hours is heavily congested. This is something that is likely to get worse when other committed developments are built out.*

*The proposed residential buildings are likely going to accommodate parking in basements and podium structures. It's disappointing that this level of parking is being provided when the councils City Plan 2030 is going to be aiming to promote a city where people don't not to rely on a car to move around. The allocated car parking areas could be put to better use. Environmental Protection would recommend that any car park should be designed so that it could be easily altered to change its use in the future.*

*There have been major improvements in sustainable transport and with the way people want/don't want to commute. One of the main aims of the Choices for the City Plan 2030 is to create a city where you don't need to own a car to move around. It states that one of the aims of City Plan 2030 will be to realise the lifelong health benefits of walking and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport.*

*To do this, City Plan 2030 will plan for a city in which you don't need to own a car to move around. City Plan 2030 will provide for new homes, jobs and amenities and services in accessible neighbourhood locations with good access to walking and cycling routes and to public transport. We also want to reduce carbon emissions and we are committed to the reduction of traffic borne air pollution.*

*The choices we make for City Plan 2030 will align with those of the City Mobility Plan to help balance quality of life with access to jobs and services for all residents and workers in the city.*

*Low Emission Zones's in Edinburgh are being progressed in close alignment with several strategies aiming to enhance placemaking and connectivity in Edinburgh, including City Centre Transformation and City Mobility Plan.*

*Alongside the development of the national regime, the next steps for Edinburgh's LEZ will involve continued technical assessment work to inform LEZ decisions. The applicant will need to engage with Planning with regards the development of LEZ's and its potential in this area.*

*The applicants supporting documents have described a strategy for parking including public and private roads and parking They also describe proposals for electric car charging, taxi stops (including electric taxi rapid charging for taxis), car share and City Car Clubs.*

*The applicant has stated a commitment for EV charging points that will need to be provided in all the car parks to the agreed standards with the necessary infrastructure for this to be increased over time. In accordance with the Edinburgh Design Standards the applicant will need to provide a minimum of 236 electric vehicle charging points. These would need to be to a minimum standard of 7kw (32amp) type two plugin sockets. As the proposed parking areas are in basements it will be easy and cheap to install wall mounted chargers at the development phase. Environmental Protection would recommend that every underground parking space has access to a 3kw (16 amp) three pin plug to enable slow charging of electric vehicles. We would recommend that users of the spaces are given an option to upgrade the charging outlets to the 7kw standards, so the developer would need to ensure there is capacity in the electrical mains to increase the amps. Details of this will need to be clearly demonstrated in detailed drawing at the detailed planning stage.*

*The applicant should also ensure that any fleet/service vehicles have access to a rapid charger. Furthermore, the applicant could consider using the electric stored in vehicles to be fed back into the building during peak hours in demand. This technology has already been developed.*

*The applicant has submitted a noise impact assessment that has highlighted that parts of the site is exposed to high levels of noise and will not be suitable for residential use. They breach World Health Organisations outdoor levels. The main constant sources of noise are transport related which mainly impact the boundaries Gogar round-about, heavy rail line to the north and airport to the west. Environmental Protection allow for a closed window standard to be applied for transport related noise sources. The applicant would need to submit details on the minimum specification of acoustic glazing that will be required to serve affected properties at the detailed planning stage. Indicative information has been provided. Environmental Protection shall recommend a condition is attached to ensure the correct levels of mitigation are applied, this will require further detailed noise impact assessments being conducted to the satisfaction of the Planning Authority.*

*Environmental Protection must also ensure that a worst-case scenario is assessed with regards noise impacts. There are other considerable non-transport related noise sources on the site boundary. This would include the airport, Gogar tram depot and Edinburgh Gateway Train Station. Although these serve transport modes the type of noise that can be generated by these uses is different from transport noise and would include industrial engineering type noises. It is noted that the applicant has located the more sensitive uses to the west of the proposed development site as the level of transport noise is less. This is also further away from the rail station and tram depot but is right next to the active airport.*

*This is a serious cause of concern as the airport could conduct operations on their site that could have extremely significant impacts on the proposed residential units. The airport also has Permitted Development (PD) rights so Planning would have no controls on the airport land future uses. There is nothing to stop the airport running aircrafts on the remaining part of the runway right now. It's likely that it will be used for taxiing aircraft to various buildings as part of its current operations.*

