

Development Management Sub Committee

Wednesday 18 August 2021

Application for Planning Permission 21/00217/FUL at Main Terminal, 1 Edinburgh Airport, Jubilee Road. Formation of new access road and active travel route from east of terminal building to Gogar Roundabout.

Item number

Report number

Wards

B01 - Almond

Summary

The principle of a new access road serving the airport is supported by the LDP.

However, this route is intended to be multi-purpose and support the long-term sustainable development of West Edinburgh. The proposed route is not consistent with the West Edinburgh Strategic Design Framework (WESDF) and LDP Proposal T9, which safeguards the Gogar Link Road, a route which was subject to comprehensive analysis as part of WETA (West Edinburgh Transport Appraisal) Refresh Study 2016.

The proposal would not achieve coordinated development, the route alignment would be prejudicial to the delivery of the Gogar Link Road and potentially require the delivery of a second route to achieve the objectives of the LDP.

The strategic design context of the route has not yet been fully established and it is not yet possible to demonstrate how the proposal would successfully integrate with the development of adjacent land or potentially contribute to the delivery of green-blue networks. Whilst the proposed design would deliver a functional requirement for a road, it has not been demonstrated how this would achieve a sense of place.

The proposal does not comply with the LDP. There are no material consideration which outweigh this conclusion. It is recommended that this application be refused.

Links

[Policies and guidance for this application](#)

LDEL01, LDES01, LDES02, LDES03, LDES05, LDES06, LDES07, LDES08, LEN03, LEN09, LEN16, LEN21, LEN22, LEMP04, LTRA07, LTRA08, LTRA09, LTRA10, NSGD02,

Report

Application for Planning Permission 21/00217/FUL at Main Terminal, 1 Edinburgh Airport, Jubilee Road. Formation of new access road and active travel route from east of terminal building to Gogar Roundabout.

Recommendations

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

Background

2.1 Site description

The proposal site is situated in west Edinburgh, approximately 10km from Edinburgh City Centre.

The application site extends between the Edinburgh Airport Passenger Terminal lying to the north west and the Gogar Roundabout and the A8 dual carriageway situated the south east - a distance of 3km.

The site (10.35 hectares) is bounded by Edinburgh Airport to the north west and Edinburgh-Fife railway to the north east. The southern edges are defined by the Gogar Burn, operational facilities and land related to Edinburgh Airport including the now decommissioned 'Crosswind' 12/30 runway and the Edinburgh Tram Depot. The Gogar Mains Farm and Castle Gogar Estate including the Category A listed Castle Gogar (LB27092, Date of listing:- 14/07/1966) and the Gogar Burn are situated beyond the former Crosswind runway to the south west.

The site extents include Myreton Drive, which provides vehicular access between the depot and the Gogar Roundabout via an overbridge crossing the tram line. The application red line also includes a square of land to the north of Myreton Drive, this lying within the airport perimeter fence. This is to make provision for a looped access to the west of the proposed route. Short spurs from the main site extents are also indicated to the south of Eastfield Avenue, to the north in the vicinity of the freight terminal and to the south west.

In terms of uses in the wider area, the Edinburgh Gateway Intermodal Station, providing connections to tram and heavy rail is located immediately to the south east. The area to the north west of the site form the operational extents of Edinburgh Airport including the air freight terminal which is accessed from Turnhouse Road. LDP Housing allocation HSG19 Maybury/West Craigs is situated immediately beyond the railway to the north east with site development expected to commence during 2021.

An historic bridge, in the vicinity of the former Meadowfield Farm, currently provides limited pedestrian access over the railway. Network Rail have advised of their intention to remove this bridge by the end of this year. This is currently served by an access track which flanks the north eastern edge of site, also defined by the airport perimeter fence.

The LDP allocation for the Edinburgh International Business Gateway lies to the south and south west of the application site, the extents broadly defined by the Gogar Burn, the Castle Gogar Estate and the Edinburgh Tram Depot.

The western sections of the site are based around existing road alignments of Gogar Bridge Road and Eastfield Avenue. These currently link existing airport parking and facilities associated with the operation of the airport to Eastfield Road and the main airport passenger terminal via a crossing of the tram line.

The existing use of the site mostly comprises operational land for Edinburgh Airport with sections of adopted road at the south eastern corner.

The extents of the site located to the east of the former runway are formed of managed grassland with areas of hardstanding, access tracks, airport plant and equipment, these enclosed by security fencing to the airport's perimeter boundary.

The topography of the site generally falls from south to north, with the southern edges of the site rising sharply from the Gogar Roundabout and the Tram Depot to form an escarpment. Spoil mounding is situated within the airport land bounded by the site, this located to the north of the former Crosswind runway. The northern section of the site which forms the main operational area of the airport is predominately flat.

The LDP defines the site as being substantially within the airport boundary, this being designated as Special Economic Area and also forming part of the Urban Area.

LDP Transport Proposal T9 outlines the requirements for the Gogar Link Road, this supporting long term development in West Edinburgh and connecting Eastfield Road to the Gogar roundabout via the International Business Gateway. The LDP identifies an indicative alignment which includes Myreton Drive, this intersecting the southern part of the site.

The site boundary also relates to LDP Proposal T12 which identifies improvements to the Gogar Roundabout, required to support development in West Edinburgh. Measures could include an extra lane on the inside of the existing roundabout and may also include some widening of approaches.

LDP Greenspace proposal GS7 identifies an enhancement and diversion of the Gogar Burn. This proposal seeks to reduce flood risk in west Edinburgh, improve water quality and enhance biodiversity. The LDP shows an indicative alignment linking the existing course of the Gogar Burn to the south west of the site with the River Almond to the north, this crossing the former Crosswind runway. The proposed alignment flanks the southern edge of the site for approximately 740 metres before crossing the site in a northerly direction towards the air freight terminal.

2.2 Site History

06 November 2019 - Notice of Planning Application (PAN) agreed for the formation of a new airport access road from the east of the terminal building at Edinburgh Airport to Gogar Roundabout (Reference:- 19/05434/PAN)

22 January 2020 - Notice of Planning Application (PAN) agreed for mixed use development at land to the south west of Meadowfield Farm, Turnhouse Road (the 'Crosswinds' proposal) (Reference:-19/05303/PAN)

03 March 2021 - Application proposal presented to Committee for mixed use development (Crosswinds/Elements Edinburgh) including business and employment, residential, flatted development, hotels, ancillary uses and associated works including car parking and associated works including car parking, servicing, access and public realm at land to the south west of Meadowfield Farm, Turnhouse Road. Appeal for non-determination previously lodged with the DPEA, 22 February 2021. Application proposal overlaps with the north eastern extents of this application. (Application reference:- 20/03219/PPP, DPEA Appeal reference:- PPA-230-2333)

15 April 2021 - Notice of Planning Application (PAN) received for mixed use development at site 100 metres east of 194 Glasgow Road. This PAN overlaps the southern extents of the application site at Myreton Drive, also including the eastern part of the IBG allocation to the east of the Gogar Burn, land to the north west of the Tram Depot and land to the north west of Edinburgh Gateway (Reference:- 21/01364/PAN)

22 April 2021 - Direction issued that appeal will be determined by Scottish Ministers in view of the potential impact of the proposed development on the spatial strategy for West Edinburgh (Application reference: 20/03219/PPP, Appeal reference PPA-230-2333)

28 May 2021 - Application for Planning Permission in Principle lodged for development of Gogar Link Road and active travel route. Application proposal overlaps with south eastern extents of the application at Myreton Drive and Gogar Roundabout. Decision pending. (Reference:- 21/02941/PPP)

Land to the west

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

Land to the north east

20 April 2017 - Application for Planning Permission in Principle was refused for 'Residential development, up to a maximum of 1400 units, and ancillary commercial (Class 1 retail and Class 2 financial and professional) including landscaping, access and services and all other ancillary development' at Site 100 Metres North East Of 19 Turnhouse Road Edinburgh.

In summary the application was refused for reasons including loss of green belt, landscape impact, transport infrastructure delivery, drainage and flood risk, insufficient environmental assessment information and failure to outline a comprehensive design approach (Reference: 16/04738/PPP)

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

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

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

Main report

3.1 Description of the Proposal

Full Planning Permission is sought for the development of a single carriageway access road to link the main passenger terminal at Edinburgh Airport with the Gogar Roundabout. The proposed route would extend 3km in length, with 2.4 km comprising new road alignment. The proposal would be fully accessible to general traffic and designed to a 30-mph standard.

The applicant states that the purpose of the access road is to reduce congestion and increase airport resilience, relieving pressure on Eastfield Road, with the requirement for a new eastern access road identified in the Airport Masterplan 2025. The proposed access road will also provide enhanced access to the air freight and cargo areas at Turnhouse, providing additional access from the east both for public transport (buses and taxis serving the airport terminal) and private cars (to long/mid stay car parks).

A Planning, Design and Access Statement has been submitted in support of the application. This includes an Option Appraisal outlining the preferred route alignment selected by the applicant.

The western section of the route (approximately 680 metres length) would be based on the existing alignment of Gogar Bridge Road and Eastfield Avenue. This would involve the modification and upgrading of existing roads within the airport boundary, these currently serving airport parking and ancillary facilities related to the operation of the airport. Works will require reconfiguration to adjacent site boundaries with a single building proposed for demolition. A dedicated westbound cycle route would partially extend along the existing alignment of Eastfield Avenue.

The central section of the route would comprise a 7.3 metre wide single carriageway requiring 2060 metres of new construction. Sections of the route would utilise existing airport accesses including former taxiways and the former Crosswind runway.

The proposed route would traverse in a north easterly direction towards Turnhouse where a new 3-arm roundabout is proposed. The northern arm would provide future access to the air freight terminal. The proposed route would then run parallel to the railway line in a south easterly direction for 1 km before diverging southwards.

The south eastern section of the route (approximately 260 metres length) would involve the modification of the northern arm of the Gogar Roundabout and the realignment works to the existing Myreton Drive, which forms vehicular access to the Tram Depot. This would include the construction of an access loop (400 metres length) to the southern edges of the site, with a 200 metre section of Myreton Drive being reconfigured as one way only.

Modifications to the Gogar Roundabout including the requirement for additional lanes circulating the roundabout and to the A8 eastbound are identified.

The proposal identifies a range of access points, both existing and proposed, from north west to south east:-

- Existing access to the airport terminal to the northern end of Gogar Bridge Road;
- Existing accesses (x2) to airport parking situated to the east of Gogar Bridge Road;
- Existing western access and northern access via roundabout at Eastfield Avenue/Gogar Bridge Road;
- Existing northern access points to Eastfield Avenue (x3) these serving existing airport car parking;
- Existing southern access points formalised to Eastfield Avenue (x5) these serving existing facilities associated with the operation of the airport. This would include reconfiguration of access to an existing fuel depot;
- New southern access to the parking area occupying the extents of the former Crosswinds runway;
- New northern access via new 3-arm roundabout. This is identified as access for future development and relates to existing access routes serving the air freight terminal;
- New western accesses (x2) to the Crosswinds site. These are identified as Development Access Roads;
- New pedestrian access to the east via the existing railway footbridge, providing link to the Maybury/West Craigs development site. This would require construction of a ramped access formed by concrete retaining wall and gabion baskets;
- New eastern access via new junction to south eastern section of the Crosswinds site. This is identified as a Development Access Road;
- New western access via new junction to the Crosswinds site. This is identified as a Development Access Road, also forming a new exit loop from the Edinburgh Tram Depot;
- Existing western access via Myreton Drive to the Edinburgh Tram Depot would be converted to exit only;
- Existing eastern access to West Craigs land;
- Existing eastern access to Edinburgh Gateway Station.

The central and south eastern sections of the route would include a shared use cycle/footpath. This would be located to the south before crossing to the east via an un-signalised crossing adjacent to the existing railway footbridge to Maybury/West Craigs. A shared cycle/footpath is identified to both sides of the route around the proposed new junction to the Crosswinds site, but pedestrian/cycle access to Edinburgh Gateway and Gogar Roundabout would be to the eastern side only.

The application is supported by detailed layout and landscape design proposals.

Soft landscape treatments would mainly comprise amenity grassland including areas of pictorial meadow and groundcover planting to the verges and site margins. Small clusters of avenue tree planting are identified to the north western site edge at the boundary with the railway, to the centre of the proposed roundabout and entrance to the parking area occupying the extents of the former Crosswinds runway. Species would include Silver Birch and Lime. Beech hedging would define much of the southern site boundary, with some sections incorporating 2 metre weldmesh fencing with double planting on either side. Conventional 2 metre weldmesh fencing, black powder coated, would be used to define other boundaries.

Other than new fenced boundaries to define the extents of the road alignment, minimal soft landscaping is proposed to the western section of the route.

A Swale feature would be formed to the western edge of the route to provide drainage. This would extend along most of the central section of the route from the proposed junction to the Crosswinds site to the proposed entrance to the car parking occupying the extents of the former runway.

The proposed alignment would mostly utilise existing land levels or require formation of a low embankment, although more extensive cutting will be required to the escarpment at the southern edge of the Crosswinds runway to accommodate the proposed changes to Myreton Drive. Cuttings will also be required to the earth mounding located to the north of the former runway.

In terms hard landscaping, the route including carriageway, footway and cycle routes would be surfaced using hot-rolled asphalt. Lighting columns are identified along the full length of the route.

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

- Planning, Design and Access Statement
- Transport Assessment
- Landscape and Visual Appraisal
- Heritage Impact Assessment
- Ecological Impact Assessment
- Archaeology Statement
- PAC Report
- S1 Sustainability Form

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

Scope and Methodology
Site and Scheme Description
Transport
Noise and Vibration
Air Quality
Water Environment
Ground Conditions
Cumulative and Residual Effects
Mitigation, Monitoring and Conclusions
Non-Technical Summary

3.2 Determining Issues

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

Do the proposals comply with the development plan?

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

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

3.3 Assessment

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

- a) The principle of development is acceptable;
- b) The proposal would achieve co-ordinated development;
- c) The proposal raises transport issues;
- d) The design would be acceptable;
- e) The proposal would result in strategic landscape impact;
- f) The proposal raises issues relating to surface water management;
- g) The proposal raises issues relating to ecology and biodiversity;
- h) The proposal raises issues relating to archaeology;
- i) The proposal raises issues relating to air quality
- j) The proposal would adversely affect the amenity of neighbours;
- k) The proposal would raise infrastructure contribution;
- l) The proposed EIA is acceptable;
- m) The proposal address issues raised in representations.

a) Principle of Development

Policy Context

National Planning Framework 3 (NPF)

The NPF identifies various National Developments in Scotland. The purpose of National Development Status is to establish the need for these developments. Although it does not grant consent for them, development plans are required to take account of the NPF. Strategic airport enhancements, including Edinburgh Airport are identified as National Developments.

