

Development Management Sub Committee

Wednesday 26 May 2021

Application for Planning Permission in Principle 20/04611/PPP

at land 322 metres west of 6, Ravelrig Road, Balerno.

Proposed mixed-use development comprising residential development (Class 9), health centre (Class 2), community facility (Class 10), outdoor recreational area (Class 11) and associated landscaping, access and infrastructure works.

Item number

Report number

Wards

B02 - Pentland Hills

Summary

The application for Planning Permission in Principle for residential development that proposes approximately 350 houses in the Green Belt is contrary to the strategic strategy of the Edinburgh Local Development Plan (LDP).

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

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

The application fails to demonstrate compliance with LDP Policies Tra 2 and Tra 8, in terms of transport and accessibility. The proposal is likely to be car dependent with limited sustainable transport modes promoted in the application. The application fails to comply with LDP Des 6 in terms of Sustainability.

The application fails to demonstrate that a good level of amenity can be achieved through compliance with LDP Policies Des 5. Furthermore, the application fails to demonstrate that the will development will not have an adverse impact upon air quality, and therefore it does not comply with LDP Policy Env 22.

There are no material considerations that outweigh this decision.

Links

<u>Policies and guidance for this application</u>	LDPP, LHOU01, LHOU03, LHOU04, LHOU06, LHOU10, LEN07, LEN09, LEN10, LEN12, LEN16, LEN21, LEN22, LDES01, LDES04, LDES03, LDES02, LDES05, LDES06, LDES07, LDES08, LEN08, LDES11, LTRA02, LTRA03, LTRA04, CRPBAL, NSG, NSGCGB, NSGD02,
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Report

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development (Class 9), health centre (Class 2), community
facility (Class 10), outdoor recreational area (Class 11) and
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Recommendations

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

Background

2.1 Site description

The application site is 34 hectares of arable farmland located to the north-west of Balerno, approximately 0.6m from the centre of the village. The land is designated as Green Belt within the Edinburgh Local Development Plan (LDP).

The site is situated to the north of Lanark Road West with Ravelrig Road running through the site. Ravelrig Road is a single carriageway road that links Lanark Road West to the south with the existing settlement edge of Balerno. It also joins with Long Dalmahoy Road to the north, which provides connections to Kirknewton and the A71.

The site is in generally contained by mature trees and areas of woodland with boundaries predominantly defined by post and wire fences with some sections of drystone walling.

The land broadly slopes down towards the north boundary which is formed by the railway line which connects to Glasgow Central from Edinburgh, beyond which is farmland.

The western site boundary comprises a dense area of mature woodland covering the western end of Ravelrig Hill. A local nature conservation site lies to the west of the site and is characterised by woodland, pastoral land and ground cover plant species.

The southern site boundary abuts an existing residential development which fronts the A70, Lanark Road West to the south. This is generally late 20th century, predominantly two storey, detached houses.

The eastern boundary abuts a housing site which is situated to the west of Newmills Road; a residential development characterised by a mix of two-storey and single storey detached dwelling houses.

These existing residential areas define the northern settlement edge of Balerno. This includes allocated sites HSG38 & HSG37 which are currently under construction.

A disused railway embankment runs across the site, in a north-west to south-east direction, and defines the northern and southern areas of farmland.

Within the locality is 550 Lanark Road West, Northfield, a Category B listed building (historic reference number 27076, listing date: 30 January 1981) and a designated Designed Landscape. Both Ravelrig Hill and Dalmahoy Hill are located within a designated site of importance for nature conservation.

Curriehill train station is located around 1.5km from the eastern edge of the site and can be accessed via Newmills Road to the east. This station provides services to Glasgow and Edinburgh and contains a park and ride facility.

Access to bus services is available within walking distance of the site but these are limited in service. There are a few existing bus stops located within 1.5km of the site which provide connections to the surrounding localities, including services to Edinburgh and East Lothian.

2.2 Site History

15 November 2019 PAN approved for Proposed residential development with associated landscaping and infrastructure works (planning application reference 19/05205/PAN)

10 February 2020 PAN approved for proposed mixed use development comprising residential development (Class 8), doctor's surgery (Class 2), community facility (Class 10), outdoor recreational area (Class 11) and associated landscaping, access and infrastructure works (planning reference 20/00283/PAN).

Main report

3.1 Description of the Proposal

The application is for planning permission in principle for a proposed mixed-use development comprising residential development (Class 9), health centre (Class 2), community facility (Class 10), outdoor recreational area (Class 11) and associated landscaping, access and infrastructure works.

The planning application seeks planning permission in principle for up to 350 dwellings. It is proposed 30% of the units will be provided for affordable housing.

The application is supported by an indicative masterplan which identifies up to 1,000sqm to provide a health centre to support the development and wider community. Up to 500sqm of floorspace is proposed for a range of community uses such as sports hall or meeting place.

Creation of a new landscape setting to the north of the site is proposed which will include SUDS, allotments, open space and play areas. The masterplan aims to enhance the landscape setting to the north of the site and will introduce footpath connections leading through areas of open space.

The former railway line which runs through the site will be formed into a pedestrian/cycle route providing a connection to the surrounding countryside and Balerno.

The initial masterplan informs the development framework for the site is based on the following design principles:

- Protect the existing settlement edge of Balerno by setting development back from boundary;
- Protect setting to the western edge of the site and introduce enhanced planting and a landscape buffer to protect natural habitat;
- Creation of a permeable • development and extensive pedestrian network which connects to the wider core path network;
- Establish a new park to the north of the site, complete with footpath network, extensive new planting, open space, play areas and garden allotments;
- Maximise use of open space;
- Utilise the former railway line through the site as a new core active transport route, which connects to the east and west;
- Provide positive frontage onto areas of open space, streets and Ravelrig Road and
- Retain key views and vistas to the north of the site.

The highest proportion of the development is proposed to the west of Ravelrig Road and it is anticipated that this will be served by two main access points. Development to the east of Ravelrig Road will be served by one access point. The proposal includes the creation of a new bus route and terminus within the site.

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

- Balerno Planning Statement;
- Supplementary Planning Statement;
- Design and Access Statement;
- Pre-application Consultation Report;
- Historical Environment Desk Based Assessment;
- Preliminary Ecological Appraisal;
- Habitat Regulations Appraisal;
- Utilities Capacity Assessment;
- Updated Flood Risk and Drainage Strategy;
- Tree Survey and
- Covid-19 Supplementary Statement.

Environmental Impact Assessment

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

- Landscape and Visual Impact;
- Biodiversity;
- Preliminary Ecological Appraisal;
- Air Quality;
- Transport Traffic and Access;
- Transport Assessment and
- Cumulative.

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 the development is acceptable in this location;
- b) the proposal will impact upon the setting of a listed building or historical environment;
- c) the proposal is acceptable in scale, design and landscape impact;
- d) the proposal is acceptable in terms of accessibility, connectivity or has any road safety implications;
- e) any impact upon local infrastructure as a result of the proposed development can be mitigated;
- f) the proposal delivers adequate affordable housing provision;
- g) the proposal will achieve a good level of residential amenity for future occupiers and not adversely affect the amenity of neighbouring sites;
- h) any adverse impacts upon air quality can be mitigated;
- i) the proposal will increase flood risk;

- j) the proposal will be to the detriment of the natural environment;
- k) the proposal will result in an unacceptable loss or damage to existing trees;
- l) the proposal will have any archaeological implications;
- m) the proposal meets sustainability standards;
- n) any other material considerations and
- o) any comments received in public representations have been addressed.

a) Principle of Development

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

The overarching strategy of the LDP seeks to control new growth to four Strategic Development Areas with defined controlled greenfield housing allocations including within the Currie and Balerno area. This controlled release of land through the LDP has allowed for the development of allocated sites HSG 37 Newmills Road, Balerno and HSG 38 Ravelrig Road, Balerno. Both of these sites have the benefit of planning permission

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

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

The latest Housing Land Audit and Completions Programme (HLACP) was reported to Planning Committee on 3 February 2021. This monitored the completion of housing and the supply of housing land in the period for 2019 - 2020. It concluded that there is more than sufficient unconstrained housing land to meet the housing land requirement and that the five-year completions programme is above target. The supply of effective housing land and the delivery programme within the HLACP were agreed as reasonable with Homes for Scotland.

The 2018 - 2019 HLACP recorded a five-year completions programme more than the 5-year completions target for the first time since the SDP was approved and the housing supply targets set. An increase in anticipated delivery rates has increased the surplus of programmed completions against the target and the 2019- 2020 HLACP demonstrates a 5-year completions programme over 35% higher than the target level. At current build rates, based upon the agreed five-year completions programme, there is sufficient effective housing land in Edinburgh to last for nine years.

Planning Advice Note 1/2020 was published in December 2020 providing further clarification on the calculation of effective housing land supply. The current focus on maintaining a 5 year supply of effective housing land is replaced with a longer term perspective to enable future plans to promote immediate deliverability and viability, and proactively steer development to appropriate locations in line with the plan's spatial strategy, informed by an infrastructure-first approach. The pace of land take-up would be monitored through completions with additional land releases triggered in line with the development plan when the need for additional capacity is demonstrated.

The Council's approach to monitoring land supply and delivery of homes is closely aligned with the Scottish Government's policy change with a focus on the factors that are affecting delivery on individual sites alongside the anticipated rates of delivery. The HLACP helps to identify where there is potential to increase delivery of homes on the current land supply and when additional land releases may be required to maintain current rates of delivery.

As there is no deficit in the maintenance of the five-year land supply, LDP policy Hou 1 part 2 does not apply.

Recent appeal decisions have quoted the application of SPP in terms of paragraph 33 in relation to a "presumption in favour of development that contributes to sustainable development will be a significant material consideration." This is also address in the applicant's planning statement as a justification to support development.

In December 2020 following a consultation exercise the Scottish Government updated the terms SPP with reference to support for sustainable development. It is clarified that the starting point for decision making is the development plan unless material considerations indicate otherwise. Para 33 of the SPP has been amended to adjust sustainable development as a material consideration and not as a "significant material consideration" as in the previous SPP. The emphasis to the weight applied to a sustainable development has been altered.

The aim of the SPP as detailed in paragraph 28 is "to achieve the right development in the right place, it is not to allow development at any cost." The SPP also quantifies the assessment of sustainable development including -

- Supporting good design and the six principles of successful places,
- Making efficient use of existing capacities of land, buildings and infrastructure,
- Supporting delivery of accessible housing, business, retailing and leisure development and
- Supporting climate change mitigation and adaption.

It is recognised that this is an application for planning permission in principle and specific design information has not been submitted. However, the overall principle of development within this location fails to demonstrate a sustainable development proposal with a location remote from existing amenities, limited access to public transport networks and it involves new land and therefore does not make efficient use of existing capacities of land identified in the LDP. It does not provide housing in an accessible location.

Scottish Government are currently preparing National Planning Framework 4 (NPF4) - the long-term plan for development and investment across Scotland which will set out national planning policies and guide where future development should take place. In November 2020, Scottish Government published a position statement which detailed potential changes that are being considered to national planning policies.

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

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

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

The proposal does not meet with any of above the criterion and as such is contrary to LDP Policy Env 10. The development's impact upon the landscape and rural character is assessed the relevant section of this report.

In this instance, the proposed 350 residential units in this location is not considered to have a good level of public accessibility. The proposal constitutes overdevelopment which would be damaging to the rural character of locality. As the application is for planning permission in principle, the impact upon environmental quality and amenity is not known at this time.

Policy Conclusion

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

The proposal is not a sustainable development in accordance with the principles set out within the SPP.

b) Setting of a listed building and Historic Environment

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

Within the locality is 550 Lanark Road West, Northfield, a Category B listed building (historic reference number 27076, listing date: 30 January 1981) and a designated Designed Landscape. Furthermore, Both Ravelrig Hill and Dalmahoy Hill are located within a designated site of importance for nature conservation, the boundary of which forms the western most edge of the application site.

In this instance, given the distance and the existing screening between the curtilage of the listed building and the application site, it is concluded that the proposed development will not adversely affect its setting.

LDP Policy Env 8 (Protection of Important Remains) states development will not be permitted which would adversely affect a scheduled monument, archaeological remains or integrity of their setting.