*Therefore, locating residential properties in this area will likely expose the to high levels of noise during night or daytime levels of noise. If enforcement action was possible then this could adversely impact the airport operations. However, there are no other obvious areas on the site that would provide a good level of amenity with regards noise.*

*The applicant has advised that whilst the Airport has PD Rights, if they are proposing anything which could give rise to significant adverse environmental effects, these PD Rights would no longer apply. Furthermore, the proposed development will be phased so that the areas adjacent to the Airport will come forward towards the end of the build out period (over 20 years time). It is recommended that a condition requiring detailed noise assessments to be undertaken for each phase of the development should be attached to the grant of any planning permission. Should noise generating uses come forward at the airport in the future under PD rights, the noise assessment for the latter phase of development, will take this into account and further mitigation may be required at this stage.*

Noise from the existing runway from take-off and landing is demonstrated in noise contours around the runway. The 2016 noise contours stretch predominantly from south-west to north-east, with the site (located to the south-east of the airport) itself falling outside of the lowest daytime contour and night-time contour (57 dB LAeq,16h and 50 dB Lnight respectively). There are plans to expand the capacity of the Airport in the future, the applicant advises that any increase in flights will in part be offset by the Airport's commitment to "the quietest fleet practicable, the quietest practicable aircraft operations and effective and credible noise mitigation schemes". None of this can be controlled by the Local Authority however it is accepted that the site falls outside of the lowest noise contour ranges, any change in the Airports capacity is unlikely to significantly affect the existing aircraft noise climate on site.

The applicant's noise impact assessment has provided indicative information on the fabric of the buildings. Outdoor amenity has also been considered. These outdoor amenity areas will be exposed to high levels of noise way above the criteria levels in the World Health Organisations Guidelines. Anything that can be done to reduce this level of exposure should be implemented. The applicants noise impact assessment has recommended locating garden/balcony areas behind the buildings away from the transport noise sources. Therefore, the buildings will act as an acoustic barrier which is something that Environmental Protection would need to insist on being implemented and conditioned. The applicant will need to submit detailed noise impacts assessments as the phases progress.

The noise impact assessment has not addressed the potential impacts that some of the applied for use classes may have on the proposed residential units. For example some of the class uses may not be compatible below residential units such as the proposed class 11 & 10 uses. The applicant will need to submit detailed noise impact assessments to ensure that none of the non-residential proposed uses will impact amenity of existing, committed and proposed sensitive uses.

The applicant will need to identify all areas that will have proposal for commercial kitchens. The applicant will need to include drawings that demonstrate an adequate commercial flue could be installed. The drawings should highlight the route of any voids are taking and the termination point on the roof plan. The system will need to be capable of achieving 30 air changes per hour in the proposed kitchens and have a minimum efflux velocity of 15m per second with a jet cowl attached. This is more of an issue for cooking odour, but noise would also need to be considered. Environmental Protection will not be able to support a class 3 proposal with out this level of information.

The applicants noise impact assessment has identified that the construction phase at the site will have an impact on the noise and local air quality environment if not mitigated. The applicant has proposed many different mitigation measures that could be implemented to ensure the impacts are minimised. Environmental protection would recommend that construction impacts are covered under a Construction Environment Management Plan (CEMP) is conditioned. This should be a working document that is used throughout the duration of the development and would allow flexibility. It is recognised that constructions impacts will change as the site is developed out. Existing neighbouring residents must be protected when construction is occurring near them. If residential units are erected and occupied while construction on other plots are ongoing then this should be considered. Hours of construction noise are currently restricted under the Control of Pollution Act. However as this is going to be a construction site for a

*significant period tighter restriction on construction noise should be implemented through this CEMP.*

*The Braehead Composting Site is located to the west of Turnhouse Golf Course, approximately 700 m northwest of the proposed development site boundary at the closest point. It is an open windrow composting site from which there may be a risk of odorous emissions.*

*The applicant has conducted an odour impact assessment via a desk-based review of recent odour assessments submitted for nearby developments. The composting site is regulated by SEPA under a Waste Management Licence. The applicant advises that SEPA have received only three minor complaints about odours from the Braehead Composting Site, all of which originate from locations to the north east of the composting site. The low level of complaints indicates that there are no significant odour impacts upon existing residential properties in the area, the closest of which are over 800 m from the composting site. It should be noted that during certain periods in the past the local authority has received complaints about odours from this site. An onsite survey should be considered as further encroachment on this facility may impact its operations if odours are detected and complained about by future residents.*

