

# What You Can Comment On — and What Counts

---

## A guide for residents commenting on planning application 26/02900/PPP

**The proposal:** Planning permission in principle to demolish the Scottish Water office at 55 Buckstone Terrace and build up to **124 homes** in blocks of **three to six storeys**, with **26 car parking spaces**, of which 43 homes (35%) would be affordable.

Prepared by Fairmilehead Community Council, 1 August 2026

---

## About this guide

---

Fairmilehead Community Council is a statutory consultee on this application and will submit its own detailed response. **This guide is not that response, and it does not tell you what to think.**

Its purpose is narrower: to set out what the application actually contains, which matters the Council is legally allowed to take into account, and how to make a comment that will be counted. Residents at our meeting on 29 July asked for exactly this.

**You may comment in support, in objection, or simply to raise a point you want considered.** All are counted, and all are read. Comments in support are as legitimate as comments against, and the Council receives fewer of them — so if you are in favour, saying so is worth doing.

The figures and quotations below are taken from the applicant's own documents and from the Council's Urban Design Panel report. Where the applicant has given an answer to a concern, we have said so. You are welcome to disagree with our reading of any of it — please check the documents yourself on the planning portal.

---

## Three things that decide whether your comment counts

---

**1. Only "material planning considerations" can be taken into account.** The Council cannot refuse or approve an application because of how many people write in. It can only weigh matters that planning law recognises. Sections 1 to 16 list those. The later section on non-material matters lists what the Council must ignore, however strongly it is felt.

**2. Applications are not decided by counting comments.** One well-argued material point carries more weight than fifty identical letters. **Please write in your own words.** Describe how the proposal affects *your* house, *your* street, *your* journey. A comment that could have been written by anyone tends to be read as though it was.

**3. You do not need to use all of this.** Pick the two or three matters that affect you most and say something specific about each. A short, precise, personal comment is stronger than a long general one.

**On tone.** Measured, factual comments are taken more seriously than angry ones. It is perfectly reasonable to say you welcome housing on this site but have concerns about particular aspects of this scheme — or that you support it as proposed.

# MATERIAL MATTERS — these can be taken into account

---

## 1. Car parking

---

- **26 parking spaces are proposed for 124 homes** — roughly one space for every five homes. Four are accessible spaces.
- Edinburgh Design Guidance would permit up to **93 spaces** in this location. A maximum is not a target, and current policy encourages lower car provision.
- The applicant's own census data records that **65% of people in this area travel to work by car**.
- There are **no parking controls** on Waterfield Road, Skerryvore Loan, Fairfield Gardens, Bellrock Park or Gladhouse Place, and the area is not near a controlled parking zone.
- **The applicant's position** is that the site is highly accessible by public transport and that a future Travel Plan "will ensure that there is no overspill of car parking onto the local road network". No on-street parking survey or car-ownership analysis is provided in support of that.

*If this affects you: say where you park now, whether your street is already full in the evenings, and what you expect to happen.*

## 2. Traffic, access and road safety

---

- The applicant states the development would **reduce** traffic. That comparison is against a pre-Covid office of **400 staff**. Measured against what was actually surveyed in March 2026, the application's own tables show an increase of **11 vehicle movements in the morning peak, 32 in the evening peak and 225 across a day**.
- Scottish Water is relocating to Waverley Court regardless of this application.
- The **Fairmilehead crossroads has not been modelled**. It is **110 metres** from the site access, and the applicant's own distribution routes **38% of the development's traffic** through it. Only the Waterfield Road junction was assessed.
- **No allowance for traffic growth** was made between the 2026 surveys and the 2028 assessment year. The applicant considers any increase would be "negligible".
- Traffic surveys ran **Tuesday to Thursday**, with the junction counted on a **single day**. There is no weekend assessment.
- The traffic distribution is taken from a **2011 planning application**.
- The application **describes access two different ways**: the Transport Assessment says the Buckstone Terrace exit would be closed; the Design and Access Statement says the road will loop round and exit onto Buckstone Terrace. The traffic modelling depends on which is correct.

*If this affects you: describe the junctions at the times you actually use them.*

## 3. Walking and cycling connections to the east

---

There is an existing pedestrian path in the neighbouring estate running between **24 and 26 Skerryvore Loan** up to the site's eastern boundary. The application does not connect to it.