Historic Environment Scotland (HES) was consulted on the proposal. Whilst not objecting to the principle of the development in this location HES raise the potential for adverse impacts on the setting of nearby scheduled monuments including the Dalmahoy Hill and the Kaimes Hill.

HES have stated their disagreement with the desk-based assessment submitted in support of the proposals that no designated heritage assets are likely to be affected by the proposed development and, consequently, the decision to exclude the cultural heritage topic area from detailed consideration in the EIA Report (October 2020).

HES recommend that some consideration is given to reducing impacts on the setting of these assets at the detailed design stages where possible. As the development proposal is located on the same east/west topographic ridge as these two forts, this consideration is likely to involve adjustments to the scale and height of the development to ensure that important eastward views from these monuments are not adversely affected.

Overall, the proposal will have no impact upon the settling of the listed building. Whilst the potential impact upon the identified forts is likely to be minimal, a condition is recommended to ensure the impacts are fully assessed, and mitigated through design, in any future application.

c) Scale, Design and Landscape

LDP Policies Des 1 - Des 9 set a requirement for proposals to be based on an overall design concept which draws on the positive characteristics of the surrounding area with the need for a high quality of design which is appropriate in terms of height, scale and form, layout, and materials. This includes access to the site, consideration of existing trees and future planting, footpath/cycleway links through the site and to existing areas, amenity issues and the creation of open space.

The policies seek a comprehensive and integrated approach to the layout of buildings, streets, footpaths, cycle paths, public and private open spaces. The incorporation of existing features including archaeology, trees, woodland, landscape character, views and biodiversity can enhance a developments sense of place and contribute to the wider habitat and green network.

This application is for planning in principle and includes indicative landscape and design information only. This is not assessed at PPP stage. The design, including layout and height, density, mix and materials would be assessed in any AMC applications.

Design, Layout and Landscape Infrastructure

The indicative masterplan shows the built environment of 350 houses, community facilities and healthcare facilities set within a comprehensive landscaped site, with areas of open space, allotments and playparks with a hierarchy of primary and secondary streets.

In terms of layout, the indicative site sections reveal the site could be subdivided by planted slopes and may not provide a cohesive or accessible street layout.

Access routes, connecting within and through the site and to the wider settlements and greenspaces are proposed, building on the allocation of the former railway as a core path through the site. Green corridors are proposed through the development, for both access and open views, as well as enhanced woodland planting on the periphery with access. The proposed open space forms a linear strip adjacent the railway line to the north of the site.

These measures, if delivered successfully have the potential to deliver diverse and accessible greenspaces, with a variety of uses and habitats to benefit people and nature.

Given this application is for Planning Permission in Principle, there is no detail on the delivery methods at present. A detailed Landscape Site Plan and Management Plan would be required with any future application detailing the long-term management and maintenance of proposed open spaces as this will be essential to the quality and success of the resulting green-blue infrastructure. This would include detail on the servicing of the proposed allotments.

The design would need to ensure natural surveillance on to the linear park, which at present is shown to be on the peripheral of the site in line with design guidance.

Character of Landscape

The Balerno Conservation Area Character Appraisal emphasises the predominance of vernacular buildings within the conservation area, the consistency in the use of traditional building materials, the substantial green setting giving a rural appearance, and the wide range of uses and which result in a self-contained village character.

The Edinburgh Landscape Character Assessment, 2010, details the character of the surrounding landscape:

'The linear form of this area of farmland is accentuated by the railway and two electricity transmission lines which are aligned through it. Predominantly arable farmland has an increasingly fragmented character on the urban fringes of Currie/Balerno and close to Dalmahoy Hill, where horse paddocks and stables are a feature. While there are few woodlands within this character area, wooded policies on the periphery of the Dalmahoy estate and the Riccarton campus form a backdrop to farmland.

Remnant thorn hedgerows are patchy, and areas of gorse and scrub colonise steeper slopes near areas of pasture. Dispersed farmsteads are sited against narrow angular roads and are visually dominated by tall transmission line towers.

As previously stated the landscape strategy has been informed from the initial concept for the masterplan, which aims to preserve the setting to the north of the site, to protect and enhance the landscape edge of the development and to respect the existing settlement edge of Balerno, with housing will also be set back from Ravelrig Road with the addition of a landscape buffer.

Housing on the eastern and western edges of the development will be set back to allow for additional areas of landscaping and tree planting. This aims to protect the existing edge of the site and ensure that new housing is well contained.

Whilst this additional structural planting is proposed with the aim to contain the site, alongside open space provision, development of the site would alter the existing rural character through the introduction of urban residential development. The introduction of urban residential development across the north facing arable slopes would break with the linear pattern of Balerno's 20th century and more recent expansion across the flatter ridge top north of Lanark Road West.

Visual Impact and Key Views

Key development frontages will be established to all main areas of open space within the development as well as primary street and lanes. Housing along the southern boundary will back onto the edge of the site thereby protecting the setting of the existing neighbourhoods. Housing which fronts onto Ravelrig Road will also be set back to protect the setting around the entrance and increase visibility along this section of road as well as the northern edge of development which front onto the woodland.

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

Avenue planting will define vistas and screen housing from the road edge, and footpaths will connect north to the proposed parkland and to the existing footpath along the southern boundary.

An LVIA would be required to assess the impact of the proposed development on the surrounding landscape, showing both short and long views.

The indicative masterplan and submitted Design Statement state that areas of housing have been located with the aim to preserve key views to the north, thus creating 'green links' which provide physical and visual breaks within neighbourhood blocks, as well as acting as amenity spaces within the development. These views include the City skyline and hills to the north and east; the Firth of Forth and farmed wooded landscape on the coastal margin and backdrop of the Fife hill ranges to the north and the distant Ochils to the northwest. These views can be seen from Ravelrig Road and the existing farm track to the south of the site and path network at Ravelrig Heights

Baseline photography has been submitted as part of the EIA to inform the assessment.

Whilst this is an application for Planning Permission in Principle, the effects of the indicative development parcels and landscape structure have not been tested through visual representation by use of block model photomontages which would aid evaluation given the sloping nature of the site and it would be desirable to test any detailed masterplan in this way.

The proposal could have localised visual impacts on users of the Kirknewton Core Path along Ravelrig Road and Long Dalmahoy Road CEC 16. In addition to partial views from residential open spaces and path network to the south, where the southern edge of the proposed layout would obscure this outlook. Proposed north-south breaks are indicated in the development but the views to the north and east toward the city are also of interest.

Overall, the information submitted is insufficient to assess the likely impact on key views and the landscape. The application has failed to demonstrate that there would be no adverse impact on the landscape setting and the visual impact of the development has not been demonstrated to a satisfactory level.

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

d) Access, Connectivity and Road Safety

Active Travel

Across the site a hierarchy of pedestrian routes are proposed including Informal footpaths will provide connections through areas of open space, including the green links and pocket parks. The design encourages connectivity and permeability with several key connection points established to the existing settlement edge and crossing over the cycle-path/footpath into the parkland area.

Green links with access are proposed through the development, connecting in with the existing settlement to the south. The proposed access links and extension to/from Kingfisher park to the new parkland and beyond is positive and will be an important green network allowing local and wider community access to the new parkland as well as south into existing settlements and north/west into the rural area beyond.

An extensive footpath network will also form a 'perimeter' walk around the edge of the site and create new extended walking routes from the existing settlement edge. This will form a loop of approximately 2km around the edge of the site and connect to existing footpaths to the south.

The proposed site is located adjacent to existing foot-way connections and able to access the Core Path and National Cycle Networks. The existing railway line which passes through the site has been identified and safeguarded by The Council as 'Cycleway Footpath Safeguard: Off road alternative NCNR 75' between the northern edge of Balerno and the north-west to an existing rail crossing which provides access to the surround footpath and cycle path network.

Ravelrig Road and Newmills Road, which lies to the east, are also categorised as core paths. These both provide links south to the beginning of The Water of Leith Walkway - a public footpath and cycleway that runs alongside the river all the way into Leith and the shore of Edinburgh.

The Pentland Regional Park lies directly to the south east of Balerno and can be accessed via the existing core path which leads through Malleny Mills. Further to the south, around 2 miles from the site, lies Threipmuir Reservoir and Red Moss Nature Reserve which offer walking routes around circular boardwalks with areas to observe the local wildlife.

Overall, the proposed masterplan provides for a permeable and well-connected site to core paths and local green space, and the opportunity to deliver the off-road cycle link.

However, there is no confirmation of this being viable at this stage. Delivery of the off-road cycle link to Kirknewton would be a positive outcome, subject to the applicant having control of this land to enable construction and to provide connectivity with Kingfisher Park and the Water of Leith Walkway beyond. Connectivity with Ravelrig Heights path networks would also need to be achieved to form a well-integrated urban area.

Overall, the indicative masterplan provides adequate connections to core paths, open space and surrounding residential development.

Car Ownership, Parking and Public Transport

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

- Minimise the distances people need to travel;
- Promote and prioritise travel by sustainable means, i.e. walking, cycling and by public transport and
- Minimise the detrimental effects of traffic and parking on communities and the environment.

A Transport Assessment was submitted as part of the application.

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

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

Whilst the level of proposed parking is not stated in this planning permission in principle application, given its location, it is likely that there will be high car dependency. As such, the LDP Policy Tra 2 objective of lower provision will be difficult to achieve.

A development of 350 new homes in this rural location would be heavily reliant upon car usage as the primary mode of transport. The site is not well served by public transport, given the limited bus service and accessibility to the railway station, nor is it likely to encourage walking and cycling given the distance to existing retail, services and employment facilities. Whilst the applicant has expressed intention to increase bus services there is no confirmation that this is achievable.

There are no confirmed practical measures to significantly reduce the use of private cars to and from the site.

As such, the application fails to demonstrate compliance with LDP Tra 2.

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

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

The policy requires a robust assessment to address cumulative impacts and the suitability of any proposed mitigation for any windfall sites.

In this instance the application fails to demonstrate that suitable transport infrastructure can be provided to mitigate the local and cumulative impact of the additional 350 homes on the local road network and public transport network. As such, the proposal is contrary to LDP Policy Tra 8.

Given the reliance on car usage the application and does not represent a sustainable development and the Roads Authority recommends refusal of the application.

e) Local Infrastructure

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

LDP Table 9 and the LDP Action Programme February 2020 identifies transport proposals and safeguards. A proposed cycle path T7 is identified through the site. This is reflected in the indicative masterplan.

Education

The proposed development is not supported by the Council's Local Development Plan, therefore its impact, including the cumulative impact of other developments, has not been assessed in the Education Appraisal (August 2018).

The site is in Dean Park Primary School and Balerno High School's catchment areas. The education infrastructure actions identified in the current Action Programme are not sufficient to accommodate the additional pupils expected from the proposed development.

There is an existing project to extend Dean Park Primary School to 20 classes. To mitigate the impact of the proposed development one additional classroom at Dean Park Primary School is required.

School roll projections for Balerno High School indicate there will not be sufficient spare capacity to accommodate additional secondary school pupils as a result of the proposed development. Accordingly, additional secondary school capacity will be required.

The cost of one primary school class is £392,194 (as at Q4 2017), as set out in the Education Appraisal (August 2018). The pro-rata contribution rate for secondary school extensions, set out in the Supplementary Guidance, should also be applied to the proposed development (£6,536 per house and £980 per flat - as at Q4 2017).

For the purposes of assessing the impact of the proposed development on education infrastructure a mix of 80% houses and 20% flats has been assumed, in line with other greenfield housing development assumptions. An increase in the number of dwellings across the site, or a change of the housing mix, may affect the number of pupils expected from the proposed development and the accommodation required to accommodate them.

The necessary contributions are as follows: -

The total infrastructure contribution requirement for one additional primary school class is:

£392,194.00

The per unit infrastructure contribution requirement for additional secondary accommodation is:

Per Flat - £2,892

Per House - £15,854

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

Healthcare

The site lies adjacent to the South West Healthcare contribution zone which identifies a need for an expansion of the existing medical practice based on the sites identified in the LDP, therefore is likely to require further health care facilities. It is noted that a health care facility is included in the proposal however discussions would be required as the most appropriate way in which provision could be made for any additional population as separate premises may not be the most suitable.

