

Representation by Fairmilehead Community Council

Application reference: 26/02900/PPP

Site: Fairmilehead Water Treatment Works, 55 Buckstone Terrace, Buckstone, Edinburgh EH10 6XH

Proposal: Planning permission in principle for demolition of all existing buildings and the erection of a residential (Class 9/Sui-Generis) development and other associated works and infrastructure including car parking, servicing, access arrangements and landscaping

From: Fairmilehead Community Council

Date: 4 August 2026

Position: **OBJECTION**

1. Introduction and standing

1.1 Fairmilehead Community Council ('FCC') is the community council for the area within which the application site lies. The site sits wholly within the FCC area, and the streets immediately surrounding it — Buckstone Terrace, Waterfield Road, Skerryvore Loan, Fairfield Gardens, Gladhouse Place and Caiystane — are home to the residents FCC represents.

1.2 **FCC is not opposed to the redevelopment of this site for housing, including affordable housing.** The office is being vacated irrespective of the outcome of this application, and new homes here would be welcome. FCC's objection is to this application as submitted.

1.3 FCC held a special public meeting on 29 July 2026, attended by 61 residents, at which the application was considered. This representation reflects that meeting and FCC's own examination of the submitted documents.

1.4 FCC notes the advice in the elected-member notification of 16 July 2026 that comments made to the applicant at pre-application stage do not carry over. FCC's detailed letter to the applicant's agent of **12 April 2026** is therefore restated as part of this representation, and FCC asks that it be read alongside it.

1.5 This representation is in two parts. **Section A** sets out material planning considerations. **Section B** records concerns raised by residents which FCC accepts are not material, and which FCC does not ask the Council to take into account. They are recorded only so that the nature of local feeling is on the file.

1.6 Every quotation and figure below is taken from the applicant's own submitted documents or from the Council's Edinburgh Urban Design Panel report of May 2025.

SECTION A — MATERIAL PLANNING CONSIDERATIONS

2. Car parking

2.1 The Transport Assessment proposes **26 car parking spaces for up to 124 dwellings** — 0.21 spaces per unit, or approximately one space for every five homes. Four are accessible spaces. Edinburgh Design Guidance would permit up to 0.75 spaces per unit in this location, approximately 93 spaces.

2.2 The justification for this level of provision is contradicted by the applicant's own evidence. The Transport Assessment records that **65% of residents in this area travel to work by car**.

2.3 **LDP Policy Inf 7** requires the appropriate level of parking to be judged on the circumstances of the site, including whether neighbouring streets have controls capable of absorbing overspill. There are none. **Waterfield Road, Skerryvore Loan, Fairfield Gardens, Bellrock Park and Gladhouse Place are entirely uncontrolled**, and the area is not near a controlled parking zone.

2.4 No on-street parking capacity survey has been undertaken. No analysis of local car ownership has been carried out. No parking controls are proposed. The sole mitigation offered is a single sentence asserting that a future Travel Plan "will ensure that there is no overspill of car parking onto the local road network". No evidence supports that assertion, and none of the circumstances that would ordinarily justify parking at this level — a city centre location, car club provision, controlled streets nearby — applies here.

2.5 The applicant's own trip generation predicts **602 vehicle movements a day**. Those vehicles must be parked overnight.

2.6 FCC draws attention to one consequence in particular. The applicant's own Landscape and Visual Impact Assessment records an **emergency vehicle access** running along the southern boundary of the site, between the A702 and vehicle routes in the residential development to the east. Nothing in the application assesses whether displaced parking could obstruct it.

2.7 **FCC requests** an on-street capacity survey of the streets named at 2.3 before determination; a parking provision justified against evidenced local car ownership; and, if permission in principle is granted, a condition fixing a minimum on-site provision together with a **Section 75 contribution to fund parking controls** on the affected streets, triggered by post-occupation monitoring. FCC notes that Edinburgh Design Guidance sets 0.75 as a maximum, and does not ask the Council to exceed it — the funded control mechanism is the policy-compliant means of addressing the overspill that will otherwise follow.

