

Planning Statement

Brunstane

Proposed residential development (including class 8 residential institutions, class 9 houses and sui generis flats), primary school (class 10 non-residential institutions), local centre (including class 1 retail, class 2 financial and professional services, class 3 food and drink, class 10 non-residential institutions and class 11 assembly and leisure), green network, means of access and transport links, infrastructure, and associated ancillary works at land north of Newcraighall Road and south of Milton Road East, Edinburgh

The EDI Group Limited

August 2016





The Planning Statement was completed in August 2016
to accompany the PPP Application

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Appendix

Appendix 1 Site Location Plan

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For and on behalf of GVA Grimley Ltd

Executive Summary

This Planning Statement has been prepared by GVA James Barr on behalf of The EDI Group Ltd ('the applicant') and is submitted in support of an application for Planning Permission in Principle (PPP) for the creation of a new sustainable community, New Brunstane, in south east Edinburgh.

The applicant has promoted the site for residential-led development since 2012 through the development plan process, in particular the emerging Edinburgh Local Development Plan (ELDP). The site was allocated as a new housing proposal HSG 29 Brunstane in the ELDP Second Proposed Plan (June 2014) and following an examination of unresolved objections to this plan, Reporters concluded that the site should remain designated in the plan for housing development. As such, we are now pleased to present this application for Planning Permission in Principle (PPP).

This planning statement has appraised the proposals against the development plan and other relevant material considerations. It sets out that the development proposals comply with the terms and provisions of prevailing planning policies and that it will support broader objectives for the ELDP's spatial strategy and South East Edinburgh, as a sustainable city extension.

The site presents an appropriate opportunity to create a new mixed community at the edge of the capital city. Its release from the green belt for residential-led mixed use development is appropriate and would create a sustainable settlement pattern which could effectively reduce the need to travel across the city region, being close to the main sources of employment in Edinburgh and other nearby settlements. The proposals will facilitate the efficient use of land, including a new local centre and primary school sitting amongst a new network of routes which prioritise pedestrians and cyclists. A broad mix and range of housing, with an emphasis on family housing, is included reflecting the known shortage of land for new housing across the city. A range of green spaces, including public and private open space and allotments, will enhance public accessibility of the site, improve biodiversity and expand the city's existing green network.

The applicant has taken a comprehensive, masterplan-led approach to the proposals throughout, with a commitment towards high quality placemaking and sustainability at its heart. Accordingly, the planning application is informed by consultation with the public, stakeholders, statutory and non-statutory consultees and City of Edinburgh Council Officers. It is supported by a range of specialist documentation including this Planning Statement, a Report of Pre-Application Consultation, Environmental Statement, Masterplan Report with Design Code and formal Masterplan drawings for approval, Transport Assessment, Flood Risk Assessment and Drainage Strategy. These studies, assessments and reports have helped inform the production of this planning statement and its conclusions in respect of the conformity of the application measured against policy, the suitability of the site for the development proposed and its implementation.

This planning application is for Planning Permission in Principle (PPP), albeit a significant amount of detail and supporting information has been provided with the application to help inform the process and to demonstrate that the masterplan is deliverable. We would remind City of Edinburgh Council that detailed proposals for the Approval of Matters Specified in Condition will come forward following the grant of any PPP, which will be the appropriate stage at which to consider some of these matters in greater detail. This is made clear in the supporting material submitted with the application. As such, this application fully

accords with the policy principles in the ELDP and ensures that all detailed matters specified in the ELDP can be delivered at the AMSC stage. We anticipate that any grant of PPP will include conditions and a Section 75 Obligation setting out details of how these matters can be secured by the Council.

1. Introduction

1.1 This Planning Statement has been prepared by GVA James Barr on behalf of The EDI Group Ltd ('the applicant') and is submitted in support of an application for Planning Permission in Principle for residential-led mixed use development on land north of Newcraighall Road and south of Milton Road East, in south east Edinburgh. The development proposed is referred to as New Brunstane in the PPP submission.

1.2 The description of development is as follows:

'Proposed residential development (including class 8 residential institutions, class 9 houses and sui generis flats), primary school (class 10 non-residential institutions), local centre (including class 1 retail, class 2 financial and professional services, class 3 food and drink, class 10 non-residential institutions and class 11 assembly and leisure), green network, means of access and transport links, infrastructure, and associated ancillary works'.

1.3 The Site Location Plan is shown in [Appendix 1](#).

1.4 This planning statement forms part of a suite of documents submitted in support of the application. The full set of documents is as follows:

- [Planning Statement – GVA James Barr](#)
- [Report of Pre-Application Consultation– GVA James Barr](#)
- [Environmental Statement \(including Flood Risk Assessment and Drainage Strategy\) \(ES\)– IKM Consulting](#)
- [Transport Assessment \(TA\) – Transport Planning](#)
- [Masterplan Report with Design Code and formal Masterplan drawings – AREA](#)
- [CEC S1 Sustainability Form – GVA James Barr](#)

1.5 The Masterplan Report (with Design Code) and the following formal Masterplan drawings are submitted for approval as part of this application for PPP:

- [Strategic Landscape Framework \(Ref NB_P_04\)](#)
- [Strategic Movement Framework \(Ref NB_P_05A\)](#)
- [Strategic Masterplan \(Ref NB_P_12\)](#)

1.6 This statement provides an assessment of the proposals against the development plan and other material considerations. It has been prepared with the benefit of pre-application discussions with officers of the City of Edinburgh Council (CEC) and will comprise the following sections

- [Section 2: Site Description and Context](#)
- [Section 3: The Proposals](#)
- [Section 4: Planning Policy Assessment](#)
- [Section 5: Environmental Impact Assessment](#)
- [Section 6: Conclusions](#)