Subject to contributions being secured, the proposal complies with Policy Del 1 (Developer Contributions). The contributions will be based on the proposed mix of units and established methodology as identified within the supplementary guidance.

If permission is granted, a Section 75 Legal Agreement would be required to be concluded to secure the above infrastructure contributions.

f) Affordable Housing

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

The applicant proposes 30% of the 350 units to be affordable units (equating to 87 homes) which exceeds that of the required level as identified by Policy Hou 6 which is welcomed.

The applicant has made a commitment to provide affordable housing and this will be secured by a Section 75 Legal Agreement. This approach which will assist in the delivery of a mixed sustainable community.

It is also recommended that an Affordable Housing Statement be submitted with any detailed application. A proposal of this scale, affordable housing provision should be delivered on site and integrated within the market housing and address a full range of housing need.

Overall, the proposal complies with LDP Policy Hou 6 (Affordable Housing) providing in excess of the 25% requirement. Further details in the form an Affordable Housing Statement would be required with any future application to secure the units in line with the Housing need and standards.

g) Residential Amenity

LDP Policy Des 5 (Design-Amenity) supports proposals that have no adverse impact on neighbouring developments. Hou 3 (Private Green Space in Housing Development) and exceeds the requirements for Edinburgh Design Guidance, ensuring a good quality living environment for future occupiers.

The proposed masterplan will incorporate a number of children's play area throughout the site. These areas are proposed both within areas of housing development and within the open space to the north of the site, including woodland play trails and barrier free play zones.

The proposal makes reference to crib walls between rear garden plots. In association with garden fencing can provide poor amenity and cause over-shadowing to new outdoor spaces (refer to EDG p.105). If in curtilage planting or a better slope transition were to be delivered, longer gardens would be essential. In terms of Policy Des 5 - new open spaces and garden ground should receive adequate levels of sunlight. Overshadowing and daylight analysis should be addressed as part of any detailed application.

Environmental Protection were consulted on the proposal and have raised concerns regarding noise and the potential adverse impact of neighbouring uses upon residents of the proposed development.

Even though this is a PPP application Environmental Protection require further detail to assess noise/vibration, local air quality impacts and dust from quarry operations. The applicant also needs to ensure rail, road and high-power voltage lines (corona affect) do impact proposed residential areas as there will be areas that are not suitable for residential use due to these impacts.

Noise and Vibration Impact Assessments for adjacent developments highlighted that there would be an impact from general quarry operations on those residential properties located on the western boundary of that site, with mitigation measures were put in place to reduce this impact in the form of an acoustic barrier. Continuing this barrier down the western boundary of this proposed development and along the north to cover the railway noise and would be required to be documented in any future detailed planning application.

Whilst this is an application for planning permission in principle, Environmental Protection cannot support and development until satisfied there will be no adverse impacts from noise levels.

The application fails to consider the noise impact of the health centre (Class 2), community facility (Class 10) and outdoor recreational areas (Class 11) uses on residential amenity.

In light of this, the application fails to demonstrate compliance with LDP Policy Des 5. If minded granting, a number of conditions are recommended to ensure these matters are fully considered and addressed.

The applicant submitted a contaminated land report to support the application. Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s.

If permission is granted, conditions are recommended to ensure any remediation requirements require to be approved by the Planning & Building Standards service.

Overall, whilst the proposal aims to achieve a good provision of open space and amenities on site, the proposal fails to comply with LDP Des 5 in terms of residential amenity due to a lack of supporting information.

h) Air Quality

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

A local air quality impact assessment has been submitted which has concluded that there will be no adverse impacts on a residential development in this location and the proposed development would not have an adverse impact on the surrounding local environment with regards to local air quality.

However, CEC's Environmental Protection Team are concerned that there are significant levels of development already proposed in the wider area, and the potential cumulative impacts these developments may have on the local road network and subsequent local air quality.

In this instance, insufficient detail has been submitted to fully assess the cumulative impact of development in the area, and therefore Environmental Protection cannot support the application with the impact unknown and as such recommend refusal of the application.

Any subsequent application would need to demonstrate how the development will link into the existing networks. It must also be recognised that the main network especially during peak hours is congested. This is something that is likely to worsen when other committed developments are built out. Car parking numbers and EV charging points should take this into consideration.

SEPA raises no objection to the proposal in terms of air quality but recommends good practice is exercised to reduce emissions and exposure is incorporated into all developments at the outset.

Overall, the application fails to include sufficient information to prove compliance with LDP Policy 22.

i) Flooding Risk and Drainage

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

Two SUDS basins are also proposed to the northern edge of the site which will provide sustainable drainage.

SEPA has no objection to the proposals but comment that the site is outwith the SEPA flood maps (fluvial) and there is significant lateral and vertical separation between the proposed development and the nearest main watercourses/small watercourse/drainage channel on the eastern flank.

The Councils Flood Prevention Team has reviewed the submitted information.

The application does not include sufficient information to comply with LDP Policy Env 21. Surface water management information for the site as part of the self-certification (with third party verification) will be required. If Committee are minded to grant permission, a condition is recommended to ensure this information is submitted and these matters are fully assessed.

The condition and capacity of the culvert is unknown at this time. The Flood Team would also require confirmation that the condition and capacity of the railway culvert is sufficient to accommodate the proposed surface water discharge. If minded to grant, a condition would be recommended to ensure this information is submitted with any future application.

j) Biodiversity, Ecology and Protected Species

LDP Policy Env 16 (Species Protection) aims to ensure development will not be to the detriment to the maintenance of a protected species and suitable mitigation is proposed. Furthermore, the site is designated as a Local Nature Conservation Site and of is of International Importance, and therefore LDP Policies Env 13 (Sites of International Importance) and Env 15 (Local Nature Conservation Site) apply.

An Ecology Report and follow up information has been submitted in support of the application. This considers any likely impacts on protected species.

A Local Nature Conservation site runs through the site and species requiring protection and potential further survey have been identified, as such good practice measures are recommended.

The submitted EIA, acknowledges that the arable farmland does offer grazing opportunities for geese. Therefore, to comply with Policy Env 13 and based on the advice from Nature Scot, information would be required on the number of geese in the area, likely use of this site and availability of alternative supporting habitat in the area.

The site is not an allocated site within the LDP, so has not undergone Habitats Regulations Appraisal (HRA) in relation to the Firth of Forth Special Protection Area. On this basis Nature Scot have advised that an HRA should be carried out, in line with allocated sites. A condition is therefore recommended to ensure this is submitted if planning permission is granted.

In accordance with Policy Des 3 (Development Design) and the Edinburgh Design Guidance, developments protect and enhance biodiversity, as part of development design.

The landscape scheme for the site supports the objectives of Des 3, by including the creation of these new habitats and retention of the woodland habitats. However, the woodlands are currently unmanaged, and it is recommended that these are brought under management for biodiversity benefit. A condition is therefore recommended seeking a Woodland Management Plan to be submitted.

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

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

k) Impact upon Existing Trees

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

The site is surrounded by trees which are significant in terms of arboriculture, habitat connectivity and landscape amenity. This includes a row of trees to the south, existing trees forming the green belt boundary at Ravelrig Heights Woodland (G081) to the southeast near to Kingfisher Park (a high quality woodland), early mature woodland and lower quality developing woodland to the west of the site. Along Ravelrig Road, trees to the south of the disused railway line are visually important and those on the west are of higher quality.

The proposal intends to retain the mature trees to provide containment from existing development to the south as well as reducing the visual impact from the north. In addition, new tree, and landscape planting along the edges of the development are proposed to enhance the rural edge of the site and further mitigate visual impact.

A tree survey was submitted as part of the application. As an application for planning permission in principle, the tree survey does not consider the final development layout. At present the indicative layout applies a set-back to existing trees and woodland, including the adjacent woodland at Ravelrig Hill to the west.

The set-back to Ravelrig Heights may need to be increased to the southeast, where the stature of the trees and sloping ground to the north, may give rise to over-shadowing. This would also apply to the effect of supplementary planting on a north-facing slope.

The submitted application does not consider the implications of the gas main in terms of proposed woodland areas to the north of the site (min. 3m offset to either side, therefore 6m gap). Taken alongside restrictions to planting in proximity to high voltage powerlines, the resultant landscape structure may be more open along the railway boundary.

An updated Tree Survey, Constraints Plan, Tree Protection Plan and Woodland Management Plan would need to be prepared as part of any detailed masterplan and application.

l) Archaeological Implications

The site is formed by terraced improvement era farmland located on the north-western limits of modern day Balerno. Recent archaeological investigations by AOC Archaeology as part of the current housing development neighbouring to the South, uncovered important though isolated remains of prehistoric (Neolithic) occupation. The archaeological potential for this high terraced ground was also uncovered by AOC to the east during advance works associated with the Cala Homes Newmills development, where more extensive later prehistoric settlement was revealed.

The site is bisected by the line and embankment of an historic railway Branch Line, which followed and connected the Water of Leith mills and Balerno with the main E-W railway line forming the northern boundary of the site. Further to this upstanding industrial monument, the site still contains important sections of 18th/19th century agricultural field boundary walls.

As such the site has been identified as occurring within an area of archaeological and historic significance. Accordingly, this application must be assessed against LDP Policies Des 3, Env 8 & Env 9.

The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

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

m) Sustainability

LDP Policy Des 6 (Sustainable Buildings) sets out criteria by which proposed development should meet to ensure sustainability.

In this instance, the site is not considered a sustainable location for development given its dependency on car use and limited public transport.

Given this is planning permission in principle details, in terms of carbon technologies, urban drainage, recycling facilities and sustainable materials, are not at this time.

Overall, the proposal fails to comply with Policy Des 6.

n) Other Material Considerations

Network Rail

Given the site's proximity to the railway line, Network Rail was consulted on the proposal.

Whilst Network Rail has no issues with the principle of the proposed development, they would object to the proposal unless a condition was appended stipulating that the applicant provide a suitable trespass proof fence of at least 1.8 in height before development is commenced in the interest of public safety.

It is recommended that if Committee is minded to grant permission, that a suitable condition be appended.

Waste

No Waste and Servicing Strategy was submitted as part of the application. These details will be required as part of any future application.

O) Public Comments

There have been 654 letters of representation received in relation to the proposal. This comprises of 3 letters of support, 6 neutral representations and 635 letters objecting to the development.

Material Considerations

- Contrary to green belt. Addressed in 3.3a;
- Not in City Plan. Addressed in 3.3a;
- Overdevelopment; Addressed in 3.3a;
- Lack of roads infrastructure; Addressed in 3.3d;
- Limited capacity at schools or healthcare services. Addressed in Section 3.3e;
- Traffic and Congestion. Addressed in Section 3.3d;
- Concern relating to time period and ability for local residents to comment due to Covid-19 restrictions. Additional time was given for comments in line with EIA regulation timescales.
- Loss of character of area. Addressed in Section 3.3b;
- Lack of public transport. Addressed in Sections 3.3a and 3.3d;
- Air Quality. Address in Sections 3.3h;
- Neighbouring Amenity. Addressed in 3.3g;
- Housing Need. Addressed in Section 3.3a;
- Road safety. Addressed in 3.3d;
- Distance to train station. Addressed in Section 3.3d;

Non Material Considerations

- Request for investment be made into the local park next to the primary school by Cala;
- Request for Train Station to be built by developer.

Letters of Support

No narrative included in letters.

Balerno Community Council

- Green Belt land, not compliant with LDP Policy ENV 10;
- SESPlan Policy 7- Applicants have failed to establish the existence of any relevant housing land shortfall and effect of the development on the character of Balerno;
- Non-compliance with LDP Policy ENV 22 and potential impacts on local air quality, noise, vibration and corona effect;
- No Waste Management Strategy submitted;
- Not inconsistent with SPP 2014 para 80 - Prime Quality agricultural land;
- Roads and transport implications;
- Private vehicles ownership, additional road traffic generated from the development and impact on local road network;
- Suggestion that traffic generated figures are under calculated.;
- No evidence that Health Care Facility would be supported by Lothian Health Board.
- No evidence that a Community Hub would be economically, environmentally and socially sustainable.
- No evidence that a bus service either can safely access or negotiate the Ravelrig Road, or would be financially viable without subsidy, or whether subsidy would be forthcoming.

