

# Development Management Sub-Committee Report

Wednesday 4 December 2024

**Application for Planning Permission in Principle  
Land 500 Metres North East Of Ingliston Park & Ride Eastfield Road,  
Edinburgh,**

**Proposal: Residential-led mixed use development including residential (Class 9) and sui generis flatted development (including student housing, build to rent, co-living and affordable housing), business and employment uses (Class 4), storage or distribution uses (Class 6), hotels (Class 7), residential institutions (Class 8), non-residential institution uses /education (Class 10), shops, financial, professional and other services (Class 1A), food and drink uses (Class 3), assembly and leisure uses (Class 11), other sui generis uses (which could include public house, hot food take-away, launderette & taxi business) and other related infrastructure and associated works including car parking, servicing, access arrangements, formation of new roads and active travel networks, sustainable urban drainage and open space /public realm.**

**Item – Committee Decision  
Application Number – 24/00132/PPP  
Ward – B01 - Almond**

## **Reasons for Referral to Committee**

The application has been referred to the Development Management Sub-Committee as the application is an EIA Development, is of significant public interest and a hearing is required, the number of public comments objecting to the proposal exceeds the threshold for a delegated decision, and the level of developer contributions exceeds the threshold for a delegated decision.

### **Recommendation**

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

### **Summary**

The proposal is acceptable with regard to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as subject to conditions and reserved matters it will not harm the setting of listed buildings in proximity to the site.

Particular regard has been given to the agent of change principle in assessing the proposals under Section 41A of the Town and Country Planning (Scotland) Act 1997. It is considered to have been demonstrated that sufficient measures to mitigate, minimise and manage the effect of noise to the proposed noise sensitive development from Edinburgh Airport and the Royal Highland Showground, have been either included within the proposal, or will be included at Approval of Matters Specified in Conditions (AMSC) stage. The proposal is acceptable with regard to Section 41A of the Town and Country Planning (Scotland) Act 1997 (as amended).

The proposed housing-led mixed-use development is supported by Local Development Plan - City Plan 2030 policy Hou 1, Housing Proposal H63, policy Place 16, and NPF 4 policy 16. It will contribute towards the creation of a new urban quarter, and it is compatible with the West Edinburgh Development Principles, as guided by the West Edinburgh Placemaking Framework and Strategic Master Plan. As the proposal is found to accord with these principles, subject to conditions, the reservation of the details of matters such as scale, form and design, phasing, amenity, transport and flooding, and the conclusion of a suitable legal agreement, the proposal is acceptable in principle.

Matters raised by other development plan policies in relation to design, layout, landscape, placemaking, open space, heritage, transport and infrastructure, amenity, and environmental considerations such as climate change, biodiversity, protected species, and water management, have been addressed by the proposal in sufficient detail at this in principle stage. A sufficient level of detail has been articulated by the parameter plans, design and access statement and other supporting documentation to give confidence to the planning authority that the proposal, subject to securing detailed designs through multi-stage planning applications and the attached conditions, is compliant with the applicable requirements and policy aspirations of the development plan.

The EIA Report is comprehensive in its scope and content and demonstrates that no unacceptable adverse effects will result from the proposal as a result of the embedded mitigation and other mitigation measures at the construction stages.

Subject to conditions and the conclusion of a suitable legal agreement, the proposal complies with the applicable requirements and policy aspirations of the development plan. No other material considerations have been identified that outweigh this conclusion. It is therefore recommended that this application be granted.

## **SECTION A – Application Background**

### **Site Description**

The application site is an 80.63 hectare area of land located to the west of Edinburgh, bounded to the south by Glasgow Road (the A8), to the east by the Gogarburn and the Category A-Listed Gogar Castle (ref: LB27092; date: 14/07/1966), to the north by the Gogar Burn and to the west by Eastfield Road and the Ingliston Park and Ride. Edinburgh Airport is located to the north and northwest of the site. The Edinburgh Airport to city centre tram link passes through the centre of the site, running west to east, with the Ingliston Park and Ride tram stop located out with the site in an area of land to the west, and the Gogar Burn tram stop located to the site's east.

The site is a mix of fields and grassland, sloping from the south towards the Gogar Burn valley to the east. The Gogar Burn is a Local Nature Conservation Site and areas nearby to the Gogar Burn are considered to be an Area of Importance for Flood Management. A number of trees are present on site near to the Gogar Burn and Gogar Castle as well as at the southern interface with the A8, some of which are subject to Tree Preservation Order 204. The Gogar Mains Fort, Palisaded Enclosure and Field system Scheduled Monument which includes the remains of two enclosures is situated in the southeast corner of the site (ref: SM4573).

Existing access to the site is taken from the A8 via an eastbound left-in left-out only junction which leads to the Gogar Mains Farm Road. Existing features on the site include stone walls at the southern boundary, an existing dwelling ('the Golf House') at the south of the site, Gogar Mains farmhouse and associated steading with sheds, and a substation to the north of the tramline at the eastern side of Gogar Mains Farm Road. Other features in the site include trees and hedges.

Surrounding development in close proximity to the site, but outside the red line boundary, includes residential properties at Castle Gogar Rigg to the site's east, residential properties to the southwest of the site boundary, operational airport buildings at Eastfield Avenue, the Royal Bank of Scotland campus to the south of the A8, the Ingliston Park and Ride to the site's southwest. The Gogar Special Landscape Area and Millburn Tower Designed Landscape are located to the site's south, across the A8.

The site is subject to the West Edinburgh Placemaking Framework and Strategic Masterplan (WEPFSM) and is identified by the Local Development Plan (LDP) as part of the West Edinburgh Area of Economic Importance and the designated Urban Area.

## **Description of the Proposal**

### Scheme 2

Planning Permission in Principle (PPP) is sought for a mixed-use development. The application identifies the following mix of uses and development quantum (unit/sqm totals are maximums):

- 7,000 residential units, plus 300 student accommodation bedrooms (class 9 or sui-generis flatted dwellings, and sui-generis purpose-built student accommodation)
- 15,000 sqm. of class 4 commercial (office) space
- Class 7 hotels totalling 300 bedrooms.
- 8000 sqm. of class 8 residential institution floorspace
- Primary school - site safeguard for up to 630 pupils
- Secondary school - site safeguard for up to 1,200 pupils
- 2000 sqm. of class 10 non-residential institution floorspace
- 20,100 sqm. of class 1a, class 3 and sui-generis space including retail, professional service and food and drink uses.
- 5,000 sqm. of class 11 assembly and leisure floorspace
- 1,850 sqm. of class 6 storage and distribution space

Eight parameter plans are proposed defining the following across the site:

- Structures for Demolition
- Development Plots
- Proposed Ground Levels
- Proposed Plot Heights
- Proposed Land Use
- Proposed Access
- Proposed Vehicular and Non-Vehicular Movement
- Proposed Open Space and Green Infrastructure

Proposed demolition includes an industrial shed near the site's northern boundary, located off Gogar Mains Farm Road; a substation to the north east of the site, located off Gogar Mains Farm Road; a dwelling to the south of the site, 'The Golf House', accessed off Glasgow Road. The plans note the potential demolition of a stone wall that marks the boundary of the site and Glasgow Road.

Development plots at the site are proposed to be distributed around the site. Principal frontages, intended land uses, intended maximum building heights and plot ground levels are identified in the parameter plans. The parameter plans show a new town centre featuring commercial led mixed use development plots, with a mixture of commercial uses centred on the new Tram Stop, as well as two plots for education use and two plots for use as mobility hubs. Most of the plots on site are described as being for residential led development. A +/- 7.5-metre limit of deviation to the footprint is proposed for all development plots. For proposed ground levels a limit of deviation +/- 2.0-metres is proposed.

Maximum building heights for each of the development plots are proposed on drawing 05 Proposed Plot Heights, ranging from 44m Above Ordnance Datum (AOD), to 75.2m AOD which includes for plant and construction tolerances. For airport safeguarding reasons no development may exceed this height. It is envisaged that these building heights when considered in combination with proposed ground levels would allow for buildings of approximately 3-4 stories, 5-6 stories, and 7-8 stories; and on a low number of selected plots, up to 9-10 stories.

The supporting Design and Access Statement (DAS) includes 14 masterplan principles that have been submitted for approval describing how plot development should be implemented within the site. The proposal envisages that the Design Guidance will provide the framework for future detailed multi-stage applications. This includes specific guidance for individual plots, phases, public realm, and landscaping, structured under two headings 'General Guidance', covering matters such as building typologies, frontages, heights, materials and landscaping, and 'Character Areas' covering character profiles of individual neighbourhoods within the site. Indicative phasing proposals are also included within the DAS, as well as an indicative masterplan. The proposal envisages that the Design Guidance within the DAS will provide the framework for future detailed multi-stage applications.

The proposed development will be served by two vehicular accesses from Glasgow Road (A8) and a vehicular access from Eastfield Road. Other potential access routes for active and public transport modes are proposed at the site's northeast and eastern boundaries across the Gogar Burn to allow the possibility for new connections to surrounding land. A new tram stop is proposed in the centre of the site. Active travel connections are identified running north-south and east-west through the centre of the site, as well as to the south along Glasgow Road. Six different strategic road and path access configurations for vehicular and public transport access to and from the site are identified, with a preferred access to be confirmed as part of detailed design and multi-stage planning application processes.

The proposed movement network within the site includes a combination of internal streets of four distinct designs corresponding to their intended use(s) including for public transport, and a network of paths for pedestrians and active travel some of which are shared surfaces. The proposal is based on 20-minute neighbourhood principles where private vehicle movements around the site are limited and the street network in-combination with the distribution of land uses promotes walking, wheeling, and cycling.

Up to 2,217 parking spaces are proposed for all the land uses, with an anticipated maximum of 2,100 associated with residential development. Parking is proposed to be provided within two mobility hubs close to the principal public transport and vehicle routes, one situated north of the proposed town centre, and one situated to the south of the proposed town centre. A small-scale mobility hub is proposed near the proposed town centre and tram stop.

Open spaces and green infrastructure are proposed in the form of a linear two-hectare 'Central Park', an archaeological park at the location of the Gogar Mains Fort Scheduled Monument which measures approximately five-hectares, SUDS/ecological areas, on-street green spaces, and a retention and enhancement of existing vegetation within the area surrounding the Gogar Burn is identified. Open spaces capable of including equipped play areas and multi-use games areas (MUGAs) are proposed.

Drainage proposals are divided into four distinct areas for treatment and management and include a mixture of four SUDS areas, swales, filter trenches, porous paving, rain gardens and water butts. It is proposed that following treatment in SUDS features surface water runoff would discharge from Areas 1 and 2 to the Ratho Channel at the northwest of the site, and from Areas 3 and 4 to the Gogar Burn to the east of the site.

### Scheme 1

The applicant made amendments to the parameter plans and DAS during the assessment. The summary of amendments includes:

- Set-back of plots 48, 49, 52, 53 and 54 from the north-eastern site boundary at the mutual boundary with Castle Gogar Rigg
- Development plots 50 and 51 divided into four zones rather than two
- Set-back of plot 24 from the Gogar Mains Scheduled Monument
- Increased set-back of plots from A8 at the site's southern frontage to a minimum of 20 metres
- Addition of segregated cycle links at the western and southern boundaries of the site, and addition of a path along the Gogar Burn at the east of the site.
- Addition of an option for a bus route through the proposed town centre

- Alteration of the proposed primary school and secondary school plots
- Limits of deviation for development plots were increased to +/- 7.5 metres from +/- 5 metres.
- Limits of deviation for proposed ground levels amended from +/- 1 metre to +/- 2 metres.
- Update to proposed access parameter plan to reference public transport and active travel where appropriate.
- Updates to Open Space and Green Infrastructure parameter plan to more clearly illustrate the open space strategy.

## **Supporting Information**

The applicant has submitted a suite of supporting documents and technical assessments, some of which are part of a supporting Environmental Impact Assessment Report. The information is available on the Planning and Building Standards online portal:

- Planning Statement
- Design and Access Statement
- S1 Sustainability Form
- Energy and Sustainability Statement
- Pre-application Consultation Report
- Transport Assessment
- Flood Risk Assessment and Drainage Strategy
- Topographical Survey
- Ecology survey(s)
- Tree survey
- Cultural Heritage assessment
- Geo-environmental Preliminary Risk Assessment
- Air Quality Assessment
- Noise Assessment
- Landscape and Visual Impact Assessment

As the proposal is EIA development an EIA Report was submitted which includes the following assessment chapters:

- Chapter 6 - Landscape and Visual
- Chapter 7 - Ecology and Nature Conservation
- Chapter 8 - Archaeology and Heritage
- Chapter 9 - Hydrology, Geology, and Ground Conditions
- Chapter 10 - Water Resources and Flood Risk
- Chapter 11 - Transport and Access
- Chapter 12 - Air Quality
- Chapter 13 - Noise and Vibration
- Chapter 14 - Climate Change
- Chapter 15 - Socioeconomics
- Chapter 16 - Effect Interactions
- Chapter 17 - Additional mitigation

An EIA Addendum was submitted as part of the supporting information for Scheme 2.

## Relevant Site History

22/01625/PAN

Land 500 Metres North East of Ingliston Park And Ride  
2 Eastfield Road  
Edinburgh

Relates to PPP for new neighbourhood comprising residential-led mixed use development including residential (Class 9) and sui generis flatted development (including student housing, build to rent and affordable housing), business and employment uses (Class 4), general industrial uses (Class 5), storage or distribution uses (Class 6), hotels (Class 7), residential institutions (Class 8), non-residential institution uses/education (Class 10), retail (class 1), financial, professional and other services uses (Class 2), food and drink uses (Class 3), assembly and leisure uses (Class 11), other sui generis uses and other related infrastructure and associated works including car parking, servicing, access arrangements, formation of new roads and active travel networks, sustainable urban drainage and open space/public realm. Pre-application Consultation approved.

13 April 2022

22/01626/PAN

Land 500 Metres North East of Ingliston Park And Ride 2 Eastfield Road  
Eastfield Road  
Edinburgh

Relates to Phase 1 of new neighbourhood comprising residential-led mixed use development including residential (Class 9) and sui generis flatted development (including student housing, build to rent and affordable housing), business and employment uses (Class 4), general industrial uses (Class 5), storage or distribution uses (Class 6), hotels (Class 7), residential institutions (Class 8), non-residential institution uses/education (Class 10), retail (class 1), financial, professional and other services uses (Class 2), food and drink uses (Class 3), assembly and leisure uses (Class 11), other sui generis uses and other related infrastructure and associated works including car parking, servicing, access arrangements, formation of new roads and active travel networks, sustainable urban drainage and open space/public realm. Pre-application Consultation approved.

13 April 2022

22/03624/SCO

Land 500 Metres North East of Ingliston Park And Ride Eastfield Road  
Edinburgh

EIA Scoping Opinion request in respect of forthcoming outline planning application for residential-led mixed-use development.

EIA Not Required

29 September 2022

## Other Relevant Site History

The below application is relevant to the consideration of this proposal and partially overlaps with the red line boundary:

07 December 2015 – An application for planning permission in principle for ‘Mixed use development inc. business + employment uses (class 4); hotels (class 7) + ancillary uses including retail (Class 1), financial + professional services (Class 2), food + drink (Class 3), residential (Class 9), non-residential institutions (Class 10), assembly + leisure (Class 11), sui generis flatted development; associated works inc. car parking, servicing, access + public realm. (As Amended)’ was submitted to the Council. Scottish Ministers were notified of the Council’s ‘Minded to Grant’ decision in line with the now revoked Town and Country Planning (Notification of Major Applications) (Housing Proposals Within West Edinburgh) Direction 2016 and Ministers confirmed that the determination of the application required to be referred to them. The application remains with Ministers (application reference: 15/05580/PPP).

### **Pre-Application process**

Pre-application discussions took place on this application.

### **Consultation Engagement**

Historic Environment Scotland

Flooding

Ratho and District Community Council

Cramond and Barnton Community Council

Affordable Housing

Environmental Protection

Scottish Water

Transport Scotland

Scottish Ministers

Transport Scotland

Waste

Network Rail

Nature Scot

Edinburgh Airport Safeguarding

Edinburgh Trams

Communities and Families - Education

Scottish Environmental Protection Agency



Historic Environment Scotland Addendum

Ratho and District Community Council - Additional

Archaeology Service

Refer to Appendix 1 for a summary of the consultation response.

## **Publicity and Public Engagement**

**Date of Neighbour Notification:** 30 October 2024

**Date of Renotification of Neighbour Notification:** Not Applicable

**Press Publication Date(s):** 4 October 2024 2 February 2024 2 February 2024

**Site Notices Date(s):** Not Applicable

**Number of Contributors:** 54

## **Section B - Assessment**

### **Determining Issues**

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

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

This report will then consider the proposed development under Section 41A of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act).

This report will then consider the proposed development under Sections 24, 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Having regard to the legal requirement of Section 24(3), in the event of any policy incompatibility between National Planning Framework 4 (NPF4) & Local Development Plan - City Plan 2030 (LDP) the newer policy shall prevail.

Do the proposals comply with the development plan?

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

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

In the assessment of material considerations this report will consider:

- equalities and human rights;
- public representations; and
- any other identified material considerations.

## **Assessment**

To address these determining issues, it needs to be considered whether:

### **a) The proposals harm the listed building(s) and its setting?**

The Historic Environment Scotland guidance 'Managing Change in the Historic Environment: Setting' is relevant in the determination of this application.

The guidance states that '*Setting*' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated, and experienced."

The document states that where development is proposed it is important to:

- Identify the historic assets that might be affected;
- Define the setting of each historic asset; and,
- Assess the impact of any new development on this.

The applicant submitted an EIA Report in support of the application which considered the effects of the proposal on sensitive heritage receptors including listed buildings and their settings. Listed buildings near the application site include:

- Category A-listed Castle Gogar, cottages, and stables (ref: LB27092) to the east of the site;
- Category B-listed Castle Gogar Bridge (ref: LB27102) to the northeast of the site;
- Category B-listed former Gogar Parish Church and Graveyard (ref: LB27268) to the east of the site across the Gogar Burn valley and Edinburgh Tram line; and,
- Category B-listed North Lodge, gates, gate piers, walls, and railings of Gogar Mount House (ref: LB27135) located at the southwestern fringe of the site.

No works are proposed nor are any direct impacts to listed buildings identified in the supporting EIA Report and the below assessments consider setting.

### Castle Gogar, cottages, and stables

Castle Gogar is approximately 150 metres away from the application site boundary to the northeast. The Castle and associated listed features are screened by mature trees within a well-established landscaped setting that contains much of the building(s). Modern development lies between the application site and the Castle, at Castle Gogar Rigg, which forms a notable part of its immediate setting. Castle Gogar is no longer within its original context and views from the castle have been altered by modern development.

The nearest proposed buildings to Castle Gogar to the west are proposed to be set-back from the mutual boundary of Castle Gogar Rigg by a minimum of 15-metres and will be lower in scale to closer match the existing development that surrounds the Castle. To the south, five development plots are proposed (Blocks 49-51A) and these are also set-back from the mutual boundary with Castle Gogar Rigg by a minimum of 15-metres. The proposals to the south range between 4-6 six storeys in height and would remove any potential glimpsed views of the open fields to the south from Castle Gogar. Landscape mitigation in the form of a green corridor, planted SUDS areas, and landscaped communal gardens associated with these development plots.

The EIA Report concludes that the predicted slight adverse, and therefore not significant impact, on Castle Gogar's setting would be mitigated by existing landscape screening and development at Castle Gogar Rigg which limits views to and from the listed building. HES does not object to the proposal and takes the view that the proposals will to an extent preserve the understanding of the castle's cultural significance as a rural baronial tower house, but that there will still be an adverse impact on setting which could be further mitigated by reducing the height of blocks 50A and 51 to a maximum of four storeys.

Views to and from the listed building are largely contained by mature trees and structural landscaping, as well as residential development at Castle Gogar Rigg, which consists of a mixture of residential buildings varying in size, form, and scale of up to three storeys. The proposed set-back distances introduced as part of Scheme 2 achieve a clearer separation from the proposed development and allowing a greater sense of openness and go some way in preserving the Castle's existing setting. The revised information assists in mitigating the impact of the proposals on the setting of Castle Gogar.

The proposal will not have an adverse effect on the setting of Castle Gogar.

### Castle Gogar Bridge

The B-listed Castle Gogar Bridge is noted in its listing summary as providing the means to carry an avenue to Castle Gogar over the Gogar Burn. It is separately listed from the Castle and its associated features.

The EIA Report concludes that after proposed mitigation measures which will include the detailed design of Blocks 49-51A, and a detailed landscape scheme as part of the SUDS scheme south of the bridge at application site's boundary the predicted residual effect on the setting of the bridge would be slight adverse and not significant.

While there will be a partial change in the open setting of the bridge to the south, which will become a more urban or suburban environment in character, its primary function as described in the bridge's statement of special interest, to provide access to Castle Gogar, will remain in place, and its interest will remain understood. Part of the existing open views south along the Gogar Burn valley as far as the tram line will be retained as well.

The proposal will not lead to an adverse effect on the setting of the bridge.