2. Site Description and Context

The Site

- 2.1 The site is located at the south east of the city of Edinburgh, within the urban area. A Site Location Plan (Ref NB_P_13) is included at [Appendix 1](#), the area of which is 54.6 hectares.
- 2.2 The site comprises mostly arable land and slopes gently north-east down towards Joppa and the Firth of Forth beyond. It is surrounded on three sides by existing built development, including new housing at Newcraighall North, which is currently under construction.
- 2.3 The eastern edge of the site is bordered by the designed landscape of Newhailes House and mature woodland. The Brunstane Burn runs along the northern edge of the site; on its northern bank lie housing at Daiches Braes, Edinburgh College: Milton Road Campus and Portobello Cemetery.
- 2.4 The site is bisected by the East Coast Main Line (ECML) railway line in a cutting running from north-west to south-east, and an existing bridge for agricultural use forms a vehicle crossing into the eastern fields of the site. Pylons and overhead lines also traverse the site, however these are in the process of being de-commissioned and removed by Scottish Power.
- 2.5 The John Muir Way footpath runs parallel to the Brunstane Burn, crossing to the south bank at the ECML railway line and adjoining the northern edge of the eastern field. National Cycle Route (NCR 1) runs along part of the south western boundary of the site.
- 2.6 Within the site are two Scheduled Ancient Monuments. Outwith the site, but close to its boundary, are listed buildings and a designed landscape. These are described below:
- [Brunstane Moated Site Scheduled Monument at the western edge of the site.](#)
 - [Brunstane Enclosure Scheduled Monument within the western field, south of the ECML.](#)
 - [Category A listed Brunstane House and walled garden and Category B listed steading and farm cottages to the south of Brunstane House, beyond the western boundary of the site.](#)
 - [Category C listed Newhailes Policies, Wanton Walls Farmhouse and Steading beyond the southern boundary of the site.](#)
 - [Various Category A, B and C listed buildings associated with Newhailes House beyond the eastern boundary of the site.](#)
 - [Newhailes Garden and Designed Landscape beyond the eastern boundary of the site](#)

Surrounding area

- 2.7 Immediately beyond the site to the south, new residential development (known as Newcraighall Village) has already been delivered by Barratt Homes, with more homes under construction. Beyond this to the south east and south of Newcraighall Road, further new housing has already been granted planning permission. Further to the south, within East Lothian, land surrounding Queen Margaret University is being promoted for mixed residential and employment related development.
- 2.8 To the west, beyond the A1, is Fort Kinnaird retail park and the Asda superstore. As noted above, listed buildings and a designed landscape are located immediately beyond the site to the east (Newhailes House) and to the west (Brunstane House). Existing housing known as Gilberstoun is situated beyond Brunstane House to the west. To the north, and beyond the Brunstane Burn and John Muir Way, is Edinburgh College and residential areas north and south of Milton Road East.

Accessibility

- 2.9 The accompanying Transport Assessment details the site's existing public transport accessibility and movement routes, which form a key part of the site's context.
- 2.10 Briefly, the site is well-situated in relation to the existing transport network and is accessible by a range of transport modes. There are rail stations in close proximity to the site at Brunstane, Newcraighall (including park & ride facilities) and Musselburgh, providing direct access to Edinburgh city centre.
- 2.11 In addition, main bus routes operate nearby to the south and north of the site along Newcraighall Road and Milton Road East. As described further on, and within the masterplan and TA, the proposals provide the opportunity for a new bus route to be formed linking Milton Road East and Newcraighall Road.
- 2.12 Finally, a detailed network of cycle routes and footpaths already surround the site and again, the proposals include a number of connections to these.

3. The Proposals

3.1 This application is for Planning Permission in Principle (PPP) for residential-led mixed use development. The full description of development is set out in section 1 of this statement.

3.2 It should be noted that the submission of this application is the culmination of a lengthy process that has included policy formation, pre-application consultation and extensive pre-application discussions with City of Edinburgh Council and other consultees. This has included the following critical path:

- March 2013: City of Edinburgh Council (CEC) publish the Edinburgh Local Development Plan (ELDP) First Proposed Plan
- June 2013: The applicant submits a representation to the ELDP First Proposed Plan to promote the site for a housing led land use allocation
- June 2013: Scottish Ministers approve the first South East Scotland Strategic Development Plan (SESplan) which identifies South East Edinburgh as a Strategic Development Area (SDA) and within which the application site is located;
- November 2013: SESPlan Supplementary Guidance on housing land published for consultation (approved November 2014) including an increased housing land requirement with additional allowances to be made within Edinburgh's SDAs;
- June 2014: City of Edinburgh Council publish the ELDP Second Proposed Plan for consultation. The application site is included as a housing allocation (HSG29)
- October 2014: The EDI Group Ltd submit representations to the Edinburgh Local Development Plan (ELDP) Second Proposed Plan
- 2015 – 2016: DPEA examination of ELDP; DPEA examination concludes in July 2016 and retains the HSG29 land use allocation (with recommendations)
- December 2015 – August 2016: the applicant submits a Proposal of Application Notice to CEC and embarks upon formal pre-application consultation, further site appraisal, survey and assessment; masterplan and application preparation

3.3 It is apparent that the application is the culmination of extensive work and that the policy position relating to the application site has evolved over time. The application has been prepared with this in mind and it is considered that the submission of this application is entirely appropriate given the prevailing policy framework that now governs the site.

3.4 The Masterplan report and associated Masterplan drawings explain the scale and extent of the development proposed, together with other associated works. This can be summarised as follows:

- Residential development providing circa 1,330 residential units in a mix of housing types and sizes, with 25% of the units being affordable;
- A new primary school;
- A new local centre including retail, commercial and community uses;
- The formation of three new site accesses, one from the north (via Milton Road East) and two from the south (via Newcraighall Road), as well as a network of internal roads and paths, a replacement bridge over the East Coast Main Line (ECML) railway and other associated infrastructure;
- A green network, including open space, parkland, planting buffers to the railway and existing services within the site, and protection for the setting of listed buildings and the on-site Scheduled Monuments;
- Other structural and amenity landscaping and planting.