## What the Council and its advisers asked for

- The **Council's own pre-application response** to the applicant (CEC ref 25/00703/PREAPP, reproduced in full 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 **Urban Design Panel** said: "The Panel noted the importance of designing a hierarchy of legible routes through the site. **Connections to the site to the east is important** and perhaps this needs to become a more important route/street through the site."
- **LDP Policy Inf 10 (Cycle and Footpath Network)**, quoted in the applicant's own Transport Assessment, states: "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.

## What the application offers

- The Transport Assessment states that access for pedestrians and cyclists "**will** be provided along the sites northwestern, eastern and western boundaries".
- Its own detail is weaker and narrower: "an active travel connection **could** be provided along the eastern boundary of the development site to the existing footway / cycleway in the residential area **to the north-east** of the site." That is one possible link at the north-east corner — not a connection to the existing path further south.
- **The Indicative Framework Layout shows no pedestrian route crossing the eastern site boundary at all.** Footpaths run parallel to the boundary inside the site; none crosses it.

**Where the existing path meets the site, the drawing shows the drainage basin.** The **indicative SuDS basin** is drawn hard against the eastern boundary at approximately the point where the path between 24 and 26 Skerryvore Loan would arrive. A connection there would have to be designed around or through the drainage feature — a layout question far easier to resolve now, while the framework is being set, than once the principle is fixed.

**Why it may matter.** Connections of this kind are hard to add later. If permission in principle is granted on a layout that places a drainage basin across the natural desire line, the opportunity may not return at the detailed stage. Existing residents lose a route into the new open space; new residents lose a direct walking route east.

**In fairness to the applicant.** This is an application in principle and the layout is expressly indicative — the applicant would say connections are a matter for the detailed stage. Whether something the Council's own pre-application advice asked for should be settled now or later is a fair question to put.

*Please check the path's position yourself — this point rests partly on local knowledge and the drawings are indicative. If you use that path, say so, and say where you walk to.*

## 4. Height, scale and character

---

- Blocks of **up to six storeys**, modelled at **19 metres**.
- The applicant's own documents describe the surroundings as **bungalows to the west** and predominantly **two-storey housing** to the north and east. The existing office is three storeys.
- The Council's **Edinburgh Urban Design Panel** (May 2025) called it "a very bold urban response in what is a suburban area" and said "the development will feel like an anomaly in the area". It was "**unconvinced by the six storey elements and roof form**".
- **In fairness to the applicant**, the same Panel *supported* dense development on this site and considered "this scale of development is appropriate in this context". Its reservation was about six storeys and the roof form, not density.

- The **western part of the site cannot be built on** — strategic water mains run beneath it under wayleave — so the homes are concentrated on the eastern part of the site.
- The applicant states it "is not possible to fully demonstrate compliance with Policy Env 30" (building heights) at this stage.

## 5. Daylight, sunlight and overshadowing

---

- The sunlight evidence is **one drawing with four shadow plots**, all for **21 March**, at 10am, 12pm, 2pm and 4pm.
- There is **no 21 December assessment**, when shadows are longest, and nothing before 10am — the period when shadows fall westwards towards the **Buckstone Terrace bungalows**.
- There is no BRE-standard daylight assessment, **no measurement of light at any existing window, and no sun-on-ground test for any existing garden**.

*If this affects you: say which rooms and which part of your garden get sun now, and when.*

## 6. Privacy and overlooking

---

- The application contains **no assessment of overlooking**.
- **No separation distances** are given between proposed windows and existing houses or boundaries.
- Four- and six-storey flats would face the rear gardens and windows of one- and two-storey houses.
- Ground level on the site is **one to two metres higher** than neighbouring land at the north-east boundary (Urban Design Panel).
- The Panel asked twice for **cross-section drawings** showing how buildings sit against existing homes. These were not provided.