### Gogar Parish Church and Graveyard

The B-listed Gogar Parish Church and Graveyard is approximately 70m away from the site. The church and graveyard are well-screened from the site by trees, mature planting, and the tram embankment. The EIA identifies a slight adverse and not significant effect on the setting of this listed building. The effect of the proposal on the setting of the church is not significant.

### North Lodge, gates, gate piers, walls, and railings of Gogar Mount House

This B-listed building is a single storey rectangular planned building constructed next to the gates and within the grounds of Gogar Mount House immediately south of the westbound lane of Glasgow Road. The proposal will introduce development of an urban form behind a landscaped boundary to the north of the listed building across Glasgow Road in place of the existing open agricultural fields. While this will alter the view from the building, its association with Gogar Mount House will not be diminished. The effect of the proposal does not harm the setting of the listed building.

### Construction effects

The proposal will be developed over a long period of time, with phasing of development closest to the above listed buildings yet to be confirmed via the submission of a phasing framework which is required in attached conditions. The EIA Report indicates that mitigation to reduce effects on the setting of the above listed buildings at the demolition and construction stages will include auditory and visual screening along the boundary with the application site, which would still result in a slight adverse effect in all cases. This temporary predicted effect on the setting of the above listed buildings is acceptable over the short-term.

### Cumulative effects

The EIA Report identifies the potential for significant adverse effect(s) on the setting of Castle Gogar due to the extent and nature of development that could be introduced in the surrounding area. The identified schemes that could in combination with the proposal include development that either has planning permission or applications that are yet to be determined. Any cumulative adverse effect would mostly relate to long views and changes to landscape character of the wider area around the castle. The cumulative effect on the immediate setting would not be unacceptable due to the extent of existing screening vegetation around the castle, while other schemes can include mitigation measures that minimise localised effects on setting.

Cumulative effects will not harm the setting of Castle Gogar or other listed buildings.

### Summary - listed buildings

Overall, the proposal will introduce a new urban area in the vicinity of the above noted listed buildings. The proposal does not result in harm to any of the listed buildings or their setting. The proposal is therefore acceptable with regard to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

### **b) Conditional grant of planning permission: noise-sensitive development**

Section 41A of the Town and Country Planning (Scotland) Act 1997 (as amended) states:

- (1) *A development that is the subject of an application for planning permission is a "noise-sensitive development" if residents or occupiers of the development are likely to be affected by significant noise from existing activity in the vicinity of the development (a "noise source").*
- (2) *Without prejudice to the generality of section 41(1), a planning authority—*
  - (a) *must, when considering under section 37 whether to grant planning permission for a noise-sensitive development subject to conditions, take particular account of whether the development includes sufficient measures to mitigate, minimise or manage the effect of noise between the development and any existing cultural venues or facilities (including in particular, but not limited to, live music venues), or dwellings or businesses in the vicinity of the development, and*
  - (b) *may not, as a condition of granting planning permission for a noise-sensitive development, impose on a noise source additional costs relating to acoustic design measures to mitigate, minimise or manage the effects of noise.*

The applicant submitted a noise impact assessment in support of the application as part of the EIA Report, and a noise impact assessment EIA addendum chapter was submitted during the assessment phase in response to matters raised in representations including the 'agent of change' principle.

With reference to section 41A (1) of the 1997 Act the development proposal is a noise sensitive development, as Edinburgh Airport and the Royal Highland Centre are in the surrounding area and could conceivably generation noise that could affect future occupants and residents at the proposal.

The Royal Highland Centre object to the proposal on grounds of noise impact and so-called 'agent of change' principles for noise-sensitive development.

The EIA Report includes information in Appendix 13.3 with reference to the proposal's suitability for development in the context of surrounding noise sources. The report includes possible glazing specifications, noting that glazing of a high acoustic performance may be required in some circumstances to ensure acceptable internal noise conditions for future residents. As the application is for planning permission in principle with no details of buildings coming forward it is not possible to confirm the exact glazing specification at this stage.

The requirement for other mitigation is identified in the EIA report and includes acoustic glazing, ventilation solutions, the position and layout of buildings and open spaces, screening of varying types, and acoustic properties of building materials are to be secured as part of reserved matters for multi-stage applications. Further consideration is given in the EIA report to indicative mitigation specifications. The EIA Report recommends that further assessment be carried out on detailed designs and the assessment concludes that residual effects relating to noise should not be an unacceptable constraint provided that appropriate measures are put in place, which, where necessary, account for thermal comfort, insignificant effects are predicted. The supporting statement asserts that the EIA shows measures can be put in place to ensure that any noise impacts on the proposed development would be acceptable and that existing operations beyond the site can continue as required; this position is accepted at the planning permission in principle stage. While Environmental Protection have raised concerns on these matters particular regard has been paid to the Agent of Change Principle and consider that these matters can be appropriately mitigated at detailed stage and through condition.

Applications for detailed design(s) would be further considered under Section 41A of the Town and Country Planning (Scotland) Act 1997.

Subject to the recommended conditions and reserved matters the proposal is acceptable. The recommended condition does not impose on a noise source, in this case the Royal Highland Centre and Edinburgh Airport, additional costs relating to acoustic design measures to mitigate, minimise or manage the effects of noise. The proposal does not conflict with Section 41A(2)(b) of the 1997 Act.

### **c) The proposals comply with the development plan?**

The relevant development plan policies to be considered in this assessment are:

#### **National Planning Framework 4**

- Sustainable Places policies 1, 2, 3, 4, 5 6, 7, 9, 11, 12, and 13;
- Liveable Places policies 14, 15, 16, 18, 19, 20, 21, 22, and 23;
- Productive places policy 25, 26, 27, 28, and 31;

#### **Local Development Plan - City Plan 2030**

- Place policy Place 16;
- Environment and Design policies Env 1, Env 2, Env 3, Env 4, Env 6, Env 7, Env 8, Env 11, Env 15, Env 16, Env 17, Env 20, Env 21, Env 25, Env 26, Env 27, Env 29, Env 30, Env 31, Env 32, Env 33, Env 34, Env 35, Env 36, and Env 37;
- Housing policies Hou 1, Hou 2, Hou 3, and Hou 5;
- Infrastructure and Transport policies Inf 1, Inf 3, Inf 4, Inf 5, Inf 6, Inf 7, Inf 8, Inf 10, Inf 11, Inf 13, and Inf 22;
- Economy policies Econ 3, Econ 4, Econ 5, Econ 6, Re 1, Re 3 and Re 9.

The West Edinburgh Placemaking Framework and Strategic Masterplan (WEPFSM) (13 November 2024), draft Supplementary Guidance on Developer Contributions and Infrastructure Delivery (June 2024), and the draft Edinburgh Design Guidance (13 November 2024) are material considerations that are relevant when considering the development plan.

## Listed Buildings

LDP policy Env 11 (Listed Buildings - Setting) states development affecting a listed building's townscape or landscape setting will be permitted only if not detrimental to the architectural character, appearance, or historic interest of the building, or to its setting. NPF 4 policy 7 provides additional policy guidance on heritage assets.

The effect of the proposal on the setting of surrounding listed buildings is addressed above in this report. As a result of the proposal, when completed the residual effects on Category A-listed Castle Gogar, Category B-listed Bridge over the Gogar Burn, Category B-listed Gogar Parish Church and churchyard, and the nearby Category B-listed North Lodge at the site's periphery will cause a slight adverse effect on their settings. The EIA Report highlights that cumulative effects on the setting of Castle Gogar will result in a possible in-principle a significant adverse effect(s). The extent of the effect(s) would depend on detailed designs and layouts for the proposal and all surrounding developments in West Edinburgh.

HES comments welcome the applicant's efforts to reduce the impact on the Castle's setting particularly at the western interface which will preserve an understanding of the castle's cultural significance as a rural baronial tower house. Comments further reiterate a preference for no development at Blocks 50-51A or alternatively for development to be restricted to four storeys at Blocks 50A and 51 which would closer reflect neighbouring development. HES does not object to the proposal on the basis of impact on the setting of Castle Gogar Rigg, but is of the view that the proposal is counter to NPF 4 policy 7 c.

In the context of the scale of development that is proposed at this allocated housing site, where the proposal forms part of a significant growth area of the City to form a new urban quarters, the impact(s) on the settings of these listed buildings are acceptable and embedded mitigation including plot set-backs, screening, reduced height and massing at the site's northeastern boundary with Castle Gogar Rigg, and a detailed landscaping scheme which will be the subject of reserved matters for development near the above mentioned listed buildings. Existing vegetative screening and surrounding development at Castle Gogar Rigg provides further mitigation for Castle Gogar and the associated bridge over the Gogar burn.

In summary, while there will be a high degree of change introduced to this part of the City due to the spatial strategy contained within the LDP, the proposal includes embedded measures that minimise the effect(s) of this change as far as possible. Subject to the attached reserved matters and consideration of detailed designs at the multi-stage planning application stages the proposal is acceptable in the context of the requirements for LDP policy Env 11 and NPF4 policy 7.

## Principle

The application is for planning permission in principle for a residential and housing-led mixed-use development of up to 7,000 new homes, along with a new town centre and associated civic space, open spaces, a variety of commercial and community land uses, open spaces, and ancillary infrastructure including roads and active travel routes.

The Spatial Strategy in the LDP describes the Council's planned direction for growth over the plan period (2024-2032) and identifies West Edinburgh as a Major New Development Area. The plan specifies that:

*'The vision is for West Edinburgh to become a vibrant, high density, mixed-use extension to the city with a focus on place making, sustainability, connectivity, biodiversity and a strong landscape framework'.*

The application site is identified in Table 2 of the LDP as Housing Proposal H63 (Edinburgh 205) where up to 7,000 residential units are identified as part of the creation of a new urban quarter in this part of the City. In principle the proposal accords with the spatial strategy of the plan for housing-led mixed-use development of the site.

Place policies 16-23 set out development principles for sites across the wider West Edinburgh area. Policy Place 16 applies to this site and states:

*'Planning permission will be granted for development which will contribute towards the creation of new urban quarters in West Edinburgh (including H59, OPP60, H61, H62 and H63 on the Proposals Map), and is in accordance with the West Edinburgh Development Principles. An approved West Edinburgh Placemaking Framework will include a phasing plan to further detail these principles along with the mechanisms for delivery and an infrastructure first approach. The Council will coordinate a collaborative, multidisciplinary master planned approach to development across these sites.'*

Development principles for the site are identified through LDP Policy Place 16. The non-statutory WEPFSM provides further guidance on these principles. The supporting text of the policy notes that individual masterplans submitted an application stage should generally align with the council's approved Framework.

The policy's supporting text further outlines the key infrastructure requirements for Place 16, including cumulative transport interventions, education infrastructure requirements, and healthcare infrastructure. The policy text advises that supporting guidance in the form of the WEPFSM and draft Supplementary Guidance on Developer Contributions and Infrastructure Delivery provide further context to these infrastructure requirements. With reference to the principle of housing at this site, the proposal complies with LDP policy Hou 1 (Housing Development) which supports development at allocated housing sites provided they accord with their development principles in corresponding Place policies and Appendix D of the LDP. The density of up to 7,000 residential units is also in accordance with LDP policy Env 26 (Housing Density). Considering the requirements of LDP policy Hou 3 (Mixed Communities) the mix of housing will be identified as part of multi-stage applications to address the attached conditions, and the proposal's supporting DAS and Design Guidance clearly demonstrates that a mix of housing types and sizes to meet a variety of needs can be delivered.

The below assessment considers the proposal in the context of Place 16 policy development principles a) to bb), related LDP and NPF4 policies, the supporting WEPFSM, and supplementary guidance.



### ***Principle a***

Principle a) requires that collaborative masterplan-led approach, inclusive of statutory consultees as key stakeholders, will result in a high-density urban extension of the City and embody the principles that help the City progress towards net-zero.

The West Edinburgh Placemaking Framework and Strategic Masterplan was approved by the Council's Planning Committee on 13 November 2024. The Council-led masterplan details how Place 16 should be delivered and the key components that are required for this new part of the City. The masterplan was the subject of a public consultation process and input from statutory consultees and other key stakeholders including landowners in West Edinburgh. The approval of the masterplan is a development plan requirement, and its recent approval enables applications for planning permission to be submitted for proposals in the context of policy Place 16. Applications must generally align with the details of the masterplan and the below assessment will consider the proposal's compatibility with the vision to deliver housing-led mixed-use development based on 20-minute neighbourhood principles.

### ***Principle b and o***

Principle b) requires a mix of uses focused around the tram stops, with a particular focus within housing site H63 as a town centre development with civic space, community facilities and commercial and leisure uses as the focal point of a new 20-minute neighbourhood.

Principle o) requires development proposals to reflect the area's identification as an Area of Economic Importance (Table 13) and as a Strategic Business Centre. Any masterplan and phasing work is required to establish how a mix of uses, including vertical mix, is distributed across the area. The mix must include but not be limited to retail, professional services, food and drink, office and light industrial, industrial in appropriate locations away from residential use, assembly and leisure and community facilities/ hubs as well as high and medium density residential with mixed tenure development as required by other plan policies.

The EIA Report and Planning Statement identify a list of proposed development quantum and land uses that would support a housing-led mixed-use development and support the area's role as an Area of Economic Importance.

The proposed parameter plans identify a town centre at the site's centre, which would include a new tram stop, civic space, and a mixture of commercial and leisure uses, acting as a focal point and new town centre for the application site and surrounding sites in Place 16. The supporting parameter plans and Design and Access Statement (DAS) detail in principle how the town centre would be accessible via public transport and via a road and path network catering for sustainable travel modes.

Drawing 06A, 'Proposed Land Use', establishes how a mix of uses will be distributed across the area, in accordance with 20-minute neighbourhood and town centre first principles that are outlined in NPF4 policy 15 and 27, and LDP policy Re 1. Though remaining a residential led development, the quantum of commercial floorspace to be provided accords with the area's role as an economic centre, providing significant opportunities for business. Employment opportunities in the area support 20-minute neighbourhood opportunities and ensure that West Edinburgh is an attractive place to live and work.

Subject to conditions the proposed parameter plans are consistent with policy Place 16. The inclusion of up to 15,000 sqm. of office space and 1,850 sqm. of storage and distribution space gains support in terms of their principle from LDP policies Econ 3, Econ 4, and Econ 5 respectively and NPF 4 policy 26 (Business and industry). The inclusion of 20,100 sqm. of class 1a, 3 and sui-generis space (incl. retail, professional services and food and drink uses) and 5,000 sqm. of assembly and leisure floorspace within the new Town Centre similarly gains support in terms of their principle from LDP policies Re 1 (Town Centres First Policy), Re 3 (Town Centres), and Re 9 (Entertainment, Leisure, and café/restaurant Developments - Preferred locations) respectively.

Public comments note that a retail impact analysis has not been submitted with reference to the provision of greater than 2500sqm. of retail floorspace by the application and the possible impact of this to existing town centres and the Gyle Shopping Centre. The proposal is to form a new town centre as part of the development, and it is acceptable that the majority of retail space is proposed within, or in close proximity to, the new town centre with a view to achieving 20-minute neighbourhood principles in accordance with NPF 4 policy 15 (Local living and 20-minute neighbourhoods) and LDP policy Inf 1 (Access to Community Facilities). The new town centre has been established as part of the Local Development Plan process including examination. NPF 4 policy 28 (Retail) supports retail development in existing town centres. The proposal is an identified town centre in the LDP, and although not yet existing, the proposal will create a vibrant town centre in line with this policy's objectives. NPF 4 policy 25 (Community wealth building) supports development that contributes to local economic priorities. The EIA Report's chapter on socio-economics sets out the benefits of the proposal and these are consistent with the objectives of this policy.

The proposal includes hotel development for up to 300 bedrooms. LDP policy Econ 6 (Hotel Development) supports new hotels in defined town centres and the proposal is consistent in principle with this policy as the development plan identifies a new town centre at this site.

The applicant proposes student accommodation of up to 300 bedrooms. Policy Hou 5 (Student Accommodation) outlines where student accommodation will be supported in the City. In the context of this proposal, it is accepted that a small number of student accommodation would be appropriate in this expansion area of the City where good access to public transport will be available as the development phases are delivered. Subject to phasing information and detailed designs being secured by conditions, the principle of this quantum of student accommodation is acceptable as a small element of the proposal.

Details of the new town centre, tram stop and civic space, and distribution and design of retail uses will come forward as part of further detailed applications and will be required to address the additional information requirements as set out in the proposed conditions.

### ***Principles c and d***

Principle c) supports development which takes account of the West Edinburgh Landscape Framework as appropriate and considers how the site connects into the wider, strategic green network at West Edinburgh in creating a landscape structure and green network as a setting for development which incorporates north - south and east-west corridors and views, linked blue/green spaces and water management and ecosystem services.

The West Edinburgh Landscape Framework has been superseded by the WEPFSM and no longer applies. The WEPFSM re-enforces the requirements of Principle c), requiring a robust blue-green network and landscape structure to be introduced in West Edinburgh including open spaces, green corridors and routes, boundary treatments, and green streets.

The supporting information demonstrates that the development will introduce a suitable landscape structure at the site. The supporting open space plan includes linear parks, green spaces, pocket green areas, biodiversity areas at the Ratho Channel and Gogar Burn Valley, open meadow habitat at the Gogar Mains Fort Scheduled Ancient Monument, and SUDS inclusive of ecological enhancements, which will provide a robust landscape framework that will positively contribute to the creation of the blue/green network in Place 16. The supporting DAS and Design Guidance includes the intended strategy for multi-stage applications and the site's capability to deliver a suitable landscape environment is demonstrated at this permission in principle stage. The scale of green/blue infrastructure is proportionate to the development's scale and nature and in principle compliance with LDP policy Env 6 (Green Blue Infrastructure) is demonstrated and NPF 4 policy 20 (Blue and green infrastructure).

It is recommended that all hard and soft landscape details be secured as part of the multi-stage application process, and these are included in the attached reserved matters. The WEPFSM establishes that early delivery of green/blue infrastructure will be important to establish a high-quality place, ideally in the first phases of development. While indicative phasing intentions are included in the applicant's DAS, details of phasing are to be secured through attached conditions.

Principle d) supports design which takes account of detailed contextual appraisal and analysis, agreed with the Council, that considers potential impact of development on key views, surrounding landscape, listed buildings and other designated heritage assets and the landscape setting of the city, including topographical features and typical woodland cover.

The supporting EIA Report and Landscape and Visual Impact Assessment (LVIA) provide a comprehensive assessment of the effect on the City's landscape setting and have informed the proposal's layout. Whilst it is clear that there will be substantial change to the area by introducing development supported by the development plan at this location, its findings and the degree of change proposed are acceptable in principle. It should be noted by the Committee that the LVIA at this stage assesses the maximum plot volume and height parameters, and updated LVIA details should be secured in future applications that reflect detailed design, including height, mass, scale, and materiality.

The impact and degree of change on heritage assets is set out above within this assessment and is acceptable subject to securing detailed designs in further applications. The supporting DAS includes a comprehensive baseline review of the site and its context, and this has informed the proposed development layout in parameter plans. The supporting EIA Report and LVIA acknowledge that the proposal will rise above some of the surrounding tree lines and will be visible from many of the viewpoints that were considered, however with careful mitigation by design, including materials, roofscape design, varied building heights, and landscape design the proposal will not unacceptably erode the City's landscape setting. The EIA Report summarises that of the thirteen viewpoints considered for impacts on the surrounding landscape that there will be impacts ranging from no effect or negligible to major adverse significant, while any effects on the surrounding Special Landscape Areas or Gardens and Designed Landscapes would be indirect as the site lies out with these areas. The identified zone of visibility shows that the proposal will be visible from much of the surrounding area.

Generally, the adverse effects on landscape character and sensitive visual receptors within are likely to be experienced to occur at locations in close proximity to the site due to the introduction of a new urban area to a location that has previously been at the City's urban edge. Proposed mitigation is largely embedded where the site's landscape context has informed the position of development blocks and open spaces with a view to avoiding and reducing significant effects. For example, the tallest elements of the proposal are set-back from mutual boundaries and at the boundary with the A8, works in Gogar Burn valley are to be minimal, the Scheduled Ancient Monument is free of any development to retain part of the site's current and historic open character, and tree protection measures for trees on site are proposed.

The proposal will be constructed over a long period of time, and construction impacts on the surrounding landscape are predicted. Impacts will largely be localised through works including construction compounds, topsoil heaps and materials, the presence of cranes and vehicle activities, and lighting and it is recommended that a CEMP be secured by condition to minimise these effects. As the development is phased to completion, open spaces and other features in the proposal will also mature and with time some of the greater visual impacts will be reduced in comparison to the early phases of development.

Overall, the proposal complies with this policy criteria and the objectives LDP policy Env 4 (Development Design - Impact on Setting), LDP policy Env 15 (Historic Gardens and Designed Landscapes), LDP policy Env 20 (Protection of Trees and Woodlands), NPF 4 policy 9 (Forestry, woodland and trees) and a clear design concept has been demonstrated in compliance with LDP policy Env 1 (Design Quality and Context) and NPF 4 policy 14 (Design, quality and place) objectives. The proposal is acceptable in principle, with the final proposals for the siting, layout, and design of the landscape and built environments to be reserved matters for further approval.