3. Public transport, and how the accessibility case is presented

3.1 Because the parking provision depends entirely on residents travelling by other means, the accuracy of the public transport case matters.

3.2 **Transport Assessment Table 3.1 presents seven bus services: 4, 11, 15, 18, 101, 101A and 102**. Services **101, 101A and 102 are all operated by Houston's Coaches on the Edinburgh to Biggar and Dumfries route**. They are not three separate local services. **Service 102 is a single southbound departure at 17:49**. Presenting them as three services materially overstates the provision available.

3.3 The Supporting Statement relies on Houston's Coaches as "facilitating wide-reaching connectivity with the application site". A long-distance coach to Dumfries is not a commuting, school or daily-travel option for residents of Fairmilehead.

3.4 The local bus provision is properly described as **four Lothian services at two stops**, together with a long-distance coach. FCC asks the Council to assess accessibility on that basis.

3.5 Table 3.1 records **frequency only**. There is **no patronage, crowding or capacity data anywhere in the application**. The case for 26 parking spaces rests on residents using these services without any evidence that there is room on them at peak times. **Frequency is not capacity**. FCC requests that a bus capacity assessment be required.

3.6 FCC further notes that the Supporting Statement refers to only two Lothian services (11 and 15) while the Transport Assessment lists four. The two documents do not agree.

4. Traffic, access and road safety

4.1 The headline claim of a net reduction in traffic depends on inflating the observed office baseline by a factor of **1.747** to a hypothetical pre-pandemic occupancy of 400 staff. The applicant's own **Office Market Viability Report** states that "there will be no return to a similar market", and the Transport Assessment itself accepts that staff numbers have "significantly reduced since COVID-19".

4.2 Measured against the position actually surveyed in March 2026, the applicant's own Table 5.8 shows the development **increasing** traffic by 11 movements in the AM peak, 32 in the PM peak and approximately 225 across a typical day. Since Scottish Water is relocating to Waverley Court irrespective of this application, the realistic future comparison is 602 daily movements against effectively none.

4.3 **Only one junction has been modelled** — the A702 Buckstone Terrace / Waterfield Road priority junction. The signalised **A702 / B701 Fairmilehead crossroads has not been assessed at all**, despite sitting approximately **110 metres** from the site access and despite the applicant's own trip distribution (Table 5.12) routing **38% of development traffic** through it.

4.4 **No growth factors** have been applied between the 2026 surveys and the 2028 assessment year, on the stated basis that any increase would be "negligible". A policy aspiration to reduce car use is not evidence of what background traffic will do, and no sensitivity test is offered.

4.5 The **trip distribution is taken from the Transport Assessment for application 11/00188/PPP** — a gravity model prepared in **2011** — and applied without adjustment to a 2028 assessment year.

4.6 Traffic surveys were carried out **Tuesday 24 to Thursday 26 March 2026 only**, with the manual junction count on a **single day**, Wednesday 25 March, in two windows. There is **no weekend assessment**.

4.7 The Transport Assessment derives observed local trip rates from its own survey and then discards them, at paragraph 5.31, on the basis that "the Charwood Bar and Restaurant car park **is often well used** and as such it appears that the Charwood Bar and Restaurant is influencing the observed residential trip rates". **The Charwood, 47 Buckstone Terrace, closed permanently on 24 January 2026** — two months before the surveys, and five months before the Transport Assessment was dated. The stated basis for substituting lower TRICS rates does not hold.

4.8 The same closure also depresses the baseline against which the development is measured, and a Miller & Carter restaurant is due to open on that site under live application **26/01377/FUL**, which itself proposes ten additional parking spaces. The assessment treats the restaurant as present where that lowers the development's trip generation, and as absent where its presence would raise the baseline.

4.9 **The application describes its access arrangement in two contradictory ways.** Transport Assessment paragraph 4.5 (page 37) states that "the existing egress onto the A702 Buckstone Terrace **would be closed**". The Design and Access Statement (page 36) states that "the road **will loop round and exit on to Buckstone Terrace** to the west of the site. This is an existing access arrangement, providing continuity for neighbouring road users." The trip assignment at paragraph 5.48 and the single junction model both depend on which is correct.