Although the NPF make reference to new walking and cycling routes there is no specific reference to vehicle based access roads to the airport. The NPF3 supports the expansion of Edinburgh Airport as defined in its current Masterplan that is supported by the development plan. The current draft 2016 Airport Masterplan shows an indicative route for two access roads, one following the current eastern boundary of the airport providing access to the cargo area at Turnhouse to the Gogar roundabout and the other largely following the route of the Gogar Burn providing access from Gogar to the car parks in front of the terminal building. It should be noted that the Airport Masterplan has not been formally approved by the Council nor are these indicative access roads identified in the LDP.

Scottish Planning Policy (SPP)

SPP states that the NPF is the spatial expression of Government Economic Strategy (2011) and sustainable economic growth forms the foundations of its strategy. The NPF sits at the top of the development plan hierarchy and must be taken into account in the preparation of strategic and local development plans.

Strategic Development Plan (SDP)

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

LDP Policy Emp 4 - Edinburgh Airport

LDP Policy Emp 4 outlines specific planning policy requirements in respect of the development and enhancement of Edinburgh Airport. The purpose of the policy is to guide proposals for airport expansion in accordance with NPF3.

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

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

West Edinburgh Strategic Design Framework (WESDF) 2010

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

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

As part of the section addressing Movement, the WESDF seeks to ensure that movement both to and through West Edinburgh is sustainable as possible with the network of routes contributing to a high-quality environment. Development Principle M1 states that development should be as sustainable as possible, maximising the use of public transport and the promotion of walking and cycling through a range of measures to make these modes of transport as attractive and convenient as possible. Development Principle M2 states that transport infrastructure should contribute to the creation of a sense of place with new routes laid out on a grid and the Gogar Link Road designed to a 30mph speed or lower.

Summary - Principle of Development

The current National Planning Framework (NPF3) identifies the application site is of strategic importance to Edinburgh Airport.

LDP Policy Emp 4 outlines that the development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the Proposals Map. The approved master plan will inform this process. Proposals for ancillary services and facilities will only be permitted where it is demonstrated these have strong and functional and location links with the airport and are compatible with the operational requirements of the airport.

The majority of proposed access road is within the defined boundary for Edinburgh Airport and the proposal could be argued as having strong, functional and location links with the airport and may be compatible with its operations. The general principle of a new access road serving the airport would therefore be in accordance with the LDP.

However, this proposal is not supported by an Airport Masterplan which has been approved by the Council and agreed with key stakeholders. A draft masterplan dates from 2016 but has not been subject to any formal approval process with the Council. A further draft was prepared by the Airport in 2020.

This identifies an eastern access road to the north east of the decommissioned Crosswinds runway which would serve an expanded air freight terminal to the north, however, this latest draft has not been subject to any formal approval process.

The applicant's case for the development largely rests with a draft masterplan that is now 5 years old and a further draft which as yet has not been approved by the Council or key stakeholders. These represent a materially different context to the present date across a range of competing factors, not least airport growth. These draft masterplans should therefore be afforded little or no weight.

LDP Policy Emp 4 states that all development proposals within the airport boundary must accord with the WESDF and other relevant local development plan policies. Supporting information will be required to demonstrate how proposals will contribute to meeting the mode share targets in the WESDF.

WESDF refers to the application site in the operational context of as forming an operational part of Edinburgh Airport. Whilst a new access road serving the airport is identified, this is articulated as the Gogar Link Road, which is in turn supported by LDP Proposal T9. It does not support an access road along the alignment which has been proposed as part of this application.

The application proposals have not demonstrated how transport mode share targets outlined in WESDF would be achieved, these further articulated in the WETA Refresh Study 2016.

The nature of the proposed development is contrary to the existing National Planning Policy 3, the Strategic Development Plan and the Local Development Plan (LDP) specifically LDP Policy Emp 4. The proposal does not fully address requirements of this policy as the application proposal is not supported by an approved airport master plan nor does it accord with the West Edinburgh Strategic Design Framework (WESDF) 2010 and other local development policies. The proposal would be prejudicial to the implementation of LDP Proposal T9, Gogar Link Road specifically the delivery of proposed new roads, network improvements and public transport improvements. It would thereby fail to address requirements of LDP Transport Policies Tra 10, Tra 7, Tra 8 and Des 2, Co-ordinated Development. These are further assessed as part of sections related to Co-ordinated Development and Transport below.

b) Co-ordinated Development

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

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

The Council encourages a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks or masterplans to identify the full potential for creating successful places, particularly to ensure a cohesive network of streets and spaces including green/blue networks are to be created. Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces.

In relation to part a) of this policy, there is concern to the relationship between this proposal and the current development proposals for the adjacent Crosswinds site, which partially overlaps with this application to the south east.

Whilst both represent discrete proposals, there is nevertheless a close interrelationship between the Crosswinds development and this application proposal. Detailed masterplanning was undertaken in relation to the Crosswinds application, this making provision for the access road proposal to the north eastern edge of the site. The road would also provide road access for the Crosswinds site. The Crosswinds application (Reference:-20/03219/PPP) is now subject to appeal for non-determination with subsequent call-in by Scottish Ministers. Until the outcome of this appeal is fully understood, the development status for the Crosswinds site remains unresolved.

In the absence of a decision by Scottish Ministers, it is not possible to fully understand whether this proposal would compromise the effective development of adjacent land. The strategic design context of the route has yet to be fully established and further detailed masterplanning would be required to ensure potential opportunities for achieving coordinated development, securing effective linkages and connectivity are maximised. For a proposal of this nature, it would also be critical to ensure that the development of green/blue networks, carbon reduction and exemplary placemaking can be achieved.

The applicant maintains that this application proposal would be additional to LDP Proposal T9, Gogar Link Road which is required to support development in West Edinburgh. This is further discussed in the Transport section below.

However, as proposed, there are concerns that this proposal for an eastern airport access road would effectively fix the alignment of the route to the airport, potentially resulting in the need for a second access to serve IBG and Eastfield Road. Although a proposal for an eastern airport access road is shown as part of the draft Airport Masterplan 2025, this has not been approved by the Council or agreed with key stakeholders.

This application proposal is not identified as part the West Edinburgh Strategic Design Framework (WESDF), does not align with the objectives for LDP Proposal T9, Gogar Link Road, or the outcomes of the WETA Refresh Study.

Given the current planning status of the land, the application proposal is not currently supported by an approved masterplan, strategy or development brief approved by the Council. The application proposal would therefore fail to address part b) of the policy.

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

The strategic design context of the route has not yet been fully established and it is not yet possible to demonstrate how the proposal would successfully integrate with the development of adjacent land or potentially contribute to the delivery of green-blue networks.

The application would be contrary to the current LDP. The application is not supported by an Airport Masterplan which has been approved by the Council and agreed with key stakeholders and is therefore premature.

c) Transport

Proposed Route Alignment

The application proposal is described as an Eastern Access Road, this providing a single carriageway route between the Gogar Roundabout and the Airport (eastern terminus). The requirement for such a new eastern access road is identified in the draft Airport Masterplan 2025.

The applicant states that the purpose of the access road is to reduce congestion and increase airport resilience, relieving pressure on Eastfield Road, with one main access point to the airport being suboptimal. The proposed access road is to provide enhanced access to the air freight and cargo areas at Turnhouse, providing additional access from the east both for public transport (buses and taxis serving the airport terminal) and private cars (to long/mid stay car parks).

The Planning, Design and Access Statement outlines three alternative routes which were explored by the applicant:-

- 1) A western alignment comprising a New Link Road and New Main Street as per the alignment proposed by WETA;
- 2) A western alignment based on the LDP Proposal T9;
- 3) A route through the middle of the Crosswinds site.

An assessment of alternative route options and potential impacts were also considered as part of the EIA Report. It was concluded by the applicant that Alternatives 1 and 2 would result in adverse impact on traffic compared with the eastern alignment, with an eastern alignment removing the requirement for substantial amount of dual carriageway as per the WETA proposal. The applicant also states that Alternative 2, based in LDP Proposal T9 would not provide an additional route to the airport as this only connects to Eastfield Road.

The applicant has prepared a Transport Assessment to support the application.

Gogar Link Road and Gogar Roundabout

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

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

The Gogar Link Road is envisaged as a street to serve the IBG westwards as well as the airport, with the east-west alignment required to ensure effective access and permeability through the wider IBG area.

The site boundary also includes LDP Proposal T12 which identifies improvements to the Gogar Roundabout, required to support development in West Edinburgh. Measures could include an extra lane on the inside of the existing roundabout and may also include some widening of approaches.

WETA Refresh Study

The West Edinburgh Transport Appraisal (WETA) Refresh Study was approved by the Council in December 2016. The Study took into account a number of changes in West Edinburgh, particularly in relation to a number of planned developments but also in specific relation to airport growth. The various transport mitigation measures identified as part of the study subsequently informed the interventions identified in the LDP Action Programme to support the delivery of LDP site allocations in West Edinburgh. One of the key transport actions in WETA is the provision of the Gogar Link Road.

The feasibility and options for the Gogar Link Road were further considered as part of the Refresh Study, with this route intended to improve network resilience to Edinburgh Airport and to open up development opportunities in west Edinburgh.

The Study considered five separate access strategies with strategy 4c emerging as the best performing package of measures to bring forward development. A proposed alignment for the link road, skirting the south western edge of the Crosswinds site, emerged from the WETA Refresh Study as the best option to address the different requirements of development and the airport whilst providing an efficient network with flexibility for public transport provision, walking, cycling and general road users. The WETA Study advocated a 'Y' shaped network of routes based around the Gogar Link Road. A single route would lead from Gogar Roundabout, before splitting to the north east of Castle Gogar. A western route would then cross the Gogar Burn to provide a link with IBG and Eastfield Road, this potentially providing a further link to airport from the south. An eastern route would then provide a link to the air freight terminal at Turnhouse. The WETA Study also suggested the possibility of additional lanes along the central section of the route to allow for public transport priority.

At the time the WETA Study was prepared in 2016, the Crosswinds runway was still operational and therefore limited options to where such a route could be placed. The findings of the Crosswinds EIA also identified the importance of Castle Gogar and Castle Gogar Estate in terms of the cultural heritage, with the Gogar Burn and Castle Gogar Estate being of ecological value. These factors would need to be considered in the design of any detailed alignment.

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

This proposal for an eastern access road is a stand-alone proposal and is not aligned with the WETA Study findings, nor does it represent the safeguarded route as set out in the LDP. As proposed, it represents a completely independent access point to the airport and the air freight depot at Turnhouse.

There is concern that options to deliver the Gogar Link Road are being ruled out prematurely and this application proposal fixes a road alignment to the east which would effectively limit a wider range of options from being further explored.

Assessment

LDP Policy Tra 10 - New and Existing Roads, does not support permission being granted for development which would prejudice the proposed new roads and road network improvements listed in Table 9 and shown indicatively on the Proposals Map. The Council does not generally support new road construction or road improvements aimed at increasing capacity on the road network. However, in some cases proposals are necessary to mitigate the effects of development on the road network or to improve existing congestion levels.

LDP Policy Tra 7 - Public Transport Proposals and Safeguards, states that planning permission will not be granted for development which would prejudice the implementation of the public transport proposals and safeguards listed in LDP Table 9 and shown indicatively on the Proposals Map.

LDP Policy Tra 8 - Provision of Transport Infrastructure, states that development proposals relating to major housing or other development site, 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 relevant and necessary for the proposal;
- b) Any required transport infrastructure in Table 9 and in general and site specific development principles has been addressed as relevant to the proposal.

The proposal has been assessed in relation to the West Edinburgh Transport Appraisal Refresh Study (WETA).

The proposed access road is not considered to meet the requirements of the Gogar Link Road set out in the WETA Refresh Study. Whilst there is some flexibility with the proposed alignment, the proposed road configuration aligns the airport link eastwards of the set out in WETA and is considered to promote the north/south direction of travel over access to IBG and Eastfield Road lying to the west. The proposed alignment is considered to focus on access to the airport rather than the main IBG area and is likely to be to the detriment of public transport serving the IBG site.

Although the provision of an eastern airport access route could provide enhanced access for bus services using the airport, particularly from the east, it has not been demonstrated how this proposal relates to wider public transport objectives for west Edinburgh including the findings of the WETA Study and the implications for delivery of LDP Proposal T9, Gogar Link Road, which identifies dedicated provision for public transport.

The Gogar Link Road is intended not only to improve network resilience to Edinburgh Airport but also to open up development opportunities in west Edinburgh. The proposed Link Road alignment emerged from WETA as the best option to address the different requirements of development and the airport whilst providing an efficient network with flexibility for public transport provision, walking, cycling and general road users.

The Planning, Access and Design Statement prepared by the applicant suggests that the proposal will not prevent the delivery of the Gogar Link Road and will facilitate the delivery of the route, providing an important connection that will unlock the delivery of the Crosswinds site.

This further suggests that the proposed access road would not be 'instead of' but 'as well as' the Gogar Link Road and this point is fundamental to whether the proposal meets the requirements of LDP Policy Tra 10, New and Existing Roads. This policy makes clear that the Council does not generally support new road construction aimed at increasing capacity on the road network which is the clear intention of this proposal.

The WETA Study advocated a multi-purpose route for the Gogar Link Road, which avoided the need for multiple routes serving the airport. A single route would be more efficient, both serving and being funded through a range of development interests. If a further route had to be delivered in addition to that proposed through this application, additional resources would need to be secured. It is also not clear if the proposed road would actually be needed once the Gogar Link Road was delivered. This could result in additional road capacity over and above the existing proposals, inevitably encouraging increased car trips to the airport and undermining modal shift. In respect of Public Transport Proposals and Safeguards, LDP Policy Tra 7 seeks to ensure that development proposals take account of committed and potential public transport proposals which are required to reduce reliance on travel by private car and help meet climate change targets and sustainable development objectives.

The requirements of LDP Proposal T9 Gogar Link Road have not been properly explored as part of the application and critically, how connections beyond the site boundaries would be achieved. Although potential access points have been indicated to the Crosswinds site, no linkages have been identified to landholdings to the west of the Gogar Burn nor has it been indicated how the proposed alignment is intended to serve IBG and Eastfield Road to the west.