## 7. Wind and microclimate

---

- Residents at the 29 July meeting raised wind and a possible "**canyoning**" **effect** between tall blocks.
- The Urban Design Panel **requested microclimate studies twice** in May 2025.
- **The application contains no wind or microclimate assessment.**

## 8. Schools, healthcare and infrastructure

---

- The application contains **no assessment of school capacity** for any school.
- The catchment secondary is **Boroughmuir High School**. It does not appear in the applicant's list of local amenities, which lists **Firrhill High School** — not the catchment school.
- There is **no assessment of GP or healthcare capacity**.
- The applicant states it "is not possible to fully demonstrate compliance" with the infrastructure policies at this stage, and that contributions will be settled later. **Whether that is acceptable at the principle stage is a legitimate matter to comment on either way.**
- **Public transport capacity is not assessed** — the application records how often buses run, not whether there is capacity at peak times.

*If this affects you: say if you have had difficulty getting a school place or registering with a GP.*

## 9. Open space and play provision

---

- **No equipped play space is shown** in the indicative layout, though 20% of homes would have three bedrooms.
- Much of the open space relied on is the strip that **cannot be built on** because of the water mains.
- The Urban Design Panel said it should be settled **now** whether this space is public or private and who maintains it. That has not yet been answered. Maintenance costs for communal open space commonly fall on residents.

## 10. Trees and landscape

---

- **87 individual trees would be felled**, against roughly 130 new plantings. The applicant proposes to retain the western tree belt.
- **42 individual trees were surveyed** — the remainder of those to be removed sit within groups and were not individually assessed.
- The tree survey dates from **August 2024** and assesses the proposal against a superseded version of the development plan.
- A section of the **listed boundary wall** would be removed for bus-stop access.
- Once planning permission is granted, **no separate felling consent is required** — so tree protection would need to be secured by planning condition.

## 11. Listed buildings and heritage

---

- A **Category B listed** filter house and pump house adjoin the southern boundary of the site, and there is a **Category C listed milestone** on the western boundary.
- **A section of the listed boundary wall would be removed** to allow direct access to the bus stop. The Heritage Assessment describes this as "a small section".
- The **Urban Design Panel** advised that "care will have to be taken with the relationship with the listed pump house".
- Where development affects a listed building or its setting, the planning authority is required to have **special regard to the desirability of preserving the building or its setting**. Six-storey blocks in proximity to a single-storey Edwardian filter house is a matter you may wish to comment on.
- **In fairness to the applicant**, a full Heritage and Archaeological Assessment has been submitted, it works methodically through Historic Environment Scotland's guidance on setting, and it concludes that "no potential impacts upon other designated heritage assets have been identified". Archaeological impact is assessed as negligible and no further archaeological work is proposed.

## 12. Nature and wildlife

---

**This is not a strong ground of objection, and it would be wrong to present it as one.** Surveys were carried out and found little. It is included here so you know what has and has not been done.

- A **bat survey** was carried out in June 2025 and reported in November 2025. **No bats were observed emerging from or re-entering the buildings or trees**, and the report concludes that roosting bats are "likely absent". Please do not suggest otherwise.
- The same report states that **if works do not begin by April 2027**, an updated bat inspection and possibly further nocturnal surveys may be needed. Given the sequence from permission in principle, to a second detailed

application, to demolition, works starting before April 2027 look unlikely. **Asking for an updated survey to be secured by condition is a reasonable and proportionate request.**

- A **Biodiversity Enhancement Plan** (June 2026) measures the site baseline at 5.18 area biodiversity units and 1.48 linear units, and states that the proposals "will improve on this baseline and deliver a biodiversity uplift". **It does not give the resulting figure.** The uplift is asserted rather than calculated.
- NPF4 Policy 3 requires development to contribute to the enhancement of biodiversity. You may wish to ask that the uplift be **quantified, and the enhancement and its long-term management secured by condition.**
- The assessment used a Natural England metric. The plan itself notes that Scotland has no mandatory net gain target and that NatureScot's Scottish metric has not yet been published.

### 13. Drainage and flooding

---

- Runoff is calculated using **London Heathrow rainfall data** for a site in Edinburgh.
- The strategy describes the site as being in the "Argyll River Basin Region"; it is in the Forth region. **In fairness, the climate change allowance actually applied (39%) is the correct Forth figure** — the region appears to be misnamed rather than the calculation being wrong.
- The design storm is given as **39%** in the text and **40%** in a table on the same page, without saying which was used.
- **No infiltration testing** has been carried out, and confirmation of sewer capacity from Scottish Water remains outstanding.