### ***Principle e***

Principle e) requires design which aligns streets and spaces to capture and accentuate potential key views to important landmarks such as the Pentland Hills, Arthur's Seat, the Forth Bridges and Edinburgh Airport air traffic control tower, as well as to new landmarks of the development will be supported by this Development Principle.

At this stage, all long views have not yet been identified as these would be informed by details of final building positions, heights, and associated landscape treatments. With the introduction of buildings of the height and scale proposed, views from some parts of the site will be restricted and this to be expected with the density of development. There are clear corridors that could provide views both east and west within the layout that would afford the opportunity for views from the site to important landmarks in the local area and the wider city. Those view corridors could be introduced in the site, notably along the principal transport routes, tram corridor, from the east of the site at the Scheduled Ancient Monument open space, through the central linear park, along the A8 corridor, and at the site's western boundary a north-south view corridor along the Ratho ecological corridor would be introduced. In principle, these features demonstrate that the layout of the development can capture potential key views where feasible and this complies with the requirements of the policy and the WEPFSM, as well as the intent of NPF 4 policy 14 (Design, quality, and place) to promote successful design-led places.

### ***Principle f***

Principle f) requires development proposals to include designs which develop options to address how development in the south of the area should take account of transport and traffic improvements on the A8 to define how development should address that route.

The supporting parameter plans 'Proposed Access' and 'Proposed Vehicular and Non-Vehicular Movement' propose two strategic points of access to the site from the A8, reflecting those that are within the WEPFSM. The WEPFSM establishes that the nature of the A8 will change with reduced vehicle speeds, new pedestrian crossings, and active travel infrastructure. The proposed parameter plan and land use layout shows that new buildings will address the A8 with key frontages identified in most locations that face this transport artery, while a buffer of approximately 20 metres is proposed including the internal street network and landscaping at the interface with the A8. The possibility of retention of the existing stone wall at the site's southern boundary with the A8 is proposed where feasible. Options within the proposed Design Guidance at this location allow for various configurations of the 'missing link' active travel route, listed in the LDP as Transport Intervention WE7 and these are appropriate in principle. A clear design intent for how the development shall address the A8 has been submitted at this stage and subject to securing details in recommended conditions and reserved matters the terms of this Development Principle are satisfied in principle.

### ***Principle g***

Principle g) requires that proposals provide a legible hierarchy of streets, routes and spaces designed for convenient, safe movement of pedestrians, cyclists, and public transport that connects all parts of the brief area. This development principle reflects the objectives of LDP policy Env 25 (Layout Design) which supports development that delivers a comprehensive network of new streets and active travel routes that will encourage sustainable travel.

Drawing 08A, Proposed Vehicular and Non-Vehicular Movement, describes a suitable street hierarchy, prioritising the safe and convenient movement of people walking, wheeling, or cycling, both within, to and from the application site.

Streets are divided into four categories, the details of which are expanded upon within the DAS in indicative sections. Roads are to be hierarchically designed such that vehicular traffic is encouraged to make use of larger roads (type one) wherever possible, using type two roads to access the mobility hubs and homes on a 'drop off basis', and only types three and four roads in limited circumstances. A pedestrian path network is strategically provided to enable site permeability for people walking and wheeling, while segregated cycle routes are to be provided along all type one streets as well as running parallel to the A8. Opportunities provided by public spaces are taken to enhance the transport network as appropriate, with green blue network and open space proposals feeding into site permeability for active travel modes.

The proposal successfully responds to the needs of active and public transport users, connecting to all parts of housing site H63, as well as to other parts of the West Edinburgh area as defined in policy Place 16, and to the wider city. The proposed street hierarchy gains support from NPF 4 policy 13 (Sustainable transport) clauses a), b) i), b)ii) and b)iii).

Transport interventions required to support the development are to be secured via condition and/or appropriate legal agreement, as detailed elsewhere in the report.

## ***Principle h***

Principle h) requires that proposals be led by contemporary design to reinforce the image of Edinburgh as a modern, prosperous city and integrate positive characteristics of the city's historic townscape, roofscape and spatial character to create a sense of place.

The proposal provides information of a detail that is appropriate for an application for planning permission in principle, specifying development quantum and uses, plot location and size, building heights, and key infrastructure. The parameter plans, DAS, and supporting information all address the intended design of the site, requiring that the design approach at plot level is both contemporary and informed by the City's historic townscape, roofscape and spatial character.

The DAS sets out generalised guidance to be applied across the site, describing six principles relating to urban grain and plot frontages, street frontages, the sloping topography of the site, legibility of the townscape, sun lighting and daylighting, and locating private and shared gardens within block structures. These are inspired by many of the traditional design responses typical of other localities in Edinburgh.

To ensure each of the areas within the site are identifiable as distinct places, when considered against the site as a cohesive wider whole, guidance is provided with respect to the creation of ten 'Character Areas'. These are eight overlapping locations within the site, that will inform design at AMC stage; defining key features, aspects of design and individual responses to the design challenges that will be identifiable in the design of future development to be located in one of the areas to support placemaking.

It is recommended that details of the site's design at a plot level is secured by the proposed conditions such that they are required to broadly conform with the information provided. In so far as the design approach can be assessed from the information available, the proposal gains support from LDP policies Env 1 (Design Quality and Context), Env 3 (Development Design - Incorporating and Enhancing Existing and Potential Features), Env 4 (Development Design - Impact on Setting), and NPF4 policy 14 (Design, quality and place).

The WEPFSM states that each new town centre in West Edinburgh should be of high-quality public realm and incorporate distinctive/placemaking public art. This information shall be secured through the multi-stage planning application process. This information shall be secured through the multi-stage planning application process which will ensure compliance with NPF 4 policy 31 (Culture and creativity) which requires that where development involves the creation of new and public open spaces, provision for public art must be made.

LDP policy Env 30 (Building Heights) requires new development that rises above the prevailing building height in the surrounding area to enhance the skyline and surrounding townscape, deliver buildings appropriate in context, and ensure no adverse impact on key views in the City of on the City's setting. The proposed building heights will assist in delivering and new high-density urban area to the City and the scale identified in parameter plans, which represent maximum heights including roofs at this stage, is appropriate for development in Place 16. Exact building heights and designs of roofs will be secured by the attached conditions at the AMC planning stage(s).

### ***Principle i***

Principle i) supports proposals that have considered and demonstrated an iterative process with the use of Townscape and Visual Impact Assessment (TVIA), sunlight and daylight analysis to ensure building height and mass responds well to site context, topography and micro-climate and provides future residents with high levels of residential amenity.

The applicant submitted a Landscape and Visual Impact Assessment (LVIA) at this stage to consider the effects of the development in landscape terms including the surrounding area. The development principle identifies that a TVIA is required, and in the context of the EIA Report the landscape assessment has comprehensively addressed this requirement.

The LVIA considers the likely effects of a proposed development on the surrounding townscape and visual amenity. At this stage, the supporting LVIA captures the visual effect of the proposal from surrounding viewpoints, while the supporting DAS and its Design Guidance details how matters including future amenity within the development which will rely on design details including ground levels, height, mass, open space, and materiality. The proposed Design Guidance specifies that detailed designs must consider building heights, massing, orientation with the potential for higher buildings-oriented north-south and lower buildings-oriented east-west, roofscape design, maximising natural light to shared courtyard gardens of permitter blocks, and compliance with the Edinburgh Design Guidance. A clear design intent for the proposal demonstrating that a high quality of residential amenity can be achieved is included in the supporting information, and it is recommended that these details be secured as part of the multi-stage planning process. Future applications would be further considered in the context of this Place 16 Development Principle and other relevant development plan policies including LDP policy Env 33 (Amenity) and NPF 4 policies 14 (Design, quality, and place) and 16 (Quality Homes).

### ***Principle j***

Principle j) states that the WEPFSM will consider the feasibility and detail of a green network spur from the Gogar Burn east of Castle Gogar including the alignment, extent, nature, and width of this corridor. Further assessment will also address the potential for a re-routed Gogar Burn channel (as set out in Table 1 through Proposal BGN49). An alternative option may include improvement along the existing route of the burn. This should be retained in any event for water management purposes.

The recently approved WEPFSM includes two options for LDP Environment Proposal BGN49 'Gogar Burn'. While the Gogar Burn and its valley are within the eastern extents of the application site, the red line boundary stops short of including the culverted burn channel at the northeast of the site.



With reference to co-ordinated development and development plan requirements for policy Env 2 (Co-ordinated Development) clause b., the application site's northeastern area extends to the western boundary of the existing Gogar Burn channel. The WEPFSM identifies that a green blue corridor inclusive of a path should be delivered in this area. The position of proposed plots 58 and 60, while close to the boundary of the burn, would not prevent the delivery of a burn improvement scheme along the existing channel alignment at this location subject to confirmation of detailed designs to be secured by condition and reserved matters. The part of the Gogar Burn that could be re-routed in option 2 for BGN 49 is out with the application site and the proposals would not impede this option from proceeding in the future if necessary.

LDP policy Env 29 (Waterside Development) supports development that adjoins a watercourse where an attractive frontage is provided, where public access is provided to and along the water's edge, where climate change has been considered including green and blue network consideration and landscape interest, and including a buffer zone along the water's edge. The proposal adjoins the Gogar Burn at the site's eastern extents where a Local Nature Conservation Site (LNCS) is designated along the burn's route. Parameter plans show the potential for a path to be introduced at this location, while development around the Gogar Burn valley is limited due to the presence of the scheduled monument and local topography constraints. In the context of this policy a suitable interface with the watercourse is proposed which is reflective of the site's status as a LNCS, and as part of details to be secured by conditions there is potential to implement an appropriate buffer and manage public access.

### ***Principle k***

Where operationally acceptable, principle k) requires that new developments should integrate the tram line with the urban character and civic space of the town centre and local centre and with the tram line to the south of the space so that buildings are set back to allow for sunlight. Where it is not operationally acceptable to integrate the tram in this way, access and crossing points should be clear and designed for ease of active travel. Tram line operational boundary treatments should be designed as an integral part of the urban and landscape framework. Crossings are also required to be signalised for safety.

Due to the nature of the tram line bisecting this application site, by necessity the proposal has had to be designed around this existing site feature. A new town centre is proposed with associated civic space that would be focussed around either side of the proposed new tram stop. The proposed design intent in the DAS for streets, boundaries and surfacing around the tram line will be dictated by the existing track bed design which varies along the line. While the position of buildings is to be confirmed in detailed multi-stage applications, the parameter plans show that development plots are generally a minimum of more than 10 metres away from the tram line on either side and separated by streets inclusive of active travel routes, public space(s), and designed landscape areas. Building heights along the line and new town centre are indicatively shown to vary between 3-10 storeys at various points, and buildings would be approximately 40 metres apart on either side of the tram line which will allow for sunlight to penetrate the civic space and town centre.

The supporting DAS includes indicative sections of streets and spaces that would be adjacent to the tram line and these show that in principle, subject to detailed designs, the proposals will comply with requirements of the WEPFSM, and comments raised by Edinburgh Tram. Edinburgh Tram requests that detail of development that would affect the operation of the tram be supplied and these details are to be secured by the attached conditions.

Two crossing points of the tram line are proposed, one to the west of the new town centre which utilises existing infrastructure and would allow crossing of the line for public transport (buses), general traffic, active travel, and pedestrians. The second crossing point is to the east of the new town centre and in effect follows the existing alignment of Gogar Mains Farm Road. Edinburgh Tram highlight in comments that this crossing would require to be upgraded from its existing Strail surfacing if it is to be used for frequent high volume traffic movements or for construction purposes and the applicant has confirmed during the assessment that the limitation of this crossing is understood. Any works to upgrade this crossing point will require the applicant to engage with Edinburgh Tram to ensure works can be effectively co-ordinated.

The WEPFSM outlines how new development in close proximity to the tram should be designed without undue disruption to the operation of the Edinburgh Tram. The supporting DAS refers indicatively to boundary treatments and landscaping tramline and the applicant confirms during the application stage an understanding of the requirement to sensitively design and construct the development proposal near tram infrastructure in respect of crossing points, drainage, groundworks, landscaping, public spaces, and buildings.

### ***Principle I***

Principle I) requires that new development should address and connect across land ownerships and to the wider city - physically, visually, and socially, including with urban frontages to site edges where appropriate and with active travel and public transport infrastructure which enables movement around the area and to the city. Active travel and public transport connectivity between the sites and to the north shall be established through the master plan and phasing work and public transport options for orbital bus routes to north and south will be delivered either through improvements to public transport priority at the Gogar and Maybury roundabouts or through public transport access to the north.

The supporting parameter plans, and DAS include details of the strategic movement network and access points to the application site. Links to and from neighbouring land ownerships are safeguarded and demonstrate appropriate connections can be delivered. Details of infrastructure delivery to the surrounding area not proposed by the applicant at the planning permission in principle stage and a combination of attached conditions and legal agreement negotiations relating to infrastructure contributions (addressed below within this report) will establish when connections to surrounding land ownerships are required to be delivered.

In addition to safeguarding connections to neighbouring Place 16 sites the proposal includes connections to Eastfield Road and the A8, clear and direct public transport routes along 'Green Streets' which allow for 7.5-metre-wide carriageways with segregated bicycle and pedestrian paths are proposed, and an extensive internal path network that includes parts of the active travel network envisaged in the WEPFSM are shown within the application site boundary. Subject to delivering the required West Edinburgh Transport Improvements that are identified in City Plan Table 8 and the WEPFSM Table 9 at the correct time in line with infrastructure first principles, the proposal's layout is acceptable in principle.

Regarding design at the site edges, active frontages are proposed along the A8 corridor, the tram line, and principle access routes, while at other parts of the site the proposed physical characteristics of the interface with Castle Gogar Rigg are appropriate in the interest of safeguarding the amenity and privacy of both neighbours and future occupants at the development. Socially, the proposal that is presented in the supporting parameter plans will be well-connected internally to act as a 20-minute neighbourhood for future residents of Place 16, while externally the proposal will be well-connected to neighbouring land and other parts of the City. The new Town Centre will include a mix of land uses that will foster a sense of place with diverse characteristics to serve Place 16 as a destination in the City's network of Town Centres.

The proposals comply with this policy criterion in principle.

### ***Principle m and Principle aa***

Principle m) states that the relevant Table 8 and Table 9 transport proposals are shown indicatively on the Proposals Map and in diagrammatic form in LDP Map 24. Proposals for road access, layout and linkages which follow the principles of WETA will be confirmed through the West Edinburgh Placemaking Framework. These include:

- east-west Gogar linkages and Main Street;
- north-south access through Crosswinds potentially following the railway line and associated options for a secondary access to the airport;
- options for a public transport only easterly link using either the existing bridge or a new bridge across the railway;
- potential for local access from the south of the area to the A8 in conjunction with transport and traffic improvements on the A8; and
- further consideration of the hierarchy of routes for vehicle access, public transport, and active travel.

In addition to LDP Tables 8 and 9 the WEPFSM provides clarity regarding the required road and movement network, layout(s), and linkages that are required for West Edinburgh including all sites in Place 16 of which this application site forms a significant part.

Two of the proposed parameter plans set out the proposed access (drawing 07A Proposed Access) and movement network (drawing 08A Proposed Vehicular and Non-vehicular Movement). To support the proposal the applicant submitted a Transport Assessment, and the EIA Report and addendum considers the effect(s) of the proposal in transport terms.

The Roads Authority does not object to the proposal subject to the terms of the comments which relate to provision of infrastructure and advisory notes, while several representations object to the proposal on transport grounds.

In response to the requirements of development principle m., the applicant's proposed parameter plan layout is acceptable as it provides the required roads and linkages within the application boundary area and safeguards space(s) for the above-noted road accesses, layouts, and linkages to surrounding areas in line with WETA principles and the WEPFSM. In principle, and subject to securing details of infrastructure delivery through a combination of phasing details, conditions, and legal obligations, which are addressed below within this report, the proposal's layout reflects the network that is envisaged in the WEPFSM. The proposals do not preclude co-ordinated delivery of the strategic transport network in this part of the City and the layout in transport terms is acceptable.

#### EIA Report:

The EIA Report considers transport matters in relation to both construction traffic and operational traffic impacts. In addition, the EIA Report is supported by a Transport Assessment which is further considered below.

With reference to construction impact, it is forecast that the traffic will generate approximately 4% increase in vehicle movements and a 25% increase in HGV movements which would have the greatest impact on Eastfield Road. Other areas would experience approximately a maximum increase of 1% and 4% in general traffic and HGV flows and it is concluded that overall, the effect of construction traffic will be negligible, and based on the findings of the EIA Report this is accepted. Figures in the EIA identify that at the peak construction activity period daily trips on all the local road network will be 61 x HGVs, 30 x LGVs, and 333 x cars and vans. A CEMP is recommended to manage these temporary and short-term impacts.

In terms of the development the EIA Report considers the effect(s) of the proposal on traffic including delays to drivers and non-motorised users, severance of communities, non-motorised user amenity, and experience and pedestrian safety. The assessment identifies a series of embedded mitigation measures in the proposal that are intended to support and encourage sustainable travel including a mix of uses to support 20-minute neighbourhood principles, a masterplan layout and streets that prioritise and promote active travel, a layout that includes low levels of parking and includes mobility hubs, early activation of the tram stop.

The EIA Report considers that some but not all of the committed infrastructure improvements identified in the LDP and the 2016 WETA Refresh Study form the baseline assessment. The assumed interventions (and their corresponding LDP Table 8 West Edinburgh Transport Intervention references) include:

- Airport Link Road (WE 28 and WE 29);
- Dualling of Eastfield Road Phase 1 (WE 24);
- A8 Glasgow Road / Eastfield Road Dumbbell Roundabout Improvement (WE 22);
- Gogar Roundabout - 4-lane northern circulatory improvement (WE 3);
- Gogar to Maybury additional eastbound traffic lane (WE 5); and
- Maybury improvement scheme (no LDP reference).

The EIA Report concludes that the residual effect of the proposal both by itself cumulatively with other proposed development in the area as well as the airport's projected passenger growth is concluded to be negligible or minor adverse when mitigation measures are considered, however it is to be noted this depends on the identified WETA measures being in place. Overall, the greatest development generated traffic impact is predicted to be at the proposed development access from Gogar roundabout with the interface of the other development proposals within the area. Less than 10% of traffic on other road links is predicted to be from the proposed development. The transport mitigation is part of a series of measures both on and off site and this is addressed further in the report under infrastructure delivery.

#### Transport Assessment:

In addition to the EIA Report the supporting TA considers the effect(s) of the proposal on the transport network. The TA confirms that the assumed baseline is the same as noted above in the EIA Report. Cumulative schemes considered in the assessment include neighbouring LDP development sites H61, H62, IBG 1 (planning application reference: 15/05580/PPP), and projected airport growth.

The applicant's TA identifies six vehicular access points to the site and suggests that a variety of combinations would be possible for access to the site from the south, east and west boundaries. No preferred combination of options is identified in the TA. Parameter plans distinguish between three proposed accesses and those that are safeguarded for co-ordinated development with surrounding land within Place 16. The TA demonstrates that all the modelled combinations for access would result in acceptable outcomes regarding traffic impact(s). The above-noted embedded mitigation through the proposal's design and low parking is identified as playing an important role in reducing impact(s) on the surrounding road network.

The TA includes an overview of transport modelling results for impacts on the road network for all access options and observes that there will be increases in journey times, congestion, and queuing on different parts of the network but not leading to unacceptable impacts across the wider network. Dependent on the access arrangement chosen, the TA notes that each access option shows some worsening to the operational performance of the modelled network with an increase to journey times; however, the network is expected to operate with levels of congestion similar to today's conditions.

The applicant proposes to deliver elements of the development plan's transport mitigation within the red line area as part of phasing and proposes that contributions towards the delivery of infrastructure on a zonal basis for infrastructure outside the application should be negotiated. Attached conditions recommend that a phasing plan which details all new roads and accesses should be submitted to the planning authority in advance of commencement of development. The WEPFSM identifies the transport interventions that are required to support new development in Place 16 and responsibilities for delivering these requirements will be secured through a combination of the recommended reserved matters, conditions, and the terms of a legal agreement relating to infrastructure delivery.

## Objections:

Edinburgh Airport Limited's (EAL) representation objects to the proposal on a variety of transport grounds, and highlights that the Transport Assessment that underpins the Local Development Plan is based upon the assumption that all the WETA Refresh 2016 measures will be in place by 2030. The objection further notes that the labelling of some WETA actions as 'potential access route' in supporting parameter plans is not consistent with development plan requirements, as these are a requirement of the underlying Transport Assessment for the LDP to support the allocation of Housing Proposal H63 in the development plan. The representation contends that if the application does not commit to the delivery of the WETA actions by 2030, it will not comply with development principle (m). Among other points of objection EAL identifies that the applicant's transport modelling methods and consistency with the LDP's Transport Assessment, impact on the public transport network, and construction traffic management details are unsatisfactory.

The neighbouring landowner of LDP Housing Proposal H62 also objects to the proposal based on concern regarding delivery of transport infrastructure and site accessibility. Other representations further highlight the importance of infrastructure provision to support the proposal and mitigate any effects on the surrounding area as far as practicable.