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.

Conclusion

The application for Planning Permission in Principle for residential development that proposes approximately 350 houses in the Green Belt is contrary to the strategic strategy of the Edinburgh Local Development Plan (LDP).

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

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

The application fails to demonstrate compliance with LDP Policies Tra 2 and Tra 8, in terms of transport and accessibility. The proposal is likely to be car dependent with limited sustainable transport modes promoted in the application. The application fails to comply with LDP Des 6 in terms of Sustainability.

The application fails to demonstrate that a good level of amenity can be achieved through compliance with LDP Policies Des 5. Furthermore, the application fails to demonstrate that the development will not have an adverse impact upon air quality, and therefore it does not comply with LDP Policy Env 22.

There are no material considerations that outweigh this decision.

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

3.4 Conditions/reasons/informatives

Reasons:-

1. The principle of residential development is contrary to policy Hou 1 part 1 of the Edinburgh Local Development Plan as the proposed development is not an allocated site or located within the urban area and will fail to comply with the criterion identified with Policy ENV 10. The proposal is not considered to be a sustainable development in accordance with the principles set out within the SPP.
2. The application fails to demonstrate compliance with Edinburgh Local Development Plan Policies Tra 2 and Tra 8, in terms of transport and accessibility with specific reference to the reliance on private car usage.
3. The application fails to demonstrate that a good level of amenity can be achieved through compliance with Edinburgh Local Development Plan Policy Des 5 in terms of potential noise impact from nearby uses.
4. The application fails to demonstrate that the development will not have an adverse impact upon air quality, and therefore it does not comply with Edinburgh Local Development Plan Policy Env 22.

Financial impact

4.1 The financial impact has been assessed as follows:

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

Risk, Policy, compliance and governance impact

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

Equalities impact

6.1 The equalities impact has been assessed as follows:

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

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

The application fails to demonstrate compliance with sustainability standards as per Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

There have been 654 letters of representation received in relation to the proposal. This comprises of 3 letters of support, 6 neutral representations and 635 letters objecting to the development.

Background reading/external references

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

**Statutory Development
Plan Provision**

Adopted Edinburgh Local Development Plan.

Date registered

29 October 2020

Drawing numbers/Scheme

01-05,

Scheme 1

David Givan

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Sonia Macdonald, Planning Officer

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

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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.

The Balerno Conservation Area Character Appraisal emphasises the predominance of vernacular buildings within the conservation area, the consistency in the use of traditional building materials, the substantial green setting giving a rural appearance, and the wide range of uses and which result in a self-contained village character.

Relevant Non-Statutory Guidelines

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

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 20/04611/PPP

**At Land 322 Metres West Of 6, Ravelrig Road, Balerno
Proposed mixed-use development comprising residential
development (Class 9), health centre (Class 2), community
facility (Class 10), outdoor recreational area (Class 11) and
associated landscaping, access and infrastructure works.**

Consultations

Waste Services comment

We can't see anything that mentions a refuse strategy or even vehicle access. However, the indicative masterplan appears to show road access to all the properties, so I would hope that this would enable a waste collection service to operate. Nevertheless, I would encourage the architects to consult our Instructions, and produce a waste strategy in advance of gaining planning permission, so that we can eliminate any issues at an early stage and ensure a simple and safe refuse collection service can be implemented.

Environmental Protection comment

The site is currently an area of agricultural ground with an old railway line running through the site. The site is at either side of Ravelrig Road to the east and south there are housing developments under construction with the A70 (Lanark Road) located further to the south, with the existing residential properties of Balerno bordering both roads. There are high voltage overhead powerlines located across the site to the north which is then bounded by the Glasgow - Edinburgh Central rail line. Mixed scrub bounds the site to the west, with Ravelrig Quarry located just beyond this.

The area does not appear to be allocated for any of the applied for use classes in the Local Development Plan. This area is Green Belt with residential units under construction housing (HSG38 &37) juxtapose this development site.

The applicant has submitted an air quality impact assessment and contaminated land reports to support the application. There is no supporting noise and vibration impact assessment

Even though this is a PPP application Environmental Protection would need further supporting documents to deal with noise/vibration, local air quality impacts and dust from quarry operations. The applicant needs to ensure rail, road and high-power voltage lines (corona affect) do impact proposed residential areas. There will be areas that are not suitable for residential use due to these impacts.

Its noted that neighbouring developments did submit noise and vibration impact assessments which highlighted that there would be an impact from general quarry operations on those residential properties located on the western boundary of that consented development site. Mitigation measures were put in place to reduce this impact in the form of an acoustic barrier, this may need to be continued down the western boundary of this proposed development and along the north to cover the railway noise. Such mitigation measures need to be documented in any future detailed planning application. However, it needs to be assessed at this PPP stage to ensure there are no areas that cannot have noise levels reduced to acceptable levels. A noise/vibration impact assessment would need to cover blasting activities taking place in the neighbouring quarry. Any assessment would need to be done in co-operation with the quarry operator to ensure a worst-case noise/vibration scenario is assessed.

The applicant proposes including a health centre (Class 2), community facility (Class 10) and outdoor recreational areas (Class 11). A class 2 use should not be problematic in a residential setting; however, a noise impact assessment may be required to support that use. Class 10 & 11 uses in a residential setting are problematic. There may be potential to restrict the use within the condition to ensure that other noisy uses in those class uses cannot be established without another planning application being submitted. We will need clarification on what the specific uses are required under Class 10 & 11.

A local air quality impact assessment has been submitted which has concluded that there will be no adverse impacts on a residential development in this location and the proposed development would not have an adverse impact on the surrounding local environment with regards to local air quality.

Environmental Protection are concerned that there are significant levels of development already proposed in the wider area. Environmental Protection have issues with the potential cumulative impacts these developments may have on the local road network and subsequent local air quality.

The development site also offers limited access to public transport, as well as walking and cycling infrastructure. The Edinburgh Cycle Hire scheme is an emerging and important mobility option that should always be considered. Any proposed development needs to demonstrate how the development will link into the existing networks. It must also be recognised that the main network especially during peak hours is congested. This is something that is likely to get worse when other committed developments are built out. Car parking numbers must be kept to a minimum. The site is near to the Currie Train station with the Hermiston Park and Ride facility.

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.

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.

The applicant will need to commit to installing 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 number of EV charging points. These would need to be to a minimum standard of 7kw (32amp) type two plugin sockets. As the proposed parking areas are likely in basements/driveways it will be easy and cheap to install wall mounted chargers at the development phase. Environmental Protection would recommend that every 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.

Any non-residential parking spaces will need to have a rapid three-phase 50Kw electric vehicle charging points installed and operational prior to occupation. This will need to be highlighted on any detailed plans.

The applicant will also need to provided details on how they can meet the heat and energy demands for the site using onsite renewables such as ground/air source heat pumps and PV/solar panels linked to energy storage. This information could be submitted at any detailed planning stage.

Due to the size of the proposed development it would likely take many years to complete. Therefore, construction phase amenity at the site will need to be considered and any impact on the noise and local air quality need to be considered. Environmental Protection would recommend that construction impacts are covered under a Construction Environment Management Plan (CEMP) are 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/Under construction 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.

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The

investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable).

Therefore, Environmental Protection recommends the application is refused due to potential impacts the development will have on local air quality and there is insufficient information provided with regards noise, vibration and corona affect.

Scottish Water comment

Audit of Proposal

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

Water Capacity Assessment

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

There is currently sufficient capacity in the 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

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

Drainage Impact Assessment would be required. The applicant should continue to engage with Scottish Water through the PDE process.

Please Note

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

Asset Impact Assessment

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

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.

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

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

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.

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.

Environmental Protection comment updated

The site is currently an area of agricultural ground with an old railway line running through the site. The site is at either side of Ravelrig Road to the east and south there are housing developments under construction with the A70 (Lanark Road) located further to the south, with the existing residential properties of Balerno bordering both roads. There are high voltage overhead powerlines located across the site to the north which is then bounded by the Glasgow - Edinburgh Central rail line. Mixed scrub bounds the site to the west, with Ravelrig Quarry located just beyond this.

The area does not appear to be allocated for any of the applied for use classes in the Local Development Plan. This area is Green Belt with residential units under construction housing (HSG38 &37) juxtapose this development site.

The applicant has submitted an air quality impact assessment and contaminated land reports to support the application. There is no supporting noise and vibration impact assessment

Even though this is a PPP application Environmental Protection would need further supporting documents to deal with noise/vibration, local air quality impacts and dust from quarry operations. The applicant needs to ensure rail, road and high-power voltage lines (corona affect) do impact proposed residential areas. There will be areas that are not suitable for residential use due to these impacts.

Its noted that neighbouring developments did submit noise and vibration impact assessments which highlighted that there would be an impact from general quarry operations on those residential properties located on the western boundary of that consented development site. Mitigation measures were put in place to reduce this impact in the form of an acoustic barrier, this may need to be continued down the western boundary of this proposed development and along the north to cover the railway noise. Such mitigation measures need to be documented in any future detailed planning application. However, it needs to be assessed at this PPP stage to ensure there are no areas that cannot have noise levels reduced to acceptable levels. A noise/vibration impact assessment would need to cover blasting activities taking place in the

neighbouring quarry. Any assessment would need to be done in co-operation with the quarry operator to ensure a worst-case noise/vibration scenario is assessed.

The applicant proposes including a health centre (Class 2), community facility (Class 10) and outdoor recreational areas (Class 11). A class 2 use should not be problematic in a residential setting; however, a noise impact assessment may be required to support that use. Class 10 & 11 uses in a residential setting are problematic. There may be potential to restrict the use within the condition to ensure that other noisy uses in those class uses cannot be established without another planning application being submitted. We will need clarification on what the specific uses are required under Class 10 & 11.

A local air quality impact assessment has been submitted which has concluded that there will be no adverse impacts on a residential development in this location and the proposed development would not have an adverse impact on the surrounding local environment with regards to local air quality.

Environmental Protection are concerned that there are significant levels of development already proposed in the wider area. Environmental Protection have issues with the potential cumulative impacts these developments may have on the local road network and subsequent local air quality.

The development site also offers limited access to public transport, as well as walking and cycling infrastructure. The Edinburgh Cycle Hire scheme is an emerging and important mobility option that should always be considered. Any proposed development needs to demonstrate how the development will link into the existing networks. It must also be recognised that the main network especially during peak hours is congested. This is something that is likely to get worse when other committed developments are built out. Car parking numbers must be kept to a minimum. The site is near to the Currie Train station with the Hermiston Park and Ride facility.

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.

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.

The applicant will need to commit to installing 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 number of EV charging points. These would need to be to a minimum standard of 7kw (32amp) type two plugin sockets. As the proposed parking areas are likely in basements/driveways it will be easy and cheap to install wall mounted chargers at the development phase. Environmental Protection would recommend that every 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.

Any non-residential parking spaces will need to have a rapid three-phase 50Kw electric vehicle charging points installed and operational prior to occupation. This will need to be highlighted on any detailed plans.

The applicant will also need to provided details on how they can meet the heat and energy demands for the site using onsite renewables such as ground/air source heat pumps and PV/solar panels linked to energy storage. This information could be submitted at any detailed planning stage.

Due to the size of the proposed development it would likely take many years to complete. Therefore, construction phase amenity at the site will need to be considered and any impact on the noise and local air quality need to be considered. Environmental Protection would recommend that construction impacts are covered under a Construction Environment Management Plan (CEMP) are 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/Under construction 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.

Ground conditions relating to potential contaminants in, on or under the soil as affecting the site will require investigation and evaluation, in line with current technical guidance such that the site is (or can be made) suitable for its intended new use/s. Any remediation requirements require to be approved by the Planning & Building Standards service. The investigation, characterisation and remediation of land can normally be addressed through attachment of appropriate conditions to a planning consent (except where it is inappropriate to do so, for example where remediation of severe contamination might not be achievable).

Therefore, Environmental Protection recommends the application is refused due to potential impacts the development will have on local air quality and there is insufficient information provided with regards noise, vibration and corona affect.