3.5 As set out in section 1, the Masterplan Report (with Design Code) and Masterplan drawings are submitted for approval with this application. They comprise the applicant's response to the ELDP 'Brunstane (HSG 29) – Development Principles' (as modified by the ELDP examination Reporters) and will provide a coherent framework of parameters, guidance and principles which will inform the preparation of future applications for the approval of matters specified in conditions (AMSC's).

3.6 The masterplan allows for a variety of house types, densities and styles (including 25% affordable provision) and the precise detail of this will form part of future applications for AMSC's. The same applies to the make-up of the local centre, albeit the description of development allows for typical land uses appropriate to a local centre, including shops, other commercial and local community uses (such as a doctors, dentists etc).

3.7 Indicative phasing of development across the site is set out within the Masterplan Report. It shows the relationship between the delivery of housing and other associated development and infrastructure, in particular the replacement crossing over the ECML, new primary school, new local centre and network of green spaces. The Transport Assessment also considers phasing and associated development thresholds relating to the provision of a replacement crossing over the ECML and accessibility to public transport. All of these matters have informed the Environmental Impact Assessment (EIA) process, which is summarised in greater detail at section 5 of this statement. Again, we expect matters of phasing to form part of the approval of AMSC's, particularly on a site of this scale where development is likely to be delivered by a range of housebuilders and developers.

4. Planning Policy Assessment

- 4.1 The Town & Country Planning (Scotland) Act 1997 (as amended) requires that planning applications are determined in accordance with the Development Plan unless other material considerations indicate otherwise. This section therefore considers the relevant policy context by National, Strategic and Local policy.
- 4.2 In this case, the Development Plan comprises the Edinburgh and South East Scotland Strategic Development Plan (SESplan) (June 2013) and the Edinburgh City Local Plan (ECLP) (2010).
- 4.3 An examination of unresolved objections into the Edinburgh Local Development Plan (ELDP) Second Proposed Plan has recently concluded with the Reporters Report being published in July 2016. Subject to the limited exceptions set out within the Act and associated Regulations, the city council is now required to make modifications to the ELDP as set out in the Reporters recommendations. As such, whilst the ELDP does not represent adopted policy, we note that greater consideration will be given to the ELDP in the following section under Material Considerations.

South East Scotland Strategic Development Plan (2013)

- 4.4 The Edinburgh and South East Scotland Strategic Development Plan (SESplan) was approved by Scottish Ministers in June 2013. Paragraph 8 of SESplan identifies South East Scotland as the main growth area and key driver of the Scottish economy, with Edinburgh at its heart.
- 4.5 The South East Scotland Strategic Development Plan (SESPlan) was approved in June 2013. Supplementary Guidance on housing land was approved in November 2014 (SESPlan SG).
- 4.6 SESPlan is a high-level spatial plan setting out a land use vision for the next 20 years for the city-region centred on Edinburgh and the Lothians.
- 4.7 This includes providing a policy framework to help deliver sustainable economic growth, shape good quality places and enhance the quality of life in the City of Edinburgh and the surrounding area.
- 4.8 The main aims of SESPlan are as follows:
- “Enable growth in the economy by developing key economic sectors, acting as the national hub for development and supporting local and rural development;
 - Set out a strategy to enable delivery of housing requirements to support growth and meet housing need and demand in the most sustainable locations;

- Integrate land use and sustainable modes of transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations;
- Conserve and enhance the natural and built environment;
- Promote green networks including through increasing woodland planting to increase competitiveness, enhance biodiversity and create more attractive, healthy places to live;
- Promote the development of urban brownfield land for appropriate uses;
- Promote the provision of improved infrastructure to enhance connectivity within the area, between the area and other parts of the UK and elsewhere to support economic growth and meet the needs of communities;
- Contribute to the response to climate change through mitigation and adaptation and promote high quality design / development”.

4.9 Policy 1A The Spatial Strategy: Development Locations, builds on existing committed developments and identifies five Sub-Regional Areas, including the Regional Core, which relates to Edinburgh.

4.10 It continues to state that Local Development Plans will direct further strategic development to thirteen Strategic Development Areas (SDA's) within the five sub-regional areas. The boundaries of these SDA's are identified in the SESPlan Strategic Spatial Assessment Technical Note (November 2011) and show the site forming part of the South East Edinburgh SDA.

4.11 At a strategic level, the application site is clearly within an appropriate location for development and would make a positive contribution to the delivery of the key aims of SESplan, particularly: enabling the delivery of housing requirements to support growth; integration with other land uses and local sustainable modes of transport; promotion of green networks and connectivity within the area.

Housing

4.12 Matters relating to housing are considered in pages 39-44 of SESplan. Paragraph 106 sets out that the key role for SESplan in housing is to ensure that the housing needs and demand for the SESplan area can be met.

4.13 **Policy 5 – Housing Land** sets out that for the period from 2009 up to 2024 there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built across the SESplan area, including on land which is currently committed for housing development. Of that total, the requirement for the period 2009 to 2019 is for 74,835 houses. It goes on to set out that **Supplementary Guidance** will be prepared to provide detailed further information for LDPs as to how much of that requirement should be met in each of those six areas, both in the period 2009 to 2019 and in the period 2019 to 2024.