The proposed access is a stand-alone proposal to deliver enhanced access to the airport by providing a secondary access point from the north east. Although the access does not pass through the IBG or the safeguarded access route, there is still the potential to prejudice the delivery of the Gogar Link Road, because it will form another road connecting to the Gogar roundabout.

The proposal does not represent a joined up approach, will not contribute towards placemaking, with the possibility of two roads instead of one and the unintended consequences on the road network which were not modelled by the WETA Refresh Study.

The proposed route is not consistent with the safeguarded LDP Proposal T9, for the Gogar Link Road, a route which has been subject to comprehensive analysis in the context of a strategic package of transport measure for West Edinburgh. It is critical that objectives can be realised, i.e. development of a link between the Gogar Roundabout and Eastfield Road via IBG, and this is not prejudiced.

Public Transport

The Transport Appraisal has undertaken an analysis of existing bus routes, tram and heavy rail services in the vicinity of the application site.

The provision of an eastern airport access route could provide enhanced access for bus services using the airport, particularly from the east. However, it is not clear how this proposal relates to wider public transport objectives for west Edinburgh including the findings of the WETA Study and the implications for delivery of LDP Proposal T9, Gogar Link Road, which identifies dedicated provision for public transport.

Two bus stop facilities are proposed adjacent to the proposed Crosswinds site. These facilities would consist of cage markings which would be provided on the general carriageway.

Given that the development status for the Crosswinds site, there is concern that these locations may not provide optimal public transport provision for the development of this site, being placed at its north eastern edge.

Active Travel

The application identifies a new active travel route. A shared use pedestrian/cycle route (3.5 metre width) is proposed along the central and south eastern sections of the of the route with a dedicated westbound cycle route partially extending along the existing alignment of Eastfield Avenue. However, this would not be continuous along the full length of the proposed road alignment with no dedicated provision for cyclists along parts of the western and central sections.

Also, the route would not be continuous along both sides of the road alignment and it would be necessary to cross the south eastern section via an un-signalised crossing.

Whilst the proposal has included some of the required elements for active travel provision, it is not been demonstrated how the proposed design has been developed in accordance with the Edinburgh Street Design Guidance. The proposed layout is not considered to be supportive of cycle use due to:-

- The requirement to cross carriageways at a number of locations. This would be prejudicial to the continuity of the off-road network;
- Lack of pedestrian and cycle priority at side road crossings;
- Lack of crossing opportunities at the proposed north-eastern roundabout
- Crossing points not being on desire lines;
- Absence of coherent signalised crossing at Gogar Roundabout to link Quiet Route 9 on the north side of the A8 (this connecting Newbridge with South Gyle)
- The current absence of built form and lack of enclosure along the south eastern parts of the route could also result in a feeling of remoteness, particularly for pedestrians and cyclists.

Issues relating to the design of the active travel measures were raised extensively as part of representations, with particular reference to east-west access to the north of the Gogar Roundabout and the impact on Quiet Route 9.

LDP Policy Tra 9 - Cycle and Footpath Networks, states that permission will not be granted for development which would: a) prevent the implementation of proposed cycle/footpaths shown on the Proposals Map; b) be detrimental to a path which forms part of the core paths network or prejudice the continuity of the off-road network generally.

As proposed, the layout would be detrimental to the continuity of Quiet Route 9, which forms part of the strategic off-road cycle network between Newbridge and the Gyle, this extending along the northern edge of the A8.

The Transport Appraisal has conducted analysis of existing walking and cycling provision in the locality and notes the current inaccessibility of the Crosswind site and absence of such routes which currently lead to the Airport. This point would be accepted given the nature of the Crosswinds site as an operational part of the airport. It is not clear how this proposal both relates to and seeks to develop the wider strategic active travel network. This proposal would appear primarily focussed on the delivery of a general traffic route to airport and it has not been demonstrated how this would seek to complement the strategic active travel network, both existing and proposed particularly links to adjacent landholdings including IBG. The Edinburgh Street Design Guidance also emphasises the importance of prioritising pedestrians, walking and public transport in street design and this has not been borne out as part of the proposal.

Access to the Tram Depot

Edinburgh Trams have provided comments, these also captured by Transport. These have expressed a range of concerns regarding the proposed road layout where this interfaces with the Tram Depot and in relation to drainage.

Myreton Drive was purposely designed to provide access to the Tram Depot including specialist articulated low loader vehicles used to move tram vehicles to and from the depot. The proposed layout, which would significantly alter the existing route of Myreton Drive, does not appear adequate for this purpose.

Transport have commented that the proposed route alignment is likely to impact on the existing tram crossing at Eastfield Avenue, which lies immediately to the south of the Airport tram stop. Although this lies outside the red line boundary, the proposed route will result in increased traffic flows using the crossing and this may present issues for the operation of the tram.

Given the broader issues affecting this application, these matters have not been discussed with the applicant and therefore remain unresolved.

Summary - Transport issues

The WETA Refresh Study 2016 advocated a multi-purpose route for the Gogar Link Road, which avoided the need for multiple routes serving the airport.

This proposal for an eastern access road represents a stand-alone proposal and is not aligned with the findings of the WETA Study, nor does it represent the safeguarded route as set out in the LDP. As proposed, it represents a completely independent access point to the airport and the air freight depot at Turnhouse.

There is concern that options to deliver the Gogar Link Road are being ruled out prematurely and this application proposal fixes a road alignment to the east which would effectively limit a wider range of options from being further explored. The proposal does not represent a joined up approach, will not contribute towards placemaking, with the possibility of two roads instead of one and the unintended consequences on the road network which were not modelled by the WETA Study.

The proposed route is not consistent with the safeguarded LDP Proposal T9, for the Gogar Link Road, a route which has been subject to comprehensive analysis in the context of a strategic package of transport measures for West Edinburgh. It is critical that objectives can be realised, i.e. development of a link between the Gogar Roundabout and Eastfield Road via IBG, this also serving the Airport, and this is not prejudiced.

The proposed development would be prejudicial to the implementation of Local Development Proposal T9, Gogar Link Road, specifically the delivery of proposed new roads, network improvements and public transport proposals. The proposed route alignment would prejudice the road network improvements and public transport improvements as listed in the LDP Table 9.

The proposal has failed to address the objectives of the WETA Refresh Study 2016 in that it has not demonstrated how a multi-purpose link required to support long term sustainable development in West Edinburgh would be delivered.

The proposal is thereby contrary to LDP Policies Tra 10 - New and Existing Roads, Tra 7- Public Transport Proposals and Safeguards and Tra 8 - Provision of Transport Infrastructure, part b) in that transport infrastructure identified in LDP Proposal Table 9 has not been addressed as relevant to the proposal.

d) Design

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

With regard to street design, detailed guidance is contained in the Council's Edinburgh Design Guidance and Edinburgh Street Design Guidance this aligning with the Scottish Government's Designing Streets Policy Guidance. The Edinburgh Street Design Guidance sets out the Council's expectations for the design of Edinburgh's streets to support the Council's wider policies, in particular transport and planning policies.

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

- The airports masterplan needs to be revised to address the City's carbon neutral and set the context for road access requirements and modal shift.
- Linkages to adjacent development area and transport infrastructure requires further consideration especially with respect to pedestrian and cycle routes.
- Further traffic modelling is required to assess the impact on the existing road network.
- A full landscape strategy should be prepared to provide a context for the road.
- Temporary landscape should be considered to create an attractive approach to the city in the interim, as future development may take many years to be completed.

Further advice in relation to design matters, including landscape and streetscape was provided as part of Planning Pre-Application discussions.

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

A Planning, Design and Access Statement has been submitted. Whilst some analysis has been undertaken of the site context, this is largely based around planning policy and development issues, rather than seeking to provide a comprehensive overview of the strategic design context for the proposal.

The application site, particularly the south eastern section of the route is largely characterised by open land related to the airport, with Eastfield Avenue occupied by a range of ancillary uses and premises associated with the airport, these flanked by large areas of surface car parking.

Although the potential for incorporating and enhancing existing and potential features as part of the proposal, as per LDP Policy Des 3, is relatively limited, the openness of the site allows for views to features within the wider landscape including Castle Gogar, the Pentlands, Corstorphine Hill and the Forth Bridges. Whilst views to these features would not be diminished by the proposal, it has not been demonstrated how the design concept has sought to respond to these features.

The proposed route alignment will establish the placemaking framework for the potential redevelopment of the Crosswinds site.

LDP Policy Des 7 - Layout Design, emphasises the need for comprehensive and integrated approach to the layout of new buildings, streets, footpaths and cycle paths and SUDS features. Furthermore, Edinburgh Street Design Guidance (Section 4.3) outlines that when creating new street patterns, designers should seek to create an urban form that establishes suitable grid and patterns and creates relationships between street widths and building heights.

However, there is concern that the design concept for the proposal has been developed in the absence of a full understanding of the emerging context, not least the City Plan 2030 and spatial strategy for West Edinburgh. Crosswinds does not yet form a committed development proposal supported by the development plan or national planning policy. The planning context of the proposal site is not therefore established nor can an integrated design approach with the development of adjacent land be demonstrated at this stage.

The proposed route alignment would also result in a one-sided street running parallel to the railway. This could reinforce the existing 'edge' created by the railway along the north eastern extents of the site and limit the potential of providing future connections to adjacent landholdings, including Maybury/West Craigs.

The existing character of Eastfield Avenue is utilitarian and functional in nature, this forming an existing access through the Airport estate. The proposal will result in this becoming a through route, yet minimal steps have been taken to positively enhance the environmental quality of this route as a key entrance and arrival point into the city. The perception of the south eastern section of the route, currently occupied by land associated with the former runway could remain poor until such a time that development is forthcoming and/or landscaping is established.

The design concept has not sought to fully draw upon the positive characteristics of the locality. The proposed route would not contribute towards a high-quality environment, which is a reflection of the fact that it does not form part of an integrated design approach to development in west Edinburgh. The strategic design approach for the proposal is flawed and may result in placemaking opportunities being missed.

There are concerns that the proposal has largely been derived from the operational needs of the Airport and has not responded fully to committed developments in the immediate context of the site including Maybury/West Craigs and International Business Gateway.

LDP Policy Des 8 - Public Realm and Landscape Design states that external spaces and features, including streets, footpaths, civic spaces, green spaces, boundary treatments should be designed as an integral part of the scheme as a whole and it has been demonstrated that:-

- a) the design and materials to be used are appropriate for their intended purpose, to use and character of the area generally, especially this has a special interest or importance;
- b) the different elements of paving, landscaping and street furniture are coordinated to avoid a sense of clutter, and in larger schemes design and provision will be coordinated over several phases of development;
- c) particular consideration has been given, if appropriate, to the planting of trees to provide a landscape setting for buildings, boundaries and road sides and create a robust landscape structure;

The overall design approach has largely been based conventional roads design principles - more typical of a new road passing through an undeveloped area, such as a rural by-pass, rather than an urban street. Although hedged boundaries are proposed along parts of the route, hard surface treatments and fenced boundaries which would be largely functional and utilitarian in nature.

The EUDP suggested that a full landscape strategy be provided to provide a context for the road with possible temporary landscape measures to create an attractive approach to the city.

Detailed landscape proposals have been prepared by competent consultants, with a satisfactory level of detail although these have not been supported by a wider landscape strategy to establish a landscape context for the route nor have temporary landscape proposals been provided. In the absence of this, there is concern that the road could be in existence for many years before development takes place therefore it is important the sacrificial landscape is provided so that the road integrates with its surroundings.

There are also concerns that in the absence of a robust landscape strategy, opportunities to integrate such a route as part of a strategic Green/Blue network are potentially being missed.

The extents of soft landscaping are minimal with few trees proposed within the scheme. The proposed road alignment sits in a relatively narrow corridor where opportunities to create a strong landscape structure will be limited.

The proposed embankments including the slopes to the proposed swale features are indicated as 1:3 which is steep and likely to make grass cutting and maintenance difficult. In visual terms, a 1:3 slope will also appear engineered rather than a shallower, more natural slope that ties into the adjacent landscape.

Summary

The Edinburgh Street Design Guidance is intended to bring about a shift in emphasis of street design across the city from a movement dominated approach, to one which starts considering streets as places. The WESDF also seeks to ensure that movement both to and through West Edinburgh is as sustainable as possible with the network of routes contributing to a high-quality environment. Furthermore, under principle M1 development is to be as sustainable as possible, maximising the use of public transport and promotion of walking and cycling measures.

The application proposal is based on a functional roads design which has prioritised movement before place. The overall design concept has not sought to draw up the positive characteristics of the surrounding area or demonstrate how it would contribute to a sense of place. The design has been primarily driven by the requirements of vehicular traffic, not least the private car, with the needs of pedestrians and cyclists treated as secondary. The proposals have not been supported by a landscape strategy to provide a context for the route nor has a robust landscape structure been proposed, with minimal levels of tree planting identified.

The strategic design context of the route has not yet been fully established and it is not yet possible to demonstrate how the proposal would successfully integrate with the development of adjacent land or potentially contribute to the delivery of green-blue networks. The environment along parts of the proposed route would form a poor initial impression to the city for passengers arriving at Edinburgh Airport.

The proposal has not addressed requirements of LDP Policy Des 1 or Des 8, part c).

The design proposals have not been developed in line with principles contained in the Edinburgh Street Design Guidance, the Scottish Government's Designing Streets policy guidance, or the West Edinburgh Strategic Design Framework.

e) Strategic Landscape Impact

LDP Policy Des 9 - Urban Edge Development identifies that permission will only be granted for development on sites at the green belt boundary where it: a) conserves and enhances the landscape setting of the city and c) includes landscape improvement proposals that will strengthen the green belt boundary and contribute to multi-functional green networks by improving amenity and enhancing biodiversity.

The site lies at the western edge of the city in close proximity to the rural edge and green belt, where a number of landscape characters converge. The relatively open nature of the site affords expansive views to open countryside and landscape features.

In view of these issues, a Landscape Visual Impact Assessment (LVIA) has been submitted as part of the application. This has considered 3 viewpoints along the length of the proposed route.

Given the linearity and low-level nature of development and the relatively low sensitivity of its landscape and visual context, landscape and visual effects are expected to be limited.