If consented, then the following conditions will need to be considered along with the recommended informative;

1. *Prior to the commencement of construction works on site:*
 - (a) *A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*
 - (b) *Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning*

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

2. *Development shall not commence until a scheme for protecting the occupiers of the residential units hereby consented from transport, powerlines and quarrying noise and vibration has been submitted to and approved in writing by the Planning Authority; all works which form part of the approved scheme shall be completed to the satisfaction of the Planning Authority, before any part of the development is occupied.*
3. *An agreed minimum number of 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.*
4. *An agreed number of Rapid 50 Kw (125amp) triple headed (Combined Charging Standard/CHAdeMO/Type 2) chargers shall be installed at the commercial and other non-residential parking areas.*
5. *A detailed Construction Environment Management Plan (CEMP) should be submitted to the satisfaction of The Planning Authority and adhered to during the construction phase.*
6. *During the demolition and construction phase no crushing should be permitted on the development site.*
7. *During the demolition and construction phase hours of noisy construction should be restricted to the satisfaction of the Planning Authority and specified in the CEMP.*
8. *Details on how the heat and energy will provided, with specific details on renewable energy and storage submitted to the satisfaction of the Planning Authority.*
9. *Any gas boilers in excess of 1MW (accumulative assessment) will require secondary abatement technology incorporated into any plant to the satisfaction of the Planning Authority.*

10. When available the applicant shall provide details of all the boilers to Environmental Protection to ensure compliance with the Clean Air Act 1993.

11. 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.

Informative Plant

1. 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.

Construction Phase Informative

2. Careful selection of methods and plant to minimise noise at source as far as reasonably practicable;

3. Use of modern, quiet and well-maintained machinery such as electric powered plant, where possible and hoists should use the Variable Frequency Converter drive system;

4. All mobile plant introduced onto the site shall comply with the emission limits for off road vehicles as specified by EC Directive 97/68/EC.

5. Vehicles and mechanical plant used for the Works would be fitted with exhaust silencers, which would be maintained in good and efficient working order and operated in such a manner as to minimise noise emissions in accordance with the relevant EU/UK noise limits applicable to that equipment or no noisier than would be expected based the noise levels quoted in BS 5228. Plant should be properly maintained and operated in accordance with manufacturers' recommendations. Electrically powered plant would be preferred, where practicable, to mechanically powered alternatives;

6. Establish noise and vibration target levels (a Section 61 agreement under the Control of Pollution Act 19745 (COPA)) to reduce noise and vibration to a minimum in accordance with best practicable means, as defined in Section 72 of COPA;

7. Adherence to relevant British Standards to establish noise and vibration 'Threshold' and 'Action' levels. Noise criteria would be discussed and agreed with CEC prior to the commencement of works

8. Identification and use of low noise techniques and non-vibratory or percussive piling techniques, where possible, to minimise noise and vibration. For example, equipment that breaks concrete by munching or similar, rather than by percussion. Where construction plant is known to generate significant levels of noise then it is to be used sparingly and the construction activity closely monitored to minimise noise levels;

9. *Where possible, adopt low vibration working methods or alternative working methods, use of cut off trenches, reduction of energy input per blow and reducing resistance to penetration e.g. pre-boring for driven piles;*
10. *Where high levels of noise and vibration are predicted, monitoring of noise and vibration levels;*
11. *Positioning plant as far away from residential property as physically possible and switching off when not in use;*
12. *Switching off plant and vehicle engines when not in use;*
13. *Regular maintenance and servicing of vehicles, equipment and plant;*
14. *Adherence to the agreed operational hours;*
15. *Use of hoarding to the required height and density appropriate to the noise sensitivity of the area. Use of enclosures and screens (hoardings and heavy sheeting), where necessary and practicable, around noisy fixed plant, especially near to surrounding residences;*
16. *Liaison with the occupants of adjacent properties most likely to be affected by noise or vibration from activities on the Site should also take place. The occupants should be informed of the nature of the works, proposed hours of work and anticipated duration prior to the commencement of activities; and*
17. *Review of demolition and construction techniques, especially in response to exceedances of the Action Level and / or complaints*
18. *Implementing measures to reduce dust emissions during transport (for example, sheeting the sides of vehicles carrying fine material);*
19. *All mobile plant shall be maintained to prevent or minimise the release of dark smoke from vehicles exhaust;*
20. *Using dust screens and covers and the appropriate location of dusty materials storage;*
21. *Fires to be prohibited on the Site;*
22. *Restricting drop heights onto lorries;*
23. *Assessing the risk of dust annoyance from the operations throughout the working day, taking account of wind speed, direction, and surface moisture levels. The Contractor should ensure that the level of dust suppression implemented on site is adequate for the prevailing conditions. The assessment should be recorded as part of documented site management procedures;*
24. *Spraying of internal unsurfaced temporary roadways with water at regular intervals as conditions require. The frequency of road spraying would be recorded as part of documented site management procedures;*

25. *Keeping surfaced roads and the public road during all ground works clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping would be recorded as part of documented site management procedures;*

26. *Adherence to the speed limits. All vehicles operating within the Site on unsurfaced roads would not exceed 15mph to minimise the re-suspension of dust;*

27. *Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) should be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason would be recorded. Review of the dust management plan on a monthly basis during the construction project and the outcome of the review to be recorded as part of the documented site management procedures.*

28. *No bonfires shall be permitted on the Site*

Flood Planning comment

We have reviewed the documents on the portal and have the following comments, to be addressed by the applicant:

1. *Please provide a signed copy of the declaration certificate A1, provided on page 13 of the link below:*

o *<https://www.edinburgh.gov.uk/downloads/file/22711/flood-risk-and-surface-water-management-plan-requirements> (Page 13)*

2. *The drainage calculations use a 30% uplift to account for climate change. Our latest guidance, found at the link in my signature below, requests a 40% uplift be used to account for climate change. Could the applicant please confirm that the proposed attenuation can accommodate the 1:200-year storm event with a 40% uplift?*

3. *Since preparing the report, have any further discussions been had on who will adopt and maintain the surface water management system, including SuDS.*

4. *Please confirm that the condition and capacity of the watercourse and railway culvert is sufficient to accommodate the proposed surface water discharge rate.*

Flood Planning comment updated

Would it be possible to attach a condition to the application? The updated report notes the applicant is still waiting for information from Network Rail about the condition and capacity of the culvert. For the next FUL planning application, the applicant should confirm that the condition and capacity of the railway culvert is sufficient to accommodate the proposed surface water discharge.

As this application is considered a major development, then we require an independent consultant to conduct a check of the submitted SWMP and provide a signed copy of the certificate B1. This is found on page 15 of the following link.

Balerno Community Council comment

These comments are lodged on behalf of Balerno Community Council (BCC). BCC objects to this application in the strongest possible terms on the grounds that;

1. *It is non-compliant with planning policy LDP Policy ENV 10 (Green Belt) in that*
 - a. *The application relates to development on Green Belt land, does not qualify for any exemptions listed under LDP Policy ENV 10, and should accordingly be refused;*
 - b. *SESPlan Policy 7 is not engaged to the extent that the Applicants have failed to establish the existence of any relevant housing land shortfall, and consequently the application must be refused;*
 - c. *Even if SESPlan Policy 7 were engaged, the relevant conditions in Policy 7 are not satisfied, including that the effect of the development on the character of Balerno would be devastating. The application should accordingly be refused;*

2. *It is non-compliant with LDP Policy ENV 22 (Pollution and Air etc Quality) in that*
 - a. *The development insofar as detailed in the application discloses potential impacts on local air quality and the application should accordingly be refused;*
 - b. *The development insofar as detailed in the application discloses insufficient information with regards to noise, vibration and corona effect and the application should accordingly be refused;*
 - c. *The application not disclosing a Waste Management Strategy, the application should accordingly be refused.*

3. *The development would be inconsistent with SPP 2014 para 80 - Prime Quality agricultural land*
 - a. *The land is Prime Quality agricultural land and the Applicants having failed to establish a precise housing land shortfall, have failed to indicate an established need for the development for the purposes of SPP 80. The application should accordingly be refused, and*
 - b. *In any event housing development on prime agricultural land is not sustainable development, and the application should accordingly be refused;*

4. *Roads and transport implications;*
 - a. *The majority of residents will use private vehicles and the additional road traffic generated from the development would use Lanark Road West which could not absorb the increased volumes. BCC believes that the Applicant's figures for increased traffic arising as a result of this development, when taken with other ongoing developments in West Edinburgh, are seriously understated and would be much more than the mere 18% they suggest would be added to the Bridge Road/Lanark Road West junction that his figures imply for 2025. The application should accordingly be refused;*
 - b. *The surrounding road network being narrow country roads could not absorb traffic generated by the development. BCC believes that the Applicants figures for increased traffic arising because of the development would be significantly above the 42% implied for traffic passing through the Dalmahoy Road/Ravelrig Road junction. The application should accordingly be refused;*

5. *Infrastructure*

- a. *The Applicants not having produced any evidence that a Health Care Facility would be supported by Lothian Health Board, representations as to its inclusion in the development should be discounted;*
- b. *The Applicants not having produced any evidence that a Community Hub would be economically, environmentally and socially sustainable, representations as to its inclusion in the development should be discounted;*
- c. *The Applicants not having produced any evidence that a bus service either can safely access or negotiate the Ravelrig Road, or would be financially viable without subsidy, or whether subsidy would be forthcoming, representations as to its availability in connection with the development should be discounted;*

The objections set out above are enlarged on in the annex to this letter. The Community Council believe that this application must also be considered in the context of Scotland's Fourth National Planning Framework Position Statement published in November 2020, and in particular that regard must be had to,

- i Establishing 20 minute neighbourhoods not just for new building but also for transforming existing places, and that must involve reducing urban sprawl especially where it involves loss of greenfield Green Belt land;*
 - I. ii Reusing existing building before new development proceeds, which must mean using brownfield sites first;*
 - II. iii Shifting future development away from greenfield sites by actively enabling redevelopment of vacant or derelict land, which must create a bias against the use of Green Belt greenfield land;*
 - III. iv Transitioning away from car-dependent developments, and*
 - IV. v expanding green infrastructure and natural spaces which must militate against destroying Green Belt and greenfield sites.*

In light of all these considerations the Community Council asks that the application be refused.

Annex to Balerno Community Council letter of objection to 20/04611/PPP Land 322 Metres West Of 6 Ravelrig Road Balerno

- 1. The proposal*
 - a. *The application is for outline planning permission in principle for the development of the Site to comprise up to 350 residential units (Use Class 9), health centre (Use Class 2), community facility (Use Class 10), outdoor recreational area (Use Class 11) and associated landscaping, access and infrastructure works.*
 - b. *The site is located in Green Belt and is Prime Quality Agricultural land.*
- 2. Ground of objection 1 - Non-compliance with the LDP Policy ENV 10 -*
 - a. *This paragraph addresses the compliance between the development proposed and LDP Policy ENV10 - Green Belt.*
 - b. *To be approved the development must fall within the scope of developments which may be permitted under the Local Development Plan (LDP) which in this case is the City of Edinburgh Local Development Plan of 2016. The site on which development is proposed is Green Belt land. Development on Green Belt land is not permitted except where it falls within the criteria specified in LDP Policy ENV 10. This application does not meet those criteria and is therefore LDP non-compliant.*

c. Notwithstanding non-compliance with the LDP the Applicants seek to justify development by reference to alleged shortfall in housing land supply in terms of Policy 7 SESPlan. There would be a shortfall where the supply is less than that required for a period of 5 years.

d. Compliance with Policy 7 is to be assessed on the basis of SESPlan which is said to be now out of date. The Applicants argue that in those circumstances the assessment should be on the basis of SESplan Housing Need and Demand Assessment 2 (HNDA2) (2016) which 'contains the most recent assessment of housing need and demand, as updated using the same methodology'.

e. Referring to PPA-230-2295 the Applicants concede that the Reporter was unable to assess a precise figure but is reported as having recorded that 'the weight of evidence does indicate that it would be probable that if the housing supply target and housing land requirement was now updated, it would be greater than that in SESplan1 and the LDP.'

f. It is also relevant to point out that CityPlan2030 is not as the Applicants suggest at a very early stage of development

g. The Applicants further argue on the basis of *Gladman v Scottish Ministers* that in such cases where policies are out-of-date, paragraph 33 of SPP makes clear that the presumption in favour of development that contributes to sustainable development will be a significant material consideration. That means that the Applicants have to establish the reasonable probability that there is a housing land shortfall in Edinburgh and if they can they may then be able to displace the restrictions on building on Green Belt land.

h. To secure the benefit of SESPlan Policy 7 the development must be in keeping with the character of Balerno and the local area, must not undermine Green Belt objectives. and any additional infrastructure required must effectively be funded by the Applicants. Accordingly and looking at those in turn;

i. The development has to be in keeping with the character of the settlement and local area

1. For a picture of the character of Balerno please see also the Balerno Community Plan published in April 2019 by BCC under the title 'Our Village - Our Community', available on Balerno Community Council's website. That Community Plan followed on from a Discussion Paper - A Vision for Balerno - published in 2016, which was in turn followed by a period of consultation across the community in co-operation with Balerno Village Trust.