- 4.14 **SESPlan Housing Land Supplementary Guidance (2014)** is based on the 2012 Housing Land Audit and indicates that the total supply across the area to 2024 is 83,207 units. It sets out that LDPs will need to identify land to accommodate at least an additional 24,338 units. Table 3.2 of the Supplementary Guidance demonstrates how these Additional Allowances are distributed across the Strategic Development Areas and outwith them. The application site is located within the South East Edinburgh Strategic Development Area, where it is expected that land will be allocated to deliver at least 2,950 units, of which 2,500 of these should be within the City of Edinburgh Council area.
- 4.15 **Policy 6 – Housing Land Flexibility** sets out that each planning authority in the SESplan area shall maintain a five years' effective housing land supply at all times and that the scale of supply shall derive from the housing requirements for each LDP area identified through the Supplementary Guidance provided for by Policy 5.
- 4.16 **Policy 7 – Maintaining a Five Year Housing Land Supply** states that sites for greenfield housing development proposals either within or outwith the identified SDAs may be allocated in local development plans or granted planning permission to maintain a five years' effective housing land supply, subject to satisfying each of the following criteria:
- a) the development will be in keeping with the character of the settlement and local area;
 - b) the development will not undermine green belt objectives; and
 - c) any additional infrastructure required as a result of the development is either committed or to be funded by the developer.
- 4.17 With potential capacity to provide circa 1,330 units, the application site will clearly provide a significant contribution to the South East Edinburgh Strategic Development Area's housing requirements.

Transportation

- 4.18 Matters relating to **transportation** are considered on Pages 45-46 of SESplan. Reducing the need to travel and promoting use of sustainable modes of transport are highlighted as key principles underpinning the Spatial Strategy for the SESplan area. It also sets out that development likely to generate significant travel demand will be directed to areas that are capable of being well served by public transport and that are accessible by foot and cycle, to reduce the need to travel by private car. For all development types it will be expected that the generation of additional car traffic is minimised.

4.19 **Policy 8 – Transportation** sets out that SESplan will support and promote the development of a sustainable transport network for new development and requires LDPs to comply with a range of relevant criteria (in part):

- a) Ensure that development likely to generate significant travel demand is directed to locations that support travel by public transport, foot and cycle;
- b) Ensure that new development minimises the generation of additional car traffic, including through the application of mode share targets and car parking standards that relate to public transport accessibility;
- c) Relate density and type of development to public transport accessibility;
- g) Ensure that the design and layout of new development demonstrably promotes non-car modes of travel; and
- h) Consider the merits of protecting existing and potential traffic-free cycle and walking routes such as disused railways affected by any development proposal.

The site is well served by access to public transport and the masterplan includes a number of links to existing pedestrian and cycle routes that mean new development will be easily accessible by a range of modes of transport. The Transport Assessment and Masterplan Report describe this in greater detail.

Green Belt

4.20 Matters relating to **Green Belts** are considered on Pages 53-54 of SESplan. Paragraph 129 sets out that the Green Belt around Edinburgh may need to be modified to implement the provisions of the Strategy which requires development in South East Edinburgh (amongst other areas), as set out in policies 1, 5, 6 and 7.

4.21 Paragraph 130 sets out that *'LPAs should identify allocations which seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where Green Belt land is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long-term boundaries'*.

4.22 **Policy 12 – Green Belts** sets out that LDPs will define and maintain Green Belts around Edinburgh for the following purpose to:

- a) Maintain the identity and character of Edinburgh and their neighbouring towns, and prevent coalescence, unless otherwise justified by the LDP settlement strategy;

The site is allocated for new housing within the proposed ELDP as part of its settlement strategy (or 'spatial strategy' as it is referred to in the ELDP). Whilst the ELDP notes that this will result in further coalescence between Edinburgh and Musselburgh, which is not normally supported, it goes on to state that it is justified in this instance because the site compared favourably to other possible options in the ELDP housing site assessment. Furthermore, following an examination into unresolved objections to the ELDP, Reporters concluded that further coalescence between Edinburgh and Musselburgh would not undermine green belt objectives and that the site should remain designated in the plan for housing development.

- b) Direct planned growth to the most appropriate locations and support regeneration;

The site is located within the South East Edinburgh SDA which has been defined to deliver strategic housing land requirements. The ELDP Reporters Report concluded that development of the application site for housing would make a significant contribution to the housing land requirement. At a strategic level, the application site is within an appropriate location for development and represents planned growth. The proposals will support the wider regeneration of the area by providing much needed new housing in a sustainable settlement extension. The development proposals will provide for a range of benefits for the area, including improved transport linkages, provision of new open space, a new primary school and local centre.

- c) Maintain the landscape setting of these settlements;

The ELDP Reporters Report concluded that although there would be some adverse landscape impact arising from housing development at the site, this would not be to an extent that would significantly undermine green belt policy objectives.

Furthermore, the masterplan proposals include a Strategic Landscape Framework that addresses the boundaries of the site, access to open space and mitigating any wider landscape impact on strategic views. The Environmental Statement includes a chapter on "Landscape, Townscape and Visual Impacts", which considers this in further detail and includes mitigation measures that are addressed within the Masterplan Report and masterplan drawings.

- d) Provide opportunities for access to open space and the countryside.

The Masterplan Report shows how the application proposals provide opportunities for access to proposed new areas of open space, as well as ensuring that appropriate links are formed to give easy access to adjacent areas of existing open space and countryside, such as the Newhailes House Gardens and Designed Landscape.

- 4.23 Policy 12 concludes by stating that LDP's will define green belt boundaries to conform to the above purposes, ensuring that the strategic growth requirements of the Strategic Development Plan can be accommodated. Earlier parts of this section have already described how the site has been removed from the green belt and allocated for new housing in the ELDP to ensure that strategic growth requirements can be met and that an examination into unresolved objections to the ELDP concluded that the site should remain designated in the plan for housing development.