The delivery and timing of infrastructure, including transport to enable development in West Edinburgh, is set out in the WEPFSM. The Airport's representation requests that all details with regards to access should be reserved to be addressed in detail in future AMCs. A condition is proposed relating to the submission of a phasing framework and the reserved matters include details of all access points to the site and updated transport information which would consider the detailed design and phasing of new access arrangements at the site.

Due to the long-term development of this site and complexities in transport infrastructure delivery it is recommended that details of the identified infrastructure required be secured by a combination of the attached conditions and an appropriate legal agreement. This approach provides a degree of flexibility for the delivery of infrastructure at the right time in line with the development plan principles of infrastructure first. Some transport infrastructure interventions are identified in the WEPFSM as being delivered directly by developers; where this is not possible, other options such as securing delivery through developer contributions and legal or other agreements and mechanisms will need to be put in place. Some interventions such as new east-west roads across the Place 16 area will be important to secure as the development is phased in order to deliver the sustainable travel infrastructure for public transport and active travel that the allocation of this site in the development plan for significant housing-led development is predicated on.

Development principle aa) requires provisions for a potential public transport connection to the east, over the railway. The introduction of a link across the railway, West Edinburgh Transport Improvement WE 12, is not within the red line area of this site and forms part of the wider package of transport measures that are required for West Edinburgh. The WEPFSM confirms that WE 12 shall be required to provide a link between the north of the strategic masterplan area and Turnhouse Road/Craigs Road. The route would require a new road over airport land and then utilise the existing bridge on Turnhouse Road to the north, rather than introducing a new bridge over the railway.

The WEPFSM advises this route is to be directly delivered as part of development by the airport. The proposal does not prejudice the delivery of this public transport connection, and the proposed layout allows for co-ordinated development with WE 12 which is consistent with the transport strategy in this part of the City.

Subject to the attached conditions and a suitable legal agreement to secure infrastructure required for Place 16 the proposal is acceptable in principle regarding development principles m. and aa as well as LDP policies Inf 3 (Infrastructure Delivery and Developer Contributions), Inf 4 (Provision of Transport Infrastructure), and Inf 5 (Location of Major Travel Generating Development).

### ***Principle n***

Principle n) requires that proposals facilitate internal connectivity for active travel and public transport modes, including relationship with the Ingliston Park & Ride site and how that site might be relocated or redesigned for the better overall place making of the area. Masterplan and phasing work should develop a design, parking strategy and parking standards approach to minimise need for private car use and private vehicle ownership. This and other demand management measures are an important element of relevant local, regional, and national policies and will be critical in promoting sustainable travel behaviour in West Edinburgh area.

The proposal is designed in accordance with 20-minute neighbourhood principles, siting a mix of uses within a short distance of each other to enable people to live, work and undertake their daily activities within one locality. The site is to be internally connected by tram, bus, and active travel modes, and via these modes connected to Ingliston Park and Ride, local amenities and facilities, West Edinburgh, and the wider city. Parking is to be limited to a maximum of 2,217 parking spaces and will be controlled by condition. The DAS outlines that the majority of vehicle spaces are to be contained within the two proposed mobility hubs, with on street parking being largely limited to facilitate deliveries, servicing and the needs of disabled people and this approach is consistent with the aims of LDP West Edinburgh Transport Interventions WE 39 and WE 40 (Mobility Hub).

The combination of low vehicle parking availability, demand management measures, readily available attractive and cohesive public and active transport facilities, and the mix of land uses in the area are considered to minimise demand for private vehicle ownership and use, promoting sustainable travel on the site and across the West Edinburgh area.

LDP policy Inf 7 (Private Car Parking) establishes the criterion for determining the appropriate level of parking for new development, and in criterion f) states that for major new developments mobility hubs should be provided where identified in a Place Policy. The proposed mobility hubs achieve the objective of this policy, while the attached condition to cap parking numbers for the proposal combined with the applicant's Design Guidance will ensure the proposal will be a low-car development which is in accordance with the Council's sustainable transport objectives and the vision for the site in the WEPFSM. The design of all car parking and mobility hubs will be secured by the attached conditions to ensure compliance with LDP policy Inf 8 (Design of Car Parking) at the AMC application stage(s). Regarding details of cycle parking for future residents and visitors who can avail of the site's active travel network, these details will be secured by the attached conditions to ensure compliance with LDP policy Inf 6 (Cycle Parking).

Ingliston Park and Ride is located outside of the site boundary and as such the application does not address its relocation or redesign, however a potential access route and sufficiently sized road (a public transport/green street) ending at the site boundary to facilitate future connectivity to the park and ride site is provided.

It is proposed that details of the car parking provision on the site and other demand management measures are secured by the proposed conditions. Subject to conditions and suitable financial contributions being made to mitigate transport impacts, the proposal gains support from elements of NPF4 policies 13 (Sustainable transport), 14 (Design, quality and place), 15 (Local Living and 20 minute neighbourhoods) as well as LDP policies Inf 1 (Access to Community Facilities) and Inf 5 (Location of Major Travel Generating Development).

### ***Principle p***

Principle p) requires the use of a public realm strategy to achieve an integrated design approach to the delivery of high-quality streets and public spaces to provide identity, and a public art strategy to complement this.

The DAS describes a strategy for how the public realm is to be approached across the site, defining a range of street types (Green Streets, Neighbourhood Access Streets, Pedestrian Priority Streets, and Mews Streets); character areas, which feature descriptions of key locations and open spaces on the site; generalised guidance for the selection materials in the public realm; and a site wide planting strategy, providing opportunities for the creation of a bespoke identity for the site.

These approaches rely on their cumulative effect for the overall creation of a successful and integrated public realm across the site. It is recommended all details of the public realm are treated as a reserved matter to provide sufficient certainty to the planning authority that the public realm strategy is successfully realised in each part of the site. It will be possible to incorporate examples of public art through the AMC process, aiding placemaking and a distinct identity for public spaces. The proposal demonstrates the requisite parameters and principles are provided to ensure compliance with the objectives of LDP policy Env 27 (Public Realm, New Planting and Landscape Design) and NPF 4 policy 14 (Design, quality, and place).



### ***Principle q***

Principle q) requires development proposals to provide a sustainable place increased biodiversity and a net-zero carbon target that is adapted to climate change.

In terms of climate targets, at a site wide level, the Design and Access statement describes a number of principles, 'be lean, be clean, be green', that will contribute to the proposal's sustainability. Detailed designs at AMC stage, as part of a multi-stage planning process, will be required to comply with these principles and the requirements of the development plan to deliver sustainable developments, resulting in the proposal complying with a net zero carbon target.

At a plot level, future developments are to adopt a fabric first approach to energy efficiency, make use of efficient and compliant technologies, and optimise on-site renewable energy generation in order to meet these principles. Future applications at the plot level will need to comply with LDP policies Env 7 (Sustainable Developments) and Env 8 (New Sustainable Buildings) and NPF 4 policies 1 (Tackling the climate and nature crises), 2 (Climate mitigation and adaption) and 11 (Energy), requiring them to demonstrate that all reasonably practicable measures to address the climate emergency and contribute to sustainable living and achieve a net zero level of operational greenhouse gas emissions have been undertaken.

In terms of biodiversity, the EIA Report identifies several mitigation measures that will be undertaken. This includes restrictions on the introduction of footpaths within the Gogar Burn Valley, the retention and creating of habitats, the use of native and wildlife attracting species in soft landscaping across the site, tree planting, and the implementation of a green corridor. Construction mitigation measures are also proposed to form part of a Construction Environment Management Plan (CEMP) which is to be secured by condition.

The proposal is in principle considered to be sustainable, in terms of biodiversity, carbon emissions, and climate adaptation, subject to the proposed conditions and reserved matters. These include a requirement for the submission where appropriate of Long-Term Habitat Management Plans, and Badger Protection Plans, as well as undertaking wildlife monitoring, installing bat roost features and bat boxes in new buildings, and creating bird nesting opportunities throughout the site.

### ***Principle r***

Principle r) requires proposals to provide or contribute towards education infrastructure, healthcare infrastructure, and community facilities.

In accordance with the WEPFSM, the council is to design and build the necessary education infrastructure required to support the development of West Edinburgh, making use of funding (and land) secured from developers. Education infrastructure can also be used to provide community, health, and social care facilities. As detailed below in this report, the proposed phasing of development reflects an infrastructure first approach. The WEPFSM also sets out that developer contributions to deliver healthcare provision should be applied through a cumulative contributions zone on the conclusions of the Council's Health Care Appraisal.

Plots for a primary school and a secondary school are safeguarded in the proposal parameter plans and the application includes Class 10 education campuses to accommodate a primary school and a secondary school. It is proposed to require the transfer of this land to the Council, as well as appropriate financial contributions towards education, healthcare, and community infrastructure provision. Details of the required provision are discussed elsewhere in the report, however subject to securing a suitable legal agreement the proposals gain support from NPF4 policy 18 and LDP policy Inf 3 with respect to the provision of education, healthcare, and community infrastructure.

### ***Principle s***

Principle s) states that a flood risk assessment is required and should inform the development and design/layout of the site, as shall a strategic assessment of surface water management with a view to setting out a coordinated, strategic approach to surface water management for the whole site.

In support of the application a Drainage Strategy, Flood Risk Assessment, and EIA Report chapter on Water Resources and Flood Risk was submitted.

Relevant policies in relation to drainage and flood risk include NPF 4 policy 22 (Flood Risk and Water Management) and LDP policies Env 35 (Reducing Flood Risk), Env 36 (Designing for Surface Water). Policies in relation to climate change and the nature crises and the blue/green network are also relevant.

The parameter plans show that strategic SUDS ponds will be located around four different parts of the site to manage surface water. The positions of the SUDS at different locations around the development is appropriate and the supporting information outlines the intent to secure biodiversity enhancements and multi-purpose SUDS features which will be strategically managed with the landscaping and open space proposals. As part of multi-stage applications details of the identified filter trenches, porous paving, swales, rain gardens, green/blue roofs and all other drainage arrangements will be secured. The supporting DAS outlines that SUDS areas will be designed to provide access to open space and deliver positive effects for biodiversity and habitat which subject to detailed design of these spaces in future applications accords with LDP policy Env 37 (Designing-in Positive Effects for Biodiversity) and NPF 4 policies 1 (Tackling the climate and nature crises), 2 (Climate mitigation and adaptation) and 3 (Biodiversity).

The site includes part of the Gogar Burn at its eastern boundary and its associated valley. The topography of the site means that few areas of the proposed development are at risk of flooding from this source. Other water features in the surrounding area include the Ratho channel and the Eastfield Tributary at the west of the site. A series of watercourse structures are also in the site and surrounding area. The EIA Report concludes that subject to embedded mitigation measures and construction mitigation measures the development will have a negligible effect on the water environment at or in proximity to the development. The applicant has considered the effects of climate change and demonstrated that the risk of flooding and drainage is low for the proposal.

Edinburgh Airport Limited objects to the proposal on grounds of flood risk, including effects on surrounding lands.

SEPA confirms no objection to the proposal, subject to a condition being attached requiring no development in areas in the 200 year plus climate change plus blockage flood extents that have been identified in the supporting Flood Risk Assessment and a further condition relating to the requirement for a National Vegetation Classification survey being carried out to establish if there would be any effect on groundwater dependent terrestrial ecosystems.

Flood Planning does not object to the proposal, and further design details of drainage and water management as part of the development's phasing is recommended to be secured by condition and reserved matters for future consideration.

In principle the proposed flood risk and drainage proposals are acceptable, and do not result in unacceptable effects at the site or in the surrounding area. It is recommended that details of all drainage and flood management measures at the site be subject to conditions as part of the phased development.

Scottish Water raises no objections on grounds of water capacity or waste water capacity. A representation asserts that there is insufficient sewerage infrastructure in place for the development and that the proposal cannot therefore comply with NPF 4 infrastructure first principles. Scottish Water advises in correspondence on this point of objection that it does not consider lack of infrastructure to be an impediment to this proposal, and all water and wastewater infrastructure will be delivered ahead of need for this proposal. On the basis of no objection from Scottish Water the proposal complies in principle with LDP policy Inf 22 (Water Supply and Four Waste Water). Applications at AMC stage will be required to further demonstrate compliance with this policy.

### ***Principle t***

Principle t) states the development shall provide new outdoor play facilities as necessary to ensure all homes in the site are adequately served play facilities in line with the Play Access Standard set out in the Council's Open Space Strategy (OSS). The new outdoor play facilities shall be integrated into the site layout in well overlooked and accessible location(s) with a welcoming setting. These new facilities shall provide for a range of users, including those with disabilities. The site shall also ensure all homes are adequately served by play facilities in line with the standards for different sizes of open space set out in the OSS. The second part of the principle concerns the contribution towards, or provision of active travel routes identified in Table 8 of City Plan. This matter is considered elsewhere within the report. The LDP identifies that Environment Proposal BGN 52 (Play facilities and open space) is within this site and should be integrated into proposals.

The WEPFSM provides further details in relation to the above regarding the required open spaces in the development, noting that BGN 52 should be provided as part of the first phase of the development. All open spaces in the WEPFSM area should be interconnected with the other parks and form part of the green/blue network in this part of the City, while clear visual and actual connections by walking, wheeling, and cycling should also be provided. Within this application site the identified open and play spaces include an Excellent Standard Play space near the town centre and a multi-use games area (MUGA) in the linear park to be located near the proposed primary school site. Within Place 16 new play spaces and sport/leisure facilities are also required to be available during evening and daytime hours both within and out with schools to serve the new community. An 'Archaeological Park' based on the Gogar Mains Scheduled Ancient Monument is required in this site as well, noting that due to heritage constraints no groundworks or trees can be introduced to the site.

The Parameter Plan reference 09A 'Proposed Open Space and Green Infrastructure' identifies the strategic open spaces that are included in the proposal. The DAS and design guidance show how the spaces can support development of this scale. The inclusion of a linear park ('Central Park') with capability to deliver equipped play area(s) and a MUGA is demonstrated, green spaces including capability for unequipped and informal play, landscape planting for a variety of purposes including habitat creation, on-street pocket green spaces, ecological corridors at the east and west of the site, multi-functional SUDS areas, and communal gardens and courtyards is all consistent with the requirements of the WEPFSM in principle. The DAS and Design Guidance demonstrate that the parks and proposed green routes and streets will deliver a robust green/blue network within the site and make a positive contribution to Place 16 and will be in accordance with LDP aspirations for green/blue networks as set out in policies Env 6 (Green Blue Infrastructure) and Env 25 (Layout Design). Detailed designs for these spaces and facilities will be required to accompany AMC applications in accordance with the recommended condition relation to phasing that is attached.

It is recommended that subject to securing management and maintenance details through the attached conditions and an appropriate financial contribution through a suitable legal agreement that the Council should seek to adopt strategic parks and open spaces including the linear park. The attached condition relating to phasing will consider the timing of BGN 52.

In terms of NPF4 policy 21 (play, recreation, and sport) the proposal will provide spaces and opportunities for play, recreation, and sport. Subject to detailed design and recommended conditions, the proposal gains support from points d) and f).

In addition to play spaces required in this development principle the LDP requires new development to include appropriate levels of useable private and public open space. LDP policy 31 requires the provision of 20% of the site area for good quality, attractive, useable, and publicly accessible open spaces, that wherever possible takes the form of extensions and/or improvements to the green and blue network. LDP policy 32 requires housing development to provide good quality, useable open space and/or private gardens covering a minimum of 20% of the site area, and where developments are to provide flatted dwellings a minimum of 10sqm/ flat as useable open space and/or private gardens. In addition to these policies, the Edinburgh Design Guidance requires all homes to be located within 400 metres of a 'good' quality, accessible greenspace of at least 500 square metres, and to be within 800m of a good quality accessible greenspace of at least two hectares, as well as giving detailed guidance on how the quality greenspaces should be assessed.

The supporting DAS provides generalised guidance as to the design of the proposed open spaces and parks that will inform detailed designs at the AMSC stage(s), and the guidance also indicates how the open spaces are to contribute to the development of blue-green network.

In principle, the proposal complies with the LDP's open space policies, and the spaces indicated on parameter plans will provide a good open space resource for future occupants.

Subject to securing detailed designs through multi-stage planning applications, the attached conditions, and a suitable legal agreement the proposal complies with the applicable requirements and policy aspirations of the development plan.

### ***Principles u and v***

Principle u) requires that: within the sites, there is to be the delivery of high-quality, direct walking and cycling routes, segregated from traffic and without at-grade crossings of major roads where possible between the developments, and as a minimum to the airport (as a major employment site), the Gyle, Edinburgh Park, Corstorphine, and onward links to Edinburgh City Centre. Additionally, well connected routes to the tram stops and Edinburgh Gateway Station, including one or more active travel links that cross the rail line are to be provided.

Principle v) requires proposals to support the delivery and integration of active travel infrastructure support to delivery and integration of active travel infrastructure support delivery and integration of active travel infrastructure merging from the West Edinburgh Transport Improvement Programme study, including as part of junction improvements works at Gogar and Maybury, long-distance segregated off-road routes, as part of the bus priority measures, and the Newbridge to Dalmeny route upgrade.

Parameter plan reference 08A 'Proposed Vehicular and Non-Vehicular Movement' identifies a mixture of four different street types, public transport routes, pedestrian and cycle paths, and other paths as well as a mobility hub in the proposed town centre that would support interchange facilities with the Edinburgh Tram and proposed bus routes. The DAS and Design Guidance demonstrates that in principle, subject to delivery as part of phasing details, the proposed layout is well connected to Eastfield Road, the A8, and neighbouring sites. Proposed routes for a variety of travel modes will allow for onward movement out with the site to Edinburgh Gateway Station and the surrounding area including Edinburgh Park, the Gyle, Corstorphine and the City Centre. The WEPFSM indicates crossing points of the A8, and these details will be secured in tandem with detailed applications to address reserved matters and co-ordination with ongoing Council projects including WETIP.

Subject to the attached conditions the proposal accord with development principle u).

The proposal, by providing a comprehensive network of streets and paths, will provide appropriate active travel infrastructure within its site that accords with LDP transport objectives for sustainable travel within new development that are established in policies Inf 1 (Access to Community Facilities), Inf 5 (Location of Major Travel Generating Development), and Inf 10 (Cycle and Footpath Network) and NPF 4 policy 13 (Sustainable Transport). The inclusion of part of the active travel path at the site's southern extents is shown in the supporting DAS (LDP West Edinburgh Transport Intervention WE7) to acknowledge that co-ordination with the West Edinburgh Transport Improvement Programme proposed bus lane at the A8 is possible if required. Consideration of infrastructure requirements including public transport and off-road routes is addressed below within this assessment. Subject to securing detailed phasing, site layouts and designs by conditions the proposal accords with this development principle.

### ***Principle w***

Principle w) requires proposals to segregate active travel routes developed alongside Gogar Link Road and Eastfield Road.

The Gogar Link Road is articulated in LDP Table 9 (Road Improvements and Safeguards) as R4 and Table 8 (West Edinburgh Transport Improvements) as intervention references, WE 27-WE 29.

The WEPFSM identifies that WE 27 - WE 29 are to be delivered by developers directly. The red line boundary for this proposal includes areas that are safeguarded in the LDP for delivery of the Gogar Link Road. Parameter plan reference 08A 'Proposed Vehicular and Non Vehicular Movement' shows that the parts of WE27 - WE 29 that traverse this application site can be delivered as part of development phasing, while the supporting DAS and Design Guidance indicatively demonstrate that segregated routes alongside the Gogar Link Road will be achievable in the space provided in the development layout. A condition recommending the submission of a phasing plan detailing all active travel routes is attached.

Regarding other active travel and infrastructure safeguards in the LDP, in accordance with policy Inf 11 (Public Transport Proposals and Safeguards) the proposal does not conflict with any of those listed in the policy. Similarly, no this is no conflict with LDP policy Inf 13 (Road Network Infrastructure) and the proposal will contribute to delivering some of the new road network identified in plan, subject to conditions to secure phasing details and the conclusion of a satisfactory legal agreement.

### ***Principle x***

Principle x requires the provision of a number of mobility hubs close to tram/bus stops and high footfall, master planning and phasing work will identify optimum locations, and enhanced bus provision.

The parameter plans include two mobility hubs in the proposal, which would allow for vehicular parking at the site. The locations of the mobility hubs are acceptable, situated centrally and north and south of the tram line along primary public transport routes which can include public transport in the future. Design Guidance for the proposal confirms that mobility hubs will provide cycle parking, cycle hire, cycle EV charging and maintenance, last mile delivery lockers, car club and accessible parking on the ground floor with general car parking above. A smaller scale cycle only mobility hub is also to be located by the proposed 'Tram Square' in the new town centre.

The location of the mobility hubs is acceptable and will align well with enhanced bus provision in the site. The proposals accord with the development principle, the transport objectives of the development plan, LDP West Edinburgh Transport Interventions WE 39 and WE 40 (Mobility Hub) and the movement strategy set out in the WEPFSM which encourages mobility hubs to feature in new developments. The timing of the mobility hubs will be brought forward as part of the phasing of the scheme.