4.10 **FCC requests** that the A702 / B701 crossroads be modelled; that appropriate background growth be applied, including the committed reopening under 26/01377/FUL; that the trip rates be re-derived or the Charwood justification explained; and that the applicant be required to **clarify the access arrangement**, with the clarification placed on the portal.

5. Walking and cycling connections

5.1 **LDP Policy Inf 10** provides that development proposals "**must design for and deliver direct connections** to adjacent segregated active travel infrastructure and/or the off-road cycle and footpath network". The wording is mandatory.

5.2 The Council's **own pre-application response** to the applicant (CEC reference 25/00703/PREAPP, reproduced in the applicant's Transport Assessment) lists as requirement 4: "**The site should be well connected to the existing development to the east and south**". The Edinburgh Urban Design Panel likewise recorded that "connections to the site to the east is important and perhaps this needs to become a more important route/street through the site".

5.3 The Transport Assessment states at paragraph 4.19 that access for pedestrians and cyclists "**will** be provided along the sites northwestern, eastern and western boundaries". Its own detail at paragraph 4.20 is narrower and conditional: an active travel connection "**could** be provided along the eastern boundary ... to the existing footway / cycleway in the residential area **to the north-east** of the site."

5.4 **The Indicative Framework Layout shows no pedestrian route crossing the eastern site boundary at all.** Footpaths run parallel to the boundary within the site; none crosses it.

5.5 An existing pedestrian path in the adjoining estate runs **between 24 and 26 Skerryvore Loan** to the site boundary. The indicative layout places the **SuDS attenuation basin** against the boundary at approximately the point where that path arrives.

5.6 **FCC requests** a direct pedestrian and cycle connection at that point, secured by condition, with the drainage basin sited clear of it.

6. Height, scale and character

6.1 The application proposes blocks of **up to six storeys**, tested in the Landscape and Visual Impact Assessment at a built form height of **19 metres**. The applicant's own documents describe the surrounding area as predominantly **bungalows to the west** and **two-storey housing to the north and east**. The existing office building is three storeys.

6.2 The Council's **Edinburgh Urban Design Panel** (May 2025) described the proposal as "**a very bold urban response in what is a suburban area**", observed that "**the development will feel like an anomaly in the area**", and recorded that the Panel was "**unconvinced by the six storey elements and roof form**". FCC notes, in fairness to the applicant, that the same Panel **supported dense development on this site** and considered the scale appropriate in context. Its reservation was directed to the six-storey elements and the roof form, not to density.

6.3 The applicant concedes in its Planning Statement that "**it is not possible to fully demonstrate compliance with Policy Env 30 at this stage**". Env 30 governs building heights. The same document nevertheless asks the Council to treat the indicative layout as testing "the maximum building massing and heights which could be accommodated", which "**gives the Council a degree of certainty with regards the expected built form**". **These two propositions cannot both be relied upon.** Height and massing are among the few matters which a permission in principle genuinely fixes.

6.4 The reason the scheme reaches six storeys is that the **western part of the site cannot be built on**. The Urban Design Panel recorded that "the western part of the site is constrained by underground pipes where a wayleave applies", and the applicant's own Design and Access Statement confirms that wayleaves will be respected. All 124 units are consequently concentrated on the eastern portion of the site, against the rear boundaries of existing housing. A density figure quoted across the full 2.45 hectares therefore understates the density applied to the developable land. FCC notes that the Design and Access Statement asserts at page 20 that "the site and its location presents no physical constraint to development", two sentences after describing the wayleave.

6.5 **FCC requests** that the developable area net of the wayleave, and the resulting net density, be stated; and that **maximum building heights be fixed by condition at this stage**, stepping down towards boundaries shared with existing housing.

7. Residential amenity — daylight, privacy and microclimate

7.1 **LDP Policy Env 33** requires the applicant to demonstrate that neighbours are not adversely affected in terms of daylight and sunlight. The whole of the evidence submitted is **a single A3 drawing showing four shadow plots for 21 March only**, at 10:00, 12:00, 14:00 and 16:00.