However, although the site does not form a boundary with the green belt, there are concerns that in the absence of a robust landscape strategy, and failing to establish a clear relationship with the emerging spatial strategy for west Edinburgh, opportunities to integrate such a route as part of a strategic multi-functional green networks are potentially being missed. Therefore, the proposal does not fully address the requirements of LDP Policy Des 9, part c).

f) Surface Water Management

Flood Risk and Drainage

Matters relating to water environment have been considered as part of the EIA Report, this including a Flood Risk Assessment. Surface Water Management Plan (SWMP) information and detailed drainage design.

Given reporting deadlines, Flood Prevention were unable to provide a finalised consultation response to the application and had requested that further confirmation be provided in relation to surface water attenuation up to the 1:200-year flooding event + 40% climate change for all 4 proposed catchments. The SWMP also notes that for some sections of the road, no attenuation is proposed. Also, the correct self-certification certification had not been signed. Due to time constraints this information was not been sought from the applicant.

SEPA have commented that the proposal is Scottish Planning Policy (SPP) compliant and have no objection on flood risk grounds. However, they have noted that it is for the Council as Flooding Authority to comment on the acceptability of propose surface water management measures and the provision of safe vehicular/egress routes in event of flooding.

In view of these comments, whilst it is considered that the nature of the proposal would address requirements of LDP Policy Env 21, part a) in that it would not increase a flood risk or be at risk of flooding itself, should the decision be taken to grant planning permission, it is recommended that these matters relating to surface water attenuation would need to be addressed.

LDP Proposal GS7 - Gogar Burn Diversion

LDP Greenspace Proposal GS7 identifies an enhancement and diversion of the Gogar Burn with a potential realignment crossing the north western part of the application site. The LDP shows an indicative alignment linking the existing course of the Gogar Burn to the south west of the site with the River Almond to the north, this crossing the former Crosswind runway. The proposed alignment flanks the southern edge of the site for approximately 740 metres before crossing the site in a northerly direction towards the air freight terminal.

Such a project would offer benefits of reducing flood risk, improving water quality and enhancing biodiversity. The proposal is a long running aspiration originally developed by the Gogar Burn Partnership and was incorporated into relevant documents, including development plans.

SEPA do not consider that this proposal would compromise the principle of the overall long-standing aspiration of the Gogar Burn re-diversion but have remarked there is no technical information that accompanies this application to confirm. SEPA had previously requested that the EIA should demonstrate how this proposal will contribute to the re-diversion of the Gogar Burn. Following discussions between the applicant and SEPA in March 2020, the EIA has provided justification in this respect, and it has been demonstrated that the proposed development will not prevent a future Gogar Burn re-diversion.

SEPA are therefore satisfied that the proposal will allow for a preferred future Gogar Burn re-alignment but with caveats. The proposal will have a neutral or better effect on flood risk to an area which is already developed with existing road and car parking infrastructure.

SEPA have commented that the proposed alignment would cross the LDP Safeguarded route. The EIA has stated this could be achieved through a culvert beneath. However, SEPA would not accept a culverted retrofitted solution and would expect a solution which maintains an open water course channel. If the road did require to be retrofitted, a bridge solution would likely be needed.

SEPA have reiterated the need for a strategic approach to flood risk management in the West of Edinburgh which would be aided by a baseline model that includes an extended reach of the Gogar Burn, Murray Burn and their tributaries, They strongly advise against a piecemeal approach to flood risk assessment in the this area given the complexities and interactions between fluvial, surface water and drainage in this area and the potential for significant future development proposals. SEPA also recommend that the Council work collaboratively with the applicant and SEPA to develop a design that allows the long-standing aspiration to divert the Gogar Burn.

g) Ecology and Biodiversity

The application site mainly comprises managed grassland, with few trees and is of limited ecological interest. The Gogar Burn which is designated as Local Nature Conservation Site, although this is largely separated from the proposed route by the Crosswinds site and existing airport development.

There are no findings in the EIA Report that would preclude development in relation to of the LDP environment policies for designated site or protected species. The proposal would result in some limited biodiversity enhancement along the proposed road corridor.

The EIA Report recommends mitigation and enhancements and it is proposed that a Construction Environment Management Plan (CEMP) be prepared for the site to minimise ecological impact and promote good environmental practice during construction. Should the Committee be minded to approve the application, this could be secured through condition.

h) Archaeology

The City Archaeological Officer has commented that the proposals would require significant ground-breaking works for construction, landscaping and installation of services. Such works would have significant impacts upon any surviving archaeological remains, expected to range from 20th Century remains associated with RAF Turnhouse, paleo-channels of the Gogar Burn to possible activity associated with the 1650's Battle of the Field of Flashes and potentially prehistoric and medieval remains. It is recommended that should the application be approved, further archaeological investigation should be secured through condition.

i) Setting of Listed Buildings

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

The Category A listed Castle Gogar lies to the south west of the proposed road alignment, this separated by the Crosswinds site.

The applicant has submitted a Heritage Impact Statement. This discusses the effect on the setting of Castle Gogar and associated listed buildings which form part of the Castle Gogar Estate. This concludes that the site makes a limited contribution to the landscape context of nearby heritage assets with the proposed alignment of the route maintaining an appropriate buffer distance.

Given the level of separation, the nature of the proposal would not adversely affect the setting of Castle Gogar and associated listed buildings and would address the requirements of LDP Policy Env 3 - Listed Building - Setting.

j) Air Quality

LDP Policy Env 22 - Pollution and Air, Water and Soil Quality does not support development which would result in a significant adverse effect on air quality.

An Air Quality Impact Assessment (AQIA) has been provided as part of the EIA.

Air Quality Management Areas (AQMA's) are situated at Glasgow Road (Ratho Station/Newbridge) and St John's Road, Corstorphine, each located c.2km from the application site. The report advises that no change in traffic activity attributable to the proposed Eastern Access Road is predicted on roads within either the Glasgow Road or St John's Road AQMA's.

The AQIA also states that the proposed Eastern Access Road has a beneficial effect on air quality as it would divert airport traffic away from exiting residential properties on Eastfield Road, which forms the existing access to the airport, and the section of Glasgow Road between Eastfield Road and the Gogar Roundabout. No additional mitigation to address air quality is proposed within this report.

The outcome of the AQIA advises that the operational impact of the proposed access road has a beneficial effect on air quality as it diverts airport traffic away from residential properties. Based on the understanding of emissions from traffic that would use the Eastern Access Road, it is unlikely that building residential properties on land adjacent to the proposed road alignment would create new exposure to poor air quality.

Environmental Protection have remarked that whilst the building of additional roads is not conducive to reducing localised air quality impacts, future travel modes point towards public transport and electric vehicle use. Roads to a certain extent will still be required in the future to incorporate modern sustainable transportation modes. In view of this, they do not object to the application.

In summary, based on the findings of the AQIA, the proposed development would not adversely impact upon local air quality, designated AQMA's or residential properties, both existing and proposed, in the vicinity of the site.

k) Amenity of Neighbours

Noise Impact

A Noise Impact Assessment (NIA) has considered the route of the new road and the associated noise impacts upon proposed on exiting noise sensitive properties.

The NIA process undertook detailed predictions for a total of 929 residential receptors within the study area, together with two other (non-residential) sensitive receptors. All noise level and noise changes were presented for both the short-term and long-term. Whilst there are some noise sensitive properties which are likely to be affected by noise, the NIA concludes that there will also be a reduction in noise affecting other properties on existing airport routes. The NIA advises that levels do not necessitate the need for noise mitigation (e.g. acoustic barriers or low noise tarmac) and the route will be limited to vehicle speeds of 30mph. The properties also do not qualify for mitigation under the Noise Insulation (Scotland) Regulations.

The EIA Report also considered cumulative and proposed developments within the HSG19 Maybury/West Craig housing allocation. This would be situated around 40 metres from the proposed road alignment to the north east, being separated by the railway. However, planning conditions relating to the development of this site will require a noise barrier, 1.8-2.0 metres high, to be constructed between the railway line and the Maybury/West Craigs development to mitigate railway noise. This barrier has been included in the as part of the noise impact assessment process.

The NIA advises that the majority of dwellings are predicted to experience changes of Negligible or Minor magnitude in the short and long term, during the day and night. The proposed Eastern Access Road is expected to result in a local redistribution of traffic, with a reduction in vehicle movements (and a slight increase in traffic speed) along the existing access via Eastfield Road and along the A8 between the Eastfield Road junction and the Gogar Roundabout.

In conclusion, although there will be some properties which will see some increases in road traffic noise, some properties which will benefit from a reduction in traffic noise due to the redistribution of traffic that is likely to occur from the proposal.

Environmental Protection have commented that although new roads will inherently result in increased noise levels due to vehicle movements, they concur with the conclusions of the NIA and EIA Report and do not object to the proposal

The proposal would address the requirements of LDP Policy Des 5 - Development Design - Amenity, part a) in that the amenity of neighbouring developments would not be adversely impacted by noise from the proposed development and that future occupiers of proposed development lying adjacent to the proposed route would have acceptable levels of amenity.

Land Contamination

A Ground Investigation Report has been prepared as part of the EIA.

This has concluded that potential risks arising to/from development as a result of recorded ground conditions to be sufficiently low to not require further investigations or mitigation toward future end users of the site or the wider environment. As such, Environmental Protection have not requested that additional information is required as part of the planning process, to ensure the development is suitable for use in relation to potentially contaminated ground conditions.

In view of these findings, the proposed development would address requirements of LDP Policy Env 22 Pollution and Air, Water and Soil Quality, in respect of land contamination.

However, the Ground Investigation Report does not confirm that contamination will not be present. Should the application be approved, it would be recommended that this matter be addressed as part of Construction Environmental Management Report (CEMP) and this could be secured through condition

I) Environmental Impact Report

An EIA Report has been provided alongside the application. This provides an assessment of the impact of the application in environmental terms. The scope of the EIA Report is acceptable, the content is 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.

m) Developer Contributions

LDP Policy Del 1 - Developer Contributions and Infrastructure Delivery states that proposals will be required to contribute to infrastructure provision where relevant and necessary to mitigate any negative impact (either on an individual or cumulative basis) and where commensurate to the scale of the proposed development. Detailed requirements are established through the Developer Contributions and Infrastructure Delivery Guidance and LDP Action Programme.

In the event of the application being approved, the costs of implementing the road would contribute to the delivery of the package of transport mitigation measures identified in the WETA Refresh Study and the LDP Action Programme. However, contributions would likely need to be secured in respect of the proposed junction improvements to the Gogar Roundabout (LDP Proposal T12). Further costs are likely to be incurred for the integration and tie-in of the route with the existing public road network, including active travel routes, the scope of which would need to be established with the applicant. The applicant would also need to secure agreement with the Council as landowner of the areas to the north of Myreton Drive, including the proposed change to the Tram Depot access arrangements.

Therefore, should the Committee be minded to grant permission, it is recommended that a suitable legal agreement be entered into with the applicant.

However, given the nature of the proposal, it is unlikely that further contributions would be sought in relation to other areas.

n) Issues Raised in Representations

Key issues raised:-

Objections

Environmental impacts - addressed in parts a) j) and k) of the assessment

- Encourages carbon emissions;
- Climate Emergency; contrary to Scottish Government's aims to decarbonise travel;
- Contrary to net carbon neutral by 2030;
- New roads create increase demand; building would be a regressive move;
- NPF4 Position statement sets out ambitious targets for addressing climate change allied with the need for significant investment in related infrastructure;
- AQMA - Air Quality Modelling Report Misleading;
- EIA Report has not identified potentially significant noise, air quality and visual amenity impacts relating to the West Craigs development (HSG19) - this represents the largest concentration of receptors potentially affected by the proposed development.

Transport impacts - addressed in 3.3 c) of the assessment

- Proposal is regressive, increasing traffic is retrograde;
- Traffic projections should be reduced in light of Pandemic;
- Prioritises private vehicular use over public transport and active travel;
- Increased traffic Impact on Gogar roundabout and Glasgow Road;
- Proposal would be prejudicial to the promotion of public transport, active travel and road network improvements as envisaged in the LDP and specifically safeguarded through proposal T9 Gogar Link Road and policy Tra10;
- Proposal contradicts the 'transport hierarchy';
- City Mobility Plan - Movement 15 and 23;
- Fails to support Edinburgh Active Travel Plan;
- Proposal fails to demonstrate how transport infrastructure improvements within West Edinburgh would be delivered;
- Traffic Analysis models - assumptions from WETA that are not delivered;
- Transport Assessment (TA) lacks sufficient detail to enable supporting analysis to be fully understood in accordance with TA Guidance;
- Not demonstrated that the TA scope has been agreed with the Council in accordance with TA Guidance. This is a fundamental first step, ensuring that the TA is appropriate and fit for purpose.

Proposed route alignment - addressed in 3.3 a) b) and c) of the assessment

- Contrary to Policy Tra 9 of the Edinburgh Local Development Plan;
- Contrary to the WETA Refresh Study; Proposal does not represent the agreed Gogar Link Road alignment, this reflected in the LDP Proposal T9
- Closure of the Crosswinds runway now presents an opportunity to further consider the detailed alignment of the Gogar Link Road;
- Application states that proposed road will not preclude the delivery of the Gogar Link Road in the future. As such, it is clear that it is the applicant's intention that both routes are to be delivered
- Proposal would not form part of a coordinated transport infrastructure proposal linking Gogar Roundabout with the IBG site as Eastfield Road as required by the LDP
- The proposed alignment fails to demonstrate unencumbered connectivity for development within the West Edinburgh area, including how the Council's development plan allocations can be effectively serviced and how connections beyond the site boundaries would be secured
- Given the significance of West Edinburgh, any related decision of planning applications must take cognisance of this context and in a way that continues to safeguard the successful delivery of the Gogar Link Road in due course
- Need to consider relationship with the Crosswinds application (reference 20/03219/PPP) for the adjacent landholding - now appealed to the DPEA for non-determination. Respective movement and access parameters are the same for both applications

Need for the development - addressed in 3.3 a) b) and c) of the assessment

- Access road to the airport is not a priority given reduction given reduction in flying and traffic levels using the airport since the pandemic;
- Good public transport links already exist to the Airport, project costs could subsidise high prices on the Airport tram route or provide additional bus routes;
- Proposed development is speculative and intended to facilitate other development which do not have planning permission. A Trojan horse.