### ***Principles y and z***

Principles y and z require proposals facilitate enhanced bus provision. Specifically, a North Orbital route to connect new residential and high employment areas of West Edinburgh with key areas of development along the waterfront from Granton, Newhaven through to Seafield is required. Additionally, a South Orbital route to connect West Edinburgh with new areas of development to the southeast of Edinburgh at the BioQuarter via a number of key residential localities is required. To support delivery of the bus priority and interchange recommendations that emerge from the on-going West Edinburgh Transport Improvement Programme study (improve bus priority between the area served by the current A8 between Maybury and Broxburn).

The proposal includes a northern east-west access which reflects LDP West Edinburgh Transport Improvement WE 26 where it would continue to provide a connection onward to LDP West Edinburgh Transport Improvements WE 27 and WE 29 which form part of the envisaged north orbital route in Place 16. The proposal does not conflict with the on-going WETIP project and subject to a satisfactory phasing strategy being submitted in future no unacceptable implications will arise. The delivery of these connections will be secured through an appropriate legal agreement.

## ***Principle bb***

Principle bb) requires provisions for an improved Public Transport Interchange: Train/tram/bus/active travel opportunity on the A8, The Gyle and Edinburgh Gateway Station, to integrate radial and orbital bus routes with longer distance coaches, train, and tram services.

The proposal includes new roads and paths that will allow for public transport interchange at a new tram stop in the town centre. Proposed street types cater for buses and active travel, while space to implement active travel connections parallel to the A8 within the site is also proposed. A series of transport infrastructure interventions in West Edinburgh will ensure connections to destinations in the wider area will complement the new tram stop which is anticipated to be delivered in early phases of development and provide early public transport availability. A condition is attached with reference to securing phasing details for securing infrastructure. Subject to the attached conditions the proposal complies with Place 16 policy development principle bb). The delivery of the bridge connection will be addressed further as part of the strategic public transport interventions.

## ***Summary - Place 16 and WEPFSM***

Policy Place 16 in many places articulates the intent of other applicable development plan policies in both the LDP and NPF4 including in relation to design, layout, landscape, placemaking, open space, transport and infrastructure, amenity, and environmental considerations such as climate change, biodiversity, water management, and sustainability. The WEPFSM provides further guidance regarding how the policy should be applied.

Many of the development plans objectives are demonstrated by the proposal which includes embedded design features that include high-density and efficient use of land, low-parking numbers for all land uses which are below the Council's parking standards, a mix of land uses that will foster 20-minute neighbourhood principles throughout, provision of useable open space for future residents, and consideration of how the proposal can successfully be introduced to the area without unacceptable impacts and effects on existing land uses and neighbouring development.

Subject to the attached conditions and the conclusion of a legal agreement the proposal is compliant with both LDP policy Place 16 and the WEPFSM.

## **Other Development Plan considerations**

### Amenity, noise, and air quality

Policy 23 of NPF4 supports development that will have a positive effect on human health and protects people and places from environmental harm.

LDP Policy Env 33 (Amenity) sets out that development will be supported by this policy where it is demonstrated that the amenity of future occupiers of the development and occupiers of neighbouring developments are not adversely affected by ensuring acceptable levels of amenity, particularly in relation to odour, space standards, noise, daylight, sunlight, privacy or immediate outlook.



LDP Env 34 (Pollution and Air, Water and Soil Quality) sets out development will not be supported that would be subject to and/or have a significant adverse effect on health, amenity, and the environment (including air quality) unless detrimental impacts are adequately addressed.

The applicant submitted a suite of information that addresses amenity including the EIA Report (and addendum), DAS, and planning statement.

The Council's Environmental Protection service identifies several areas of concern which relate to noise impact including the agent of change principle which is addressed above in this report, air quality impact, contaminated land, fumes and light pollution, potential for adverse interactions between the proposed land uses in an urban setting, and the quantum of car parking.

### *Neighbouring amenity*

Residents of Castle Gogar Rigg submitted a collective objection with a variety of points of objection, of which impact on amenity was one. Objections on this theme include the change in appearance of the area, proximity of development to the mutual boundary, privacy, overshadowing, construction impact(s) notably vibration.

Scheme 2 introduced a greater set-back of development blocks from neighbouring properties at Castle Gogar Rigg, with a landscaped corridor that forms part of the site's green network proposed to the west of these neighbouring properties. Development Blocks 48-54 are at a minimum approximately in excess of 15 metres from the mutual boundary, and the proposed scale of development indicated in proposed building heights ranges from between 3 to 6 stories with finalised heights and designs to be confirmed at the detailed application stage(s). Set-back distances of development areas retain a degree of flexibility though limits of deviation and these will be finalised at the detailed design stage(s) of development at this part of the site. The supporting DAS which shall be used to inform the parameter plan layouts advises that buildings in the vicinity of Gogar Castle should be lower in height and set back from the boundary in recognition of the historic setting. The attached conditions defer the finalised heights and ground levels at plots 48-54 to the detailed application stage(s) and subject to satisfactory design solutions at this sensitive part of the site the proposal is acceptable in principle and demonstrates that while there will a change in immediate outlook through the introduction of a new urban quarters in this part of Edinburgh neighbouring amenity can be protected to an acceptable standard with careful design.

Although the position of proposed development is identified in the parameter plans, detailed design features of development at the interface with Castle Gogar Rigg are unknown at this stage. In principle the location of development proposed in the parameter plans is acceptable in the context of neighbouring amenity, and subject to the recommended conditions the nature and extent of any other amenity effects such as privacy will be considered further.

The EIA Report considers noise and vibration impact on neighbours at Castle Gogar Rigg and concludes that prior to any mitigation neighbours may experience a temporary and short term moderate adverse effects from heavy construction activities such as the use of vibratory rollers, vibratory piling, or percussive piling. The assessment goes on to list mitigation measures that it estimates would reduce both noise and vibration impacts. These measures include carrying out works at a substantial distance from receptors where feasible, working only for short durations, and limiting the number of days of work. Construction noise will be regulated under the Control of Pollution Act 1974. Upon completion of the development, it is predicted that the residual effects of noise and vibration will be negligible.

With reference to construction management, the EIA Report includes a series of mitigation measures, both embedded and additional during construction, in relation to minimising impacts on neighbouring residents. The embedded mitigation measures in the layout are acceptable in principle and assist in achieving appropriate separation distances from areas of development and neighbours, and it is recommended that operational construction mitigation measures be secured through a CEMP which the EIA Report concludes is required.

#### *Future residents*

As an application for planning permission in principle detailed designs are not proposed at this stage. The parameter plans identify the areas of proposed development and associated transport routes and open spaces, as well as the intended location of uses and key frontages at plots. Limits of deviation apply to these plans which provide appropriate flexibility for distances between plots and reduce risks of unacceptable intervisibility and related amenity effects. The supporting DAS outlines a variety of strategies to ensure that detailed designs can deliver an acceptable environment for future residents which in principle accords with the objectives of NPF 4 policy 14 (Design, quality and place), LDP policies Env 33 (Amenity), Env 31 (Useable Open Space in New Development), and Env 32 (Useable Communal Open Space and Private Gardens in Housing Development).

Through the attached conditions and reserved matters, and subject to detailed designs of the development plots and areas of public realm, an acceptable level of privacy, overlooking, daylight, sunlight, outlook, and open space can be secured through AMSC applications. Any further application will be required to demonstrate compliance with LDP and NPF4 policies in relation to site layout, housing mix and design.

#### *Noise*

The EIA Report identifies that surrounding noise sources include Edinburgh Airport, the Royal Highland Centre, the Edinburgh Tram, the A8 and Eastfield Road.

The EIA Report advises that with mitigation the proposal will be capable of achieving a satisfactory living environment, and the detailed design of future development will need to consider noise impact as development is delivered over time at the development proposal.

Noise impact in the context of the agent of change is considered above within this report and the proposal complies with NPF 4 policy 23 (Health and Safety) criterion e) subject to further information being supplied at the AMC stage(s) for detailed development(s).

Environmental Protection raises concerns regarding the airport's future growth ambitions which could introduce a degree of uncertainty around the future noise baseline. The site is in a growing part of the City with a variety of surrounding existing land uses. Regarding airport noise the site is out with the runway noise contours where noise impact is greatest, and although the noise memo does not refer to operational noise impacts, further consideration of noise mitigation will be considered as part of the detailed design. Attached conditions recommend that detailed AMC applications should be accompanied by noise impact assessment(s) where applicable and the future baseline scenario will be captured at the time of submission. Mitigation measures to secure suitable living environments at the site are identified, and at the AMC stage(s) appropriate mitigation measures would feature in detailed designs of development where required.

Other Environmental Protection comments relating to noise from sports pitches at safeguarded school sites, plant and commercial noise, and other sources would be addressed through the attached conditions.

#### *Air Quality*

The supporting EIA Report included an air quality impact assessment (AQIA). The assessment identifies that embedded mitigation in the proposal's design includes implementing 20-minute neighbourhood principles with a mix of uses on-site to cater for local demand on services, sustainable travel availability within and out with the site, low parking provision, a landscaped buffer to the A8 of approximately 20 metres or more, and use of mobility hubs and electric vehicle charging facilities.

Sensitive receptors at both the construction and operational stages of the proposal include surrounding residential areas and properties, ecological receptors (Gogar Burn Local Nature Conservation Site at the site's east), and the nearby Air Quality Management Areas (AQMAs) at St. John's Road and Glasgow Road.

Environmental Protection raises concerns in relation to air quality and recommends that the development should be car free with very limited or no parking. SEPA agrees with the EIA Report conclusions on air quality matters, and highlights that the Council should seek to achieve significant mitigation measures to reduce overall traffic levels in accordance with the Council's commitment to Net Zero, City Mobility Plan, and other strategies.

The EIA Report and addendum considers air quality effects on the surrounding area and for future occupants at the proposal, detailing the 'without development' and 'with development' scenarios for sensitive receptors for concentrations of NO<sub>2</sub> (Nitrogen dioxide), PM<sub>10</sub> (particulate matter less than 10 micrometres in diameter), and PM<sub>2.5</sub> (particulate matter less than 2.5 micrometres in diameter). Environmental effects are identified pre and post the application of mitigation measures.

Without mitigation measures to manage the adverse effects of construction activities such as risk of dust the proposal would cause a major and significant effect over the short term. With mitigation measures relating to working practices identified in the EIA Report (Appendix 12.2) these effects can be managed over the short term to result in a predicted negligible adverse effect. It is recommended that a CEMP be secured by condition to ensure an acceptable scheme of mitigation is in place in accordance with the EIA Report recommendations.

At the operational stage, and after embedded mitigation measures are considered, the EIA Report concludes that there will be a moderate adverse effect on air quality for sensitive receptors, linked to the exceedances of PM10 at both the site and wider area. The EIA Report highlights that a conservative approach is taken in the assessment in line with the precautionary principle. The assessment goes on to note that '*...the City Plan 2030 Environmental Report state that there are predicted to be increases in traffic in the AQMAs of Glasgow Road and St John's Road as part of the allocation at this Site and that there should be detailed assessments on the air quality in these areas. The City Plan 2030 has proceeded with these acknowledgements made*'. The assessment asserts that there will be a deterioration in air quality which cannot be reconciled with the allocating at this site the level of development in the LDP without being able to avoid the predicted adverse effects. It is to be noted that exceedances for PM10 are predicted even without the proposal and that the road network is particularly sensitive to changes in traffic.

LDP Policy Env 34 only supports development where significant adverse effects on health and air quality are addressed through design and layout. The applicant has demonstrated that the site has been designed around 20-minute neighbourhood principles, reduced vehicle dependence and low parking, and sustainable travel options are embedded into the proposed layout, while buffers between new receptors and pollutant sources are introduced. Scheme 2 introduced a greater set-back of development from the A8 to ensure a better air quality environment will be achieved at this frontage of the site which is to include ground floor mixed-uses with residential properties above, with the set-back of buildings to be at least 20 metres. The A8 frontage space is designed to be transitory in nature and private gardens would be situated to the rear of these development plots.

The proposal includes embedded mitigation measures, some of which are to be secured by condition and/or legal agreement and which underpin its allocation for housing-led development of the scale supported by the LDP. Opportunity remains to mitigate air quality effects through low carbon energy and heat recovery, which will be better understood at the AMC stage(s) and informed by Scottish Building Standards. The predicted adverse effect on air quality presents a tension with LDP policy Env 34 and NPF 4 policy 23, however this does not outweigh the proposal's merits in respect of its compliance with the rest of the development plan.

### *Fumes and odour*

Edinburgh Airport lies to the north of the application site. Environmental Protection raises concern about the potential for fumes from airport and aeroplane activities affecting future occupants of the site, highlighting that complaints have been received in the past from neighbouring properties. The nearest plots to the airport area are around the Gogar Mains Farm and steading, and most of the application site is of comparable distance from the airport to other residential properties in West Edinburgh such as those at Eastfield Road, Castle Gogar Rigg, and Turnhouse Road where the standard of residential amenity is comparable. Should any odour from fumes lead to complaints, these complaints would be addressed out with the planning regime and addressed to SEPA, Environmental Protection and Edinburgh Airport.

Other comments relate to odour from the mix of uses proposed, such as commercial kitchens. At the planning permission in principle stage, it is not feasible to consider this matter which can be addressed as part of AMC application(s).

### *Lighting*

Environmental Protection advises that floodlighting from Edinburgh Airport could impact on amenity in parts of the proposal, with further assessment required. Lighting from the airport will largely be screened by existing vegetation along the Gogar Burn and AMC applications for will be required to demonstrate appropriate amenity for future occupants.

### *Amenity summary*

Housing-led mixed-use development at this application site is supported in the development plan to deliver new housing in West Edinburgh. The EIA Report and supporting information identifies that there are environmental effects that will affect the proposal to varying degrees. Through a combination of embedded mitigation and additional mitigation measures at both the construction and operational stages none would give rise to unacceptable effects on the living environment of this new high-density urban area. The Council's Environmental Protection service recommends conditions be attached for matters relating to air quality, noise, floodlighting, cooking ventilation, ground investigations, renewable energy, electric vehicle parking, and a CEMP if committee is minded to grant planning permission in principle, and where appropriate these recommendations are included in the attached conditions and informatives.

Subject to the attached conditions the proposal is acceptable in principle, noting the tension between the plan's spatial strategy and air quality effects.

## Cultural heritage and archaeology

National Planning Framework 4 Policy 7 intends to protect the historic environment. The LDP outlines that the objective of policies Env 16 (Protection of Important Archaeological remains and the historic environment) and Env 17 (Development of Sites of Archaeological Significance) is to protect and enhance Edinburgh's historic environment and archaeological remains, where possible by preservation in situ and in an appropriate setting. The WEPFSM identifies that development in this area should include an Archaeological Park, where the underlying landform must be retained with no groundworks or planting of trees.

The applicant's EIA Report considers the effects of the proposal on the City's heritage and archaeological resources.

### *Scheduled Ancient Monument*

The Gogar Mains Fort Scheduled Ancient Monument (SAM) is within the application site. The applicant's EIA Report included an assessment of the effects of the proposal on this historic feature. The setting of the monument is largely rural and currently open with agricultural fields and the Gogar Mains Farm Road in the site, and nearby development including A8, Castle Gogar, Castle Gogar Rigg, and Edinburgh Airport.

The proposal outlines that the scheduled area will be retained as an Archaeology Park, with no development or intrusive works. It is proposed the area would include mown paths and wild meadow planting, with the intended use of the space to provide passive, low impact recreation such as walking and recreation. The supporting DAS outlines how development to be detailed future AMC applications will address this space, with development plots 21, 24, 28, 32, 33, 50-51A, and the high school site surrounding the scheduled area. Following comments from HES and the City's Archaeology Service during the assessment of the application, Scheme 2 included alterations to the proposal to alter the position, height, and massing development near the SAM to better create a sense of distance from the area.

The EIA Report Addendum identifies that there will be no direct effects on the SAM, due to no works being proposed in the relevant area. Construction mitigation is proposed to ensure fencing is erected to avoid any adverse impacts.

The setting of the monument will change substantially, and the EIA Report concludes that after mitigation which includes planting and landscaping around the boundary, use of root barriers at the boundary to protect from roots entering the area, preparation of a Conservation Management Plan, installation of interpretation boards and educational promotion of the SAM, the predicted effect will be a moderate adverse.

HES does not object to the principle of the proposal, but in the context of Historic Environment Policy for Scotland (HEPS 2019), HES Managing Change guidance regarding Setting, and NPF 4 policy 7 clause h) i-iii is of the view that further design mitigation should be put in place to address what HES expect to be a significant effect on setting. Scheme 2 introduced changes to the proposal, which HES acknowledges and agrees with the EIA Report Addendum conclusion that the impact on the setting of the monument would not be fully mitigated through vegetative screening. While Scheme 2 does not address at this stage all HES's concerns regarding the setting of the SAM, additional mitigation requested by HES can be considered at the AMC stage when detailed designs are available within the area(s) surrounding the SAM.

Comments further advise of the possibility of Scheduled Monument Consent being required for some of the proposals including landscaping, interpretation panels or access to possible paths to the east. Scheduled Monument Consent is regulated by HES.

The City's Archaeology Service acknowledges the change to the area and the conclusion that there will be an adverse effect on the setting of the SAM that such impacts are insufficient to refuse planning permission. Recommended conditions include securing the landscape details for the SAM and construction mitigation through a CEMP.

At the planning permission in principle stage and in the context of NPF 4 policy 7 f) iii, the proposal demonstrates that while there will be an impact on the SAM's setting, these impacts have been minimised through design as far as practicable and subject to detailed design information of the areas around the SAM being secured through the attached conditions the proposal is acceptable.

### *Archaeology*

The City Archaeology Service advises in comments that due to the site's archaeological potential further survey work and a programme of public engagement should be required through a programme of works due to the significant extent of groundbreaking across the site and a condition is attached to this effect. Other comments welcome the retention of Gogar Mains Farm and steading, noting that potential infill of the Gogar Mains Farm will require further scrutiny at the relevant detailed design stage. The recording of historic buildings on the site including Gogar Mains Farm and steading, recording of buildings to be demolished, and the submission of a scheme for the existing stone wall at the A8 interface. The re-use of the Gogar Mains Farm and steading and the A8 wall gain support from NPF 4 policy 9 (Brownfield, vacant and derelict land, and empty buildings) and LDP policy Env 3 (Development Design - Incorporating and Enhancing Existing and Potential Features).

Subject to the attached conditions details of the design and mitigation measures regarding the safeguarding of the historic environment accords with the development plan.

### Ground conditions and soils.

Supporting section plans demonstrate that there will be a requirement to move soils at the site. Whilst the site is currently grassland, previous uses of areas of the site may have caused pockets of contamination. Site investigation information has been provided by the applicant; however further works are required.

NPF 4 policy 5 (Soils) seeks to reduce disturbance to soils. Given the scale of the proposal and the nature of the site, the proposal will require earthworks and grading of the site in many parts, but not all, for example at the scheduled monument and in the Gogar Burn valley. In order to deliver the growth strategy of the development plan high levels of disturbance to soils is an acceptable aspect of this proposal. To achieve compliance with the policy's objectives as far as practicable a CEMP to be secured by condition should detail how working practices will protect soils from compaction and erosion.

The site must be made safe for the proposed end use, and therefore a condition has been applied requiring that as detailed designs are received through multi-stage planning applications, that the works necessary to ensure this is the case are submitted and approved by the planning authority, and that these are then implemented by the developer. Subject to conditions and reserved matters the application complies with LDP policy Env 34 with respect to ground contamination and soils.

### Climate Change, Sustainability, Biodiversity and Natural Places

NPF4 policies 1, 2, 3 and 4 require that development contributes to creating zero carbon, nature positive places, where development emissions are minimised, climate resilience is improved, natural places and assets are protected, managed, and restored, and biodiversity is enhanced and better connected, using nature networks and nature-based solutions.

LDP policies Env 7 and Env 8 require new development to demonstrate that all reasonably practicable measures to address the climate emergency and contribute to sustainable living and achieve a net zero level of operational greenhouse gas emissions have been undertaken. Policy Env 37 requires development to have a proportionately positive effect upon biodiversity.

The applicant has provided an Energy and Sustainability Statement and an S1 Sustainability Form'. These describe principles for addressing climate chance and achieving net zero greenhouse gas emissions and other environmental sustainability targets.

The applicant has supplied various ecological surveys describing the biodiversity impact the proposed development is likely to have, and the necessary measures that need to be undertaken to ensure the application results in overall enhancements for biodiversity. The EIA Report and addendum includes an assessment of the effects of the proposal on ecology and nature conservation matters.



In terms of the protected species, impact is shown to be limited to reductions in sett occupation by badgers, however this has been accounted for as part of the proposal's design, ensuring as many setts as possible are retained, and that habitat corridors are maintained at site boundaries. It is proposed that species protection plans are required as part of future AMC applications in order to mitigate impact to both badger and other protected species, as necessary. SEPA requests that further surveys be carried out in respect of identified marshy areas of the site where there may be potential for groundwater dependent terrestrial ecosystems, recommending a National Vegetation Classification (NVC) survey be completed for these areas; a condition is attached to secure this information. NatureScot recognises that the proposal will include appropriate opportunities for biodiversity benefits through the proposed open spaces and green networks and acknowledges that while protected species will be impacted by the proposals, mitigation in the form of species protection plans as part of the development's phasing will reduce adverse effects.