7.2 There is no BRE 209 assessment, **no 21 December case** when shadows are longest, and **nothing before 10:00** — the period during which shadow falls westward towards the bungalows on Buckstone Terrace. There is no measurement of daylight at any existing window and no two-hour sun-on-ground test for any existing garden.

7.3 **There is no assessment of overlooking or privacy anywhere in the application.** No separation distances are stated between proposed windows and existing dwellings, or between proposed windows and site boundaries.

7.4 The Urban Design Panel requested **twice** that "sectional information to illustrate the spaces between the buildings and how the buildings will sit within the immediate and wider context" be provided. **None has been provided.** The Panel also recorded that ground levels at the site's north-eastern interface with neighbouring housing differ by **"approximately one to two metres"**.

7.5 Residents at the meeting of 29 July raised concerns about wind, and a possible 'canyoning' effect between tall blocks. The Urban Design Panel **requested microclimate studies twice. The application contains no wind or microclimate assessment of any kind.**

7.6 The Landscape and Visual Impact Assessment predicts **significant long-term adverse visual effects at two of its twelve viewpoints** — Skerryvore Loan and Gladhouse Place, the two nearest residential streets. It also states that **"all the viewpoints have been located on publicly accessible roads, footways and walking routes"**. Those effects are therefore recorded from the public footway; the effect on the closer private dwellings is not assessed.

7.7 **FCC requests** a BRE 209-compliant daylight and sunlight assessment of existing dwellings, stated separation distances, sectional drawings through the eastern and northern interfaces, and microclimate and wind studies — all before determination. FCC repeats its pre-application request for a **minimum 2-metre landscaped standoff** inside the eastern boundary, maintained as common ground.

8. Schools, healthcare and infrastructure

8.1 A development of up to 124 homes, with 20% three-bedroom provision, will generate demand for school places and primary healthcare. **The application contains no assessment of school capacity whatsoever, for any school.**

8.2 The Planning Statement states that the site lies **"within the catchment for Boroughmuir High School and St Thomas of Aquin's RC High School"**. This is the only reference to catchment anywhere in the application, and it appears not in an assessment of education but within the applicant's compliance case for the 20-minute neighbourhood policy.

8.3 **Neither school appears in the Transport Assessment's table of local amenities** (Table 3.3), which lists a single secondary school — **Firrhill High School at 2.2 km** — which is not the catchment school. The table lists amenities out to 3.4 km, so the omission cannot be explained by a distance threshold applied consistently. The effect is that a nearer, non-catchment school has been substituted for the actual catchment school in the very table which supports the applicant's walkability and low-car case.

8.4 There is **no assessment of GP or healthcare capacity**. Residents report waiting years to register with local practices.

8.5 The applicant concedes that "**it is not possible to fully demonstrate compliance with Policy Inf 3 ... and NPF4 Policy 18**" and defers all education, healthcare and transport contributions to the AMSC stage with a general assurance of "proportional financial contributions, where relevant and necessary". **NPF4 Policy 18 embeds an infrastructure-first approach**. Capacity is a matter for the principle stage.

8.6 **FCC requests** capacity assessments for the catchment secondary schools, the local primary schools and local GP provision, carried out **before determination**, with contributions secured by **Section 75 obligation before any grant of permission in principle**.

9. Open space, play provision, trees and heritage

9.1 **No equipped play provision is shown anywhere** in the indicative layout, against NPF4 Policy 21 and LDP Policy Env 32, for a scheme in which one home in five has three bedrooms.

9.2 The open space relied upon is **largely the wayleave strip which cannot be built upon in any event**. The Urban Design Panel required clarity on whether this space is public or private, and how it will be maintained, "**at this stage of the design process**". That has not been answered. Maintenance costs for communal open space commonly fall on residents.

9.3 **87 individual trees are to be felled** (Arboricultural Implications drawing legend). The Arboricultural Impact Assessment records that **only 42 individual trees were surveyed** — so fewer than half of those to be removed were individually assessed. The survey dates from **August 2024** and assesses the proposal against the **superseded 2016 Local Development Plan**.