Edinburgh City Local Plan (2010)

- 4.24 The adopted Edinburgh City Local Plan (2010) was prepared to conform to the now superseded Edinburgh and Lothians Structure Plan 2015 (approved in 2004). As such, it had the same end date in view (i.e. 2015) and is now more than five years old.
- 4.25 The ECLP does not conform to policies of SESplan, particularly in relation to policies concerning the spatial strategy (1) and housing land (5, 6 and 7). These have already been considered above and are of particular relevance to the determination of this planning application.
- 4.26 The ECLP is due to be replaced by the emerging ELDP, which must be consistent with SESplan. The Reporters Report into unresolved objections to the proposed ELDP has been recently published (30th June 2016). Subject to the limited exceptions set out within the Act and associated Regulations, the city council is now required to make modifications to the ELDP as set out in the Reporters recommendations. In view of this, policies of the ECLP carry little, if any weight, in the determination of this planning application.
- 4.27 In these circumstances, it is more appropriate to consider the planning application proposals against the ELDP, as modified by Reporters, which is now a material consideration of significant weight. This follows in the next part of this section.

Other Material Considerations

National Planning Framework 3 (June 2014)

- 4.28 A key objective of the Scottish Government is to make Scotland a successful, sustainable place, through increasing sustainable economic growth. The National Planning Framework 3 (NPF3) provides a long-term strategy for Scotland. It is the spatial expression of the Government Economic Strategy, and plans for development and investment in infrastructure.
- 4.29 It sets out that Scotland will have 2.89 million households by 2035, an increase of 23%. Edinburgh is identified as one of a few local authority areas expected to see the highest levels of growth. In order to accommodate this growth NPF3 sets out that a planned approach is required to ensure development needs are met, whilst taking into account existing and future infrastructure capacity.

4.30 The application proposals meet the general terms of NPF3 and supports the requirement for the increase in households that is required across the Edinburgh region.

Scottish Planning Policy

4.31 Scottish Planning Policy (SPP) 2014 sets out national planning policies which should influence Local Development Plans and be material considerations in determining applications. SPP assumes a presumption in favour of development that contributes to sustainable development through design, economic growth and transport. 13 principles are set out at paragraph 29 to guide policies and decisions in the context of the presumption in favour of development that contributes to sustainable development. These principles have been duly noted and it is considered that the application proposals are in accordance, particularly in terms of:

- The economic benefit arising from the development
- The creation of high quality place making and supporting good design
- Supporting delivery of accessible housing development
- The efficient use of land
- Supporting the delivery of infrastructure

4.32 We have also considered the subject principles in relation to, low carbon place, the natural and historic environment, and transport. Within the context of the principal policies of sustainability and placemaking, it is considered that the application proposals are supported by SPP.

4.33 SPP explains that where development plan policies are out-of-date, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. The same principle applies where a development plan is more than five years old. As set out above, the ECLP is now more than five years old and its policies are out-of-date, as it does not conform to policies within SESplan.

The Edinburgh Local Development Plan (Second Proposed Plan) (June 2014)

4.34 The Edinburgh Local Development Plan (ELDP) (Second Proposed Plan) was published in June 2014. It is a city-wide plan and once adopted will replace the Edinburgh City Local Plan (ECLP).

4.35 As noted above, the Reporters Report into the unresolved objections to the ELDP has now been published, following conclusion of the examination process.

4.36 Subject to the limited exceptions set out within the Act and associated Regulations, the city council is now required to make modifications to the ELDP as set out in the Reporters recommendations. In this regard, it is appropriate to consider the application proposals against the ELDP, as modified by Reporters, as this plan is now a material consideration of significant weight. Furthermore, it represents the settled view of the city council.

- 4.37 This is particularly relevant to proposals, like this application for PPP, which seek to deliver a significant contribution to the housing land requirement on land that forms part of a Strategic Development Area within SESplan and within the context of a considerable shortfall of a five year supply of effective housing land.
- 4.38 We therefore respectfully assert that the assessment of the application proposals against the ELDP, as modified by Reporters, is a material consideration of significant weight and should be the main consideration in the development management process that follows.
- 4.39 In view of observations above that the Reporters modifications are effectively binding on a local planning authority, the policy assessment that follows is based on these modifications to the plan, where these are relevant to this application for PPP.

Site Specific Policy

- 4.40 The application site is identified in the ELDP as a new housing proposal, HSG 29 Brunstane. Table 4 of the ELDP defines the site area as 48 hectares and that the estimated total capacity of the site is 950 – 1,330 units. Comments are provided for each housing allocation at table 4. In the case of Brunstane, it states, *“Proposal for housing-led development on land to the south Brunstane Burn and north of Newcraighall Road. Development must accord with the Newcraighall/Brunstane site brief”*.
- 4.41 The Newcraighall and Brunstane site brief describes how these sites provide the opportunity for new housing together with new and improved school and local facilities on the eastern side of the Council area (see figure 1 – LDP Spatial Strategy Summary Map for city-wide context). It continues to note how the sites are well served by bus and rail connections with the opportunity for these to be further enhanced, whilst existing and enhanced footpath and cycle links and green corridor proposals will ensure development is well connected.
- 4.42 A set of ‘development principles’ follow, specifically in relation to HSG 29 Brunstane and are given effect within a ‘Brunstane and Newcraighall Site Brief’ diagram. The genesis of a number of these principles can be traced back to representations made by the applicant, the EDI Group Ltd, to the emerging LDP and development framework proposals for housing-led development at the site. This has been summarised in earlier sections of this statement. The evolution of this framework is now presented in the Masterplan proposals submitted for approval with this application for PPP and other supporting material described in section 1 above. In light of this, the applicant is pleased to present a detailed and comprehensive response to these principles (as modified by the Reporters) in the application for determination and as summarised below:
- [Address the relevant General Development Principles on transport and education for South East Edinburgh set out in paragraphs 118 to 120 above.](#)

