# City of Edinburgh Council -Proposed City Plan 2030 Key items in/near Portobello

Portobello Community Council October 2021



### Background

- City Plan 2030 is a Local Development Plan (LDP), it will set out strategy, proposals and policies to shape development in Edinburgh over the next 10 years and beyond
- A Main Issues Report 'Choices for City Plan' was published by City of Edinburgh Council for consultation in Jan 2020
- Portobello Community Council consulted the community on this report <u>and responded</u>
  - Focused on where housing should be supplied: brownfield, greenfield or blended; and views on specific local development sites
  - Also responded on desire for local place briefs & plans
  - Also signposted people to the full CEC consultation & complete range of topics
- A proposed version of City Plan 2030 was presented to the Council's Planning Committee on 29 Sep 2021. It approved the proposed plan for a period of representation

### Next steps

- The proposed plan goes out for representation for six weeks
- This will run from from 7 Nov 2021 (so till ~19 Dec): *"Further details on this period of representation, including how to comment on the plan will be provided shortly"*
- Submitted representations should look to either support the proposed plan, or seek changes to it
- Representations will then be considered, first by the Council, then by a Scottish Government reporter in an examination
- The examination report can make recommendations for changes to the plan
- Portobello Community Council to respond in support of the proposed plan, given it aligns with our earlier representation, with specific comments on Seafield, master planning and Hifi Corner site
  - We will also share this summary and signpost how members of the public can respond individually once representations open

### Key items - related to PCC representation #1

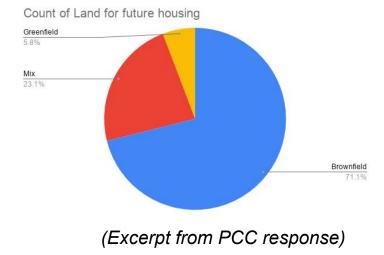
Choice 12 - Building our new homes and infrastructure 12A Which option do you support?

Option 1 (Council/Partners/Urban Area)

Explain why you support that option, or why haven't chosen an option:

Portobello Community Council undertook a consultation to inform our response to Choice 12A, while also promoting individual responses to the Choices for City Plan 2030 by the community. The consultation had 173 responses, with many detailed comments: City Choices 2030 - Anon responses.

The consultation consisted of two main questions. The first specifically on the choice of land for future housing: brownfield, greenfield or mixed options. 71% selected brownfield, 6% greenfield and 23% for the mixed blended approach. Given the dear preference for brownfield we have selected Option 1.

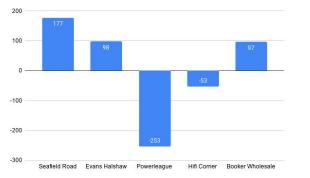


- Our response indicated local support (71%) for prioritising brownfield development
- The Proposed City Plan takes forward this approach to development city-wide

### Key items - related to PCC representation #2

We poised the second question to allow us to ascertain the level of support for residential development for the identified brownfield sites, within our local area. The sites being: Seafield (site 383), Evans Halshaw Sir Harry Lauder Rd (site 400), Powerteague Westbank St (site 334), Hifl Corner Joppa Rd (site 210) and Booker Wholesale Eastfield (site 225). Respondents were asked to rank each site on a 5 point scale from mostpreferred to least-prefered.

To analyse the responses we scored from 2 (most-preferred) through to -2 (least-preferred) and totalled:



Possible sites for residential development - preferences

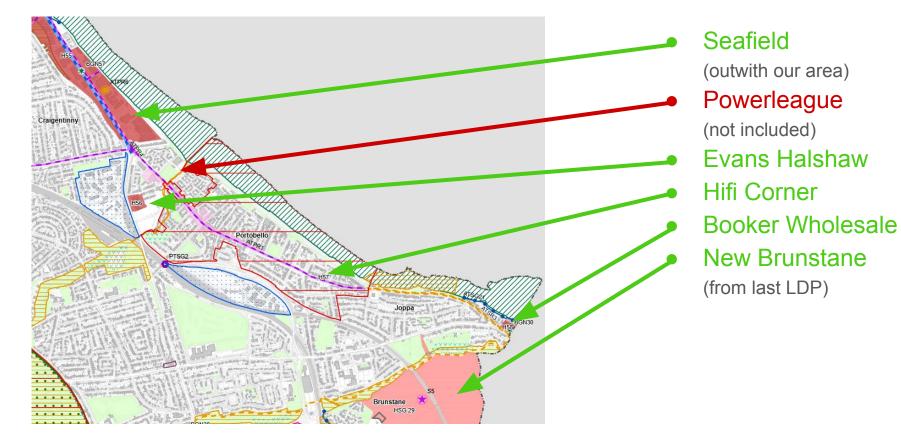
Clearly the Seafield site is the most preferred for residential development, with Evan Halshaw and Booker Wholesale site also having positive support. Hifi Corner had a negative response, with the Powerleague site dearing being the least preferred for development. The comments linked earlier should be reviewed. Some key takeaways are:

- The Powerleague site is currently designated as Openspace in the local development plan, it is not "brownfield". There is considerable history behind this designation, tied with its former use as an outdoor swimming pool and the desire to maintain recreation use of the site at the time of the last redevelopment as five-a-side football pitches. Comments received indicate there is a continuing desire to maintain it for recreational use. This site has also been the focus of a participation request and following on from that a collaborative placemaking exercise and community-led project to attempt to shape the future of the site. Car garages seem to be viewed as a sub-optimal current use of the Seafled site, with housing more
- appropriate.

(Excerpt from PCC response)

- We reflected the level of support locally for residential development of the identified brownfield sites
- Seafield Road, Evans Halshaw and Booker Wholesale were prefered
- Powerleague had considerable negative feedback, considering its history as local openspace / recreational use
- Hifi Corner had slight negative
- The Powerleague site is not in the proposed plan, reflecting the main part of our feedback

### Key items - related to PCC representation #2 (cont)



### Key items - related to PCC representation #2 (H55)

- Seafield Road; outwith PCC area
- Identified as a strategic site within the plan
- Place based policies to be used to set out development principles
  - "The Council will prepare a Place Brief for the site which will establish high level principles to inform future master planning and design processes. Once approved the Place Brief will become non-statutory planning guidance. Proposals for any part of this site in advance of an approved Place Brief will be considered as premature in line with Env 2. Proposals will also be assessed against the Seafield Development Principles set out in Place 15"
- This ties in with our response to Choice 4
- Note: Portobello Community Council are coordinating with <u>Craigentinny</u> <u>Meadowbank CC, and other local CCs on this development</u>, along with CEC officers and other stakeholders

CITY PLAN 2030 - Proposed plan September 2021

#### Place 15 Seafield

Planning permission will be granted for development within the boundary of Seafield, as defined on the Proposal Map, provided it accords with a Place Brief, a flood risk and coastal erosion appraisal, the Seafield Site Development Principles and an approved master plan.

- 3.45 The Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. The Place Brief must consider the implications of flood risk and erosion in the area and be informed by a flood risk and coastal erosion appraisal which develops options which can be supported by the Council. The implications of flooding and coastal erosion should be used to inform the development of this site. Development at Seafield should provide or contribute towards education, and healthcare infrastructure and community facilities.
- 3.46 Local communities and key stakeholders will be consulted through the development of the Place Brief. Once approved the Place Brief will become non-statutory planning guidance. Proposals for any part of this site in advance of an approved Place Brief will be considered as premature in line with Policy Env 2. Proposals will also be assessed against the Seafield Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity.
- 3.47 Development at Seafield Industrial Estate must not have an adverse effect on qualifying interests of the Firth of Forth Special Protection Area (SPA) and the Outer Firth of Forth and St Andrews Bay Complex SPA.