*The fire service operates a Fire Training facility at on the airport, that includes burning materials and chemicals such as a wooden pallet and trays with diesel. That applicant has concluded that the frequency of training events (averaging once a fortnight), emissions from the fire training facility are very unlikely to lead to pollutant concentrations in excess of any of the annual mean air quality objectives. This is not the issue we have; our concerns are more about the smell of smoke or fumes on a regular basis impacting the proposed residential units.*

*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.*

*Environmental Protection will not be able to support the application. Even if all this mitigation was included Environmental Protection would still have concerns with the level of amenity afforded to the residential uses. It is also disappointing the applicant has included such a high level of car parking and the likely impacts this will have on the wider network. We are concerned with the cumulative impact all the development in this wider area will have on existing air quality management areas.*

*In conclusion Environmental Protection cannot support the application due to the likely adverse impacts on the proposed residential properties. The main amenity issues are local air quality, odours and noise. However, if consent is granted, we would need the following conditions attached;*

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

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

*measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*

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

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

*2. Any associated future AMC applications shall be supported by a noise impact assessment which considers noise from any surrounding source which impact upon the amenity of any proposed residential properties. If noise is found to impact upon the site, then appropriate mitigation measures shall be provided to ensure the amenity of the development is protected.*

*3. Any associated future non-residential AMC applications shall be supported by noise impact assessments which consider noise impacts on surrounding sensitive receptors. If noise is found to impact upon the site, then appropriate mitigation measures shall be provided to ensure the amenity of the surrounding sensitive receptors.*

*4. All associated future AMC applications that include commercial kitchens shall be supported by detailed drawings highlighting the route of the commercial flues will take including the termination point. Any kitchen extract shall be capable of a minimum of 30 air changes per hour with a minimum of 15m per second efflux velocity at termination point achieved.*

*5. Any associated future AMC applications shall be supported by details on how the heat and energy will provided, with specific details on renewable energy and storage submitted.*

*6. A minimum of 236 car parking spaces shall be served by 7Kw (32amp) type 2 electric vehicle charging sockets and shall be installed and operational in full prior to the development being occupied. All remaining parking spaces shall be served by a minimum 3 Kw (16-amp three pin plug) with an optional upgrade to 7Kw (32amp) Type 2 electric vehicle charging sockets. These shall be installed and operational in full prior to the development being occupied. The applicant shall provide detailed drawings highlighting the location of all chargers at the AMC stage.*

*7. Rapid 50 Kw (125amp) triple headed (Combined Charging Standard/CHAdeMO/Type 2) chargers shall be installed at the taxi rank service and commercial parking areas.*

*8. A detailed Construction Environment Management Plan shall be submitted to the satisfaction of The Planning Authority and adhered to during the construction phase.*

*9. The applicant shall submit a detailed odour and fumes assessment following a site survey taking into consideration the Composting Facility and the neighbouring Fire*

*Training facility at the detailed planning stage and to the satisfaction of the Planning Authority.*

#### *Informative*

*The applicant shall engage with the Spatial Policy Team with regards the LEZ proposals [spatial.policy@edinburgh.gov.uk](mailto:spatial.policy@edinburgh.gov.uk)*

*The design, installation and operation of any plant, machinery or equipment shall be such that any associated noise complies with NR25 when measured within any nearby living apartment.*

*It should be noted that when designing the exhaust ducting, Heating, ventilation and Air Conditioning (HVAC) good duct practice should be implemented to ensure that secondary noise is not generated by turbulence in the duct system. It is recommended that the HVAC Engineer employed to undertake the work, undertakes the installation with due cognisance of the Chartered Institute of Building Services Engineers (CIBSE) and American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Guidance.*

### **Communities+Families comment**

#### Background to Education Infrastructure Requirements

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

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

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

It should be noted that the statements and figures that follow will all be subject to review as part of the more detailed assessment of education infrastructure requirements necessary in West Edinburgh for City Plan 2030.

#### Assessment and Contribution Requirements

Assessment based on:

- o 1250 Flats

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

The Council's Supplementary Guidance on 'Developer Contributions and Infrastructure Delivery' identifies the education infrastructure actions for the West Education Contribution Zone as below

- o Additional secondary school capacity - 420 pupils (West Edinburgh)
- o Additional secondary school capacity (St Augustine's RC HS)
- o New 21 class primary school and 120 nursery (Maybury)
- o 3 Primary School classes (Gylemuir PS)
- o 4 RC Primary School classes (St Andrew's Fox Covert RC PS or St Joseph's RC PS)

The developer contribution figures set out in the guidance are based on the cost of delivering the actions above.