- 4.43 The general development principles on transport and education for South East Edinburgh, as it relates to HSG 29 Brunstane, are covered further below under the sub-heading 'Developer contributions and infrastructure delivery'.
- Transport assessments should identify any appropriate commensurate mitigation which may be required with respect to the A1/Newcraighall Road junction and to the junctions on the A199, taking into account any cumulative impact with traffic from other development sites. Particular attention should be given to the proposed new junction on Milton Road East, and the management of additional traffic generation onto Milton Road East and Newcraighall Road including associated improvements to pedestrian and cycle crossing facilities.
- 4.44 A Transport Assessment is submitted with this application for PPP and addresses the full terms of this development principle.
- The site layout should allow for the proposed new bus route to be formed linking Milton Road East with Newcraighall Road. Appropriate consultation with service providers should take place in order to identify the bus service improvements which can be undertaken in the plan period, taking into account access, routes and frequency of service, and including the proposed new bus route. Proposals should provide for an appropriate upgrading of existing bus stops and an increase in cycle parking facilities at Brunstane and Newcraighall stations.
- 4.45 The Masterplan Report and drawings, together with Transport Assessment, clearly illustrate and describe how the site layout allows for a proposed new bus route to be formed linking Milton Road East with Newcraighall Road. We expect that proposals for an appropriate upgrading of existing bus stops and an increase in cycle parking facilities at Brunstane and Newcraighall stations can be secured by way of appropriately worded conditions and/or a S75 Obligation attached to any grant of PPP.
- 4.46 Appropriate consultation with service providers commenced during earlier stages of the ELDP process, as part of preparing representations to the Proposed Plan and subsequently, Second Proposed Plan. With regard to addressing the terms of this development principle, the outcome of this consultation is reflected in the Transport Assessment and we expect this consultation to continue with submission of this planning application.
- Vehicular access should be taken from Milton Road East and Newcraighall Road, forming a new vehicular crossing over the East Coast railway line. The potential for a new pedestrian/cycle bridge within the eastern part of the site should be investigated, together with an investigation as to whether or not a second vehicular crossing of the East Coast railway line should be provided in the interests of safety, as identified within the transport appraisal. Any crossings of the East Coast railway line should be on bridges over the railway line, and not at grade.

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- 4.47 The Masterplan Report and drawings, and Transport Assessment show vehicular access taken from Milton Road East and Newcraighall Road, together with a new vehicular crossing over the ECML as a replacement for the existing crossing.
- 4.48 The potential for a new pedestrian/cycle bridge within the eastern part of the site has been investigated with the conclusion that it wasn't necessary to achieve good levels of accessibility and connectivity throughout the site and beyond. The Masterplan Report and Transport Assessment explain how a new combined vehicular (including bus) and pedestrian/cycle bridge over the ECML, together with links to existing pedestrian and cycle routes immediately beyond the application site boundary, will achieve good place-making throughout the site.
- 4.49 The Transport Assessment also describes how a second vehicular crossing of the ECML was investigated and is not required in the interests of safety, as identified within the ELDP Transport Appraisal.
- 4.50 Finally, the combined vehicular and pedestrian/cycle bridge over the ECML shall be in the form of a bridge, and not at grade. Again, this is described in the Masterplan Report and Transport Assessment.
- No vehicular access should be taken from the Gilberstoun Area.
- 4.51 There is no vehicular access taken from the Gilberstoun Area within this planning application submission.
- Opportunity to enhance existing core and other paths along the boundaries of the site, and in particular the Brunstane Burn Core Path (John Muir Way) on the northern boundary of the site including pedestrian crossing where vehicular access meets the path. New multi-user path links should be formed to the Innocent Railway Core Path, Brunstane Burn Core Path and the disused railway line to the north of Newcraighall, with path connections also to housing at Gilberstoun, Newcraighall and Brunstane railway station.
- 4.52 The Masterplan report, Strategic Movement Framework drawing and Transport Assessment address the terms of this development principle. As noted above, the site is uniquely surrounded by a network of pedestrian and cycle routes, a number of which provide onward connections to train stations, bus stops, other residential areas and local areas of interest (such as Newhailes House). In this regard, the evolution of a properly integrated movement framework has been a key part of the applicant's proposals for the site since representations were first lodged to the emerging ELDP process. A number of meetings have taken place with CEC officers (planning and transport) in the course of preparing this part of the application proposals, including a Stage 1 Quality Audit which examined external paths and linkages. This is set out within the TA.
- The impact on the setting of Brunstane House should be minimised through the appropriate design and layout of housing on the site, including the provision of sufficient open space and
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landscaping to the north and east as shown on the diagram. The extent of the open space is indicative only and the exact area will depend on the design and layout of housing on the site. Sufficient open space should also be similarly provided in order to retain an open setting for the two scheduled monuments of Brunstane Moated Site and Brunstane Enclosure, also meeting a large greenspace deficiency to the south west of the site.

4.53 As with the above principles (and indeed those which follow), the applicant has adopted a comprehensive approach to matters of built heritage, archaeology, open space and landscaping. This can be traced back to representations made by the applicant throughout the ELDP process.

4.54 In the context of this submission, they are addressed within the Masterplan report and drawings, and the Environmental Statement, specifically the chapters on Landscape, Townscape and Visual Impact and Historic Environment. Where appropriate, the ES includes mitigation, which is then reflected in the Masterplan report and drawings.

4.55 The applicant's response to this principle has also been informed by consultation with CEC officers (planning, heritage and open space), as well as Historic Environment Scotland.

- A landscape framework should be provided to the boundary of the Newhailes House garden and designed landscape inventory site, with a buffer as shown on the diagram (again indicative and depending on the design and layout of housing on the site) and the detailed siting and design of dwellings should respect views to Arthur's Seat from the grounds of Newhailes House.

4.56 In addressing this principle, we would refer to the statement provided immediately above. In addition, the National Trust for Scotland (NTS) and Newhailes House have been consulted on these matters in the course of preparing the application proposals.

- Management proposals should have regard to the above stated historic environment assets. Historic Environment Scotland should be consulted on these matters when development proposals are being prepared.

4.57 As stated above, management proposals do have regard to the stated historic environmental assets and have involved consultation with Historic Environment Scotland, as well as CEC, NTS and Newhailes House. Please refer to the Masterplan report and appropriate chapters of the ES in this regard.