#### Seafield Development Principles

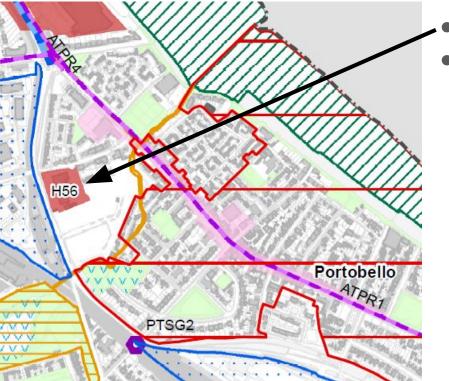
#### The requirements in principle will be:

- A housing –led mixed use urban extension with a sense of community that can connect with neighbouring areas and the wider city.
- Appropriate mass, scale, height and layout of new development, having regard to views to it from the Firth of Forth

- Ensure all homes are adequately served by play facilities and have access to open space in line with the Council's Open Space Strategy and proposalBGN57
- Deliver a SUDS solution to serve both the site and surrounding area in line with Proposal BGN9
- Provision of sustainable travel infrastructure, including where possible use of existing rail infrastructure:
  - a. Mobility Hub
  - b. Edinburgh Promenade upgrade and safe connections and safe crossing of Seafield Road East
  - c. New active travel route: City Centre along Portobello Road/London Road.
  - d. New Active Travel Route: Along Seafield Road and connection to Craigentinny Avenue via Fillyside
  - e. New Active Travel Route: Along Seafield Road and Portobello High Street
  - f. Active Travel connections through Harry Lauder Junction
  - g. New public transport route: Seafield Road to Leith
- Provide or contribute towards education, and healthcare infrastructure and community facilities.
- 3.48 The site is situated adjacent to the Firth of Forth SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA, bounded by a promenade. Development of Seafield may cause acoustic and visual (including lighting) disturbance to waders feeding and roosting within 150 meters of the site, particularly during construction but also once new development is occupied/operational and human activity, including vehicular movement, increase. However, it should be noted that this area of the SPA is readily accessible and does currently experience large volumes of pedestrians and dog walkers. The factors identified apply only in the winter months, when the wading and roosting birds are present.

- 3.49 Pollution is a potential cause of harm most likely during construction. This could have a direct impact upon the qualifying interest, through ingestion or fouling or, more likely, an indirect impact by modifying the habitat – either temporarily -including intertidal sediment quality. Disturbance and the effects of pollution could significantly alter the SPA populations as a viable component of the Firth of Forth SPA or alter their disturbance within the site. Both of these scenarios run contrary to the conservation objectives of the SPA.
- 3.50 Mitigation measures applied or taken into account. Acoustic disturbance during the construction phase of the development can be avoided by preventing work during the overwintering period, between September and April (inclusive). It may be acceptable however to mitigate any noise disturbance, if necessary, through:
  - noise attenuation (including screening) or restrictions which prevent noise exceeding thresholds above which qualifying species are disturbed,
  - phasing plans or agreed programmes of work which prevent activities likely to cause a noise disturbance such as piling from occurring during the overwintering period, or for example, working during high tides at springs between sunrise and sunset during that period.
- 3.51 To prevent pollution events, there should be standard adherence to pollution control measures e.g. SEPA Guidance Note 7.
- 3.52 The mitigation measures noted above would ensure development of the Seafield Industrial Estate would not have a significant effect upon the Firth of Forth SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA; the structure or the functioning of the Qualifying features (sps) populations or the habitats that they support.

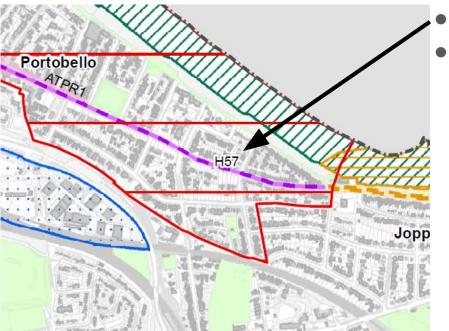
### Key items - related to PCC representation #2 (H56)



• Former Evans Halshaw site

- 1.3 ha; ~ 104 units
  - Redevelopment of the site should include new class 4/commercial space in an appropriate location
  - Development must provide active frontages onto Sir Harry Lauder Road and Fishwife's Causeway
  - Development must link to paths in the adjacent new development to the east and south of the site and provide through connections for pedestrians and cyclists