Design and layout - addressed in 3.3 c) and d)

- Active travel provision is poor and measures seem to be an afterthought;
- Proposal will result in poor continuity and be detrimental to cyclists crossing the Myreton Drive junction, this designated as Quiet Route 9;
- Poor Quality Active Travel Route - outdated designed/ shared use/ not fully segregated/ interface with road users;
- Proposal does not location of bus stops, or whether the alignment is intended to facilitate future bus services along its route;
- Access to Edinburgh Gateway Station would be reduced to a left-in left-out operation resulting in a convoluted 650m diversion for vehicles using the station including buses;
- Impact on disabled access to Edinburgh Gateway Station.

Support

- Improves commuting time by the private car;
- Easier to get to work at the airport by car;
- Provides much needed contingency airport access;
- Reduces congestion on Eastfield Road;
- Number of letters of support (x 17) provided no comments

Cramond and Barnton Community Council

- Object to the proposal unless consent is granted subject to conditions;
- Support the principle of the new road but notes its ability to operate within the capacity of the Gogar Roundabout. Without improvement the operation of the new road for additional airport traffic is likely to cause significant congestion to the wider strategic road network;
- Suspensive conditions suggested that route should not be opened until enhancements have been undertaken to the Gogar Roundabout and Maybury junction, with no access from IBG and Crosswinds developments until such a time that various transport improvements have been delivered;
- Concerns regarding analysis and omissions contained in the Transport Assessment including need for enhancement to the Gogar and Maybury junctions.

Corstorphine Community Council

- Object to the proposal. Concerns expressed in relation to increase air pollution, increased traffic congestions and reduced ease of use for local active travel links;
- New access road likely to induce demand for vehicle trips;
- Contrary to Scottish Governments Climate Change Plan that commits to a 20% in car Km's by 2030;
- Contrary to the Council's City Mobility Plan and commitment to the sustainable hierarchy which places private vehicles at the lowest level;
- Traffic modelling reliant on WETA upgrades to the Gogar Roundabout;
- Design is contrary to LDP Policy Tra 9 as it detrimentally impacts on Quiet Route 9 at the Myreton Drive junction;
- Proposed active travel provision along the route is poor. Disappointing to see shared-use paths, multiple non-signalised crossings. No consistent derire lines for pedestrians without multiple crossing points.

Ratho and District Community Council

- No objection to the application in principle but object until such a time that conditions are met;
- Appreciate that the Airport require an additional access road to the main terminal to increase resilience but difficult to understand impact to the Gogar Roundabout;
- The Gogar Roundabout should be resilient enough to accommodate increased traffic flows arising from proposed developments as per the WETA Refresh Report 2016;
- Enhancements to both the Gogar Roundabout must be implemented in advance of any approval being granted.

Conclusion

The principle of a new access road serving the airport is supported by the LDP.

However, this route is intended to be multi-purpose and support the long-term sustainable development of West Edinburgh. The proposed route is not consistent with the West Edinburgh Strategic Design Framework (WESDF) and LDP Proposal T9, which safeguards the Gogar Link Road, a route which was subject to comprehensive analysis as part of WETA (West Edinburgh Transport Appraisal) Refresh Study 2016.

The proposal would not achieve coordinated development, the route alignment would be prejudicial to the delivery of the Gogar Link Road and potentially require the delivery of a second route to achieve the objectives of the LDP.

The strategic design context of the route has not yet been fully established and it is not yet possible to demonstrate how the proposal would successfully integrate with the development of adjacent land or potentially contribute to the delivery of green-blue networks. Whilst the proposed design would deliver a functional requirement for a road, it has not been demonstrated how this would achieve a sense of place.

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

3.4 Conditions/reasons/informatives

Reasons: -

1. The nature of the proposed development is contrary to the existing National Planning Policy 3, the Strategic Development Plan and the Local Development Plan (LDP) specifically Policy Emp 4 - Edinburgh Airport in that it is not supported by an approved airport master plan. The application does not accord with the West Edinburgh Strategic Design Framework (WESDF) 2010 and other local development policies relating to transport and coordinated development.
2. The proposed development would be contrary to Local Development Plan (LDP) Policy Des 2, Co-ordinated Development, parts a) and b) and would fail to deliver coordinated development in West Edinburgh. The application is premature and may compromise the development plan strategy for West Edinburgh. The strategic design context of the route has not yet been fully established and it is not yet possible to demonstrate how the proposal would successfully integrate with the development of adjacent land or potentially contribute to the delivery of green-blue networks.
3. The proposed development would be prejudicial to the implementation of Local Development Proposal T9, Gogar Link Road specifically the delivery of proposed new roads, network improvements and public transport proposals. The proposal is thereby contrary to LDP Policies Tra 10 - New and Existing Roads, Tra 7- Public Transport Proposals and Safeguards, Tra 8 - Provision of Transport Infrastructure, part a) and Tra 9 - Cycle and Footpath Networks. The proposal has failed to address the objectives of the WETA Refresh Study 2016 in that it has not demonstrated how a multi-purpose link required to support long term development in West Edinburgh would be delivered.
4. The proposed development would be contrary to Local Development Plan (LDP) Policies Des 1, Design Quality and Context, Des 8, Public Realm and Landscape Design, part c) and has not addressed requirements of the Edinburgh Street Design Guidance. The overall design concept has not sought to draw up the positive characteristics of the surrounding area or demonstrate how it would contribute to a sense of place. The application proposal is based on a functional road design which has prioritised movement before place. The proposals have not been supported by a landscape strategy to provide a context for the route nor has a robust landscape structure been proposed, with minimal levels of tree planting identified.

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 considered and has no impact in terms of equalities or human rights.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

A Proposal of Application Notice was submitted and registered on 23 September 2019. Copies of the Notice were also issued to

- Ratho Community Council
- Cramond and Barnton Community Council
- Corstorphine Community Council
- All ward councillors

Community consultation events were held throughout in November 2019. Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online services.

A pre-application report on the proposals was presented to the Committee on 6 November 2019.

The proposal was presented, at pre-application stage, to the Edinburgh Urban Design Panel on 27 November 2019.

Extensive pre-application advice offered to the applicants has not been followed.

8.2 Publicity summary of representations and Community Council comments

The application was advertised via the Council's Planning Portal on 8 February 2021 with a 28 day period for comments to take account of the Environmental Impact Assessment.

A total of 128 representations were received, these comprising 54 objections and 74 expressing support.

Objections were received on behalf of two adjacent landowners, Spokes, Transform Scotland and the Gogarburn Bicycle Users Group.

In terms of support, some of these responses are identified as Edinburgh Airport staff or parties working on their behalf with 17 responses providing no comments. 50% of addresses are identified as being outwith Edinburgh including other parts of the UK.

Comments were received from Ratho and District, Cramond and Barnton and Corstorphine Community Councils. All have objected to the application.

The application is a hearing due to the level of public interest and range and substance of material representations received. The Council, as Roads Authority also has operational responsibility for the southern area of the application site including Gogar roundabout and Myreton Drive.

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**

National Planning Framework 3 (NPF3)
Strategic Development Plan (SDP)
West Edinburgh Strategic Design Framework (WESDF)
Developer Contributions and Infrastructure Delivery
Guidance
LDP Action Programme
West Edinburgh Transport Appraisal (WETA) Refresh
Study 2016

LDP Status:-

Special Economic Area - LDP Policy Emp 4 Edinburgh
Airport, Urban Area
LDP Greenspace Proposal GS7 - Diversion of the
Gogar Burn
LDP Transport Proposals and Safeguards T9 - Gogar
Link Road
LDP Transport Proposals and Safeguards T12 -
Improvements to the Gogar Roundabout

Date registered

4 February 2021

Drawing numbers/Scheme

1-38,

Scheme 1

David Givan

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Francis Newton, Senior Planning Officer

Links - Policies

Relevant Policies:

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

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

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

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

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

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

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

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

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

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

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

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 21/00217/FUL At Main Terminal, 1 Edinburgh Airport, Jubilee Road Formation of new access road and active travel route from east of terminal building to Gogar Roundabout.

Consultations

Edinburgh Urban Design Panel Report

Recommendations

The Panel welcomes the opportunity to comment on this proposal at an early stage in the design process. In taking forward the design, the Panel recommends that the following issues should be addressed:

The airports masterplan needs to be revised to address the City's carbon neutral target and set the context for road access requirements and modal shift

Linkages to adjacent development areas and transport infrastructure requires further consideration especially with respect to pedestrian and cycle routes

Further traffic modelling is required to assess the impact on the existing network road network

A full landscape strategy should be prepared to provide a context for the road

Temporary landscape should be considered to create an attractive approach to the city in the interim, as future development may take many years to be completed

Planning Context

Pre-application discussions commenced August 2019. A Proposal of Application Notice (Reference:- 19/04534/PAN) was considered by the DM Sub Committee on 06 November 2019.

Proposal

Development of a single carriageway road which would link the main passenger terminal at Edinburgh Airport with the Gogar Roundabout - a distance of approximately 3 km. The proposed road would be fully accessible to general traffic.

A proposed alignment has been presented for the road. This would exit the Gogar Roundabout and Myreton Drive via a new junction, before following the Edinburgh - Fife railway for approximately 1.2 km. A new roundabout is indicated to the south east of the existing Airport Freight Terminal. The road would then cross the former

Crosswind runway to the south west, proceeding through the extents of the existing Airport estate lying to the north of the Gogar Burn. The route would then connect with an existing roundabout at Eastfield Avenue, crossing the tram route to the west with a northern spur utilising the existing alignment of Gogar Bridge Road - extending to the main Airport Terminal building.

Site Description

The PAN proposal site (79 hectares) is defined by Edinburgh Airport to north and north west and the Edinburgh - Fife railway to the north east. The southern site edges are defined by the Gogar Burn, the Castle Gogar Estate, the Edinburgh Tram Depot, the Gogar roundabout and the A8 dual carriageway.

The majority of the site comprises operational land for Edinburgh Airport, this including the former 12/30 'Crosswind' runway which was decommissioned in 2018. The western part of the proposal site includes airport car parking, industrial units and various access roads associated with the operation of the airport. The site also includes the northern extents of the Edinburgh Tram Depot, Myreton Drive which provides which provides access to the depot and area of uncultivated land to the north west. Edinburgh Gateway Intermodal Station lies within the proposal to the south east.

Planning Policy

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

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

The Gogar Burn which flows to the southern edge of the site is designated as Local Nature Conservation Site with Areas of Importance for Flood Management situated in the vicinity of the Burn to the south west.

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

Declarations of Interest

Nicholas Taggert stated that 7N Architects where he currently works, has historically been engaged on the IBG project adjacent to this site. He also stated that he was not involved directly in this project.

Charles Strang stated that he had worked on the West Edinburgh Strategic Design Framework.

The above was discussed by the Chair and the Panel. It was agreed to record the above statements as part of the Panel's note but that neither constituted a conflict of interest.

General

This report should be read in conjunction with the pre-meeting papers.

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

Panel Comments

The Panel's detailed comments are as follows:

Principle of Development and Airport Management Plan/Masterplan

It was noted that the City of Edinburgh Council has set a target to deliver a carbon neutral Capital by 2030.

Given the airport has permitted development rights for operation development, the Panel noted the importance of revising the Airport Management Plan / masterplan, to address the City's carbon neutral target and in consultation with the City and other key agencies.

The Panel noted there is a balance between economic growth and climate change. A revised masterplan drawing including consented proposals for adjacent sites is required to understand the access required and whether a new road to the airport is an appropriate approach. The Panel was concerned that this proposal may increase car movements and not encourage modal shift.

Therefore, the Panel advocated a strategic approach to this area which could consider enhanced public transport links, at national and regional level, not just connections to the city.

In summary the Panel remained to be convinced that this development is compatible with the City of Edinburgh Council target to deliver a carbon neutral Capital by 2030 and actions to address the Climate Emergency.

Coordination of Development

The Panel advocated that the proposed road, if justified, should demonstrate fully how it will connect to future developments to ensure a coordinated delivery of development within west Edinburgh.

The Panel noted that linkages to adjacent development areas and transport infrastructure requires further consideration particularly with respect to pedestrian and cycle routes.

The edge conditions to the site make these connections particularly challenging for example the railway line but should be addressed through this application.

Impact on the existing network

The Panel noted that more work on traffic modelling was required on the impact this road would have on the existing network particularly the Gogar Roundabout.

The Panel were supportive of the TRIX methodologies being used to look at this issue.

The Panel suggested that the road network may benefit from new technologies for example the installation of variable message signs (VMS).

Design of the road

The Panel advocated that a Whole Life Carbon Assessment should be carried out on the road and landscape design to help quantify the impacts of the design on the environment.

The Panel recommended that a full landscape strategy should be prepared to provide a context for the road. This is important to assist in establishing an attractive character for the route as it could be an important approach to the city from the airport and to future developments in west Edinburgh. With respect to this it was noted that it may take many years for development to take place in this area and it was suggested that temporary landscape works may assist in providing a suitable context and character for the road.

Sectional and level information should be provided as part of the application to show how the road sits within the context, particularly its relationship to the site edges. Sections and levels will also assist to understand the character of the route.

Setting of Gogar Castle

The Panel noted that the alignment of the road is located on the best side of the site with respect to any impact on the setting of Gogar Castle.

Archaeology

The Panel noted that West Edinburgh has several sites of significant archaeological value and this will have to be considered as part of the design process with the appropriated assessments and field evaluations.

Public Safety and Crime

The Panel noted that this should be a well-lit route particularly the cycle/pedestrian routes. It was also noted that if cycling is encouraged to the airport then adequate and secure cycle storage must be provided.

Scottish Water response

Audit of Proposal

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

Waste Water Capacity Assessment

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

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.

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.

There are various large diameter water and sewer mains within the site boundary.

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

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

Drinking Water Protected Areas

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

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.

Edinburgh Airport response

The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We therefore have no objection to this proposal, however have made the following observation:

Cranes

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

Lighting

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

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

Cramond+Barnton Community Council response

The proposed development comprises the construction of a new road between the existing access to Edinburgh Airport at Eastfield Road and the Gogar roundabout at the confluence of the A8 and A820. The new road lies outwith the geographic boundaries of the Cramond and Barnton Community Council, but the use of the new road has the potential for serious deleterious impacts on the free and safe access between the national strategic road system and the Community Council area.

The Community Council supports the principle of the new road but notes that its ability to operate within the capacity of the Gogar Roundabout is dependant on the provision of certain public road improvements by the City of Edinburgh Council and that currently there are no firm approved plans nor approved and guaranteed financial provision for these improvements.