2. For the purposes of these comments BCC suggests that the local area should be the Balerno Community Council area covering the area from the boundary between Edinburgh and West Lothian at Kirknewton in the west, to Currie in the east, to the lower slopes of the Pentland Hills beyond Threipmuir and Harlaw Reservoirs in the south and to the Edinburgh/Glasgow via Carstairs Jct railway line in the north.

3. Population statistics - According to Mid-Year Estimates (ONS, 2014) Balerno has a population of 5,915. As at November 2020 the population of Balerno village is estimated by BCC at @6500 to 7000 based on the 2011 census of 5927 updated to take account of still continuing developments at Newmills and Ravelrig Heights (@350 units) and RiverMill (53 units). It has a higher percentage of young people aged 0-15 (18.2%) than Edinburgh (15.3%) and Scotland (17%), indicating a number of families living in the village.

4. Balerno also has a significant pensioner population. 21.7% of the population is over 65, compared to 18.1% across Scotland and 15.1% across Edinburgh. 26% of Balerno's households are pensioner households. In 2011 Balerno had 332 households

with one pensioner (13.9% - in line with the Scottish average of 13.1%). Nonetheless, Balerno pensioners are less likely to claim pension credits, indicating relatively higher levels of wealth (5.5% claim credits compared to 19.9% across Scotland).

5. *In ordinary non Covid-19 times Balerno is a thriving community which is in part at least dependent on its scale being that of a large village rather than a town. That aspect is reflected in the fact that for example it is viewed by residents as a village; eg the Balerno Village Trust. So long as people can recognize it as a village it will be a village with the benefits which a smaller scale society can confer.*

6. *Employment - As at 2019 there were 4287 economically active people living in Balerno. Around 2300 (68.6% as opposed to an Edinburgh average of 69%) were in employment and of those 663 were in part time employment, 850 were recorded as retired (19.8% as opposed to a city average of 11.6%). 76 were recorded as permanently sick (1.8% as opposed to Edinburgh average of 3.7%). Self-employment is higher in Balerno with 417 (9.7% as opposed to city average of 7.9%).*

7. *There are no readily available statistics as to available employment within the village. Most residents commute to employment outside of the village and some of the jobs within the village are held by people commuting into the village. Approximately 51% of the Balerno population recorded in the 2011 census, as working, were engaged in management or professional occupation, and that is as opposed to 26.9% city wide). Observation of traffic flows on Lanark Road West suggests that most of those at work are employed in the city of Edinburgh. Localism as is being encouraged by COVID19 constraints is difficult to apply to Balerno as there are so few job opportunities. The impact of another 350 houses, equivalent to the combined total of the CALA Ravelrig Heights and Newmills developments will mean that virtually every wage-earner in this development will be an additional commuter. We estimate up to 600+ additional private cars on Balerno's roads if this development was allowed to proceed.*

8. *A rural area - Although Balerno is part of the wider urban area of South West Edinburgh 'it has a more rural character, being at the fringe of the urban area. In comparison to more urbanised areas of Edinburgh nearby, Balerno retains a rural village identity, irrespective of its size. The wide range of uses and activities available contributes to this self-contained village character.' Development on the scale proposed is wholly out of character with that of a self-contained village. It would destroy the character of Balerno.*

9. *Balerno is still predominantly a rural area being almost completely surrounded by Green Belt and accommodating several working farms. It is also labelled as the 'Gateway to the Pentlands'. Balerno village is surrounded by farmland which is for the most part LCA Classes 4.1 and 4.2 with other land being LCA Class 6.3. The site at Ravelrig is LCA Class 2, which is prime quality land. The Balerno farmland is actively cultivated producing cereal and other crops whilst also supporting livestock farming.*

10. *Farmland is an extremely important asset both to the immediate area and more widely for both its economic and its recreational benefits. There is a serious danger that if this large site were to be built over as have been the neighbouring fields, that this farm would cease to be viable and lead to the inevitable loss of yet further farmland. In terms of Edinburgh's objectives to accommodate Climate Change, that would be a disastrous*

step which would impact not just on the immense amount of traffic generated in this part of town, but would require more infrastructure including shops and schools.

11. There is a wide network of paths in and around the village. There are serious challenges to be overcome to meet the aspirations for farming at the same time as responding to developing demand for access to the countryside including both for development and for recreation.

12. BCC believes that farming should and must be encouraged and retained as part of the overall infrastructure of the Balerno area. This is not simply because Balerno is a mixed urban and rural community but also because farming is integrated into the community and is at the core of the character of the area.

13. Developments to date - Balerno's modern expansion dates effectively from around 1945. In 1950 its population was only 1500, Housing growth in the 60s to the 80s boosted that to around 5900 by 2014. BCC estimate that housing development at Newmills and Ravelrig Heights will take that up to @6500 to 7000. In the event that this application were to be accepted then we would estimate that the overall population could rise to 8500. But given population trends, with a rising elderly population, the probability is that for some time, the greatest housing need will be for the elderly who are less ambulant and looking for ways to reduce their own need to travel. A scheme that appears intent on forcing people to take to their cars or bikes or public transport because it fails to include any local shopping facilities is therefore inappropriate for the Balerno area.

14. BCC does not believe that a 350 unit development is either in keeping with the character of Balerno or that the existing infrastructure both physical and social would be sufficient to cope.

ii. Whether the development will undermine green belt objectives

1. Green Belt objectives in Edinburgh are

- a. to maintain the identity of the City by clearly establishing its physical boundaries and preventing coalescence;*
- b. to provide countryside for recreation; and*
- c. to maintain the landscape setting of the City.*

2. The boundaries of Edinburgh along the A70 and the Upper Water of Leith corridor run in broad terms, to the south along the Lanark Road West and around the village centre of Balerno. On the north they run along the escarpment to the south of the Murray Burn as far as Ravelrig and then, until 2016, along the Lanark Road West to the village boundary beyond Hannahfield. Developments at Ravelrig Heights in 2016 which were not within the LDP pushed the boundary northwards eating into prime agricultural land.

3. Countryside provides recreation both in the sense of physical activity and also as a restorative. While Balerno as a 'Gateway to the Pentlands' is heavily used as a route to the Pentland Hills it is increasingly also a focus for walkers and ramblers on lower level tracks and paths.

4. The landscape setting for Balerno is fragile and over development will impact seriously. The Development as proposed by the Applicants would we believe be seen from possibly from as far away as Kirkliston, about 5 miles. The Applicants Viewpoint Assesment considers the impact of the development from a variety of viewpoints closer

than 5 miles and concedes long term effect; eg from Viewpoint 3 - Long Dalmahoy Road at a distance of 630m from the site, the effect on the view towards the site, described as highly sensitive for walkers is assessed as, after 15 years, significant. Development of this site would have long term and permanent effects on sensitive aspects of the landscape.

5. We believe that The Pentlands provide an essential element in the landscape backdrop for the City.

iii. Additional infrastructure

1. While BCC would accept that the infrastructure improvements such as community space and health centre, referred to by the Applicants are desirable for the community of Balerno, it emphatically does not believe that planning community infrastructure for the Balerno community as add-ons to a specific planning application is either useful or appropriate. Designing infrastructure is the function of the process to develop a Local Development Plan and in particular in this case CityPlan2030.

2. Designing infrastructure on an ad hoc basis as suggested by the Applicants necessarily means that all options are not being considered, and that necessarily means that the best solution is not guaranteed.

3. Ground of objection 2 - Non-compliance with LDP Policy ENV 22 (Pollution and Air etc Quality) in that

a. The development insofar as detailed in the application discloses potential impacts on local air quality and the application should accordingly be refused;

b. The development insofar as detailed in the application discloses insufficient information with regards to noise, vibration and corona effect and the application should accordingly be refused;

c. The application not disclosing a Waste Management Strategy, the application should accordingly be refused.

4. Ground of objection 3 - The development would be inconsistent with SPP 80 - Prime Quality agricultural land

a. This paragraph sets out why BCC does not believe that the development proposed can be consistent with SSP 80.

b. Land quality -The site is Prime Quality Agricultural land which as noted by the Applicants is graded 2 and 3.1. The Applicants note that development on such land will not be permitted 'except where it is essential as a component of the settlement strategy or necessary to meet an established need'.

c. BCC have noted that the Applicants case for approval is based on the assertion of a shortfall in housing land. The Applicants must therefore demonstrate an 'established need'. The Applicants however concede that any such shortfall has not been quantified

d. BCC have also noted the Applicants concession - para 7.14 Statement - that; at the time of writing this statement, the Housing Land Audit and Completions Programme for 2019/2020 has not been published by CEC. Without this data, it is impossible to ascertain the housing land supply for the area or gain an understanding of completions. However, given the current climate, it anticipated that completions will be far lower than initially reported which will place a greater strain on the housing need within Edinburgh.

- e. *Far from being able to point to an 'established need' for the purposes of SPP 80 the Applicants are speculating as to the existence of such a shortfall. Such a speculation of a need is incompatible with an argument for there being an 'established need'.*
- f. *The Applicants then refer to SSP 33 to argue that where relevant policies in a development plan are out of date as they would argue they are then the presumption in favour of development that contributes to sustainable development will be a significant material consideration.*
- g. *However as such it cannot displace the fact that to satisfy SPP 33 there must be an established need.*
- h. *The Applicants have accordingly failed to establish a precise housing land shortfall, and as such have failed to indicate an established need for the purposes of SPP 80. That failure should mean that the Application must be dismissed.*