### Key items - related to PCC representation #2 (H57)



Current Hifi Corner site

0.1 ha; ~ 8 units

The site is within the Portobello conservation area - the design of the development should be consistent with the conservation area character appraisal and seek to preserve and/or enhance the special character and appearance of the area, including its setting

### Key items - related to PCC representation #2 (H58)



0.5 ha; ~ 40 units

0

GN30

- Development must be set back 15m from the top of the bank of Brunstane Burn
- A cycle route is to be provided along the seafront as part of the Round the Forth cycle route
- Development should provide active frontages towards Eastfield and routes through and around the site
- New open space should enhance and extend the existing green/blue network along the Brunstane Burn and the coast
- New outdoor play facilities to be integrated into the site layout in a well overlooked and accessible location with a welcoming setting. These new facilities shall provide for varying ranges of users, including those with disabilities. See proposal BGN30

#### Key items - related to PCC representation #2 (HSG29)



- Carried over from last LDP, site already has outline planning consent
- 1330 units

#### Place 32 Newcraighall

Planning permission will be granted for development within the boundary of Newcraighall as defined on the Proposals Map, provided it accords with the Newcraighall and Brunstane Development Principles and the approved, or subsequently approved, master plan

#### **Newcraighall Development Principles**

3.78 This housing site was allocated for development and removed from the greenbelt in the Edinburgh Local Development Plan (2016). 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.

#### Newcraighall East

- new woodland should be provided along the southern boundary of the site as shown on the diagram.
- the finalised site capacity, design and layout should be informed by an adequate flood risk assessment.
- site layout should enable a bus route to be formed north-south through the site. It is intended that this connects to QMUC across land allocated for development in East Lothian. A bus gate at the site boundary should prevent general vehicular access through this route.
- layout should create pedestrian and cycleway connections through the site.
- a new green corridor should be created along the course of the power lines running through the site, extending grassland habitat with the opportunity for connections outwith the Council area. This greenspace should be fronted by new development in order to improve community safety and aid place-making.
- Layout should make provision for an extension of Newcraighall Primary School's grounds.

- opportunity for retail/commercial units as part of street frontage to Whitehill Street /Newcraighall Road
- Provide or contribute towards education, and healthcare infrastructure and community facilities.

#### Place 33 Brunstane

Planning permission will be granted for development within the boundary of Brunstane as defined on the Proposals Map, provided it accords with the Newcraighall and Brunstane Development Principles and the approved, or subsequently approved, master plan.

3.79 This housing site was allocated for development and removed from the greenbelt in the Edinburgh Local Development Plan (2016). 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.

#### **Brunstane Development Principles**

- address the education impacts by providing a new 18 class Primary School and 128 place early learning centre 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 cycle crossing facilities.
- 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.

- 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.
- no vehicular access to be taken from Gilberstoun area
- 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.
- 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 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.
- a landscape framework should be provided to the boundary of 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 detailed siting and design of dwellings should respect views to Arthur's Seat from the grounds of Newhailes House.
- 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.

- establish statutory safeguards to overhead powerlines to the north and south
  of the site. Design principles should seek to integrate overhead powerlines with
  site layout. To the south, allotment provision should compliment consented
  allotments at Newcraighall North. To the north, powerline way leave should be
  designed to provide for semi natural greenspace and habitat connectivity with
  informal recreation.
- expand grassland habitat (under pylons) and provide woodland connectivity across the site
- 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 southwest.
- opportunity to create a community focal point including a new primary school and local centre.
- 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.
- 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.
- Provide or contribute towards healthcare infrastructure and community facilities.