Without these improvements the operation of the new road for airport traffic is likely to cause significant and avoidable congestion to the wider strategic road network. The Community Council therefor objects to the application unless consent is subject to the following conditions:

- 1. The new road will not be opened to Airport traffic until the capacity of the Gogar Roundabout is increased by the construction of an additional traffic lane on the Northbound Circulatory section and improvements are made to the Maybury Junction and A8 eastbound approaches to the junction, and*
- 2. No access will be allowed to the new road from the IBG or the Crosswinds developments until such a time as the new road is further improved and appropriate measures are taken to further improve the A8, the Maybury Junction and the Gogar Roundabout or constrain access between the Gogar Roundabout and the new road to provide sufficient capacity for the predicted traffic demand.*

Reason: to ensure the continuing satisfactory traffic performance at the critical strategic node in the public road network at and around the confluence of the A8 and A820 Principal Roads.

Analysis.

The proposed new road will have the effect of transferring traffic to and from Edinburgh Airport from the existing sole access with the A8 at Eastfield Road to a new access with the A8 at the Gogar roundabout, where the traffic has an origin or destination to the east or south east of the airport.

For traffic leaving the airport this will mean that segment of the total traffic traveling to the east will no longer use the A8 between Eastfield Road and Gogar, but will join the A8 by way of the Gogar Roundabout.

It is accepted that because of the current practice by some drivers at peak traffic period to leave the A8 at the Gogar Roundabout, to pass through the circulatory system and then re-join the A8, and the ability of traffic to dynamically reassign between the through section of the A8 and the circulatory system, this may have little practical consequence. Additionally, traffic currently travelling to the south east will leave the A8

and travel to the A820 round the circulatory system. That traffic which would use the new road would join the circulatory system later and travel, as before, to the A820.

For traffic traveling to the Airport from the east, use of the new road will involve leaving the through section of the A8 under the circulatory system and using the south-westbound, westbound and northbound sections of the circulatory system. In doing this they will be joined on the northbound section by airport traffic from the A820, which currently joins the A8 westbound before reaching this section.

Analysis of this is provided by the applicant in the "Mott MacDonald Edinburgh Airport Eastern Access Road Transport assessment" which indicates in section 7.2.5.1 which indicates:

"Overall, the results of the LinSig modelling for the EAR demonstrates that the redistribution of traffic due to the proposed infrastructure has limited impact on the existing Gogar Roundabout. Our analysis demonstrates that the interchange operates within the capacity levels up to and including 2030"

The results of the analysis are set out in tables 7.5 and 7.6 for airport traffic only, and with the inclusion of IBG and Crosswinds traffic in tables 7.7 and 7.8. The former show some level of que and delay on the circulatory system, while the latter show more widespread difficulties with some arms of the circulatory system and Myreton Drive being subject to traffic beyond capacity levels. What is important to note is that the analyses model the network with the assumption that the WETA improvements comprising an additional lane on the Gogar west gyratory and improved signal operation/timings will be in place (see the first para of 7.2.5.1 of the Transport assessment).

Accordingly, the reference to existing Gogar Roundabout does not mean the roundabout as configured currently, but an improved roundabout. Although not specifically reported as having been modelled, it seems clear that without these improvements serious congestion appears inevitable once airport traffic uses the new road.

Regarding the A8, section 7.4 of the Traffic Assessment predicts:

"the implementation of separate upgrade works being progressed by CEC at the Maybury Interchange is also likely to improve current congestion..."

These works are shown in fig 3.23 of the Traffic Assessment.

The Transport Assessment Summary at section 4 within Volume 1 of the EIA Report: Non-Technical purports to provide a description of the impact of the new road. In paragraphs 4.2 and 4.3 it refers to the significant benefits the scheme will bring to the A8/Eastfield Road Junction and the possible reduction in queueing and improvements to the journey times along the western section of the A8. It indicates that up to 54% of all airport bound traffic may chose to use the new road, but makes no mention of the reliance on future public investment on improvements to Gogar and Maybury to avoid significant congestion and disruption to the strategic road network that will arise without this new public investment as a result of redistribution of traffic and overloading the existing northbound sector of the Gogar circulatory system. This omission seems to be

professionally questionable and should be a determining factor in the consideration of this application.

Corstorphine Community Council response

Corstorphine Community Council is writing to you with respect to the above planning application to note our objection.

While outside of our community council boundary, there are likely to be significant detrimental impacts to the Corstorphine area if this application is approved as stands. Concerns include increased air pollution, increased traffic congestion, and reduced ease of use for local active travel links, specifically Quiet Route 9.

The reasons for our objection are as follows:

- o This new access road is likely to induce demand for vehicle trips, as has been seen with the Queensferry Crossing. This is contrary to the Scottish Government Climate Change Plan Update that commits to a 20% reduction in car kms by 2030.*
- o It is contrary to the CEC City Mobility Plan's commitment to the sustainable transport hierarchy, which places private vehicles at the lowest level.*
- o It is contrary to the CEC commitment to be net carbon neutral by 2030. As well as increased vehicle trips, road building itself is a significant contributor to carbon emissions.*
- o The traffic modelling on the application's transport assessment is reliant on WETA upgrades to the Gogar roundabout's capacity via signal improvements and an additional lane (see 7.2.5.1 of the assessment). As we understand it, neither of these changes have been budgeted and confirmed for implementation by CEC. No traffic modelling has been done using the roundabout's existing attributes, so traffic impacts are unknown (and likely to be negative). We would expect traffic modelling to be provided using current infrastructure.*
- o The proposed design is contrary to Local Development Plan TRA9, as it detrimentally impacts Quiet Route 9 at the Myreton Drive junction. Increased vehicle passage at this junction will make crossing much more hazardous for those on foot and cycle. We would expect a toucan crossing here as a minimum.*
- o The current route for active travel is very poor and contrary to the Edinburgh Local Transport Strategy PCycle2, City Mobility Plan Movements 15 and 23, and Edinburgh Street Design Guidance. We are disappointed to see shared-use paths, multiple non-signalised crossings, no pedestrian priority over minor junctions and no advanced stop lines. We would expect pedestrians to be separated from cycles, protected on-road cycleways, continuous footway/raised tables over minor junctions, and consistent desire lines for pedestrians without multiple crossing points.*

NatureScot response

Summary

We are content that our EIA scoping comments have been incorporated within this application, and as such have only minor comments to make.

SNH Advice

Green Infrastructure and connectivity

It's noted that access links have been made to future development sites, such as Crosswinds, as well as links to the existing and to the proposed footbridges across the rail-line to West Craig's etc. These links are detailed on the landscape plans which allows ease of reference to see how active travel routes, access points and green infrastructure will integrate through and across the site.

We recommend that detail over the management and maintenance of all the green-blue infrastructure is forthcoming, as successful delivery will help integrate the road and active travel route within the wider proposed development.

We have guidance on our website for incorporating pollinators within development, such as advice on meadow creation, and this may be a useful source of reference: <https://www.nature.scot/guidance-pollinators-planning-and-construction-guide>

Biodiversity and nature conservation

We note and support the Ecological Impact Assessment that has been carried out, in particular Section 5 Mitigation and Enhancements and its various recommendations.

We agree with the conclusion that proposed earthworks by the Gogarburn, will have no impact on the Firth of Forth SPA/SSSI, due to the small scale nature of the works, distance from the designated site and water management measures that will be in place.

Should pre-construction surveys identify protected species, we refer you again to our standing species advice on our website for mitigation and licensing guidance:

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

Ratho and District Community Council response

The Ratho and District Community Council has appreciates that Edinburgh Airport requires an additional access road to the main terminal to increase the resilience of the airport as well as relieve congestion on Eastfield Road, the current main access route from the A8. However while accepting the perceived need for this development it is difficult to estimate the level of usage and therefore the impact on the Gogar Roundabout until the road has been built.

Taking these points into consideration the Ratho and District Community Council has no disagreement with the application in principle but must OBJECT to this application until such times that the following conditions are met

- *The proposed Airport Road should not be opened until these improvements listed below have been implemented*
- *The Gogar Roundabout should be resilient enough to take into account the increased traffic flow arising from future developments*
- *Traffic modelling should be undertaken by Edinburgh Council to ensure that the Gogar Roundabout is radically improved and improvements proposed are sufficient to meet current and future needs given that potential developments, including those proposed in the new City Plan 2030, arising since the preparation of the Mott MacDonald Report*
- *The junction between Myreton Drive and the Gogar Roundabout should be upgraded to take a substantially heavier traffic load and increased access by pedestrians and cyclists as
 - o *This will be the access point for the new Airport Access Road*
 - o *In addition this will also be the access point for the new Crosswinds Development, the International Gateway and a possible development by West Craigs on land to the west of the Tram Depot**
- *The capacity of the roundabout should be increased by the addition of an extra traffic lane on the north bound Circulatory Section as identified in the WETA Refresh (2016) Report*
- *Provision for pedestrians and cyclists to access the Airport via this new road, as detailed in Table 3.1 of the Mott MacDonald Report are constructed and fully functional before the opening of the new Airport Access Road*
- *Improvements to the Maybury Junction, which abuts the Gogar Roundabout to the east, causing significant delays and backlogs onto the Gogar Roundabout should also be undertaken before the Airport Access Road accesses the A8*
- *The developments at the International Business Gateway, the Crosswinds Development and West Craigs should not access the Gogar Roundabout until such times as the improvements mentioned above are undertaken*

In summary the Ratho and District Community Council OBJECTS on the grounds that the improvements to both the Gogar Roundabout and the Maybury Junction arising must be implemented before any approval of the application can be granted.

Edinburgh Trams response

1. *The swept path for the route to and from the depot needs to cater for a 25m long articulated rail low loader, which takes a tram (in sections) delivered by road approximately 13.55m long, 2.65m wide and 3.39m high weighing 15t. The routes to*

and from the depot do not look like they can accommodate that, and it is recommended that auto-tracking is undertaken to demonstrate that this is possible.

2. We do have concerns over the drainage proposal, which will increase the discharge into the tram drainage from the adjacent roads (which then outfalls into Scottish Water sewer within the tram depot). We have been experiencing annual flooding at Edinburgh Gateway (which is the lowest point in the area, which also outfalls via the depot Scottish Water connection) and increasing the surface area that goes into this system should be discouraged to avoid making matters worse. Placing this additional burden and risk onto Edinburgh Trams is not acceptable. It is therefore suggested that we work with the developer, Scottish Water and the City of Edinburgh Council to agree an alternative drainage design, that will also ensure tram safety in accordance with The Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).

3. It is not clear in the proposals how pedestrians and cyclist are being accommodated at the new traffic signals at Myreton Drive/Gogar roundabout. Given the increase in traffic flows it appears that there is no crossing facility, so how do pedestrians and cyclist cross safely?

4. The landscaping drawings show new landscaping on the existing road bridge over the tram network. It is not clear how this is to be achieved?

5. Access to and from the depot must be maintained 24hrs a day 365 days a year.

6. A tram Authority to Work permit may be required to complete the work that is adjacent to the tram infrastructure.

Network Rail response

Whilst Network Rail has no objections in principle to the development, due to its close proximity to the operational railway, we would request that the following matters are taken into account, and if necessary and appropriate included as advisory notes, if granting the application:

All 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.

The developer must contact our Asset Protection Engineers regarding the above matters.

Archaeology response

The site runs across the southern part of Edinburgh Airport, in particular cutting across the former line of the Gogar Burn and the site of RAF Turnhouse. RAF Turnhouse is of historic significance, constructed during World War I and which continued in active service through the Cold War though in a much-reduced capacity from the 1960/70's. Prior to this the area formed part of the medieval Parish of Gogar situated between the medieval village to the South of the Burn and Meadowfield Farm adjacent. The Gogar Burn, in particular former old river courses relating to it, may contain important paleoenvironmental evidence, charting local changes to the environment from the last Ice Age.

Excavations in 2008 as part of the Edinburgh Tram project at Gogar (see James & will SAIR Vols 72 & 79) along with those just completed in 2020 by AOC at West Craigs Farm and CFA Archaeology at Meadowfield Farm, have confirmed that this area contains significant evidence for occupation all periods including early medieval (Anglian) and Mesolithic occupation. The excavations by CFA at Meadowfield Farm (opposite the site) further support the archaeological potential of the area. The results providing evidence for its occupation going back to its medieval (14th century) origins. In addition, as well as medieval evidence the excavations have significantly produced two cannonballs probably relating to the 1650 battle between Cromwell and Leslie known as the Field of Flashes and WWII defences.

The Archaeology Statement produced by Golder Associates (UK) Ltd refers also recent geophysics of parts of the Crosswinds site undertaken by Headland for Litchfield. The results produced a number of results the interpretation of some of which have disputed in earlier correspondence as until they are ground truthed some may reflect important archaeological remains associated with the sites past use including those of the historic important RAF Turnhouse.

As such the site has been identified as containing occurring within and area being of archaeological and historic significance in terms of military buried archaeology (17th-20th century), paleo-environmental evidence (Gogar Burn) and relating to the development of the medieval and later parish of Gogar, Meadowfield Farm and potentially earlier prehistoric occupation. Accordingly, this application must be considered under terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), PAN 02/2011, HES's Historic Environment Policy for Scotland (HEPS) 2019 and CEC's Edinburgh Local Development Plan (2016) Policies 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 would require significant ground-breaking works regarding construction, landscaping services etc. Such works will have significant impacts upon any surviving archaeological remains, expected to range from 20th century remains associated with RAF Turnhouse, paleo-channels of the Gogar Burn to possible activity associated with the 1650's Battle of the Field of Flashes and potentially prehistoric and medieval remains.

Although I concur with Golder Associates (Uk) Ltd general conclusions that the scheme is likely overall, to have a low, impact I disagree with their conclusions in Section 6 of their Archaeological Statement that no mitigation is required.

Although it safe to say that the development of the current Airport will have had a significant adverse impact over large sections of the site especially the section closest to the current Terminal and carparks. They have also dismissed the archaeological significance of potential remains associated with the Gogar Burn and RAF Turnhouse which are likely to survive across the eastern half of the site. Indeed, remains associated with the latter may be reflected in some of the Headland's Geophysics results for the Crosswinds development.

Accordingly, it is recommended that if permission is granted that an archaeological programme of work is undertaken prior/during development, to fully excavate, record and analyse any surviving archaeological remains.