9.4 FCC draws attention to a point of some importance. Once planning permission is granted, **felling required to implement it is exempt from Scottish Forestry felling permission**. There will be no separate consent at which tree loss can be scrutinised. Tree protection must therefore be secured by **planning condition at this stage or not at all**.

9.5 A **Category B listed** filter house and pump house adjoin the southern boundary, and a **section of the listed boundary wall** is to be removed to allow bus stop access. The Urban Design Panel advised that "care will have to be taken with the relationship with the listed pump house". FCC acknowledges that a full Heritage and Archaeological Assessment has been submitted and concludes that no impacts on other designated assets arise.

9.6 **FCC requests** equipped play provision; defined ownership and maintenance of all open space; an updated BS5837 tree survey; retention, protection and long-term maintenance of the western tree belt secured by condition; retention of the listed boundary wall in full; and no development within 20 metres of the listed filter house and pump house.

10. Drainage, construction and carbon

10.1 The Surface Water Drainage Strategy uses **London Heathrow rainfall data** (Met Office, 1981–2018) in its runoff calculations for a site in Edinburgh.

10.2 The strategy places the site in the "**Argyll River Basin Region**". The site is in the **Forth** region. FCC records, in fairness, that the **39% climate change allowance actually applied appears to be the correct Forth figure** under SEPA's guidance, and FCC does not suggest that the wrong uplift has been used. What remains unexplained is that the strategy states **39%** in its text and **40%** in a table on the same page, without indicating which underlies the 924 m³ attenuation basin.

10.3 **No infiltration testing** has been carried out, and confirmation of sewer capacity from Scottish Water remains outstanding, the strategy recording the discharge as "subject to confirmation of levels, discharge rates and capacity from Scottish Water".

10.4 **No construction environmental management plan, method statement or utilities protection plan** has been submitted. The application's own appendices reproduce Scottish Water's standard warning that damaging a large diameter trunk main "can result in **loss of life** and major water supply and water quality problems". Residents recall water supply disruption during construction of the neighbouring estate.

10.5 The Noise Impact Assessment addresses road traffic noise affecting the **proposed** dwellings. There is **no construction noise or vibration assessment in respect of existing neighbours**, and **no air quality or dust assessment**. Demolition is justified in part by the presence of **asbestos and RAAC**, and no demolition method statement accompanies the application.

10.6 The Urban Design Panel advised that demolition "will require to be fully justified and evidenced" and that "**sustainability and carbon assessments will be required**". **No whole-life or embodied carbon assessment has been submitted** — the Sustainability Statement extends to approximately four pages. **Partial retention has not been assessed** as an alternative, although the Panel asked for it.

10.7 **FCC requests** a corrected drainage strategy using Edinburgh rainfall data with the design storm figure resolved; infiltration testing and written confirmation of sewer capacity before determination; a construction environmental management plan, demolition method statement and utilities protection plan secured by condition; assessment of construction noise, vibration, dust and air quality in respect of existing residents; and a whole-life carbon assessment together with assessment of partial retention.

11. Loss of employment use, and the change from mixed use

11.1 The **Proposal of Application Notice (26/00798/PAN)** on which the community was consulted described "the proposed erection of a **residential-led (Class 9/Sui-Generis) mixed-use development**". The application as submitted is for "the erection of a **residential (Class 9/Sui-Generis) development**". Both descriptions appear side by side in the planning history table of the applicant's own Planning Statement.

11.2 The mixed-use element was removed between the consultation events of March 2026 and the lodging of the application in July 2026. **The Pre-Application Consultation Report does not explain the change.**

11.3 **LDP Policy Econ 5** governs the redevelopment of employment sites. One of its criteria, quoted in the applicant's own Planning Statement, supports redevelopment for other uses where the proposals "form part of a **mixed-use development which includes floorspace for a range of business and commercial users**". The Planning Statement quotes the criterion but does not explain how a wholly residential scheme satisfies it. The Urban Design Panel separately expressed concern at the loss of employment use and encouraged a mixed-use approach.