#### Active travel

raigentinny

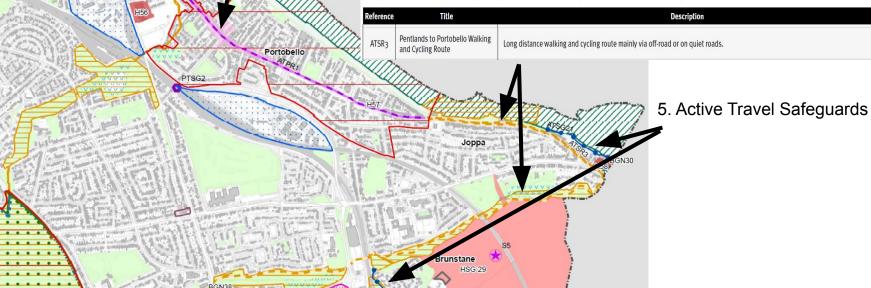
#### Table 4 - Active Travel Proposals relating to development sites

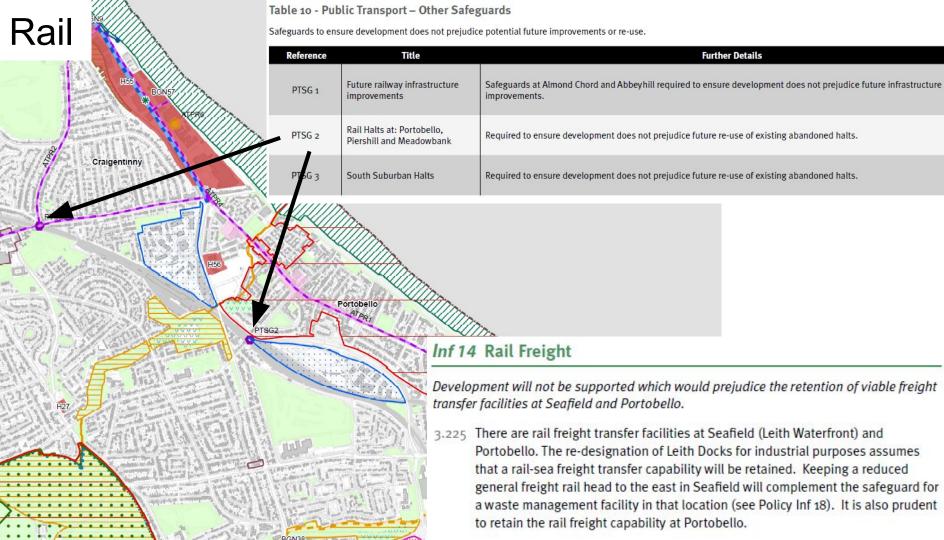
Active travel routes and connections to existing active travel infrastructure that are required to make development proposals acceptable in terms of n

Reference	Site reference	Title
ATPR1	Place 15 - Seafield	New Active Travel Route: Along Seafield Road and Portobello High Street
ATPR2	Place 15 - Seafield	New Active Travel Route: Along Seafield Road and connection to Craigentinny Avenue via Fillyside.
ATPR3	Place 15 - Seafield	New active travel route: City Centre along Portobello Road/London Road.
ATPR4	Place 15 - Seafield	Active Travel connections: Harry Lauder Junction
ATPR5	Place 15 - Seafield	Active Travel Route: Seafield Road to Edinburgh Promenade - safe crossing
ATPR6	Place 15 - Seafield	Mobility Hub: Seafield

Table 3 - Active Travel Strategic Projects and Safeguards

These include some safeguarded routes that are longer distance active travel routes, sometimes more leisure in nature, that do not necessarily have a direct relationship with the plan's development sites. It also includes projects that are programmed as part of the Active Travel Investment Programme, and within scope of the City Centre Transformation package of public realm and pedestrian priority projects. It also includes proposals that serve a cluster of development sites.