This will require the undertaking of phased programme of archaeological investigation, the first phase being the undertaking of an archaeological evaluation (max 10%) across the eastern side of the site. The results of this evaluation work will inform the scope of secondary phases of investigation and analysis. Based upon the results from the adjacent sites at Gogar and Meadowfield/West Craigs, this is likely to include both set piece excavations and a wider programme of strip, map record and excavate during topsoil removal/landscaping works and paleoenvironmental sampling of former river and associated deposits.

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

Public Engagement

As stated, it is likely that archaeological investigations will reveal to important remains associated with RAF Turnhouse and possibly dating back to early prehistory. It is therefore considered important that a programme of public/community engagement is undertaken. The full scope of which will be agreed with CECAS but could include press calls, social media, temporary exhibitions.

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

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

The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation

submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.

Roads Authority Issues

The application should be refused.

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

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

1. The proposal has been assessed in relation to the West Edinburgh Transport Appraisal Refresh (WETA). The WETA Refresh was completed in 2016 and took into account a number of changes in west Edinburgh, particularly in relation to a number of planned developments but also in specific relation to the airport;

2. The proposed access road is not considered to meet the requirements of the Gogar Link Road set out in the West Edinburgh Transport Appraisal Refresh (WETA Refresh). The Gogar Link Road is intended not only to improve network resilience to Edinburgh Airport but also to open up development opportunities in west Edinburgh. The proposed Link Road alignment emerged from WETA as the best option to address the different requirements of development and the airport whilst providing an efficient network with flexibility for public transport provision, walking, cycling and general road users. Whilst there is some flexibility with proposed alignment, the proposed road configuration aligns the airport link eastwards of that set out in WETA and is considered to promote the north / south direction of travel over access to the IBG area to the west. The proposed alignment is considered to focus on access to the airport rather than to the main IBG area and is likely to be to the detriment of public transport serving the IBG site (ref. LDP Policy 7, TRA 8, TRA 10, DES 2);

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

4. The proposed alignment is likely to impact on the existing tram crossing at Eastfield Avenue immediately south of the airport tram stop. ;

5. The proposed layout includes cycle and pedestrian provision. Whilst some of the required elements have been included, the proposed layout is not considered to be supportive of cycle use due to:

- o the requirement to cross carriageways at a number of locations. This is considered to be prejudicial to the continuity of the off-road network;*
- o lack of pedestrian and cycle priority at side road crossings;*
- o lack of crossing opportunities at the proposed north-eastern roundabout;*
- o crossing points not being on desire lines;*
- o absence of coherent signalised crossing at Gogar Roundabout to link Quiet Route 9 on north side of A8;*

6. The proposed layout will also impact on access to the tram depot and to the related drainage:

- o The proposed layout serving the tram depot does not appear adequate for access by the required vehicles. The required swept path will be required to cater for a 25m long articulated rail low loader, which takes a tram (in sections) delivered by road approximately 13.55m long, 2.65m wide and 3.39m high weighing 15t;*

- o The proposed drainage is likely to increase discharge into the tram drainage from the adjacent roads which then outfalls into a Scottish Water sewer within the tram depot. There are existing issues with flooding at Edinburgh Gateway, the lowest point in the area, which also outfalls via the depot Scottish Water connection sewer. Any increase in hard standing etc. which enters this system will place additional burden and risk onto Edinburgh Trams. This is not considered acceptable. Further discussion with Scottish Water and the City of Edinburgh Council will be required to agree an alternative drainage design to ensure tram safety in accordance with The Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS);*

- o It is unclear how the proposed landscaping on the existing road bridge over the tram line adjacent to Gogar Roundabout can be accommodated;*

- o It should be noted that access to and from the depot must be maintained at all times and that a tram Authority to Work permit may be required to complete any work adjacent to tram infrastructure.*

7. The applicant should note that any road will require to be constructed under separate application for road construction consent and will form a public right of passage.

Environmental Assessment response

Environmental Protection does not object to the proposed development.

The application proposes the formation of a new airport access road and active travel route from the east of the existing terminal building at Edinburgh Airport to the Gogar Roundabout via Myreton Drive. A noise impact assessment (NIA) and air quality impact assessment (AQIA) have been provided by the applicant in support of the application.

The proposed Eastern Access Road (EAR) follows an easterly alignment, running northwards from the Gogar roundabout towards the airport, before turning to the west to join the existing Eastfield Avenue. This alignment maximises the separation distance between the proposed EAR and the nearest dwellings to the west (Castle Gogar, Castle Gogar Rigg and Castle Mains Farm).

The proposal includes additional access to the airport from the east including sustainable modes (pedestrians, cyclists, public transport - buses and taxis) and private cars (to long/mid stay carparks).

The proposed development will provide a two-directional single carriageway road with a verge separating the carriageway from a shared-use active travel route (for pedestrians and cyclists) towards the eastern section.

Edinburgh Airport has previously published an Airport Surface Access Strategy (ASAS) (2012) and will be updating this to support a new Masterplan. This strategy emphasises the importance of improving public transport access but notes that road capacity is of increasing long-term concern and that increasing road capacity is likely to be required to support both airport development and that of West Edinburgh.

The Masterplan sets out potential future land uses within the airport. By 2025 it identifies the requirement for the new eastern access road (which is the subject of this planning application) with its purpose being to reduce congestion and increase access resilience.

During scoping CEC advised that consideration of other future developments in the area including HSG19 (Maybury / West Craigs) should be undertaken. These developments have also been given due consideration in the EIA.

Noise

The Noise Impact Assessment (NIA) has considered the route of the new road and the associated noise impacts upon proposed and existing noise sensitive properties.

The NIA advises that the majority of dwellings are predicted to experience changes of Negligible or Minor magnitude in the short and long-term, during the day and night.

The proposed EAR is expected to result in a local redistribution of traffic, with a reduction in vehicle movements (and a slight increase in traffic speed) along the existing airport access road (Eastfield Road) and along the A8 between the Eastfield Road junction and the Gogar roundabout.

The NIA advises that all dwellings and other sensitive receptors are predicted to experience an impact of Negligible magnitude (Not Significant) by 2036 during the day and night

Detailed predictions have been carried out for a total of 929 residential receptors within the study area, together with two other (non-residential) sensitive receptors, comprising a nursery, and fitness and wellbeing centre. All noise levels and noise changes are presented for both the short-term and the long-term.

The NIA advises that there is a single dwelling predicted to experience an increase of Moderate Adverse magnitude in the short-term during the daytime. It can also be seen that the short-term impacts during the night are greater with a single dwelling predicted to have an increase of Substantial Adverse magnitude and 13 dwellings predicted to have an increase of Moderate Adverse magnitude. There are also a number of

dwellings, during the day and night, with an increase of Minor Adverse magnitude, which might be significant if overall noise levels are particularly high.

This leaves 14 dwellings with a short-term increase of Moderate or Substantial Adverse magnitude at night. These increases are considered potentially Significant. All these dwellings are to be found in broadly the same location to the north of the A8 and west of the Gogar Burn and remote from road traffic sources.

The report also advises that whilst there are no dwellings predicted to experience an increase of Moderate Adverse magnitude in the long-term during the daytime, there are seven at night.

Therefore, notwithstanding the predicted increases of Moderate and (in one case) Substantial Adverse magnitude at these dwellings, the report advises that it is considered that the residents potentially adversely affected by the proposed EAR would be unlikely to perceive the increases as Significant and that their behaviour or response to noise would be unlikely to change. Therefore, the overall report conclusion is that the predicted noise increases are likely to be Not Significant in the short and long-term.

The road will also operate to a 30mph speed limit which in itself limits the level of road traffic noise which can impact upon nearby noise sensitive properties.

In addition to the traffic noise impacting upon amenity, the NIA also considers if the Noise Insulation (Scotland) Regulations should apply. The key aspects of the Noise Insulation (Scotland) Regulations (NISR) advise that existing properties should be offered noise mitigation measures e.g. upgraded or secondary glazing if the noise levels from a new road meet certain criteria. Whilst there are receptors with levels above the Noise Insulation Scotland Regulations threshold of 68 dB LA10,18h and receptors with an increase of 1.0 dB or more, there are no receptors which have both (which is required within the Regulations to be deemed suitable for compensation). Therefore, it is considered unlikely that any dwellings would qualify for sound insulation treatment in line with the requirements of the NISR.

Noise Summary for Existing Properties

Although there are 14 dwellings with a predicted short-term increase at night of Moderate or Substantial Adverse magnitude, consideration of all contextual factors leads to the conclusion that these effects would be Not Significant in the short and long-term. These dwellings (Castle Gogar, Gogar Mains Farm and Castle Gogar Rigg) are to be found in broadly the same location to the north of the A8 and west of the Gogar Burn and remote from road traffic sources.

The proposed EAR will result in a redistribution of traffic on the local road network.

Dwellings close to roads with reduced flows will experience noise decreases of Minor, Moderate or Substantial Beneficial magnitude. Consideration of all contextual factors leads to the conclusion that there would be 52 dwellings where these effects would be Significant in the short-term. These receptors are to be found in three broad areas:

- o Fairview Road and Eastfield Road (close to the current access into the Airport)*

- o Glasgow Road and Gogarstone Road (close to the A8 between the Eastfield Road and Gogar junctions)
- o Turnhouse Road, Turnhouse Farm Road, West Craigs Avenue and Lennymuir (to the east of the Airport).

The short-term, daytime noise level decreases of Minor Beneficial magnitude at the two other sensitive receptors (the Nursery and Fitness and Wellbeing Centre at RBS) would be considered Not Significant.

It is considered unlikely that any dwellings would qualify for sound insulation treatment in line with the requirements of the NISR.

In conclusion, there will be some properties which will likely see some increases in road traffic noise but also some properties which will benefit from a reduction in traffic noise due to the redistribution of traffic that is likely to occur from the proposal.

Proposed Maybury/West Craigs Development - Road Traffic Noise

The EIA also considers cumulative and proposed developments with HSG 19 (Maybury/West Craigs housing allocation (1750 units with Planning Permission in Principle) which lies to the north east). This sizeable development is located either side of Turnhouse Road and to the southwest extends as far as the railway line running between South Gyle and Dalmeny. Consequently, only the railway corridor separates the Maybury development from the proposed EAR.

At the time of the NIA being drawn up, there is no detailed masterplan for the whole Maybury development and individual plot site plans are now coming forward through AMSC applications. However, based on the illustrative masterplan available from the CEC's planning portal (planning application reference 19/05514/AMC), the dwellings are estimated to be to around 40m from the proposed EAR.

A railway Noise Impact Assessment Report prepared by Jacobs in June 2019 to support that application (and discharge planning condition 14 relating to an earlier associated planning application reference 16/04738/PPP) advises that a noise barrier, 1.8-2.0m high, would be constructed between the railway line and Maybury development to mitigate railway noise. This barrier has been included in the assessments described in this section. This noise barrier is identified on the 'proposed site plan in context (tenure mix) plot 5' drawing that was submitted as part of planning application 20/03942/AMC, drg reference 1726-A(00)058 revA.

A noise model has been used to estimate the likely worst-case road traffic noise levels from the proposed EAR (and including traffic associated with committed developments in the area) at ground floor and first floor locations. The predictions include the railway barrier and relate to a point around 40m from the proposed EAR but with no buildings within the Maybury development.

Noise - West Craigs Maybury

External Areas

Providing the principles and features included within the illustrative masterplan are adopted within the actual layout of the Maybury development then the external amenity

of future residents should not be significantly affected by the proposed EAR and traffic associated with committed developments in the area. However, the EIA advises that suitable external amenity levels are still likely to be achieved in most gardens providing a suitable layout is employed.

Internal Areas

Providing the principles and features included within the illustrative masterplan are adopted within the actual layout of the Maybury/West Craigs development and that the mitigation measures identified by the consultant acting for the promoters of the Maybury/West Craigs development are incorporated in to the eventual design, then internal amenity of future residents should not be significantly affected by the proposed EAR and traffic associated with committed developments in the area.

Operational Road Traffic Noise Predictions - Cumulative Considerations

Detailed road traffic noise predictions have been carried out for a total of 929 residential receptors within the study area; together with two other (non-residential) sensitive receptors, comprising a nursery, and fitness and wellbeing centre at the Gogar Headquarters of RBS. All noise levels and noise changes are presented for both the short-term (comparing DM2022 and DC2022) and the long-term (comparing DM2022 and DC2036). The noise predictions relating to cumulative scenarios include the influence of the railway noise barrier.

As impacts relating to the cumulative scenario are very similar to the impacts relating to the do something scenario, the same conclusions can be drawn in respect of likely significance. Based on consideration of all contextual factors, the following conclusions are reached:

- o It is considered that the residents of the 14 dwellings potentially adversely affected would be unlikely to perceive the increases as Significant and that their behaviour or response to noise would be unlikely to change. Therefore, the overall conclusion is that the predicted noise increases are likely to be Not Significant.*
- o It is considered that the residents of 56 dwellings potentially benefitting from the redistribution of traffic as a result of the proposed EAR would be likely to perceive the changes as Significant and that their behaviour or response to noise would be likely to change. Even discarding four dwellings which lie beyond 50m from a dominant road traffic source, the overall conclusion is that there would be 52 dwellings where the effect is likely to be considered Significant.*

Cumulatively, the report advises that the overall development, once all of the proposals are considered in combination, is advised as considered to be Not Significant

Cumulative Summary & Conclusions

The EIA has considered the inter-relationships between impacts identified within this EIAR and whether there is a need for further mitigation (synergistic effects). It also considers the potential for cumulative impacts when the development is considered with other developments in the surrounding area (cumulative effects).

It has been identified that no synergistic effects exist for the identified sensitive receptors surrounding the site, and therefore no additional mitigation and monitoring during the construction period or once operational is deemed necessary.

Consideration has also been given to the potential for cumulative effects when the proposed development is considered alongside 19 other identified emerging and schemes under construction in the surrounding area. The assessment has shown that in relation to most topics there are non-significant, Negligible or no cumulative effects.

It has been shown, in relation to Transport, that the proposed EAR incorporates a degree of resilience within the design and landscaping proposals to accommodate any associated increases in traffic from other committed schemes. In particular, the potential to include of a four-lane wide section at the eastern end of the EAR between Gogar Roundabout and the point at which IBG and airport related traffic separate, consistent with WETA, plus appropriate junctions (traffic signal format to support a higher priority for pedestrians and cyclists) to accommodate the increase in traffic demands. These additional future embedded mitigation measures will mitigate the risk of cumulative impacts of the nearby developments, and any effects should be considered Not Significant.