Habitat assets have been integrated into the masterplan proposals as demonstrated within the DAS and landscape proposal. Whilst it has been demonstrated that the majority of the site consists of species poor grassland, features of value are to be retained, particularly areas of semi-natural woodland along the Gogar Burn (a potential Local Biodiversity site 'pLBS'), native hedgerow habitats, narrow strips of species-diverse grassland and running water habitats along the Gogar Burn and Ratho Channel. The DAS outlines how open space and landscaping across the site is to be used to promote biodiverse habitat, by incorporating meadow creation, linear corridors of green space with hedgerows, tree lines and grassland. The EIA Report concludes that with mitigation during construction stage, embedded mitigation already applied in the parameter plans, and the submission of species protection plans the effects on biodiversity and protected species will be reduced to an acceptable level and in the context of the development plan this is acceptable. The proposal complies in principle with the objectives of LDP policy Env 21 (Protection of Biodiversity).

Further detail of measures taken to address the climate crisis is provided within the DAS and Transport assessments. Buildings will be required to comply with the relevant building regulations in terms of energy efficiency, operational energy targets are to be set, and a refuse storage and collection strategy is to meet the standards described in the Edinburgh Design Guidance and of the Council's waste service. Refuse management and commitments to zero waste will be secured through detailed designs through AMC applications and compliance with the Waste (Scotland) Regulations to ensure compliance with NPF 4 policy 12. As discussed above, the application is to adopt 20 minute neighbourhood principles and enable the use of active and public transport modes by future residents, reducing the reliance of residents on private motor vehicles for their transport needs by ensuring that it is possible to walk, wheel or cycle for most of their daily needs (i.e. travelling to work, school or other necessary activities).

At AMC stage developments are to adopt a fabric first approach to energy efficiency, make use of efficient and compliant technologies, and optimise on-site renewable energy generation in order to meet these principles. Applications at the site level will need to comply with LDP policies Env 7 and 8, requiring them to demonstrate that all reasonably practicable measures to address the climate emergency and contribute to sustainable living and achieve a net zero level of operational greenhouse gas emissions have been undertaken. Biodiversity is to be addressed at AMC stage by requirements for species protection plans and habitat creation and management plans, whilst individual AMC applications will be required to demonstrate compliance with LDP policy 37, requiring details to be provided of measures to be taken to ensure an overall positive effect upon biodiversity.

Subject to conditions and reserved matters, the application complies with NPF4 Policies 1, 2, 3, and 4, and LDP Policies 7, 8 and 37.

### Infrastructure and developer contributions

NPF4 Policy 18 Infrastructure First requires:

- Development proposals which provide (or contribute to) infrastructure in line with that identified as necessary in LDPs and their delivery programmes will be supported; and
- The impacts of development proposals on infrastructure should be mitigated.

Development proposals will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure. Where planning conditions, planning obligations, or other legal agreements are to be used, the relevant tests will apply.

### *Developer Contributions*

The Council's Draft Developer Contributions and Infrastructure Delivery Supplementary Guidance (SG) was published for consultation on the 26 June 2024 and the consultation closed on 17 September 2024. The responses and final draft SG is scheduled to be considered by the Planning Committee on the 11th of December 2024 and, if approved, will subsequently be submitted to the Scottish Ministers. Legislative allowance to the Scottish Government ceases at the end of March 2025, so the Scottish Ministers must make a decision to allow the Council to adopt the SG by then. If adopted, it will be statutory supplementary planning guidance. The guidance is a material consideration in the assessment of this proposal.

LDP Policy Inf 3 Infrastructure Delivery and Developer Contributions requires that development will be supported where there is sufficient infrastructure capacity already being available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts.

LDP Policy Inf 4 states that development proposals relating to housing or other development sites which would generate a significant amount of trips, shall demonstrate through an appropriate transport assessment or statement and through mitigation (including development layout, form, design, and other measures) that:

Local, city-wide and cross-boundary individual and cumulative transport impacts identified in the City Plan Transport Appraisal modelling and analysis can be timeously addressed where this is relevant and necessary for the proposal; and

The required transport infrastructure, as set out in Part 4 Tables 3-10, place policies/ development principles or forthcoming guidance in place briefs/master plans has been addressed where relevant to the proposal.

Where infrastructure cannot be delivered by the developer directly, developer contributions will be sought where considered necessary to mitigate any negative impacts (either on an individual or cumulative basis). Infrastructure requirements identified include:

- Transport proposals and safeguards (Part 4, Tables 3-10) and/ or interventions identified in transport assessments and/or transport consultations;
- Education provision including new schools, early years nursery proposals, school extensions etc. (Part 4, Table 11);
- Primary healthcare infrastructure capacity (Part 4, Table 12);
- Greenblue network actions (Part 4, Table 1); and
- Infrastructure of a regional scale where identified as part of a national or regional spatial strategy or as a Regional Spatial Priority as set out in NPF4.

West Edinburgh Placemaking Framework and Strategic Masterplan which was approved by Planning Committee on 13 November 2024 identifies infrastructure requirements and potential delivery mechanisms and timing taking cognisance of infrastructure first principles set out in NPF4.

Planning conditions have been applied taking cognisance of the six tests set out in Circular 1998: The Use of Planning Conditions in Planning Permissions where they need to be: necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise, and reasonable in all other respects.

Similar considerations apply to the use of planning obligations where Circular 3/2012: planning obligations and good neighbour agreements where five tests where they need to be: necessary to make the proposed development acceptable in planning terms (paragraph 15); serve a planning purpose (paragraph 16) and, where it is possible to identify infrastructure provision requirements in advance, should relate to development plans; relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area (paragraphs 17-19); fairly and reasonably relate in scale and kind to the proposed development (paragraphs 20-23); and be reasonable in all other respects (paragraphs 24-25).

## Education

The LDP identifies educational infrastructure requirements including:

- Additional primary school capacity -9 x streams of Primary School provision and associated nurseries across the Place Policy 16 area (EWE 4/5). This shall include Primary Schools on both the application site (H63) and Crosswinds (H61); and
- Additional secondary school capacity - A new secondary school and associated community facilities (including healthcare, public library, sports pitches and leisure and recreational facilities) is required at an initial stage on the application site to ensure education infrastructure is in place to serve this proposal and wider development in Place Policy 16. This school shall have an initial capacity of 1200 pupils but shall be designed and built from the outset so it can be subsequently expanded to accommodate 1800 pupils (EWE 10).

Where a development site includes the land safeguarded for a new school, the site will be secured as part of a legal agreement. The value of the land, as well as the cost of servicing and remediating the site (if appropriate), will be credited against that site's overall contribution requirement once the Council has confirmed that the new school will be delivered.

The total cost of primary school infrastructure is £106,896,672 and the total cost of secondary school infrastructure is £81,898,740. It is estimated that this application will deliver 7,000 housing units, of which 3,360 are greater than one-bedroom units generating a requirement for educational infrastructure. This equates to 59.8% share of primary school infrastructure and 59.4% of secondary school infrastructure across west Edinburgh. The proportion of developer contributions equates to £63,887,687 for primary school infrastructure and £48,665,653 for secondary school infrastructure, respectively. The total amount of developer contributions for educational infrastructure is £112,553, 340. This will be secured through a planning obligation.

## Transport

LDP Place Policy, Place 16 West Edinburgh advocates the need for a cumulative Transport Contribution Zone to address area wide transport interventions identified through the City Plan Transport Appraisal and the West Edinburgh Transport Appraisal (WETA) / West Edinburgh Transport Improvement Programme (WETIP) package of measures identified to bring cross boundary and strategic improvements to public transport and active travel as well as WETA actions previously identified to enable development at West Edinburgh. This approach has been accepted by Scottish Government Reporter's at Examination and by Scottish Ministers in issuing their direction to adopt the plan. Measures are individually identified in Part 4, Table 8 West Edinburgh Improvements. The Transport Assessment for the Local Development Plan - CityPlan 2030 and transport chapter in the EIA assume that the baseline position is that WETA/WETIP infrastructure measures have been implemented. Whilst some of the measures have been implemented there are interventions that will require to be delivered as part of any infrastructure mitigation package.

Actions expected to be funded via developer contributions with apportionment of estimated costs include:

- WE5 - Gogar to Maybury additional eastbound traffic lane (R5) (£7,000,000, £628.03 per housing unit,  $7,000 \times £628.03 = £4,396,210$ );
- WE6 - Maybury Road Approach to Maybury Junction - bus priority measure (costs to be confirmed if required);
- WE10 - Active travel route west of Maybury to city and West Edinburgh Links (£2,277,136.80, £204.30 per housing unit,  $7,000 \times £204.30 = £1,430,100$ );
- WE14 - Upgraded Bus interchange facility at Ingliston P+R (£5,000,000, £44.86 per housing unit,  $7,000 \times £44.86 = £314,020$ );
- WE15 - Enhanced interchange at Edinburgh Gateway to connect active travel and bus services with tram and rail off Myreton Drive. Additional bus stops created on Gogar Roundabout slips (£3,000,000, = £269 per housing unit,  $7,000 \times £269 = £1,883,000$ );
- WE16 - Improved northern and southern orbital bus routes from Maybury (via Maybury Road and Edinburgh Park respectively) (£6,500,000, £583 per housing unit,  $7,000 \times £583 = £4,081,000$ );
- WE17 - Bus Priority South West Edinburgh (£490,000, £44 per housing unit,  $7,000 \times £44 = £308,000$ );
- WE19 - Segregated public transport route - West alignment - using safe guarded tram line (£18,000,000, £1,615 per housing unit,  $7,000 \times £1,615 = £11,305,000$ );
- WE20-Segregated public transport route South - Harvest Road (£1,000,000, £90 per housing unit,  $7,000 \times £90 = £630,000$ );
- WE21- Segregated public transport route South - Newbridge (£8,500,000, £763 per housing unit,  $7,000 \times £763 = £5,341,000$ );
- WE 26 - connectivity linking across West Edinburgh Framework Area - proportionate cost to be attributed to the site - further feasibility and costings to be developed; and;
- Northern - East/ West access - connectivity to the north of the site linking across the West Edinburgh Framework - further feasibility and costings to be developed.

Several identified improvement proposals will be delivered as part of the development layout, and these are considered further in the section on Planning conditions below. There are a number of transport interventions that are required to provide connections between the development areas within Place 16. The Council may consider the use of Compulsory Purchase for these actions, and this would be further reported to Council as required.

## Tram

Further detail in respect of the tram contributions sought is contained in the Council's Draft City Plan 2030: Supplementary Guidance on Developer Contributions and Infrastructure Delivery December 2024, Part Three Transport - Addendum 5 Shared Mobility "Tram - Operation Tramlines".

Tram contributions have been calculated using Table 5.1 of West Town Edinburgh Limited EIAR Volume 2, Chapter 5: The Proposed Development and the applicant will be required to contribute the sum of approximately £13,633,445 to the Edinburgh Tram.

## Controlled Parking

The applicant/future applicants will be responsible for re-imbursing all reasonable costs incurred by the Council, as roads authority, in promoting and implementing necessary traffic orders to control parking in the development.

## Healthcare

The LDP identifies the need for developer contributions to deliver healthcare provision to support the level of development outlined within West Edinburgh. Contributions will be applied through a cumulative contributions zone drawing on the conclusions of the Council's Healthcare Appraisal. The actions set out in Table 12 are to be addressed through Policy Inf 3 include:

- A new medical practice; and
- Potential extension options for existing practices at Parkgrove, East Craigs, Ladywell East and Ladywell West.

Total potential contribution estimated within this zone towards a new practice from City Plan allocated sites: £18,214,636.74.

The cost attributable to West Town is  $7000 \times £1,682.49 = £11,777,430$

The development also includes the provision of student housing. A contribution rate of £801.19 is required per student bedspace.

## Affordable Housing

In line with LDP policy Hou 2 affordable housing of at least 35% of the total units will need to be secured through a legal agreement. The Council's Affordable Housing Service advises that the proposal is acceptable subject to conclusion of a legal agreement.

## Open Space

BGN48 West Edinburgh green network, seeks to extend and embed the green network into developments at West Edinburgh (Place 16). There is a requirement to ensure the long-term maintenance and future adoption of all the strategic open spaces within the development. Suitable conditions and measures for the adoption of any strategic/significant open space within the development will be required. There is a requirement for a suitable legal agreement to address matters relating to the future adoption of these spaces.

Given that this application is being considered in advance of the 2024 Supplementary Guidance on Developer Contributions and Infrastructure Delivery being reported to Planning Committee some flexibility is required on the application of contributions. Committee are therefore requested to accept the general principles of the Infrastructure Delivery with some built-in flexibility to allow the Chief Planning Officer to adjust the payment amounts and delivery options to secure the necessary infrastructure in the formation of the appropriate Legal Agreements.

## **Conclusion in relation to the Development Plan**

The proposed housing led mixed-use development is substantively located within Housing Proposal H63 of the LDP, on which development is supported by City Plan policy Place 16, if it will contribute towards the creation of a new urban quarter, and is compatible with the West Edinburgh Development Principles, as guided by the West Edinburgh Placemaking Framework and Strategic Master Plan. As the proposal is found to accord with these principles, subject to conditions, the reservation of the details of matters such as the detailed scale, form and design, phasing, amenity, transport and flooding for considered at the AMC application stage, and the conclusion of a suitable legal agreement, the proposal is considered to be acceptable in principle.

Matters raised by other development plan policies in relation to design, layout, landscape, placemaking, open space, heritage, transport and infrastructure, amenity, and environmental considerations such as climate change, biodiversity, protected species, and water management, have been addressed by the proposal. A sufficient level of detail has been articulated by the parameter plans, design and access statement, and other supporting documentation to give confidence to the planning authority that the proposal is compliant with the applicable requirements and policy aspirations of the development plan, subject to securing detailed designs through multi-stage planning applications and the attached conditions

Overall, subject to conditions, reserved matters as specified, and the conclusion of a suitable legal agreement, the proposal complies with the applicable requirements and policy aspirations of the development plan.

## **b) There are any other material considerations which must be addressed?**

The following material planning considerations have been identified:

### Equalities and human rights

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

These matters will be considered again as part of the AMC applications.

### Public representations

Fifty-three public representations were received in relation to the application. This includes objections from Ratho and District Community Council, the Royal Highland Centre, Edinburgh Airport, neighbouring landowners, and Cllr Kevin Lang. Cramond and Barnton Community Council described their position as neutral towards the application, but the content of their comment was in opposition. The application is also subject to a petition in objection to the proposal with 23 signatures.

A further neighbour notification was issued in relation to the EIA Legislation following the submission of amended information. Due to a postal error, there was a delay in the closing date for representations. The final date for submission of these comments falls after the publication of this report. Any matters raised following the publication of this report will be addressed in a supplementary paper in advance of the consideration of the application.

A summary of the issues raised is provided below. All material considerations raised have been addressed in either sections a, b, or c of the report.

#### *Material considerations in objection*

- The development is contrary to the requirements of the development plan and planning guidance.
- The development does not comply with a town centre first approach, and a Retail Impact Assessment should be submitted to support the application.
- Sufficient housing development in West Edinburgh already.
- Concerns that a holistic approach to the development of this and nearby sites has not been taken. The development should be considered a new settlement, rather than an urban extension, requiring the provision of amenities and uses appropriate for such a development.
- Long-term commitment by the developers to the provision of necessary facilities, amenities and infrastructure is necessary.
- Transport improvement projects must be delivered before the start of works on site (Road, Public and Active Transport), and in inadequate funds are available to support necessary transport actions.
- Negative impact on traffic congestion. Tram, bus and cycle infrastructure and capacity is insufficient to support the development.



- Several proposed/potential accesses and onward active and public transport route connections rely on connections via land out with the applicant's control.
- The transport assessment is insufficient.
- Requirement for a Controlled Parking Zone.
- Insufficient active travel routes to the Gyle Shopping Centre provided.
- Insufficient current sewerage capacity to service the development.
- Schools will not be delivered prior to first occupation of proposed properties; public and active travel options therefore need to be provided before occupation of the development to enable local people to travel by sustainable modes to local facilities.
- The development does not comply with Infrastructure first principles.
- Need for sufficient new healthcare infrastructure to serve new residents.
- Development's design inadequately respects the character of existing properties, will negatively impact the appearance of the area, and is of too high a density.
- Lack of green space between proposed new buildings and buildings at Castle Gogar Rigg.
- Loss of open and green space.
- The design is of poor quality.
- Need to consider the design of the strategic blue green network on the site, appreciating the connection of this with placemaking, climate change adaptation and environmental/community facilities.
- Need to consider local heritage assets.
- Amenity impacts to the residents of existing development (sun lighting, daylighting, privacy, noise, privacy, access to nature).
- The proposal contains insufficient measures to mitigate, minimise and manage the effect of noise from the Royal Highland Centre on the residents of proposed dwellings, resulting in the Agent of Change principle not being satisfied.
- Negative impact on the environment and environmental site constraints are not adequately addressed.
- Insufficient emphasis and weight placed in the application outlining how the development will address the climate and nature emergencies.

- Proposed materials are too carbon intensive in their production and the impact of the development overall, not just operational emissions, should be included in climate change related assessments.
- Negative impact to wildlife and biodiversity.
- Increase the pollution of the local area.

#### *Non-material considerations*

- The proposal is insufficiently specific.
- Greater consultation with the residents of Castle Gogar Rigg, Castle Gogar, and wider public necessary.
- Residents did not receive notification of consultation process.
- Drawings and visualisations use out of date aerial views of Castle Gogar Rigg.
- Proposed alternate development layouts, designs, or land uses.
- Amenity impacts and risk of damage to properties from construction.
- Disclosure status of correspondence between the applicant and Council officers.
- Drawing in DAS showing character areas misleadingly shows an area out with the site boundary as green space, when it is in part already developed, covering homes/gardens at Castle Gogar Rigg.
- SEA, Environmental Impact Assessment and Transport Impact Assessment not been prepared as separate strategic documents prior to the application coming forward.
- Supportive of the West Edinburgh Placemaking Framework.
- CEC budgetary issues prevent the delivery of school infrastructure.

#### Habitat Regulation Assessment

NatureScot comments advise that the Gogar burn flows into the River Almond which flows out at Drum Sands, an important habitat of the Firth of Forth Special Protection Area. Comments recommend that a brief and concise Habitat Regulation Appraisal (HRA) in accordance with the Conservation (Natural Habits, &c.) Regulations 1994 ('the Habitats Regulations') be completed. The Habitats Regulations cover requirements for protecting sites that are internationally important for threatened habitats and species and provide a framework for species protection.

The Council is the competent authority for completing the HRA. The HRA has been completed and there is no impediment to the determination of this application.

## Environmental Impact Assessment

This proposal is EIA development under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the 2017 EIA regulations).

The 2017 EIA regulations require the decision maker to examine all the submitted environmental information and reach a reasoned conclusion on the significant environmental effects of the proposed development. The EIA Report contains all the required information as set out in regulation 5 of the 2017 EIA regulations.

The Environmental Information that has been taken into account as part of this assessment includes the following:

- EIA Report submitted on 12 January 2024.
- EIA Report Addendum submitted on 30 September 2024.
- Consultation responses from: SEPA, NatureScot, Transport Scotland, Scottish Water, Historic Environment Scotland, Ratho and District Community Council, Network Rail, Edinburgh Airport Safeguarding, Edinburgh Tram, City of Edinburgh Council Environmental Protection service, City of Edinburgh Council Flood Planning service.
- Representations from members of the public.

The applicant's EIA Report includes assessment of the following effects:

- Landscape and visual.
- Ecology and nature conservation
- Archaeology and Heritage
- Hydrology, Geology, and Ground Conditions
- Water Resources and Flood Risk
- Transport and Access
- Air Quality
- Noise and Vibration
- Climate Change
- Socioeconomics
- Effect Interactions
- Additional Mitigation

Mitigation measures identified in the EIA Report include a variety of embedded and additional mitigations for the development proposal including but not limited to:

- Low parking and provision of a network of streets and paths that cater for a variety of sustainable transport modes and interchanges with public transport.
- Early activation of the tram stop for early phase(s) of the development and preparation of travel plans.
- Landscape design, SUDSs, and open space capable of providing multiple functions for future residents, drainage, biodiversity, and capable of adapting to and mitigating the effects of climate change.

- Noise mitigation measures relating to amenity for future residents.
- Commitment to provision of low and zero carbon energy sources to reduce air quality impacts.
- Agreement in principle to negotiate developer contributions to deliver supporting infrastructure at the right time in accordance with infrastructure first principles.
- A condition is attached broadly limiting the development to the scope of the description in the EIA Report and accompanying parameter plans. And a further condition is attached to secure the recommended mitigation measures in the EIA Report for all future phases of the development.

### *Construction impacts*

Construction impacts are predicted to arise in most EIA Report chapter assessments and will result temporary and reversible effects to varying degrees. Mitigation measures for these are recommended to be captured through a construction environment management plan throughout, and a condition is attached to secure the submission of a CEMP to manage the effects of construction impacts in line with the EIA Report recommendations.