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

The proposed development is anticipated to generate 137 primary school pupils and 62 secondary school pupils. The education infrastructure actions identified in the current Action programme are not sufficient to accommodate the increase in the cumulative number of new pupils expected in the area as a result of the development.

#### Primary school requirements

Given the distance that pupils will have to travel to their catchment Roman Catholic school (St Andrew's Fox Covert RC Primary School), it is assumed for the purpose of this assessment that all pupils that will be generated by the development will choose to attend the new primary school which will be required to support this development.

In order that the impact of the development can be mitigated, the developer will be required to contribute to a new primary school at the adjacent East of Milburn Tower development. The pupil generation from the East of Milburn Tower site (429 primary pupils) in addition to the 137 pupils generated by this proposed development will increase the required capacity of this new school to 566 pupils (21 classes).

The estimated cost of a 21 class primary school in Edinburgh is £18,893,343 (based on uplift of costs Q4 2020 for delivery of new 14 class Victoria and Frogston primary schools) with a further requirement for:

- o A 2 hectare site estimated in value to be £4,750,000 (based on the estimated costs for Maybury primary school as identified in the Council's Action programme);
- o land remediation costs estimated to be £3,241,760.

Based on the number of pupils expected to be generated as a proportion of the capacity of a new 3 stream school this equates to a total primary contribution from this development of £5,846,443.

If the additional primary school was added to the Action Programme, the proportion of the established 'per house' and 'per flat' contribution rates which can be attributed to the current primary school actions will not cover the cost of delivering the infrastructure that would now be required to mitigate the cumulative impact of development within the contribution zone.

In accordance with the provisions of the supplementary guidance, the developer is required to make a contribution that is sufficient to ensure that the revised set of infrastructure requirements can be delivered.

The developer is therefore required to contribute the £5,846,443.

If planning permission is granted, it may be appropriate to establish a new Contribution Zone Sub-Area to cover the development site.

It should be noted that for the establishment of any new school, including determination of its location and catchment area, a statutory consultation requires to be undertaken in accordance with the requirements of the Schools (Consultation) (Scotland) Act 2010 as amended by the Children and Young People (Scotland) Act 2014. This would involve the Education, Children and Families Committee considering and approving a proposed statutory consultation paper followed by an official consultation period with final recommendations made to a full Council meeting in an "Outcomes of the Consultation Report" at the end of the consultation process.

#### Secondary school contribution requirements

The Education Infrastructure Appraisal sets a rate of £32,678 per pupil which is based on the costs of delivering new secondary school provision (but excluding land costs). However, based on the cost of delivering the new Queensferry and Castlebrae High Schools, this is revised to £34,617 (Q4 2020).

The generation of additional pupils in West Edinburgh will require a new secondary school. Accordingly, in addition to the above per pupil rate, contributions are required for a 4.2 hectare site for a 900 capacity high school. Based on the land value and remediation costs attributed to the 2 hectare Maybury Primary School site (£4.75m + £3,241,760), this would equate to an additional contribution of £18,647 per pupil (land costs not indexed).

It is considered that the application of the above rates which are applicable to all new secondary provision would be appropriate for this development. As this site is projected to generate 62 secondary pupils, the developer is required to contribute £3,302,395.

#### Summary

It is considered that, based on an application for 1,250 flats, this development will require to make the following contributions:

Primary education infrastructure = £5,846,443

Secondary education infrastructure = £3,302,395

With these figures, infrastructure is indexed at Q4 2020 but this excludes land costs which are not indexed.

However, these figures are indicative at this stage and will be part of the more detailed assessment of education infrastructure requirements necessary in West Edinburgh for City Plan 2030.

## **Roads Authority Issues**

*The application should be refused.*

*Reasons:*

*The application is considered not to comply with a number of Local Development Plan policies:*

- a. TRA 1 Location of Major Travel Generating Development;*
  - b. TRA 7 Public Transport Proposals and Safeguards;*
  - c. TRA 8 Provision of Transport Infrastructure;*
  - d. TRA 9 Cycle and Footpath Network;*
  - e. TRA 10 New and Existing Roads;*
  - f. DES 2 Co-ordinated Development.*
- as set out below.*