In relation to potential cumulative noise impacts, there is potential for cumulative impacts in relation to Crosswind to the south and west and Maybury/West Craigs to the east, which are closer to the identified sensitive receptors than the proposed EAR. However, it is considered that cumulative effects will be non-significant for the following reasons:

- o The results for the cumulative assessment scenario reveal that exactly the same dwellings have potentially significant impacts in the cumulative scenario as in the do something scenario, therefore the same conclusions can be drawn in respect of likely significance;*
- o Providing the principles and features included within the illustrative masterplan of the nearby committed development (Maybury/West Craigs) are adopted within the actual layout of the development and that the mitigation measures identified by the consultant acting for the promoters of the development are incorporated in to the eventual design, then cumulative effects on amenity of future residents of the proposed EAR and committed developments in the area should be Not Significant.*

Air Quality

An air quality impact assessment (AQIA) has been provided in support of the application.

Air quality management areas (AQMAs) are situated at Glasgow Road (Ratho end) and St John's Road at Corstorphine, some 2km away from the closest points of the site. The report advises that no change in traffic activity attributable to the proposed Eastern Access Road is predicted on the roads within either the Glasgow Road or St John's Road AQMA's

The AQIA also states that the proposed EAR has a beneficial effect on air quality as it diverts airport traffic away from existing residential properties on Eastfield Road and the

section of Glasgow Road between Eastfield Road and the Gogar Roundabout. No additional mitigation is therefore proposed within the report.

During operation, annual mean NO₂, PM₁₀ and PM_{2.5} concentrations at existing residential properties within the study area are expected to reduce when the proposed Eastern Access Road becomes operational. This represents an overall beneficial impact on local air quality in the areas where traffic is being redistributed from. At locations where residential properties may be present in future years on the land adjacent to the proposed route of the Eastern Access Road; the dispersion modelling results indicates that annual mean NO₂, PM₁₀ and PM_{2.5} concentrations will be less than each respective health-based air quality objective.

Cumulative Impacts from Introduction of New Developments

The conclusion in the Air Quality Chapter is therefore still applicable to the '2036 with cumulative impacts' scenario i.e. annual mean NO₂ concentrations are likely to be much less than the 40 µg.m⁻³ annual mean objective at locations where residential properties may be constructed on the land adjacent to the EAR.

For PM₁₀ and PM_{2.5}, vehicles emission rates are also expected to decline from 2022 to 2036, however, not sufficiently to outweigh the additional emissions from road traffic growth and traffic generated by other planned developments in the local area. The predicted PM₁₀ and PM_{2.5} annual mean concentrations are '2036 with cumulative impacts' scenario are less than the respective objectives for each pollutant at the Elements Edinburgh Development receptors near the proposed Eastern Access Road.

Summary of Air Quality Impacts When Cumulative Effects are Included

When the cumulative effects of other planned developments are included in the air quality assessment, annual mean NO₂, PM₁₀ and PM_{2.5} concentrations at existing residential properties within the study area are expected to be less than each respective annual mean objective. When compared with the future baseline, pollutant concentrations are predicted to reduce when the proposed Eastern Access Road becomes operational. The EIA advises that this represents an overall beneficial impact on local air quality. At locations where residential properties may be present in future years on the land adjacent to the proposed route of the Eastern Access Road; the assessment results indicate that annual mean NO₂, PM₁₀ and PM_{2.5} concentrations will be less than each respective health-based air quality objective.

Air Quality Conclusions

The summarised outcome of the air quality assessment advises that the operational impact of the proposed Eastern Access Road has a beneficial effect on air quality as it diverts airport traffic away from existing residential properties. When the Eastern Access Road becomes operational it will have a beneficial effect on annual mean NO₂, PM₁₀ and PM_{2.5} concentrations at residential properties on Eastfield Road and the section of Glasgow Road between Eastfield Road and the Gogar Roundabout. In addition, no annual mean concentrations in excess of each respective NO₂, PM₁₀ or PM_{2.5} air quality objective are predicted at any of the receptor locations in the 2022 or 2036 assessment scenarios. In the event that Euro 6 LDV NO_x emissions do not decline as projected, the model results indicate that compliance with the 40 µg.m⁻³

NO2 annual mean objective will still be achieved at all receptor locations in 2022. No change in pollutant concentrations is predicted within the Glasgow Road AQMA as no change in traffic activity attributable to the proposed road is expected at this location. Based on current understanding of emissions from traffic that will use the EAR, it is unlikely that building residential properties on the land adjacent to the EAR would create new exposure to poor air quality. The EIA also concludes that the cumulative impacts associated with the development should ensure that health-based air quality objectives are met.

Site Contamination

Environmental Protection has assessed the East Access Road, Ground Investigation Report, dated 12 December 2019 produced by Curtin's Consultants in Chapter H: Ground Conditions of the Appendices of the Environmental Impact Assessment, and accepts the conclusions and recommendations in section 8.0 of the report which have determined potential risks arising to/from development as a result of the recorded ground conditions to be sufficiently low to not require further investigation or mitigation actions toward future end users of the site or the wider environment. As such, additional information is not requested in relation to Chapter H of the Environmental Impact Assessment or with respect toward the planning application process to ensure the development is suitable for use in relation to potentially contaminated ground conditions.

It should nevertheless be noted that this interpretation is based upon the information supplied and thus dependent on the investigation coverage indicated by the Ground Investigation Report and does not confirm contamination will not be present. As such, in line with the conclusions/recommendations of the report, vigilance should be maintained around groundworks by the contractor for unexpected ground conditions at variance to those recorded by the Ground Investigation Report and specifically any observations of obvious potential for contamination should be immediately reported to the Environmental Consultant/Engineer for advice. The Planning Authority should then be notified of any additional investigation being progressed and to ensure any potential risks to/from development are understood and remediated where necessary with the agreement of the Local Authority.

Conclusions

Environmental Protection would be of the opinion that building more roads is not conducive to reducing localised air quality impacts. Roads also inherently bring more noise due to vehicles travelling on the roads. However, as future travel modes point towards public transport use and electric vehicle use, roads to a certain extent will still be required in the future to incorporate modern sustainable transportation modes. The proposed development also incorporates a cycle and pedestrian route and reduces the use of the existing congested A8 airport route which incorporates an existing air quality management area (AQMA). Therefore, any reduction in traffic on this route is welcomed. West Edinburgh is though becoming a well-developed area now and will be in the future, so these surrounding routes are likely to become more congested as the developments are realised. It is therefore very important that a corridor akin to the one proposed is built which allows unfettered access for public transport, cycling and pedestrians to and from the airport. This route could be considered in the future as one which specifically allows quicker access only for environmentally friendly modes of

transport to utilise access to the airport. It is recommended that this issue be considered in the future by transport planners considering west Edinburgh and airport access.

Whilst there are some noise sensitive properties which are likely to be affected by noise, the NIA concludes that there will also be a reduction in noise affecting other properties on existing airport routes. The NIA advises that the levels do not necessitate the need for noise mitigation (e.g. acoustic barriers or low noise tarmac) and the route will be limited to vehicle speeds of 30mph. The properties also do not qualify for mitigation under the Noise Insulation (Scotland) Regulations.

Therefore, as stated above, Environmental Protection is of the opinion that additional roads are not the route that should be taken when attempting to mitigate localised air quality impacts. However, it is understood that the application road may be required to assist with the reduction of congestion in other areas of west Edinburgh and so this team does not object to the application. Therefore Environmental Protection offers no objection to the development.

SEPA response

We offer no objection to the proposal, however we request that the comments below are used by CEC when considering this proposal. Please also note that whilst we have reviewed the flood information provided, this is not an endorsement of said information as we have purely commented on the site's flood risk impacts.

Advice for the planning authority

As highlighted in our Scoping Response dated PCS/168242, SEPA have a key interest in this site in terms of how it contributes to the delivery the shared and long standing aspirations of the re-diversion - or restoration - of the Gogar Burn which would help alleviate critical pressures, as mentioned in the applicant's own Scoping Report, that are currently on this waterbody under the Water Framework Directive (WFD). Discussions have taken place between multiple parties to explore these opportunities over a long period of time and it is critical that new developments at the very least do no hinder any future proposals for the re-diversion of the Gogar Burn. Moreover, to make Edinburgh resilient to the consequences of climate change, as well as the city playing its part to limit its contribution to the causes of climate change, another key factor in the City Development Plan is to reduce flood risk overall, and not simply to avoid flood risk in or from new developments. This will involve a strategic, city-wide approach to flood risk reduction and water management which will inform the City Plan. In our responses to 'Choices for the City Plan 2030' and its Strategic Environmental Assessment (SEA) (and in the suite of accompanying plans and initiatives and their SEA), SEPA fully endorsed these objectives, and we are working with CEC and partners such as SW to deliver this plan for Edinburgh's future.

Subsequent delivery of the currently protected re-diversion may require a degree of retrofitting which would add cost to any re-diversion, which would not be desirable, nor best use of limited private or public finance, given the long-standing discussions between SEPA, the applicant and the City of Edinburgh Council. It is unlikely that this proposal itself compromises the principle of the overall long-standing aspirations of the

re-diversion, however there is no technical information that accompanies the application to confirm this. CEC must acknowledge that if this proposal were to go ahead it would likely be another potential barrier to the proposed aspirations of the re-diversion of the Gogar Burn.

In addition, it should be noted that SEPA would not accept a culverted retrofitted solution as highlighted in Chapter G, paragraph G3.7. If the road did need retrofitted to accommodate any re-diversion a bridge solution would likely be needed.

We advise CEC to work with the applicant to produce detailed designs for the road which will allow a re-diversion of the Gogar which will allow the aspirations for it which are established in the current LDP and the City Plan which is information. To do this the baseline, e.g. ground conditions and flow paths and necessary additional capacity for increased levels of surface water will have to be established, a route agreed and a suitable water crossing built into the design. SEPA are happy to be involved in these discussions if viewed appropriate. It is important to re-iterate the reasons that the diversion was first mooted and the protected route agreed - this solution would deliver gains for fish access, water quality, flood and drought resilience and reduce physical condition constraints which exist on the existing channel, allowing sediment transport and ecological function.

Please note further detailed comments below.

Drainage

We note that there are a mixture of surface water discharges proposed including discharge to the existing Gogar Burn and the adopted Edinburgh Airport drainage network. It should be noted that if discharges to the existing burn can not be accepted under the Controlled Activities Regulations then this is at the commercial risk of the applicant if new proposals need to be submitted through Planning.

Flood Risk

1. We commented on this proposal at the EIA scoping stage (29th November 2019, ref: PCS/168242). We advised that flood risk information should be submitted to address key issues in the EIA process and therefore recommended that the 'water environment' should be scoped into the EIA report.
2. We previously highlighted that there are long standing aspirations for the re-diversion of the Gogar Burn to help achieve multiple environmental benefits and to address critical Water Framework Directive (WFD) pressures. The Gogar Burn re-alignment is also identified in a current, up-to-date Local Development Plan (reference: GS7, Realign Gogar Burn - Greenspace, City of Edinburgh Council). We have highlighted concerns to this and neighbouring proposals which, in the absence of a holistic approach to flood risk management, could 'lock in' the existing Gogar Burn alignment and therefore eliminate future environmental and flood risk benefits in perpetuity.
3. We re-iterate the need for a strategic approach to flood risk management in the West of Edinburgh area which would be aided by a baseline model that includes an extended reach of the Gogar Burn, Murray Burn and their tributaries. We strongly

advise against a piecemeal approach to flood risk assessment in this area given the complexities and interactions between fluvial, surface water and drainage in this area and potential for significant future development proposals.

4. Our advice is based solely on the supporting documents supplied in this consultation and SEPA held data. We have reviewed the EIAR Water Environment Chapter (G), related appendices and proposed layout plans and can make the following comments.

5. We requested that details are provided in the EIAR to demonstrate how this proposal will contribute to the re-diversion of the Gogar Burn. Paragraphs G3.7 and G3.8 of the EIAR provide 'justification' on how the proposed development will not prevent a future Gogar Burn re-diversion through discussions with SEPA held on 9th March 2020. We expect a solution which maintains an open watercourse channel. Please refer to the opening paragraphs of this response for further comment.

6. We note that the proposal comprises an extension to established road and hardstanding infrastructure (Section D to E, Figure G4.1, EIAR) and therefore does not represent an increase in land use vulnerability. The area that has already been developed is located within the fluvial and surface water medium to low likelihood flood extents based on the indicative SEPA Flood Hazard Maps. The proposed extension to the road (Section D to A, Figure G4.1, EIAR) is outwith the indicative fluvial flood extent but within a surface water flood risk area.

7. Based on SPP, it may be acceptable to locate essential infrastructure within a built up area at medium to high flood risk, provided the development is designed and constructed to remain operational during floods and not impede water flow. Based on the supplied topographic maps and development plans, there is no evidence that the proposed road extension or car parking area involves landraising within the functional floodplain. We are satisfied the proposal can be designed to have a neutral or better effect on flood risk with the adoption of appropriate surface water management measures.

8. Proposed Layout Sheet 2 of 3 (drawing ref: 59007-00-EC-736-000003(PO2), Curtins, 20th January 2020) shows 'swale provided to west to facilitate connection to Gogar Burn'. We advise that the proposed location of surface water discharges into the Gogar Burn should take due cognisance of any future watercourse re-alignment proposals. We are pleased that an appropriate climate change uplift has been considered in the attached FRA and SWMP.

9. It is for the City of Edinburgh Council as Flood Risk Management Authority to comment on the acceptability of the proposed surface water management measures and provision of safe vehicular access/egress routes in the event of flooding.

10. In summary, based on the information supplied, SEPA view this proposal as SPP compliant and have no objection on flood risk grounds. We are satisfied that the proposal will allow for a preferred future Gogar Burn re-alignment, but with caveats, and will have a neutral or better effect on flood risk to an area which is already developed with existing road and car parking infrastructure.

Flood Planning response

We acknowledge SEPA's consultation response and support the recommendation for CEC to work collaboratively with the applicant and SEPA to develop a design that allows the long-standing aspiration to divert the Gogar Burn. Perhaps a meeting would be useful to discuss this further.

I have made some additional comments below, for the applicant to address.

- 1. The self-certification declaration certificate A1 has not been signed. Please provide a signed copy of the certificate.*
- 2. Please confirm whether it is possible to provide attenuation up to the 1:200-year+40%CC storm event for all 4 catchments. The SWMP notes that for some sections of the road, no attenuation is proposed.*

Location Plan



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