5. *Ground of objection 4 - Roads and transport implications*

- a. *This paragraph sets out traffic and transport considerations on the basis of which BCC believes that the proposal is unacceptable.*
- b. *General comment - We should at the outset make it clear that we regard the Transport Assessment as unsatisfactory. The first stage of preparation of a Transport Assessment is submission of a Scoping Report by the Applicants to the roads authority, the City Council. The Applicants' letter of 20 January - Annex B of the Transport assessment - does not satisfy the requirements for a Scoping Report as set out in para 3.25 of Transport Scotland's Transport Assessment Guidance of 2012.*
- c. *Scoping document - We are disappointed that the scope for the Transport Assessment was as limited as it is. The scoping correspondence attached as Annex B to the Transport Assessment makes clear that*
 - o *"the study area for surveying will include the following junction locations:*
 - o *Ravelrig Road / A70 priority junction;*
 - o *Balerno access signals (Bridge Road / A70); and*
 - o *Site access junctions.'*
- d. *While the consultants would according to that document also gather data for link flow on the A70, east of the Bridge Street junction, nothing was said about impact beyond Balerno itself, on the A70. We believe that preparation of the scoping document in this case required a more rigorous process, and that the consequence is that the Transport Assessment must be viewed as incomplete.*
- e. *Gillespie crossroads - BCC is concerned that no mention was made in the Scoping Report of the implications of the proposed development for the A70 eastwards towards and including the junction of Lanark Road West with Gillespie Road east of Juniper Green. The Transport Assessment advice presumably from CEC dated 23 Jan inexplicably appears to restrict assessments to the Neighbourhood Centre and Edge of Town only.*
- f. *In short the City Council's scoping response confirms a wholly inadequate extent of road network as proffered by the Applicants in their letter of 20 January. That suggests an absence of familiarity with the local road network or indeed the recent planning history of the area, the possibility of imagining a wider impact on the Lanark Road West corridor appears to be excluded. That view is reinforced by the paucity of information in the Transport Assessment about existing traffic and transport conditions, e.g. lack of footway/carriageway widths, commentary on existing traffic flows, queues and delays; road gradients, problems of safety and flooding on Ravelrig Road, Long Dalmahoy Road, etc.*

g. *Reference to Gillespie Crossroads in Transport S75 agreements - Omission of reference to Gillespie Crossroads is more than simply strange given the fact that the Gillespie Road junction traffic lights have been a regular feature of s75 payment requirements from all previous large scale developments along the length of Lanark Road West. In other words the relevance of Gillespie Crossroads to housing development on the A70 has been recognised over the years with countless thousands of pounds being committed to a MOVA traffic light system at that location. Why it is now suddenly to be left out of account is unexplained and unacceptable.*

h. *2018 A70 traffic survey - We are surprised and disappointed that both the City Council and the Applicants appear to have been unaware of the traffic survey conducted in 2018 by the community councils in Balerno, Currie and Juniper Green in partnership with Heriot Watt University. This was possibly the most extensive data collection exercise ever undertaken for the A70 corridor. Any transport assessment of the impact of development in Balerno which does not consider the impact on the A70 throughout its length to and including Gillespie Crossroads would be seriously lacking and incomplete.*

i. *Furthermore the Heriot Watt University study had the merit of using the appropriate form of traffic modelling (micro-simulation) which demonstrated realistically the dynamic inter-action of traffic operations along the Lanark Road West corridor. The Applicants' Transport Assessment only models individual junctions in isolation and is not validated*

j. *Cumulative impact assessments - The cumulative impact assessment in the Applicants' Transport Assessment is incomplete in terms of site and extent of road network. We also believe that preparing an assessment in relation to the proposed site on its own risks discounting the cumulative impact of development. The site sits immediately to the north of the as yet incomplete development at Ravelrig Heights. Good practice would dictate that a Transport Assessment for a planning application for a site which can be seen as an extension of a larger, partly developed site should prepare the Transport Assessment to take that into consideration. In this case the site is of course separate and distinct from the Ravelrig Heights site. However the latter is still under construction and it would seem to the Council that these two developments together may have a cumulative impact on the A70 which is more significant than each separately. BCC believes that in assessing traffic impact of the proposed site the correct approach is to assess the impact of the proposed site and also the impact of Ravelrig Heights, the also incomplete Somerville Road, Newmills Road and indeed the also still incomplete Ogilvie River Mill site, taking them all together as a whole.*

k. *The importance of Lanark Road West - Lanark Road West extends over 4 miles from the City Bypass to the Balerno village boundary with discontinuous footpaths that are at times of substandard width and not continuous on both sides. Lanark Road West is itself of variable widths eg in Juniper Green, at 428 where the pavement on the north side disappears, and at 505 Lanark Road West at the Bridge Road junction where the southside pavement is clearly substandard. The character of the A70 westbound changes at Gillespie Crossroads, reflecting the individuality of the separate communities along its length. There are clear community centres along the way at Juniper Green and then Currie. The road is narrower after Gillespie crossroads indicating the absence of any significant re-engineering of the road over the last 50 years. In fact, it is not possible to widen the road partly because of the expense of purchasing sufficient land from the large number of property owners whose boundaries extend to the pavements, and partly because of engineering difficulties eg at Hannahfield bends..*

l. *Car use in Balerno - According to the 2011 census only 13.7% of households in Balerno do not have access to a car (compared to 30.5% across Scotland). Balerno homes are statistically more likely to own two cars (36.2% compared to 21.6% across*

Scotland). They are also more likely to own three, four, or more cars than homes across Scotland .

m. The two data zones to the south west of the village (encompassing part of the Pentland Hills) are in the 20% most geographically access deprived areas in Scotland.

n. While only 13.7% of Balerno households do not have access to a private car as opposed to 39.9 across Edinburgh as a whole, and while this may explain in part why traffic volumes on Lanark Road west are in general at a level at which the road is at or beyond capacity, the absence of useable transport options exacerbates the problem.

o. Absence of public transport options for travel within Balerno means that there is considerable 'school run' traffic, especially for the primary school. Increased traffic in the village as a result of parents driving children to school and the potential impact on safety for children walking or cycling to school, are key concerns for residents in the Ravelrig Road area, and further traffic can only exacerbate that concern.

p. BCC has no sense that there has ever been a masterplan assessing the cumulative impact of housing developments along the Upper Water of Leith Valley on the roads and transport system.

q. Roads in and around Balerno - Despite repairs and improvements to rural roads outwith of the village, roads in Balerno are not in a satisfactory state. The A70 Edinburgh/Lanark trunk road is the main arterial route east and west in and out of Balerno. It is congested and unsafe with limited opportunities for protected pedestrian crossing as it passes through Balerno. West of Bridge Road the sight lines on Lanark Road West are poor. While some rebuilding of roads in housing areas has been carried out over the past 5 to 10 years or so the general condition of roads including bus routes, is poor, and they are not well maintained.

r. Apart from the A70, roads outside of the village proper are narrow, not suited to heavy commercial and agricultural traffic especially when it has to coexist with private vehicles, as for example accessing the Pentland Hills. This is true of Ravelrig Road. It is not clear whether or if so how often such roads are inspected to assess repair requirements; they do not appear to be repaired without specific complaints being made.

s. The A70 bisects Balerno running east/west. BCC believes firmly that Lanark Road West is now at capacity in traffic terms and could not absorb further traffic without serious congestion and with attendant inconvenience and pollution. As noted above - para 5h - BCC participated in a traffic survey in February 2018 along with Currie and Juniper Green Community Councils gathering data for analysis by Heriot Watt University. The results confirmed BCC's belief, and now lead us to the conclusion that the Applicants figures for additional traffic loadings on surrounding roads and in particular on Lanark Road West are significantly understated. BCC believe for example that the figuring for traffic through the Dalmahoy Road and Ravelrig Road junction is likely in fact be significantly above the 42% implied by the Applicant while the increase in traffic going through the Bridge Road junction might be up to 18%. It may be noted that in 1978, in appeal P/PPA/ML/170, an application by Albert Thain to develop 161 acres at Goodtrees and Bankhead farms for 1400 houses was rejected with Deputy Chief Reporter A.G.Bell stating that 'I accept that there is already congestion on this road at peak hours, particularly in the morning and that Lanark Road is the prime route used by Balerno residents commuting to the city'. Noting that the regional council expected capacity to be reached in 1987, or maybe earlier, he said

"I consider it quite imprudent to sanction a substantial development which will overtax the capacity of the main traffic route from it before the development is three-quarters complete. For this reason alone, I would have difficulty in recommending approval of a development on this scale."

t. The width of the LRW carriageway is constrained by the historic centre of Juniper Green and by the steep ravine of the Water of Leith between Juniper Green and Currie Toll, at which section there is also a risk of subsidence of the carriageway. Re-engineering LRW on its current route between Gillespie Crossroads and the western boundary of Balerno village so as to provide sufficient widening is thought impractical.

u. Since 2016 Balerno has expanded with two major housing developments at Newmills and Ravelrig totalling nearly 350 units. The current proposal by Rapleys would double the size of that expansion. There have been other large scale developments between Balerno and Gillespie Cross roads over the past decade including Kinleith Mill (90 Units) and River Mill (53 units).

6. Ground of objection 5 - Infrastructure issues

a. This paragraph considers issues in relation to infrastructure under headings Public Transport, Health, Community and Education.

b. Public Transport - Lothian Buses 44 bus service operates between Balerno and Edinburgh City Centre, and onwards to Wallyford. First Bus commenced a new 63 bus service in summer 2020 to Hermiston Gait and Gyle in west and north west Edinburgh and onwards to Queensferry. Both services are subsidized. There is no public transport service along the Lanark Road West into West Lothian despite the fact that Kirknewton - 5.0 mls distant via A70 - is within Balerno High School's catchment area. There is no public transport provision between Balerno and outlying rural areas within the BCC area, including the Pentland Hills.

c. Subsidised bus services to Livingston (St John's Hospital) (24) and to the Gyle Centre (70) were discontinued in April 2016, as a result of public spending cuts and an acute failure in liaison between CEC and West Lothian Council. As noted above there is currently a pilot of an extended First Bus 63 service to and from Balerno via Hemiston Park and Ride to Gyle Centre and Queensferry. This allows access to other routes including serving St John's Hospital but does not address the lack of bus service to Kirknewton which is within Balerno High School's catchment area.

d. While noting the Applicants representations BCC has no sense that the Applicants would be able to guarantee a public transport option for north west Balerno as they suggest in the application . They produce no evidence of immediate subsidy support or of provider commitment. Nor, as noted above, have the Applicants demonstrated the practical feasibility that buses could safely negotiate the junction of A70 and Ravelrig Road, or indeed Ravelrig Road itself. Despite the recent introduction of the 63 bus service between Balerno and NW Edinburgh and Queensferry, BCC have no reason to believe that a bus service to Ravelrig Road is imminent or even probable. Our experience has been that Balerno is in fact, despite an increase in cycling, very much car dependent.

e. Rail connections - There is a rail connection at Curriehill some 2.3 miles from Balerno village centre. There is no direct bus connection from Balerno to Curriehill station, which is 0.5 mi from the nearest bus stop on Lanark Road West. Using public transport the journey time between the Dalmahoy Crescent Ravelrig road junction - which roughly equates to the entrance to the proposed development would take 27 minutes. By foot it would take @38 minutes and by car 6 minutes, although parking provision at Curriehill station is singularly inadequate, and regularly overflows during the morning peak. The opportunity to expand parking at Curriehill station was lost with the grant of planning permission to Millers for housing at 'The Lea' adjacent to the station. It is also relevant to point out particualy so far as pedestrian access to Curriehill station is concerned that that on the back roads there is no pavement or appropriate streetlighting and so any walking commute would have to be via the current housing developments off Lanark Road, We think that pedestrian access is unlikely to be a preferred option.

- f. *Health - The Applicants Statement sets out that 'the masterplan framework indicates that the Site will be able to accommodate a Doctor's Surgery which will be of a benefit to the new residents and also the wider community. It further states that 'As existing, there is no surgery in Balerno and the nearest doctor's surgery to the Site is The Pentlands Medical Centre, located approximately 2 miles to the east of the Site in Currie.'*
- g. *The Applicants produce no evidence that a Health Care Facility at the location proposed would be supported by Lothian Health Board. The site proposed appears to be on a slope the gradient of which is not shown but which is known to be very steep and which would be likely to increase car use to access any health facility. The site is thought to be impractical.*
- h. *Community Hub - The Applicants statement sets out that 'The indicative masterplan submitted with this proposal indicates that there is capacity to provide a community facility of up to 500sqm which will be sited a location that is easily accessible for both those living within the development and the wider community in Balerno.' It further sets out that 'it is envisaged that the local community can take an active role in the ongoing management of the new facility to ensure that it provides for, and continues to meet, community needs now and in the future.'*
- i. *The Applicants produce no evidence as to how a Community Hub would be economically, environmentally and socially sustainable at the location indicated.*
- j. *Education - The Applicants state that 'There are three schools within Balerno which are all located to the south of the Site and there are four schools in Currie to the east. The 2019 report 'The School Place Challenge 2019' published by Scape Group states that Edinburgh City Council will need 'an additional 47 classrooms as pupil numbers will climb 7.5% by 2020/21'. The report cites 'offsite construction' as one of three recommendations moving forward to mitigate the rising pupil populations. It states that 'the adoption of offsite construction as the main method of building for all new schools and extensions would mean that they are built quicker than by using traditional methods. If modular can grow in scale, building schools will become more efficient and cost-effective.' The statement continues that 'While the masterplan framework does not allocate any of the development site for education, given the expansive green space indicated on the plan, there is the opportunity for the green spaces to be used by schools within the area for sport. It is anticipated that this would ease pressure on existing school sites and allow more space for modular classrooms within the vicinities of existing school sites, to provide a quick solution to additional classroom need.'*
- k. *It will be clear that the Applicants approach to education provision arising from their proposed development is scant and that no real resource has been committed to it so far. It is a matter of surprise and disappointment that there is no evidence of conversation with the education authority so far, and BCC believes that the Applicants comments are of no value.*
- l. *BCC believes that the community of Balerno deserves better from developers who wish their proposals to be taken seriously.*

SEPA comment

Advice for the planning authority

We have no objection to this planning application, but we have some comments on flood risk and air quality.