## Appendix: Sections from Environmental Report

Objective	Bio	diver	sity		Population			Soil	Wate	er A	Air & Climate			Mat Asse	erial ets	Heri	itage					Landscape			
Question	B1	B2	B3 B4	<b>B5</b>	P1 P2	P3	P4	S1	W1	W2 A	1 A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	3 L4
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	later 20th century development site is still regarded as having archaeological potential (low). Site is adjacent to Special Protection Area and adopted core path. Site potentially visible within many protected city viewcones.         Design and layout of site will have to address impact of odours from Seafield sewage works to ensure adequate residential amenity and an																								
	Due dev sha spa det infc surv rece effe whi circ	e to the relopr re tar ce sta rimer orm a vey or ommo ect, the ch the umst	ent of odo he previou ment shou rgets met. andard. Ar ntal impac project-le ver at leas ended. Th he Council e area has ances. Com ment inclu	Addi Addi n appr t on t evel H st one e Cou must s beer	es an asse ake linkag itional op ropriate a the natura IRA. This r e overwin uncil as "C t then unc n designa	essmer ges to pen sp assess al heri may re tering Compe dertak ted. D	nt of t the a ace sl ment itage equire seas etent ce an Develo	the lan adopte hould t shoul intere e a stu con. Pro Autho Appro opmen ownsc	nd for r d core be pro d be co sts of r dy of c e-appli ority" w opriate at whice ape ap	isks pre: path. P vided wi arried ou the SPA. qualifyin cation d <i>i</i> ill carry Assessm h could praisals	sented rovisio thin sir it, thro Propo g speci iscussio out the ent of narm a require	by p n of ugh sals es be on w e HR the n int ed to	otenti new p addre the Hf for de chavio ith Na A. If it mplic ernati deter	al con ublic t ss dist (A, to velopr ur in t tureSo is con ations onal in mine	tamin ranspo tance t ensur ment n the affi cot reg cludeo of the mport	ation ort se to exit e the nust b ected gardin I that e deve ant sit	may rvices sting deve be acc area g pre the p elopm te wil	be re- s will open comp of th parat propo nent fi ll only	quired be red space ent o anied e SPA ion o sal is or the be a	d. The quired which f the by ar , which f the likely conso	e des d to e ch fai site h n expo ch is l asses to ha servat ved in	ign o nsur ls to as no ert a likely smer ave a tion i exce	of the mee ppra to in nt is sign nter	e ode et op nisal nvo nific rest: onal	e pen l to olve cant cs for l

mitigation may be required.

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#### Key items - related to PCC representation #2 (H56)

impacts. Redevelopment of site will require archaeological mitigation programme of a full excavation, public engagement, analysis and publication and interpretation in the public realm. Townscape and visual appraisals would be required to determine appropriate mass, scale, height and layout of new development.

### Key items - related to PCC representation #2 (H57)

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SEA	Biodiversity					Population			Soil	il Water			Air & Climate			Mat	erial	Heritage							Landscape		
Objective																Asse	ts										
Question	B1	B2	B3	B4	B5 P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4
Effect	-	-	-	?		-	-	-	~	x	-	-	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-
Comment	The existing use is a retail warehouse. Adjacent use is residential. There is potential for protected species within the area. The SFRA																										
	iden	identifies the site as having a medium risk of surface water flooding. Site is within Portobello Conservation Area. Development on site at low																									
	risk of affecting any city protected views. Site in few local views.																										
	risk	of af	fecting	g any	city prot	ected	d viev	vs. Si	te in fe	ew loc	cal view	NS.															
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Mitigation	A pr The and	otec desig its in	ted sp gn and npacts	ecie d layo s. Th	s assessm out of this ne SFRA re	ent n s site ecom	nay b will h mend	e req lave t ls a fl	uired. to inclu ood ri	Posit ude gr sk ma	tive ef reater nagen	fects atten nent p	uation Ian is	n tha prep	n sta bared	ndard I. As t	pract he site	ice to e is w	redu ithin a	ce th a con	e risk serva	of su tion a	urface area t	e wat the d	er flo esign	oding of th	g ne
Mitigation	A pr The and deve	otec desig its in elopr	ted sp gn and npacts nent s	ecies layo s. Th shou	s assessm out of this ne SFRA re Id seek to	ent n s site com pres	nay b will h menc erve	e req lave t ls a fl and/o	uired. to inclu ood ris or enh	Posit ude gr sk ma ance t	tive ef reater nagen the sp	fects atten nent p ecial o	uation blan is charao	n tha prep cter a	n sta bared and a	ndard I. As t ppear	pract he site ance i	ice to e is w ncluo	redu ithin a ling it:	ce th a con s sett	e risk serva ing a	of su ition a nd be	area t cons	e wat the d	er flo esign nt wit	oding of th h the	g ne
Mitigation	A pr The and deve	otec desig its in elopr	ted sp gn and npacts nent s	ecies layo s. Th shou	s assessm out of this ne SFRA re	ent n s site com pres	nay b will h menc erve	e req lave t ls a fl and/o	uired. to inclu ood ris or enh	Posit ude gr sk ma ance t	tive ef reater nagen the sp	fects atten nent p ecial o	uation blan is charao	n tha prep cter a	n sta bared and a	ndard I. As t ppear	pract he site ance i	ice to e is w ncluo	redu ithin a ling it:	ce th a con s sett	e risk serva ing a	of su ition a nd be	area t cons	e wat the d	er flo esign nt wit	oding of th h the	g ne