- Establish statutory safeguards to overhead power lines to the north and south of the site. Design principles should seek to integrate overhead power lines with site layout. To the south, allotment provision should complement consented allotments at Newcraighall North. To the north, power line way leave should be designed to provide for semi natural greenspace and habitat connectivity with informal recreation.

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- 4.58 Scottish Power is in the process of decommissioning and removing the pylons to the north and this is reflected in the Masterplan report and drawings. As well removing a visual blight on the landscape, this has allowed the masterplan to increase the potential housing capacity of the site and, in line with the Reporters Report conclusions, maximise its use for housing.
- 4.59 To the south, they have been integrated within the site layout, as shown in the Masterplan report and drawings.
- 4.60 Allotment provision has been provided to complement consented allotments at Newcraighall North and along the northern embankment of the ECML, to make the most efficient use of land available. Again, please refer to the Masterplan report and Strategic Landscape Framework and Strategic Masterplan drawings in particular.
- [Expand grassland habitat \(under pylons\) and provide woodland connectivity across the site.](#)
- 4.61 As noted above, the pylons are in the process of being decommissioned and removed. The Strategic Landscape Framework drawing shows green space connectivity across the site and how the evolution of this has been informed by heritage considerations and key views in particular. The Masterplan report provides detailed narrative on these matters.
- [Streets and open spaces should be designed to benefit from views to the coast to the north, Arthur's Seat to the west and Pentland Hills to the south west.](#)
- 4.62 The Strategic Landscape Framework and Strategic Masterplan drawings demonstrate how streets and open spaces have been designed to benefit from the views highlighted above. As noted in earlier parts of this section, this has been informed through detailed analysis of heritage considerations, particularly as it relates to historic views of importance from Brunstane House and the Newhailes House estate. This analysis has been informed through consultation with CEC officers, Historic Environment Scotland, the National Trust for Scotland and Newhailes House. As well as the above drawings and Masterplan report, this analysis can also be found within the Historic Environment chapter of the ES.
- [Opportunity to create a community focal point including a new primary school and local centre.](#)
- 4.63 The Strategic Masterplan and Masterplan report shows and describes a community focal point around a new primary school, local centre and public square in the heart of the site. As with a number of other items contained within the development principles, these matters have been part of the masterplanning process from the very outset and have involved detailed dialogue with CEC officers (in particular education) and other stakeholders, to understand likely demands within the local area. The description of development allows for a mix of uses to populate the local centre, including community uses and essential services, such as a doctors surgery etc.

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- Proposals for housing (including the finalised site capacity, design and layout), the school, and any other uses provided on the site, should be informed by an adequate flood risk assessment. Enhanced sustainable urban drainage will be required as appropriate to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row.
- 4.64 A Flood Risk Assessment and Drainage Strategy are appended to the Environmental Statement and address the requirements of this development principle in full. The Strategic Masterplan shows the likely distribution of SUDs ponds throughout the site to address current/future water quality pressures. We expect these to be secured as part of the AMSC process that follow any grant of PPP.
- Proposals should fully address any necessary site remediation in relation to mining legacy constraints, and should take account of any need for prior extraction of minerals in the context of Scottish Planning Policy.
- 4.65 The Ground Conditions, Hydrogeology, Geology and Soils chapter of the Environmental Statement and associated mitigation addresses the requirements of this principle.
- 4.66 In addition to the modified development principles, the Reporters also modified the Brunstane site brief diagram as described below. With respect to the second modification, the Strategic Landscape Framework, Strategic Masterplan and Masterplan report show how an appropriate landscape buffer along the boundary of the site with Newhailes House has been incorporated into the application proposals. This has followed consultation with the National Trust for Scotland, Newhailes House and CEC officers (planning and landscape).
- Including a third arrow on the diagram for Brunstane (HSG 29) showing vehicular access from HSG 26, in accordance with the submission by the prospective developer.
 - Including a landscape buffer on the diagram for Brunstane (HSG 29) (approximately equivalent to half the width of the buffer under the electricity transmission lines) along the boundary of the site with the Newhailes House garden and designed Landscape.
- 4.67 As part of the new housing allocation at Brunstane, the ELDP also identifies a new primary school and local centre proposal (SCH9 and S5 respectively). The response to the ELDP development principles above demonstrates how these proposals form an important part of the masterplan proposals for the site, with the opportunity to create a community focal point.

Developer contributions and infrastructure delivery

- 4.68 The approach to the delivery of required transport infrastructure and education provision is set out in policy Del 1 Developer Contributions and Infrastructure Delivery (and will be detailed within Supplementary Guidance required through that policy), General Principles for transport and

schools provisions within specific development areas (in this case South East Edinburgh) and a new policy to address cumulative and cross boundary transport matters, Trans X.

- 4.69 The requirements of these policies (and scope of education/transport mitigation detailed therein) have been addressed within the Masterplan Report and Transport Assessment in particular and follow extensive pre application discussions with officers of the city council in planning, education, housing and transport. We expect this dialogue to continue with the submission of this planning application, particularly in respect of any appropriately worded conditions and Section 75 Obligation that might be attached to any grant of PPP in due course. As set out at paragraph 102 of the ELDP, any developer contributions must be proportionate and attributable to the impacts of the development, and realistic in light of prevailing economic conditions and the need to accelerate housing completions across the city.

Other ELDP policies

- 4.70 The focus of this planning policy assessment is appropriately centred on the new housing proposal HSG 29 Brunstane site brief and development principles, as modified by the ELDP examination Reporters. The applicant's response to the brief and principles is set out above.
- 4.71 There are a number of other policies in the ELDP which either relate to, or support, the brief and principles. These cover issues such as design, the environment, transport, resources and services. In this regard, we would refer to the full suite of application documentation submitted and described in section 1 of this statement, which demonstrates how the full terms of these policies have been satisfactorily addressed in this application for PPP.