1. Flood Risk

1.1 The site is outwith the SEPA flood maps (fluvial) and there is significant lateral and vertical separation between the proposed development and the nearest main watercourses/small watercourse/drainage channel on the eastern flank.

2. Air Quality

The air quality assessment indicates no significant adverse impact on local air quality. No specific mitigation for air quality is provided. We advise, however, that in order to prevent cumulative impact from developments which in themselves appear insignificant, it is important that good practice to reduce emissions and exposure is incorporated into all developments at the outset.

Examples include:

- o Support and promotion of car clubs;
- o Contributions to low emission vehicle refuelling infrastructure;
- o Financial support to low emission public transport options;
- o Improvements to cycling and walking infrastructure;
- o Travel plans.

2.1 We recommend CEC to refer 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.

Archaeology comment

The site is formed by terraced improvement era farmland located on the north-western limits of modern day Balerno. Recent archaeological investigations by AOC Archaeology as part of the current housing development neighbouring to the South, uncovered important though isolated remains of prehistoric (Neolithic) occupation. The archaeological potential for this high terraced ground was also uncovered by AOC to the east during advance works associated with the Cala Homes Newmills development, where more extensive later prehistoric settlement was revealed. In addition to these antiquarian reports record the presence of Roman Stations on Ravelrig Hill site of Ravelrig Quarry. Although the A71 in this location follows (in part) a Roman Road, these sites no gone may in fact be prehistoric in origin.

The site is bisected by the line and embankment of an historic railway Branch Line, which followed and connected the Water of Leith mills and Balerno with the main E-W railway line forming the northern boundary of the site. Further to this upstanding industrial monument, the site still contains important sections of 18th/19th century agricultural field boundary walls.

Following a site visit, the south-west corner of the site was observed to contain what appears to be the remains of possible stone structures, clearance cairns and earlier possible ditches. It was not possible to ascertain if these 'lumps and bumps' were the result of modern activities on the site, possibly associated with farming or the adjacent quarry.

As such the site has been identified as containing occurring within an area being of archaeological and historic significance. Accordingly, this application must be considered under terms of Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), PAN 02/2011, HES's Historic Environment Policy for Scotland (HEPS) 2019 and CEC's Edinburgh Local Development Plan (2016) Policies DES3, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Buried Archaeology

The proposals will require significant ground-breaking works in regard to landscaping and the construction of the various phases of development. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 19th/20th century farming activity through to prehistoric sites.

Given the potential for significant archaeological resources to occur across the proposed area, it is essential that if consent is granted for this scheme that an archaeological mitigation strategy is undertaken prior to submission of any further detailed (FUL/AMC) applications or development.

In essence this, will require the undertaking of a phased programme of archaeological investigation, the first phase of which will be the undertaking of archaeological evaluation (min 10%) linked to comprehensive metal detecting survey & field walking.

The results from this initial phase of work will allow for the production of appropriate, more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains during each phase of development. This is particularly important in relation to the area in the SW earmarked for landscaping in which several possible features/structures of unknown date/significance can be observed.

Historic Field Boundary Walls

As discussed above the site still contains upstanding stone field boundary walls which date back to the 18th/19th century. These structures are considered to be of local historic and archaeological significance and contributors to the wider landscape. Accordingly, in accordance with Policy DES3, it is recommended that these historic structures are retained and maintained within any new landscaping/masterplan for the site.

Public Engagement

As stated, the site may contain a wealth of associated remains dating back to early prehistory. It is therefore considered essential therefore that a programme of public/community engagement is undertaken during all subsequent phases of development. The full the scope of which will be agreed with CECAS but may include site open days, viewing points, temporary interpretation boards.

In consented it is essential therefore that a condition be applied to any consent if 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, analysis, reporting, publication, preservation, 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.

HES comment

Thank you for your consultation which we received on 20 November 2020. We have considered it and its accompanying EIA Report (November 2020) 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.

The Development Proposals

We understand that this application seeks planning permission in principle (PPP) for the development of up to 350 residential units, healthcare and community facilities and associated landscaping and infrastructure west of Ravelrig Road, Balerno.

Our Advice

We do not object to the principle of development in this location. It should be noted, however, that there is some potential for adverse impacts on the setting of nearby scheduled monuments including the Dalmahoy Hill, fort (SM1213) and the Kaimes Hill, fort (SM1172). We therefore disagree with the finding at paragraph 4.3.2 of the desk-based assessment (Ecus, December 2019) submitted in support of the proposals that no designated heritage assets are likely to be affected by the proposed development and, consequently, the decision to exclude the cultural heritage topic area from detailed consideration in the EIA Report (October 2020).

While we are content that impacts on the Dalmahoy Hill, fort (SM1213) and the Kaimes Hill, fort (SM1172) would not raise issues such that we would object, we nevertheless recommend that some consideration is given to reducing impacts on the setting of these assets at the detailed design stages where possible. As the development proposal is located on the same east/west topographic ridge as these two forts, this consideration is

likely to involve adjustments to the scale and height of the development to ensure that important eastward views from these monuments are not adversely affected. We have provided further information on these scheduled monuments in the Annex below.

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

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:

All roads, paths or ways providing lineside access to the railway shall be kept open at all times during and after the construction of the development.

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

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 350 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (approximately 87) homes of approved affordable tenures.

The applicant has stated that their affordable housing proposal will exceed the minimum requirement and will account for 30% of the new homes across the site, which is welcomed by housing. The applicant has made a commitment to provide affordable housing and this will be secured by a Section 75 Legal Agreement. This approach which will assist in the delivery of a mixed sustainable community.

If the development is to be built out over several phases, each phase will be expected to contain a minimum of 25% affordable housing. This is 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 stated that they will exceed the minimum AHP requirement of 25% on site affordable housing by providing 30% affordable housing. The on site affordable housing will be secured by a Section 75 Legal Agreement and this approach which will assist in the delivery of a mixed sustainable community.

If the development is to be built out over several phases, each phase will be expected to contain a minimum of 25% affordable housing. This is 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.

NatureScot comment

Position

This proposal, if delivered well and to high standards, could create well connected multi-functional green-blue infrastructure, delivering benefits for both people and nature. We recommend the Council considers the planning measures that will be necessary to enable successful delivery of the proposals for active travel, green-blue infrastructure, green networks and associated biodiversity enhancements.

We note that this site is not allocated in the current Local Development Plan. From a natural heritage point of view, this means the role the site plays in city wide green network connections has not been fully assessed, acknowledging however the protection and allocation of the former railway which runs through the site as a core path and cycle route. We also 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.

Advice

Green - Blue Infrastructure 2

A significant new parkland is proposed to the north of this site, incorporating woodland, tree planting, SUDs, play areas and allotments. Access routes, connecting within and through the site and to the wider settlements and greenspaces are proposed, building on the allocation of the former railway as a core path through the site. Green corridors are also proposed through the development, for both access and open views, as well as enhanced woodland planting on the periphery with access. These measures, if delivered successfully have the potential to deliver diverse and accessible greenspaces, with a variety of uses and habitats to benefit people and nature.

Should the Council be minded to grant consent for the development, it will be important to ensure that the aspirations for the green-blue infrastructure, open space and access routes, as set out in the PPP, are successfully created and maintained in the longer term.

The landscape scheme for the site will serve as landscape and ecological mitigation for the proposal while also playing a fundamental role in the creation of a new neighbourhood, and therefore successful delivery will be crucial. There is little detail on the delivery methods at present but we advise the Council secure the intent of the plans and ensure methods are in place to secure high standards of detailed design, specification and on the ground delivery.

It's noted that a Landscape Management Plan is proposed for the detailed application. We emphasise the importance of long term management and maintenance of proposed open spaces as this will be essential to the quality and success of the resulting green-blue infrastructure. We recommend that financing, governance and delivery issues relating to maintenance and management are clarified and submitted with the Landscape Management Plan and detailed application.

The proposed access links and extension to/from Kingfisher park to the new parkland and beyond is positive and will be an important green network allowing local and wider community access to the new parkland as well as south into existing settlements and north/west into the rural area beyond. Green links with access are also proposed through the development, connecting in with the existing settlement to the south, ensuring the proposal is fully permeable. These measures will help deliver a more sustainable place, where people can lead healthier lifestyles and connect with local nature.

In terms of the LVIA process, it should be noted that we now only provide landscape and visual advice in cases where natural heritage of national interest may be affected.

Ecology and 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 survey requirements, mitigation and licensing:

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

As this is not an allocated site within the LDP, it has not undergone Habitats Regulations Appraisal (HRA) in relation to the Firth of Forth Special Protection Area. We therefore recommend that an HRA is carried out, in line with allocated sites: <https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra>

Pink footed geese from the SPA can use habitats within 20km of the coast for feeding. The use of this rural west part of Edinburgh by geese is relatively unknown although it's likely to be low.

We recommend that some form of assessment is undertaken to enable an HRA to be undertaken, for example, the likely use of this site (current habitat) by geese, availability of alternative supporting habitat in the area etc. The pink footed goose population is healthy at this time and extensive assessment isn't required, given that this isn't a key area. The Council may already have the necessary information available to carry this out, if not, some further information may be required by the applicant.

Roads Authority Issues

The application should be refused.

Reasons:

1. The proposed development is not considered to meet the transport objectives set out in the Local Development Plan (page 126). These state that development should:

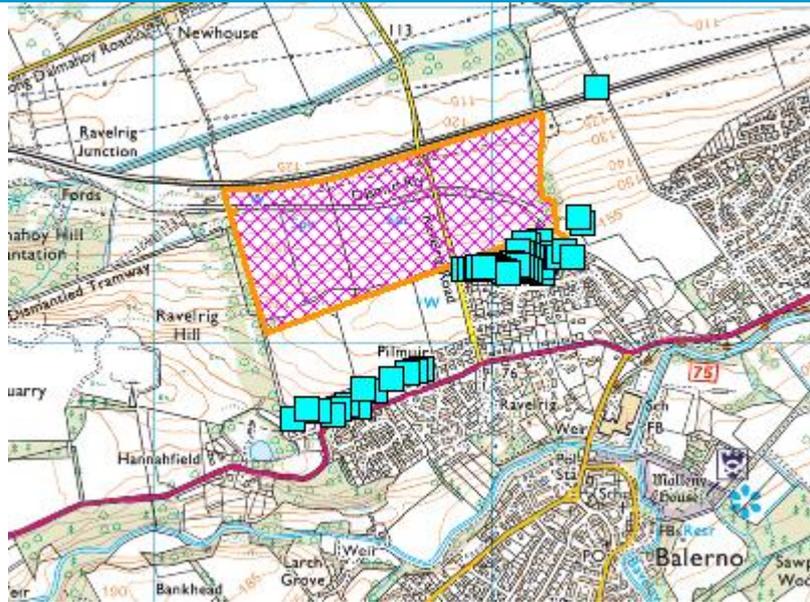
- o Minimise the distances people need to travel;*
- o Promote and prioritise travel by sustainable means, i.e. walking, cycling and by public transport;*
- o Minimise the detrimental effects of traffic and parking on communities and the environment.*

The proposed location is not well-served by public transport, nor is it one likely to encourage walking and cycling and it is considered to be remote from existing retail and other uses.

2. Whilst the level of proposed parking is not stated, it is unlikely that a reduced level can be justified, as set out in LDP Policy TRA2. This states that a lower provision of parking will be pursued subject to a number of factors, with the intention of fulfilling the wider strategy of encouraging sustainable, non-car modes.. These include:

- o Practical measures to significantly reduce the use of private cars to and from the site;*
- o Accessibility to public transport stops on routes well served by public transport, and to shops, schools and centres of employment by foot, cycle and public transport;*
- o The likelihood of low car ownership;*
- o Car club and other complementary measures to make it more convenient for residents not to own a car.*

Location Plan



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