### Key items - related to PCC representation #2 (H58)

SEA Objective	Biodive	Po	Population				Water		Air	& Climate	•	Mat Asse	erial ets	Heritag	e	Lar	Landscape					
Question	B1 B2	B3	<b>B</b> 4	B5 P1	P2	P3	P4	<b>S</b> 1	W1	W2	A1	A2 A3	A4	M1	M2	H1 H2	H3	H4	H5 H6	L1	L2	L3 L4
Effect	? ?	-	?		-	-	-	~	?	×	-	× -	?	-	-		-	-	- x	-	-	- 🗸
	the area The site modera regard t remains	a. Ver is wit te cor to surf on th	y sma hin th nditio face w ne site	all part of he catchn n by SEPA vater. Sit	site i nent a () and e sits ted w	n 1 in area f I ther behir /ith 1	or a ri efore nd a so 9 <sup>th</sup> -20	vear f ver o devel eawal <sup>th</sup> cen	lood z r burn lopme II, and tury in	one. T , when ent of t there ndustr	The SF re the the si fore r ry). Si	RA identi ere is kno te will ne may be so te not vis	fies the wn to ed to to ope fo ible w	be site be en take in or enh vithin a	at a h gineer ito acc ancen any pr	igh risk o red altera count the nent. The otected v	f floor tions reduce re is p iewco	ding fr to the ced re potent nes. S	r protected om fluvial river (con silience of tial for arc site visible	or co sider this i haeo	oastal ed in river v logica	water. vith I
Mitigation	interest birds for required the land linkages the site and adja attenua manage	s of th r forag d. Pos l for ri s with is wit acent tion t ment	ne des ging a sitive isks p the a hin a to Ta han s plan	signation and other effects or resented djacent a 1 in 200 y ne Burnn tandard p is prepar	and in beha bioc by po dopte rear f and oractio ed. R	t shou viour livers otenti ed cor lood a is wit ce to edeve	uld be s. De ity thi al con re pat zone. hin ar reduc elopm	inclu velop rough tamir h. A f Consi n area e the nent o	ded ir ment site d nation flood r derati a of er risk o of the s	the H should lesign, may I risk as on of osion f surfa site wi	IRA. d not layo be red sessn set ba susce ace wa ill req	The SPA i prevent u ut and lar quired. T nent wou ack for cli ptibility. ater flood uire arch	s adja use by ndscap he lay d be r mate The d ling ar aeolog	cent a SPA b bing ar out an require chang esign a d its in gical m	nd the irds. A e requ id desi ed for e mitig and la mpact iitigati	e mouth of A protect uired. Du ign of the this site gation. T yout of the s. The Shon: recommended	of the ed spe e to the deve which he site rRA re mmen	Bruns ecies a ne pre lopme has a e is loo e may comm datior	he natural tance Burn assessmen evious uses ent should risk of floc cated on th have to in hends a su h for pre- preservati	n is us t may s an a seek oding ne Fo clude rface	sed by be ssessi to ma as pa rth Es great water	ment of ike rt of tuary ter