*1. The proposed development has been assessed in relation to the West Edinburgh Transport Appraisal Refresh (WETA). The WETA Refresh was completed in 2016 and took into account a number of changes in west Edinburgh, particularly in relation to a number of planned developments. The above proposed development was not included in that refresh and therefore the transport impacts and required mitigation were not assessed under WETA. The Transport Assessment submitted as part of the current application has carried out a rerun of the WETA model to include the proposed development. The conclusion in that Transport Assessment is that the additional proposed development traffic has limited further impact on the already congested network. However, it is unclear whether the proposed WETA mitigation package will be sufficient to address those impacts, both in terms of capacity and in timeousness. The proposed development is therefore considered not to have adequately demonstrated that mitigation measures will be implemented to address the adverse effects on the network (ref. LDP Policy TRA 1, TRA 7, TRA 8, TRA 10, DES 2);*

*2. The proposed access road, the Boundary Road, is not considered to meet the requirements of the IBG Link Road set out in the West Edinburgh Transport Appraisal Refresh (WETA Refresh). The IBG Link Road is intended to improve network resilience to Edinburgh Airport and to open up development opportunities in west Edinburgh. The proposed Link Road alignment emerged from WETA as the best option to address the different requirements of development and the airport whilst providing an efficient network with flexibility for public transport provision, walking, cycling and general road users. The proposed development configuration aligns the proposed airport link to the east of the development and is considered to promote the north / south direction of travel over access to the IBG area to the west. The proposed alignment leads to a focus on access to the airport rather than to the main IBG area and is likely to be to the detriment*

of public transport serving the IBG site. It should be noted that whilst the extension of the Boundary Road to the airport does not form part of this application, its alignment is determined by the current application (ref. LDP Policy 7, TRA 8, TRA 10, DES 2);

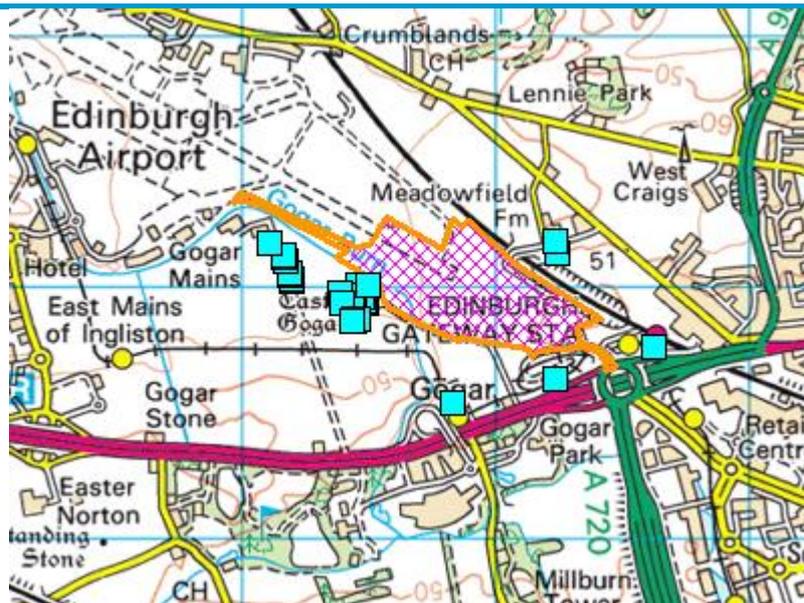
3. The proposed alignment of Boundary Road and extension to the airport, outlined in 2. above, will lead to the creation of a new link to the airport freight area to the east of the airport. Whilst there are some potential benefits of such an alignment, for example to remove some goods vehicles from the West Craigs development, it will lead to a potential new route for motor traffic between Maybury Road at Craigs Road and Gogar Roundabout. The WETA alignment, whilst still potentially creating such a link, is less likely to lead to significant additional traffic on that route;

4. The proposed development includes cycle provision. However, the proposed layout is not considered to be supportive of cycle use due to the requirement to cross carriageways at a number of locations. This is considered to be prejudicial to the continuity of the off-road network;

5. It should be noted that the proposed development includes a number of measures which are supported for potential development in this area. These include:

- a. Overall parking provision of approximately 30% of the potential maxima set out in the Council's parking standards, including residential parking provision of 47%, hotel / aparthotel provision of 20%, retail / leisure provision of zero, and business / commercial provision of 100%);
- b. Proposed 30 car club spaces;
- c. Access to existing tram and rail services;
- d. Proximity to the Gyle Centre;
- e. Mixed use development including residential, employment, retail and leisure.

## Location Plan



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**END**