### *Consultations summary*

The EIA Report and consultation feedback has been addressed above within this assessment and has informed the recommendation. A summary of all consultations is appended to the report of handling for the application. None of the EIA consultation bodies object to the proposal, and recommended conditions are attached where appropriate. HES considers further mitigation could offset the identified adverse effects of the proposal on the setting of neighbouring listed buildings and the Scheduled Ancient Monument and the detail designs of development are the subject of reserved matters where opportunity remains to include the recommended mitigation measures.

NatureScot confirms the proposal demonstrates that a positive contribution will be made by the development towards the green and blue network and acknowledges that species protection plans and enhancements for habitat will be provided as part of development phasing. NatureScot further recommended that a HRA is required for the proposal, and this has been completed by the Council as competent authority.

SEPA advised that a NVC survey is required, and this is to be secured by condition, while a further condition relating to development in identified flood risk areas is also attached. Scottish Water does not object to the proposal but advises on water and drainage infrastructures capacity which the applicant should note.

Transport Scotland request that conditions be attached to ensure the safe and optimum operation of the surrounding trunk road network, these recommendations have been considered and captured in the attached conditions and reserved matters.

### *Opportunity for public to participate in the decision-making procedures.*

The below list identifies the opportunities for public participation in the decision-making process.

A Proposal of Application Notice (PAN) was submitted to the Council on 29 March 2022 and was reported to the Council's Development Management Sub-Committee on 29 June 2022. A copy of the PAN was sent to the local Community Councils and issued to the local ward Councillors.

Public and online events which were advertised in the Edinburgh Evening News, a website with details of the development and ability to submit feedback was produced, and meetings with community councils were held as set out in the applicant's supporting Pre-application Consultation (PAC) report.

The EIA application and subsequent EIA Report Addendum were publicised in the Edinburgh Gazette and Edinburgh Evening News in accordance with the 2017 EIA Regulations. Advertisement dates are 02 February 2024 and 04 October 2024.

Neighbours were notified of the planning application and EIA Report addendum submission with information on how and where to view the environmental information and supporting information for the application.

### **Conclusion in relation to identified material considerations.**

The other material considerations do not raise any additional matters not already address and there are no material considerations that would alter the recommendation to grant planning permission.

Section 59 of the Town and Country Planning (Scotland) Act 1997 allows provision for the Planning Authority to vary the time period for the commencement of development. Due to the scale and nature of the development it is considered appropriate to allow the commencement of development to be set at a time of 5 years from the grant of planning permission. It is also appropriate to allow the submission of the subsequent approval of matters specified in condition within an extended period of 15 years. This is to take account of the scale and nature of the proposals.

### **Overall conclusion**

The proposal is acceptable with regard to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as subject to conditions and reserved matters it will not harm the setting of listed buildings in proximity to the site.

Particular regard has been given to the agent of change principle in assessing the proposals under Section 41A of the Town and Country Planning (Scotland) Act 1997. It is considered to have been demonstrated that sufficient measures to mitigate, minimise and manage the effect of noise to the proposed noise sensitive development from Edinburgh Airport and the Royal Highland Showground, have been either included within the proposal, or will be included at Approval of Matters Specified in Conditions (AMSC) stage. The proposal is acceptable with regard to Section 41A of the Town and Country Planning (Scotland) Act 1997 (as amended).

The proposed housing-led mixed-use development is supported by Local Development Plan - City Plan 2030 policy Hou 1, Housing Proposal H63, policy Place 16, and NPF 4 policy 16. It will contribute towards the creation of a new urban quarter, and it is compatible with the West Edinburgh Development Principles, as guided by the West Edinburgh Placemaking Framework and Strategic Master Plan. As the proposal is found to accord with these principles, subject to conditions, the reservation of the details of matters such as scale, form and design, phasing, amenity, transport and flooding, and the conclusion of a suitable legal agreement, the proposal is acceptable in principle.

Matters raised by other development plan policies in relation to design, layout, landscape, placemaking, open space, heritage, transport and infrastructure, amenity, and environmental considerations such as climate change, biodiversity, protected species, and water management, have been addressed by the proposal in sufficient detail at this in principle stage. A sufficient level of detail has been articulated by the parameter plans, design and access statement and other supporting documentation to give confidence to the planning authority that the proposal, subject to securing detailed designs through multi-stage planning applications and the attached conditions, is compliant with the applicable requirements and policy aspirations of the development plan.

The EIA Report is comprehensive in its scope and content and demonstrates that no unacceptable adverse effects will result from the proposal as a result of the embedded mitigation and other mitigation measures at the construction stages.

Subject to conditions and the conclusion of a suitable legal agreement, the proposal complies with the applicable requirements and policy aspirations of the development plan. No other material considerations have been identified that outweigh this conclusion. It is therefore recommended that this application be granted.

## **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following;

### **Conditions**

1. The development to which this planning permission in principle relates must be begun not later than the expiration of five years beginning with the date on which this planning permission in principle is granted. If development has not begun at the expiration of this period, then the planning permission in principle lapses.
2. Application for the approval of matters specified in condition must be made before whichever is latest of the following:
  - (i) the expiration of fifteen years from the date of the grant of the permission,
  - (ii) the expiration of 6 months from the date on which an earlier application for the requisite approval was refused, and

- (iii) the expiration of 6 months from the date on which an appeal against such refusal was dismissed or, where the earlier application is the subject of a review by the Council's Local Review Body, the expiration of 6 months from the date of the notice of the decision to uphold the determination, and may be made for
    - (a) different matters, and
    - (b) different parts of the development, at different times.
3. The planning permission in principle hereby granted shall be carried out broadly in accordance with the below listed approved parameter plans:
- Plan 02 - Structures for Demolition.
  - Plan 03A - Development Plots.
  - Plan 04A - Proposed Ground Levels - excluding the ground levels of plots 48-55 which shall be subject to further details which demonstrates compliance with privacy, amenity, and outlook of development at Castle Gogar Rigg.
  - Plan 05A - Proposed Plot Heights - excluding the height(s) of plots 48-55 which shall be subject to further details which demonstrate compliance with privacy, amenity, and outlook of development at Castle Gogar Rigg.
  - Plan 06A - Proposed Land Use.
  - Plan 07A - Proposed Access.
  - Plan 08A - Proposed Vehicular and Non-Vehicular Movement.
  - Plan 09A - Proposed Open Space and Green Infrastructure.
4. Prior to the commencement of the Enabling Works the following details shall be submitted and approved by the Planning Authority:
- (a) A plan and list of the proposed Enabling Works including phasing of such works.
  - (b) Ecological mitigation.
  - (c) Tree protection measures and details of tree removal.
  - (d) Site investigation and remediation.
  - (e) Access routes for the carrying out of enabling works.
  - (f) Details of groundworks and soil movement.
  - (g) Enabling Works Traffic Management plan.
  - (h) Airport safeguarding matters.
  - (i) Archaeological evaluation.
  - (j) Details of works that are within fifteen metres of any tram infrastructure.

Thereafter the Enabling Works shall be carried out in accordance with the approved details unless otherwise agreed in writing with the planning authority.

In this condition, Enabling Works means preparation works to make the Site ready for construction. Unless otherwise agreed with the planning authority, Enabling Works include (but are not exclusively limited to); site or ground clearance and preparation, surveying, environmental and hazardous substance testing and sampling, soil tests, remediation works, pegging out, tree protection, ecological survey and mitigation works, archaeological investigation, site clearance, ground improvement works, construction of boundary fencing or hoardings including for site security, demolition and removal of buildings and other structures, creation of temporary haul roads and enabling works accesses or other works or operations to enable any of these works to take place including site levelling and ground works.

5. The approved maximum development quantum(s) is listed below:
- Class 1a, 3 and sui generis (Class 1a (Shops and Financial, professional, and other service uses) / Class 3 (Food and Drink) / Sui Generis (comprising public house, hot food take-away, launderette & taxi business)): up to 20,100 square metres gross internal area (GIA).
  - Class 4 Business and Employment: up to 15,000 square metres (GIA).
  - Class 6 Storage or Distribution Uses: Up to 1,850 square metres (GIA).
  - Class 7 Hotel(s): Up to 300 bedrooms.
  - Class 8 Residential Institutions: Up to 8000 square metres (GIA).
  - Class 9 Residential: up to 7,000 units.
  - Class 10 Non-residential institution uses/ education campus: 630 pupil primary school; 1,200 pupil secondary school; up to 2,000 square metres other.
  - Class 11 Assembly and leisure: Up to 5,000 square metres gross internal area (GIA).
  - Sui Generis Student Housing: Up to 300 student bedrooms.
6. Prior to the commencement of development, apart from the Enabling Works as defined in condition 4, a phasing framework plan for the entire application site shall be submitted and agreed by the Planning Authority. Thereafter development shall be commenced in compliance with the approved phasing framework, unless otherwise agreed in writing with the Planning Authority. The phasing framework shall include a plan identifying all phases of development and sub-phases, and the timing and sequencing of each phase and its component parts including:
- Location of individual sub-sites and minimum and maximum number of residential units and other land use floor space(s).
  - A8 and Eastfield Road access details as part of any initial phase.
  - Tram stop details.
  - School plot details.
  - All accesses and vehicular, pedestrian, and active travel links, including those identified on parameter plans 07A and 08A.
  - Mobility hubs.
  - A Landscape, Biodiversity Enhancement, and Habitat Strategy and Management Plan for strategic open spaces, including all those identified on parameter plan 09A.
  - SUDS details.

The delivery of individual plots and sub-sites will then be carried out in accordance with the approved phasing framework.

Subsequent applications for each phase of the development shall be accompanied by the following supporting information:

- an updated phasing plan of the development site, including previous consents for the development;
- a statement of conformity with the EIA Report (Avison Young, January 2024) and EIA Report Addendum (Avison Young, 27 September 2024);
- updated Transport Information, the scope of which will be agreed with the planning authority in consultation with the Roads Authority;



- a Design and Access statement, detailing the layout, streets and spaces, accessibility, safety and security, sustainability, and energy efficiency;
  - A landscape and visual appraisal reflective of the relevant phase and referencing previous consents for the development;
  - Details of management and maintenance of the landscaping, SUDS, and open spaces; and
  - surface water management strategy;
  - A biodiversity enhancement plan;
  - updated tree survey and details of tree protection and proposed removal.
7. Prior to the commencement of works on site for each phase of the development, details of the under-noted reserved matters shall be submitted to and approved in writing by the Planning Authority, in the form of a detailed layout of that phase of the site and include detailed plans, section and elevations of the buildings and all other structures. These details shall be broadly in accordance with the 'Design Guidance' section(s) of the 7N Design and Access Statement Revision 01 dated 30 September 2024 which will inform each individual plot Design and Access Statement.

Each application for Approval of Matters Specified in Condition must be supported by the following information unless agreed otherwise in writing with the Planning Authority;

- A sustainability statement which fully details the sustainability measures incorporated within the scheme.
- A noise and vibration impact assessment should be provided with each detailed application which outlines the noise impacts associated with the proposal, ensures that noise impacts are considered within each application and mitigation recommended where necessary (including from proposed commercial operations/sports pitches).

Approval of Matters, the details of which must be addressed in approval of matters specified in conditions application(s) to the planning authority, are as follows:

- a) Details of the layout, siting, design, form, density, height, tenure, and the number and mix of units, including the design of all external features and materials and appearance of all buildings and glazing specifications (including acoustic capabilities) and ground floor levels and finished floor levels in relation to Ordnance Datum; (consultation with Edinburgh Airport on building heights will be undertaken).
- b) Details of all roads, footways, cycleways, servicing and layout of car parking, cycle parking, provision, and other parking to include:
  - (i) Transport Information based on the transport infrastructure proposed including the general traffic route through the site and parking levels proposed with mitigation measures for both the construction and operation of the proposed development.
  - (ii) Design of all access points into the site.
  - (iii) Details of the provision of footpaths and cycle routes within and connecting to the surrounds of the site, including connections to be provided to neighbouring land in Place 16 and the timescales for their implementation.
  - (iv) Location of roads and servicing.

- (v) Cycle parking and car parking details including, city car club parking spaces, disabled spaces, electric charging points. This should include a breakdown attributed to each use class within the application. For the avoidance of doubt the maximum number of car parking spaces across the entire site shall not exceed 2,217 of which residential shall not exceed 2100.
- c) Landscaping and Open Space information, including:
- (i) Existing and finished ground levels in relation to Ordnance Datum.
  - (ii) Existing and proposed services such as cables, pipelines, substations;
  - (iii) Updated tree survey and any subsequent tree removal and tree protection measures;
  - (iv) Location and detailed specification of all mounding, walls, fences, gates, boundary treatments, any other hard landscape treatments, and materials to be used;
  - (v) Provision of a range of play equipment to serve a diverse number of users
  - (vi) The location of new trees, shrubs, hedges, grass seeding, bulbs, and other planting;
  - (vii) A schedule of plants to comprise species, plant size and proposed number and density;
  - (viii) Programme of phasing including a landscape management plan including schedule for implementation and maintenance of planting scheme - this should include any proposals for the future adoption of the landscaping/ parks by the City of Edinburgh Council;
  - (ix) All other structures such as street furniture, including lighting columns and fittings;
  - (x) within the Scheduled Ancient Monument details of all landscaping interventions shall be subject to consultation with Historic Environment Scotland.
- f) surface water management plan and Sustainable Drainage Scheme (SuDS);
- g) a refuse and recycling strategy for the each of the buildings, including the identification of internal storage areas and collection points;
- h) Existing and finished site and ground levels in relation to Ordnance Datum and inclusive of site sections to be informed by a topographical survey.
- i) Daylight, privacy, and overshadowing information to assess the impacts on existing and proposed residential dwellings.
- j) An Affordable Housing Statement setting out how affordable housing will be provided on site including delivery, tenure, and location of units.
- k) i) Site investigation/decontamination arrangements:

- a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
  - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to, and approved in writing by the Planning Authority.
    - ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
  - m) Details of ventilation for commercial cooking operations (Use Class 3, public house, hotel, hot food take-away) in each of the buildings, which should be accommodated within an internal service core, and a ventilation strategy for each of the buildings that does not rely on the creation of vents or flues on external elevations of the buildings;
  - n) Full details of any solar PV scheme including a Glint & Glare Assessment
  - o) For sports areas details of floodlighting including any glare and light spillage mitigation
  - p) a scheme for public art in the town centre and public realm.
8. The development hereby permitted shall be carried out broadly in accordance with the principles and requirements of the mitigation measures set out in the EIA Report accompanying the planning application unless provided for in any other condition attached to the permission. If development is to be phased, then a revised schedule of mitigation must be submitted for approval prior to commencement of development of each phase after the first.
  9. No development, including land raising, should take place in the flood risk areas depicted by the 200 year plus climate change plus blockage flood extents mapped in Appendix 2 of Appendix C of the Flood Risk Assessment by WSP (Ref: WST-WSP-ZZ-ZZ-RP-C-5301, December 2023).
  10. Prior to the commencement of development in any phase or sub-phase, and the commencement of Enabling Works identified in condition 4, of areas identified in EIA Report Chapter 7: Ecology and Nature Conservation chapter and Appendix 7.1: Ecology Survey Data - Habitats the applicant shall submit to the planning authority a National Vegetation Classification (NVC) survey for approval by the Planning Authority in consultation with SEPA. No development shall commence until the NVC survey is approved in writing by the planning authority.
  11. Development shall not begin until a construction management strategy has been submitted to and approved in writing by the Planning Authority covering the

phase of development and any adjoining land which will be used during the construction period.

Such a strategy shall include the following matters:

- details of the area(s) subject to construction activity and the storage of materials and equipment
- details of cranes and other tall construction equipment (including the details of obstacle lighting) –

Such schemes shall comply with Advice Note 4 'Cranes' (available at <http://www.aoa.org.uk/policycampaigns/operations-safety/>).

- details of temporary lighting - Such details shall comply with Advice Note 2 'Lighting' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>).
- control and disposal of putrescible waste to prevent attraction of birds- site restoration.

The approved strategy (or any variation approved in writing by the Planning Authority) shall be implemented for the duration of the construction period.

12. Development shall not commence on each phase of development until a Bird Hazard Management Plan has been submitted for that phase and approved in writing by the Planning Authority. The submitted plan shall include details of:

- management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting, and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards.'
- monitoring of any standing water within the site temporary or permanent
- physical arrangements for the collecting (including litter bins) and storage of putrescible waste, arrangements for and frequency of the removal of putrescible waste.
- Signs deterring people from feeding the birds.

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

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

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

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

14. No development shall take place on each phase until full details of soft and water landscaping works have been submitted to and approved in writing by the Planning Authority, details must comply with Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design' (available at <http://www.aoa.org.uk/operationssafety/>). These details shall include:
- any earthworks
  - grassed areas.
  - the species, number and spacing of trees and shrubs.
  - details of any water features

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

15. Before development commences on each phase of development details of the permanent lighting scheme(s) for the that phase within the development shall be submitted to the Planning Authority for their written approval. Lighting schemes should be of a flat glass, full cut off design, mounted horizontally, and shall ensure there is no light spill above the horizontal. The approved lighting scheme is to be implemented upon completion of the development, no subsequent alterations shall take place unless first submitted to and approved in writing by the Planning Authority.
16. No structure may be erected, unless and until such time as the Planning Authority receive confirmation from the Airport Operator in writing that: (a) an IFP Assessment has demonstrated that an IFP Scheme is not required; or (b) if an IFP Scheme is required such a scheme has been approved by the Airport Operator; and (c) if an IFP Scheme is required the Civil Aviation Authority has evidenced its approval to the Airport Operator of the IFP Scheme (if such approval is required); and (d) if an IFP Scheme is required the scheme is accepted by NATS AIS for implementation through the AIRAC Cycle (or any successor publication) (where applicable) and is available for use by aircraft.
17. No demolition of 210 Glasgow Road shall take place until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication & public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.
18. No development, demolition, nor Enabling Works as specified in condition 4, shall take place on that phase of the development site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building recording, metal detecting survey, conservation, analysis & reporting, publication & public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

19. No development shall be commenced within ten metres of the Scheduled Monument park until a scheme for protection of the monument inclusive of temporary fencing is approved in writing by the Planning Authority after consultation with the City of Edinburgh Council Archaeology Service and Historic Environment Scotland. Thereafter the works shall be carried out in accordance with the approved scheme unless otherwise agreed with the planning authority.
20. Unless agreed in writing with the Planning Authority, after consultation with Transport Scotland, no new homes shall be occupied until such a time that the proposed physical tram stop infrastructure is delivered (City Plan West Edinburgh Transport Improvement reference WE 30).
21. No part of the development shall be occupied until such time as a Travel Plan relating to that part of the development has been submitted to and agreed with the Planning Authority. The Travel Plan shall identify proposed mode share targets, the measures to be implemented to achieve these and the mechanism for implementing and monitoring the Travel Plan.
22. Prior to the commencement of development of each phase, including Enabling Works, a Construction Environment Management Plan shall be submitted for the approval of The Planning Authority. The site wide plan should include but not be limited to:
  - a) risk assessment of potentially damaging construction activities;
  - b) identification of "biodiversity protection zone";
  - c) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction including transport and traffic on the surrounding road network, air quality, noise, and vibration (may be provided as a set of method statements);
  - d) the location and timing of sensitive works to avoid harm to biodiversity features;
  - e) the times during construction when specialist ecologists need to be present on site to oversee works;
  - f) responsible persons and lines of communication;
  - g) the role and responsibilities on site of an Ecological Clerk of Works or similarly competent person;
  - h) use of protective fences, exclusion barriers and warning signs;
  - i) risk assessment and consideration of any sensitive noise and vibration receptors;
  - j) demonstration of compliance with the approved site wide construction and environment construction Plan;
  - k) mitigation for protection of the Gogar Mains fort scheduled monument which should include:
    - The location of the scheduled monument to be protected during construction works;
    - The details of the agreed access routes and those areas in which works will take place;
    - The position and details of the warning signs or temporary protective fencing to be installed with an appropriate buffer around it to avoid inadvertent damage to the monument; and
    - The details of how all contractors working on the site will be made aware of the extent of the legally protect scheduled area of the monument.

Thereafter, the approved CEMP shall be adhered to in full.

23. The development shall be carried out in accordance with the landscaping scheme as approved through phasing plan(s) and reserved matter applications and shall be fully implemented within six months of the completion of the relevant block of development. Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme as may be submitted to and approved in writing by the Planning Authority.

### **Reasons**

1. To accord with Section 59 of the Town and Country Planning (Scotland) Act 1997.
2. In order to ensure applications for approval of matters specified in condition are made timeously and in accordance with section 41 (1) (c) of the Town and Country Planning (Scotland) Act 1997.
3. In the interest of securing an appropriate development on the site.
4. To facilitate preparation of the site for construction and early delivery of the development.
5. In order to ensure that the appropriate mitigation is addressed and understood for the development of the site. To ensure the development accords with the parameters of the EIA assessment.
6. To ensure the site is designed, developed, and delivered cohesively with the parameters of the approved development.
7. To enable the Planning Authority to consider this/these aspect(s) in detail. To ensure the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network.

To ensure the development does not endanger the safe movement of aircraft or the operation of Edinburgh Airport through interference with communication, navigational aids and surveillance equipment and glare issues. Buildings/structures in the proposed development may penetrate the obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and could endanger aircraft movements and the safe operation of the aerodrome.