Summary

- 4.72 This section has identified and assessed the application proposals against the prevailing development plan policies and other material considerations. It is clear the adopted Edinburgh City Local Plan carries little weight in the consideration of the site for development given that it pre-dates the Strategic Development Plan and, significantly, the emerging Edinburgh Local Development Plan which allocates the site for development has recently been examined by the Directorate for Planning and Environmental Appeals whereby the HSG29 land use allocation has been retained. The prevailing development principles, as modified by the Reporters, have been fully considered in the development of the application proposals and it is considered that the application is entirely consistent with the relevant policy context, as appraised above.

5. Environmental Impact Assessment

- 5.1 As noted earlier, this application is supported by an Environmental Statement (ES). The ES has been scoped with CEC and appropriate consultees and provides a comprehensive assessment of the potential impacts from the proposed development. It is important to note that the application site has already been assessed via the Strategic Environmental Assessment (SEA) process associated with the preparation of the Edinburgh Local Development Plan (ELDP) and found to be an appropriate location for development in this regard.
- 5.2 In any case, the EIA technical assessments presented in the ES are as follows:
- Ecology, Biodiversity and Nature Conservation (ES Chapter 6);
 - Landscape, Townscape and Visual Impacts (ES Chapter 7);
 - Historic Environment (ES Chapter 8);
 - Water Resources, Hydrology, Flood Risk and Drainage (ES Chapter 9);
 - Ground Conditions, Hydrogeology, Geology and Soils (ES Chapter 10);
 - Traffic, Transportation and Access (ES Chapter 11);
 - Air Quality (ES Chapter 12);
 - Noise and Vibration (ES Chapter 13);
 - Socioeconomic (ES Chapter 14).
- 5.3 Concluding chapters describe the methodology that was used to undertake Cumulative Effects Assessment (ES Chapter 15) and a Schedule of Mitigation (ES Chapter 16) presenting all of the mitigation measures proposed in the chapters.
- 5.4 It is considered that the masterplan and strategic plans for approval, together with the ES establish a competent basis upon which PPP can be granted.

6. Conclusions

- 6.1 This Planning Statement has been prepared by GVA James Barr on behalf of The EDI Group Ltd ('the applicant') and is submitted in support of an application for Planning Permission in Principle (PPP) for the creation of a new sustainable community, New Brunstane, in south east Edinburgh.
- 6.2 The applicant has promoted the site for residential-led development since 2012 through the development plan process, in particular the emerging Edinburgh Local Development Plan (ELDP). The site was allocated as a new housing proposal HSG 29 Brunstane in the ELDP Second Proposed Plan (June 2014) and following an examination of unresolved objections to this plan, Reporters concluded that the site should remain designated in the plan for housing development.
- 6.3 Within the adopted Local Plans (RWELP & ECLP) the application site is identified as being located within the Edinburgh Green Belt which sets out that agriculture, horticulture, forestry and countryside recreation uses are appropriate. Residential development, particularly of the scale proposed, is not included as an appropriate form of development in this location. The principle of the proposed development is therefore contrary to this policy of the current local plan. However, this Plan is now somewhat outdated and for development management purposes has less relevance in the assessment of this planning application, particularly following the publication of the Examination Report in to the Edinburgh LDP.
- 6.4 The Proposed LDP already represents the settled view of the planning authority as to what the next plan for Edinburgh should be and carries significant weight in planning decision making. This is particularly relevant to proposals which seek to deliver strategic housing land allocations required to meet the terms of SESplan and within the context of a considerable shortfall of a 5 year supply of effective housing land.
- 6.5 The application site is identified in the SESplan as being located within the Regional Core SRA and the South East Edinburgh SDA. Emphasis is placed on maintaining and developing the established role of the area as the Regional Core and Capital city, with a focus on development in a number of areas, including South East Edinburgh.
- 6.6 Following the publication of the Examination report it has confirmed and supported the HSG29 allocation for Brunstane. As considered above there are a number of alterations recommended through the Examination report, including some site specific interventions for HSG29. None of these changes to the LDP impact on the deliverability of the site and the determination of this PPP application. These have all been fully appraised and taken into consideration in the preparation of the application in any case.
- 6.7 This statement is part of a wider suite of documents, reports and plans submitted with the application. With regards to the wider assessments, it is considered that a clear case has been

made for the development. On the basis of the above assessment of the proposals against relevant policy provisions, the development proposals are fully supported by SESplan and the emerging local policy framework. The site has been confirmed as a housing allocation by the Reporters completing the Examination providing further support for the proposed development.

- 6.8 On the basis of the above assessment of the proposals against relevant policy provisions, the development proposals are fully supported by the relevant prevailing policy context and other material considerations. A number of technical assessments have been carried out, together with a detailed Environmental Statement. The application proposals have been comprehensively assessed in this regard. Where necessary, mitigation has been proposed where potential impacts and effects have been identified and we would welcome further ongoing discussion and the use of appropriate conditions and/or other means of control to assist in the delivery of the development which ultimately forms a component part of the overall LDP spatial strategy for Edinburgh.
- 6.9 In light of the foregoing, it is respectfully requested that CEC grants planning permission in principle for the application proposal.

GVA James Barr



Appendix 1
Site Location
Plan

NOTES: Do not scale from this drawing. All illustrative information is for design communication purposes only and is not to be relied upon for construction or material. Please report any discrepancies to AREA before proceeding.

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Note that the PPP boundary is the same as the PAN boundary.

— PPP boundary



Date	Rev	Description	Drawn	Check



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Project	NEW BRUNSTANE				
Client	THE EDI GROUP				
Title	SITE LOCATION PLAN				
Status	PLANNING	Drawn	JN/KC	Checked	-
Date	160816	Scale/Format	1:2500@A1		
Job ref.	NB_P_13	Rev	-		

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