11.4 **No marketing evidence** — any attempt to sell or lease the existing building — is provided, which is the usual evidential test before employment floorspace is lost.

11.5 FCC accepts the applicant's evidence that there is no realistic demand for a large suburban office at this location. That does not explain the removal of any non-residential element whatever. **A modest commercial or community unit** would satisfy the Econ 5 criterion and would give substance to the 20-minute neighbourhood case, which otherwise rests entirely on facilities that already exist elsewhere.

12. The consultation, and the applicant's response to it

12.1 **The application makes very little reference to the comments — verbal or written — made during and following the two public consultation events held in March 2026, and does not materially address their content.**

12.2 The Pre-Application Consultation Report contains a section headed 'The Applicant's Response to Feedback'. It responds under six headings, most of which are not answers. On **traffic and parking** — which the report itself concedes were "frequently raised" — the response in full is: *"Traffic generation, access arrangements and parking were frequently raised during the consultation process. The PPiP application is supported by a Transport Assessment which considers the proposals with regards traffic and parking matters."* On **impact on existing services**, the response is that "future proposals will make proportionate financial contributions ... determined when detailed proposals come forward". On **scale and character**, that the Design and Access Statement "has been prepared with careful regard to the established character", with detail "refined through any future AMSC process".

12.3 Specific requests recorded in the applicant's own report — to **increase parking numbers on the site**, to **limit the height of development to mirror the surrounding area**, to include a **children's play park**, and to include **bungalows or detached housing to minimise impact on the privacy of existing residents** — receive no response, and none is reflected in the scheme.

12.4 **The report does not state whether the proposals changed as a result of the consultation.** The report itself recites the requirement to "set out how the applicant has responded to the comments made **including whether, and the extent to which, the proposals have changed as a result of the PAC**". It does not do so. The one material change — the removal of the mixed-use element — is not presented as a response to feedback and is not explained.

12.5 **The consultation did not disclose the figures now applied for.** Six information boards were produced for the first event on 11 March 2026. They give no number of units, no parking provision and no building heights. Residents were asked to comment without being told the three figures which have generated most of the local concern.

12.6 **Feedback is reported without quantification.** The events drew 103 and 83 members of the public — 186 in total — and produced 29 and 22 feedback forms, 51 in total. Responses are summarised as **unnumbered bullet points**, so it is not possible to tell whether a concern was raised once or forty times. Recorded concerns include parking overspill, that "the existing public transport provision in the area is not fit for purpose for an increased population", impacts on "health, schooling, transport", school catchment, and that demolition "would be unsustainable" — each appearing with the same apparent weight as "pleased to see housing being proposed on the site".

12.7 The report records that the applicant received "formal feedback from the Fairmilehead Community Council via a number of emails and a letter", but **does not reproduce or summarise FCC's letter of 12 April 2026**. No face-to-face meeting between the applicant and FCC took place. FCC has separately provided a copy of that letter to the Planning Service.

12.8 **FCC requests** that the applicant be asked to identify, point by point, how the proposals were changed in response to the consultation and, where they were not, why not; and that the weight given to the applicant's account of community engagement be assessed accordingly.

13. The structure of the application, and the outstanding EIA screening

13.1 Almost every matter of substance — layout, design, building heights, parking quantum and developer contributions — is reserved to the AMSC stage. **The AMSC stage cannot reopen the principle.** If permission in principle is granted without conditions fixing these matters, the ability of the Council, FCC and residents to influence them is largely lost.

13.2 **EIA screening request 26/02961/SCR** for this site was received and validated on **13 July 2026** and, so far as FCC can establish from the planning register, remains undetermined. Under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, a screening opinion is normally to be adopted within 21 days of receipt unless a longer period is agreed. The Council's own published guidance provides for a **30-day** representation period, rather than 21 days, where an EIA is required.

13.3 **FCC requests** that the application not be determined until the screening request has been determined, and that if EIA is required the application be re-advertised and the representation period extended accordingly.