8. To ensure the management and implementation of environmental mitigation measures as set out in the EIA Report.
9. To strengthen resilience to flood risk both on and off site by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

10. To protect the integrity of Groundwater dependent terrestrial ecosystems at the site and in accordance with the EIA Mitigation Strategy.
11. To ensure that construction work and construction equipment on the site and any adjoining land does not breach the Obstacle Limitation Surface (OLS) surrounding Edinburgh Airport and endanger aircraft movements and the safe operation of the aerodrome.
12. It is necessary to manage the development in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Edinburgh Airport.
13. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of Birds and an increase in the bird hazard risk of the application site. For further information please refer to Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/policycampaigns/operations-safety/>).
14. To avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the application site.
15. It is necessary to control the permanent lighting arrangements on this development to avoid confusion with aeronautical ground lights which could endanger the safe movement of aircraft and the operation of Edinburgh Airport.
16. In the interests of aviation safety.
17. In the interests of Archaeological and Historic Environment conservation.
18. In order to safeguard the interests of archaeological heritage.
19. In order to safeguard the interests of archaeological heritage.
20. In the interest of sustainable transport measures. To ensure the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network.
21. To reflect the requirements of national planning policy.
22. In order to ensure that the construction and development phases of the site works are undertaken so as to mitigate its impact(s) on sensitive receptors, transport infrastructure, the Gogar Mains Fort, Palisaded Enclosure and Field system Scheduled Monument, and to protect the existing biodiversity and landscape of the site and its immediate surroundings.
23. In order to ensure that the approved landscaping works are properly established on site.



## Informatives

It should be noted that:

1. Where infrastructure cannot be delivered by the developer directly, developer contributions will be sought where considered necessary to mitigate any negative impacts (either on an individual or cumulative basis). Infrastructure requirements identified include:
  - Transport proposals and safeguards (Part 4, Tables 3-10) and/ or interventions identified in transport assessments and/or transport consultations;
  - Education provision including new schools, early years nursery proposals, school extensions etc. (Part 4, Table 11);
  - Primary healthcare infrastructure capacity (Part 4, Table 12);
  - Greenblue network actions (Part 4, Table 1); and
  - Infrastructure of a regional scale where identified as part of a national or regional spatial strategy or as a Regional Spatial Priority as set out in NPF4.

West Edinburgh Placemaking Framework and Strategic Masterplan which was approved by Planning Committee on 13 November 2024 identifies infrastructure requirements and potential delivery mechanisms and timing taking cognisance of infrastructure first principles set out in NPF4.

### Education

The LDP identifies educational infrastructure requirements including:

- Additional primary school capacity -9 x streams of Primary School provision and associated nurseries across the Place Policy 16 area (EWE 4/5). This shall include Primary Schools on both the application site (H63) and Crosswinds (H61); and
- Additional secondary school capacity - A new secondary school and associated community facilities (including healthcare, public library, sports pitches and leisure and recreational facilities) is required at an initial stage on the application site to ensure education infrastructure is in place to serve this proposal and wider development in Place Policy 16. This school shall have an initial capacity of 1200 pupils but shall be designed and built from the outset so it can be subsequently expanded to accommodate 1800 pupils (EWE 10).

The value of the land, as well as the cost of servicing and remediating the site (if appropriate), will be credited against that site's overall contribution requirement once the Council has confirmed that the new school will be delivered.

The total cost of primary school infrastructure is £106,896,672 and the total cost of secondary school infrastructure is £81,898,740. It is estimated that this application will deliver 7,000 housing units, of which 3,360 are greater than one-bedroom units generating a requirement for educational infrastructure. This equates to 59.8% share of primary school infrastructure and 59.4% of secondary school infrastructure across west Edinburgh. The proportion of developer contributions equates to £63,887,687 for primary school infrastructure and £48,665,653 for secondary school infrastructure, respectively. The total amount of developer contributions for educational infrastructure is £112,553,340.

## Transport

Actions expected to be funded via developer contributions with apportionment of estimated costs include:

- WE5 - Gogar to Maybury additional eastbound traffic lane (R5) (£7,000,000, £628.03 per housing unit,  $7,000 \times £628.03 = £4,396,210$ );
- WE6 - Maybury Road Approach to Maybury Junction - bus priority measure (costs to be confirmed if required);
- WE10 - Active travel route west of Maybury to city and West Edinburgh Links (£2,277,136.80, £204.30 per housing unit,  $7,000 \times £204.30 = £1,430,100$ );
- WE14 - Upgraded Bus interchange facility at Ingliston P+R (£5,000,000, £44.86 per housing unit,  $7,000 \times £44.86 = £314,020$ );
- WE15 - Enhanced interchange at Edinburgh Gateway to connect active travel and bus services with tram and rail off Myreton Drive. Additional bus stops created on Gogar Roundabout slips (£3,000,000, = £269 per housing unit,  $7,000 \times £269 = £1,883,000$ );
- WE16 - Improved northern and southern orbital bus routes from Maybury (via Maybury Road and Edinburgh Park respectively) (£6,500,000, £583 per housing unit,  $7,000 \times £583 = £4,081,000$ );
- WE17 - Bus Priority South West Edinburgh (£490,000, £44 per housing unit,  $7,000 \times £44 = £308,000$ );
- WE19 - Segregated public transport route - West alignment - using safe guarded tram line (£18,000,000, £1,615 per housing unit,  $7,000 \times £1,615 = £11,305,000$ );
- WE20 - Segregated public transport route South - Harvest Road (£1,000,000, £90 per housing unit,  $7,000 \times £90 = £630,000$ );
- WE21 - Segregated public transport route South - Newbridge (£8,500,000, £763 per housing unit,  $7,000 \times £763 = £5,341,000$ );
- WE 26 - connectivity linking across West Edinburgh Framework Area - proportionate cost to be attributed to the site - further feasibility and costings to be developed; and;

- Northern - East/ West access - connectivity to the north of the site linking across the West Edinburgh Framework - further feasibility and costings to be developed.

## Tram

Further detail in respect of the tram contributions sought is contained in the Council's Draft City Plan 2030: Supplementary Guidance on Developer Contributions and Infrastructure Delivery December 2024, Part Three Transport - Addendum 5 Shared Mobility "Tram - Operation Tramlines".

Tram contributions have been calculated using Table 5.1 of West Town Edinburgh Limited EIAR Volume 2, Chapter 5: The Proposed Development and the applicant will be required to contribute the sum of approximately £13,633,445 to the Edinburgh Tram. The legal agreement will attribute costs to each type of development.

## Controlled Parking

The applicant/future applicants will be responsible for re-imbursing all reasonable costs incurred by the Council, as roads authority, in promoting and implementing necessary traffic orders to control parking in the development.

## Healthcare

The LDP identifies the need for developer contributions to deliver healthcare provision to support the level of development outlined within West Edinburgh. Contributions will be applied through a cumulative contributions zone drawing on the conclusions of the Council's Healthcare Appraisal. The actions set out in Table 12 are to be addressed through Policy Inf 3 include:

- A new medical practice; and
- Potential extension options for existing practices at Parkgrove, East Craigs, Ladywell East and Ladywell West.

Total potential contribution estimated within this zone towards a new practice from City Plan allocated sites: £18,214,636.74.

The cost attributable to West Town is  $7000 \times £1,682.49 = £11,777,430$

The development also includes the provision of student housing. A contribution rate of £801.19 is required per student bedspace.

## Affordable Housing

In line with LDP policy Hou 2 affordable housing of at least 35% of the total units will need to be secured through a legal agreement. The Council's Affordable Housing Service advises that the proposal is acceptable subject to conclusion of a legal agreement.

## Open Space

BGN48 West Edinburgh green network, seeks to extend and embed the green network into developments at West Edinburgh (Place 16). There is a requirement to ensure the long-term maintenance and future adoption of all the strategic open spaces within the development. Suitable conditions and measures for the adoption of any strategic/significant open space within the development will be required. There is a requirement for a suitable legal agreement to address matters relating to the future adoption of these spaces.

Given that this application is being considered in advance of the 2024 Supplementary Guidance on Developer Contributions and Infrastructure Delivery being reported to Planning Committee some flexibility is required on the application of contributions. Committee are therefore requested to accept the general principles of the Infrastructure Delivery with some built-in flexibility to allow the Chief Planning Officer to adjust the payment amounts and delivery options to secure the necessary infrastructure in the formation of the appropriate Legal Agreements.

2. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
3. As soon as practicable upon the completion of each phase of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
4. For the duration of development, between the commencement of development on the site until its completion, a notice shall be displayed in a prominent place at or in the vicinity of the site of the development; readily visible to the public; and printed on durable material.
5. The applicant should note the following matters relating to development in proximity to the Edinburgh Tram:
  1. The applicant should note that detailed design proposal(s) will require a Safety Validation of Change approval from Edinburgh Trams, as Duty Holder under the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).
  2. Authority to Work permit(s) will be required to undertake the construction work in close proximity to the tram infrastructure. This can be applied for via our website at: <https://edinburghtrams.com/atw>. As part of that process, an Asset Protection Agreement will be required to be entered into.
  3. The applicant should note for any construction works carried out at height isolations may be required to carry out work safely. Such work(s) may need to be done at night when trams are not running. The developer must liaise with Edinburgh Tram to plan such works.

4. The applicant should note careful consideration will be required in relation to the construction methodology in relation to the maximum height and weight of construction plant and the need for that to cross the tram lines. The maximum axle loading is 11.5t per axle, and the maximum height is 4.9m on the existing crossing points. Any plant movements out with these parameters will require special authorisation (in advance) and will likely be restricted to overnight when the overhead power lines can be isolated and protective measures taken.

6. The applicant should note the below matters identified by the Roads Authority:

1. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent. In that regard the applicant should note:
  - a. A Quality Audit to be submitted prior to the grant of Road Construction Consent. It is recommended that Quality Audits are carried out prior to submission of detailed applications or shortly thereafter to ensure that proposals are acceptable in relation to Road Construction Consent and to avoid abortive work;
  - b. details of lighting, drainage, Sustainable Urban Drainage, materials, structures, and layout will be required;
  - c. particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;
  - d. adoptable areas are expected to include all areas from back edge of footway to back edge of footway and will include any parking spaces adjacent to the carriageway. The applicant must note that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property;
  - e. commencement of building works or construction of roads without Road Construction Consent may constitute an offence;
  - f. the Council will not accept maintenance responsibility for underground water storage / attenuation;
2. The proposed site is on or adjacent to the operational Edinburgh Tram. To ensure that work on or near the tramway is carried out safely, it is necessary to obtain authorisation to agree a safe system of work. It is a legal obligation to comply with the Authority to Work (AtW) process whilst working on or near the tramway. See <https://edinburghtrams.com/atw> The applicant should note that restrictions on working hours may require overnight working;
3. The applicant should note that various traffic and other orders will be required, including waiting, and loading restrictions, controlled parking zone, parking controls, 20mph speed limits, redetermination, and stopping up. Separate application for these orders will be required;

4. The applicant should note that new road names will be required for the development, and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity. Road names are particularly relevant to the progression of traffic and other orders;
5. The applicant should note that the proposed development lies on or adjacent to a 'traffic sensitive street' and that this may affect the method and timing of construction, including public utilities - see <https://www.edinburgh.gov.uk/roads-pavements/road-occupation-permits/2>;
6. The applicant should consider registration of the site under the Considerate Constructors Scheme;
7. The applicant should be required to submit a management plan for construction transport in support of each phase of development.
8. To ensure the conservation and interpretation of the scheduled archaeological remains and associated remains development should not begin in that phase of the development site that contains the Scheduled Monument Park and the Gogar Burn valley until details of all proposed works including a detailed landscaping scheme and associated management regime is approved by the planning authority following consultation with the City of Edinburgh Council Archaeology Service and Historic Environment Scotland.
9. The applicant should note the below advisory information regarding airport safeguarding:
  - The proposed development requires further assessment to ensure building heights are within tolerable limits and designed in accordance with safeguarding requirements. Exact coordinates of building locations and site extents are required for this.
  - The development is in a critical area of protected airspace and also requires the additional assessment against Edinburgh Airports published Instrument Flight Procedures (IFPs) to ensure there is no impact on our existing flight procedures. This would be undertaken by the Developer and must be carried out by a UK CAA Approved Procedure Design Organisation (APDO). The Safeguarding Team at Edinburgh Airport can obtain a quote for this from our APDO.
  - The Bird Hazard Management Plan would be required to include details of the management of roofs within the site which may be attractive to nesting, roosting, and "loafing" birds. This is a requirement in order to avoid endangering the safe movement of aircraft and the operation of Edinburgh Airport through the attraction of birds and an increase in the bird hazard risk of the area. I attach some guidance in relation to Wildlife Hazard Management [see full consultation response], which has been written by our Wildlife Management Consultants, and draw your attention to the advice on Green and Brown Roof Spaces.
  - Cranes or tall construction equipment required during the build would need an operating permit from the airport and will be subject to a separate IFP Assessment. This can be arranged by contacting Edinburgh Airport Safeguarding [safeguarding@edinburghairport.com](mailto:safeguarding@edinburghairport.com).

## **Background Reading/External References**

To view details of the application go to the [Planning Portal](#)

**Further Information - Local Development Plan**

**Date Registered: 15 January 2024**

## **Drawing Numbers/Scheme**

01, 02, 03A-09A

Scheme 2

**David Givan**  
**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**

Contact: Sean Fallon, Planning Officer  
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## Appendix 1

### Summary of Consultation Responses

NAME: Historic Environment Scotland

COMMENT: No objection. However, the applicant should review the design and layout of the development in light of the conclusions reached in the EIA report. The lowering or repositioning of the building units should provide more effective mitigation for the impacts on the setting of the scheduled monument and A-listed building.

DATE: 26 March 2024

NAME: Flooding

COMMENT: No comment. Subject to condition reserving the detailed design and specification of flood risk and drainage infrastructure throughout the development.

DATE: 30 August 2024

NAME: Ratho and District Community Council

COMMENT: Overall supportive, however concerned as:

- the development's design is out of keeping with the area;
- there will be a negative impact to neighbouring amenity;
- there will be a negative impact to the setting of listed buildings;
- the proposed residences will be exposed to unacceptable noise levels;
- Infrastructure First principles need to be respected;
- alterations to train and bus routes required;
- poor connectivity to local schools until on site schools are delivered;
- need for additional healthcare facilities.

DATE: 1 March 2024

NAME: Cramond and Barnton Community Council

COMMENT: Concerned regarding traffic congestion arising from cumulative increases in traffic and considers that commencement of development should be conditional on completion and operation of all WETIP junction and road improvement projects, especially improvements to Gogar and Maybury Roundabouts and increased traffic capacity between Gogar and Maybury. In order to be consistent with CEC's 'Infrastructure First' policies.

DATE: 5 February 2024

NAME: Affordable Housing

COMMENT: The applicant has advised that they are aware of the need to provide the required on-site affordable housing, and this will be secured by a Section 75 Legal Agreement. This approach which will assist in the delivery of a mixed sustainable community:

Prior to submitting any detailed applications, applicants should engage with the Council to agree the approach to delivery, tenure, and location of the affordable homes.

The proposed approach should be explained within an Affordable Housing Statement submitted as part of relevant applications for the Approval of Matters Specified in Conditions.

DATE: 20 August 2024



NAME: Environmental Protection

COMMENT: After consideration of additional information and proposed amendments, Environmental Protection remain concerned:

1. Residential amenity of the application properties may be affected due to the close proximity of the airport. These may restrict the operations of the airport and there may be limited opportunity available to mitigate the impacts of aircraft noise on the application properties;
2. The application proposes to site new residential properties adjacent to the A8 Glasgow Road, which will result in significant noise impacts to these properties requiring mitigation at ground floor level, which it may not be possible to mitigate against noise at higher floor levels;
3. The proposed motor vehicle parking levels are likely to add to significant congestion in the local area, and detrimentally affect air pollution levels in the local environs and at the nearest two air quality management areas;
4. The new residential properties are likely to be situated within areas of high and dangerous levels of air pollution contrary to air quality and health guidance.
5. Fumes and light pollution from Edinburgh Airport are likely to impact properties in proximity to the airport.

However, should Planning be minded supporting the application, this should be done subject to the outlined conditions.

DATE: 15 October 2024

NAME: Scottish Water

COMMENT: No objection, however:

- Whilst there is currently sufficient capacity in the Marchbank Water Treatment Works to service the development further investigations may be required;
- Should the development require Scottish Water networks to be upgraded this cost will have to be met by the developer;
- Sufficient capacity for a foul only connection in the Edinburgh PFI Waste Water Treatment works.

DATE: 25 March 2024

NAME: Transport Scotland

COMMENT: No objection, subject to conditions as specified.

DATE: 9 October 2024

NAME: Scottish Ministers

COMMENT: EIA Consultation. No comments.

DATE: 6 February 2024

NAME: Transport Scotland

COMMENT: No objections, subject to the application of conditions as specified.

DATE: 9 October 2024

NAME: Waste

COMMENT: Requires further information at AMC stage as specified to ensure waste and recycling requirements have been fully considered.

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

DATE: 7 October 2024

NAME: Network Rail

COMMENT: No impact on railway infrastructure and therefore have no comments on or objections.

DATE: 9 October 2024

NAME: Nature Scot

COMMENT: The development has the potential to offer good amounts of connected open space. The proposed open space and green-blue infrastructure offer biodiversity benefits, both generally and for protected species. A long-term management plan should be drafted for the biodiversity enhancement measures, including habitat creation and landscaping. Species Protection Plans should be provided. No adverse effect on Firth of Forth Special Protection Area integrity can be concluded due to water quality control/pollution mitigation measures.

DATE: 28 October 2024

NAME: Edinburgh Airport Safeguarding

COMMENT: No objection subject to conditions as specified. Applicant to be aware of further information regarding building heights, protected airspace, requirements for a Bird Hazard Management Plan, and permits relating to cranes and other tall construction equipment.

DATE: 23 October 2024

NAME: Edinburgh Trams

COMMENT: Overall supportive, subject to the following considerations:

- The need for a new tram stop on the site, stabling berths at the Gogar tram depot, purchase of new tram, and understanding of lead in times;
- Request for details of new treatment details surrounding the tram line and how people will interact along the tram corridor;
- Constructability of the development near the tramway;
- Potential need for change in track form type at eastern road access;
- Need for Authority to Work permit(s);
- Construction methodology (i.e. maximum height and weight of construction plant);
- Future façade or window maintenance/cleaning.

DATE: 15 October 2024

NAME: Communities and Families - Education

COMMENT: - A contribution of £63,887,678 (Q4 2022) is required towards new primary school(s) including early learning and childcare places.

- A contribution of £48,665,653 (Q4 2022) is required towards new a secondary school.

- A fully serviced and remediated 2.1 ha site for a primary school at nil cost to the Council is required. The school site should be free from any constraints.

- A fully serviced and remediated 5.2 ha site for a secondary school at nil cost to the Council is required. The school site should be free from any constraints.
- Limits on completions or occupations will be required until a new primary school site on IBG Phase 1 is secured or another primary school site is safeguarded in H63.
- Limits on completions or occupations may be required if temporary classes at existing schools are required to accommodate pupils from the development and the applicant is not willing to meet the costs of providing them.

DATE: 11 November 2024

NAME: Scottish Environmental Protection Agency

COMMENT: No objection subject to conditions as specified.

With respect to air quality, Without mitigation to reduce traffic levels, there is a potential impact on the surrounding road network, and subsequent impact to near-by receptors.

DATE: 14 June 2024

NAME: Historic Environment Scotland Addendum

COMMENT: We recognise that the principle of development in this area has been established, and we do not object to the proposals. We welcome the provision of additional design detail in the EIA Addendum, which responds to our previous advice. However, the revised proposals are still counter to NPF4 Policy 7c and 7h in that they raise significant issues for the settings of Gogar Mains fort, palisaded enclosure, and field system (SM4573) and Castle Gogar LB27092. These significant setting impacts could be further mitigated by design changes. The impacts and potential mitigation are discussed in the annex to this letter.

DATE: 31 October 2024

NAME: Ratho and District Community Council - Additional

COMMENT: Overall supportive, however concerned as:

- the development's design is out of keeping with the area;
- there will be a negative impact to neighbouring amenity;
- there will be a negative impact to the setting of listed buildings;
- the proposed residences will be exposed to unacceptable noise levels;
- Infrastructure First principles need to be respected;
- alterations to train and bus routes required;
- poor connectivity to local schools until on site schools are delivered;
- need for additional healthcare facilities.

DATE:

NAME: Archaeology Service

COMMENT: The site has several archaeological and historic environment issues which needed to be addressed, both by amended plans and conditions, which should be applied as specified. Notably:

- The buildings adjacent to Castle Gogar should not be higher than the current buildings;
- Preference for detailed proposals to be agreed at PPP stage relating to the Gogar Mains Farm Steading;

- The height of plots nearest to Gogar Mains Farm (57, 58 and 59) should be addressed at detailed design stage;
  - Concerns relating to buried archaeology (Scheduled Gogar Mains Fort), non-scheduled buried archaeology, and Public Engagement.
- DATE: 11 November 2024

The full consultation response can be viewed on the [Planning & Building Standards Portal](#).

## Location Plan



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