SECTION B — MATTERS RECORDED, NOT PRESSED

13.4 FCC accepts that the following are **not material planning considerations** and **does not ask the Council to take them into account** in determining this application. They are recorded because they were raised repeatedly by residents at the meeting of 29 July 2026, and because the nature of local feeling is properly part of the file.

Loss of outlook and views. Many residents whose homes face the site raised the loss of open outlook. FCC recognises there is no right to a view in planning law. Where the underlying concern can be expressed materially — as overshadowing or as loss of privacy — FCC has done so at section 7 above.

Effect on property values. Raised by a number of residents. Not a planning consideration, and not pressed.

The identity of the applicant. Residents observed that the applicant is a public body, and that the application involves demolishing a public asset while its own documents warn of the risks of damaging the strategic mains beneath the site. FCC records the observation without inviting the Council to act on it.

Loss of confidence in the process. A recurring theme was that residents felt they had been consulted on one proposal and presented with another. The substance of that concern is material and appears at sections 11 and 12. The loss of confidence itself is not, but it is real.

Disruption during construction of the neighbouring development. Residents recalled water supply interruption and construction traffic when the adjoining estate was built. The forward-looking concern is material and appears at section 10. The historic experience is not, but it explains why the concern is strongly held.

Precedent. Concern was expressed that approval would set a precedent for six-storey development elsewhere in suburban south Edinburgh. FCC understands that each application falls to be determined on its own merits.

14. Conclusion and requests

14.1 For the reasons set out in Section A, **FCC objects to application 26/02900/PPP as submitted.**

14.2 FCC is not opposed to the redevelopment of this site for housing, and **would welcome the opportunity to discuss alternative approaches** with the applicant and with the Council. In FCC's view, a scheme capable of commanding local support would cap building heights by reference to the prevailing two-storey context and step down at boundaries shared with existing housing; retain the western wayleave corridor and tree belt as usable public open space; provide car parking at the level the Design Guidance permits together with a funded mechanism to control overspill; deliver the eastward connection the Council's own pre-application response required; and include equipped play provision and a modest non-residential element.

14.3 If the Council is nevertheless minded to grant permission in principle, FCC asks that it do so only with the following secured **at this stage**, by condition or Section 75 obligation:

1. Maximum building heights fixed across the site, stepping down towards boundaries shared with existing housing.
2. A minimum on-site car parking provision, justified by an on-street capacity survey and local car ownership evidence, together with a funded mechanism for parking controls on the affected streets.
3. Education and healthcare capacity assessments carried out before determination, with contributions secured by Section 75 obligation before any grant.
4. Modelling of the A702 / B701 signalised crossroads, background traffic growth applied to the assessment year, and the committed development under 26/01377/FUL included in the baseline.
5. A BRE 209 daylight and sunlight assessment of existing dwellings, stated separation distances, and sectional drawings through the eastern and northern interfaces.
6. Microclimate and wind studies.
7. A direct pedestrian and cycle connection eastward to the existing path between 24 and 26 Skerryvore Loan, with the drainage basin sited clear of it.
8. Retention, protection and long-term maintenance of the western tree belt, informed by an updated tree survey.
9. Retention of the listed boundary wall in full, and no development within 20 metres of the listed filter house and pump house.
10. Equipped play provision, and defined ownership and maintenance responsibility for all open space.
11. A corrected surface water drainage strategy, infiltration testing, and written confirmation of sewer capacity.
12. A construction environmental management plan, demolition method statement and utilities protection plan.

14.4 FCC further requests:

- That the application **not be determined until EIA screening request 26/02961/SCR is resolved**.
- That the applicant be required to **clarify the contradiction regarding the Buckstone Terrace egress**, with the clarification placed on the planning portal.
- That the application be determined by the **Development Management Sub-Committee following a hearing** rather than under delegated powers, that members undertake a **site visit** before determining it, and that **FCC be notified of the date and given the opportunity to be heard**.

Signed on behalf of Fairmilehead Community Council

James Adams

Fairmilehead Community Council

4 August 2026