### 14. Construction

---

- **No construction 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 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.
- The noise assessment covers road noise affecting the *new* homes. There is **no construction noise or vibration assessment for existing neighbours.**
- **There is no air quality or dust assessment.** Demolition and earthworks of this scale generate both.
- The applicant justifies total demolition partly by reference to **asbestos and RAAC** in the existing buildings. A Phase 1 geo-environmental risk assessment has been submitted, but no method statement for demolition accompanies the application, and no assessment of effects on neighbouring homes during that process.

### 15. The proposal changed from mixed-use to residential-only after consultation

---

This is a change in what is being applied for, not simply a change of wording, and it happened between the public consultation and the application being lodged.

**What we were consulted on.** The Proposal of Application Notice — reference **26/00798/PAN**, the formal notice that triggered the two public events in March 2026 — described:

"Demolition of all existing buildings and the proposed erection of a **residential-led (Class 9/Sui-Generis) mixed-use development** and other associated works and infrastructure including car parking, servicing, access arrangements and landscaping."

**What has been applied for.** The application now before the Council describes:

"...the demolition of all existing buildings and the erection of a **residential (Class 9/Sui-Generis) development** and other associated works and infrastructure..."

The words "residential-led" and "mixed-use" have gone. Both descriptions are quoted from the applicant's own Planning Statement, which sets them out side by side in its planning history table.

#### **Why it may matter.**

- The statutory pre-application consultation — the events residents attended, and the feedback gathered there — was carried out on a **mixed-use** scheme. What is being determined is a **residential-only** scheme. The Pre-Application Consultation Report does not explain the change.
- **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". A wholly residential scheme does not meet that criterion, and the Planning Statement does not explain how it is satisfied without it.
- The **Urban Design Panel** expressed concern at the loss of employment use and encouraged a mixed-use approach.
- Commercial or community floorspace on the site would have contributed to the "20-minute neighbourhood" argument the application relies on. Without it, that case rests entirely on existing facilities nearby.

**In fairness to the applicant.** Its Office Market Viability Report concludes there is no realistic demand for office use at this location, and the applicant may say that "residential-led" always signalled a predominantly residential scheme. Whether that justifies dropping the mixed-use element altogether — and whether the consultation should have been carried out on the scheme actually applied for — is a matter you may wish to put to the Council.

*If you attended either consultation event: it is worth saying what you were shown and what you understood the proposal to be.*

## **16. Loss of employment land and demolition**

- The site is an employment site, so **Policy Econ 5** applies. The applicant accepts this.
- The Urban Design Panel advised that total 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 runs to about four pages. It refers to minimising embodied energy and to air source heat pumps, but does not quantify the carbon cost of demolishing an entire office building and replacing it. NPF4 Policy 2 requires development to address the climate emergency.
- The Panel also asked for consideration of **partial retention** as an alternative to total demolition. The application does not assess that option.

- Demolition is justified by reference to RAAC, asbestos and viability. **No evidence of a marketing exercise** — any attempt to sell or lease the existing building — is provided, which is the usual test before employment floorspace is lost.

## PROCEDURAL MATTERS

Not comments on the development itself, but proper matters to put to the Council.

- **The EIA screening request (ref 26/02961/SCR) has not been determined.** Lodged 13 July 2026, it was still awaiting assessment at the end of July. Until it is decided, it is not known whether this development requires a full Environmental Impact Assessment — which would also change the length of the comment period.
- **The consultation did not disclose key figures.** Neither public event gave the number of homes, the parking provision or the building heights now applied for — and the scheme consulted on was mixed-use rather than residential-only (see section 15).
- **Almost everything is deferred.** Because this is permission "in principle", layout, design, heights, parking and contributions are all reserved to a later stage. You may wish to ask that particular matters be **fixed by condition now**.
- **You can ask for a committee decision.** Given the level of local interest, you may ask that the application be decided by the Development Management Sub-Committee rather than by officers, that members **visit the site** first, and that you be notified of the date.

## NOT MATERIAL — the Council must ignore these

Please leave these out. They do not help, and a comment built mainly on them may carry little weight.

| Not material                                         | Why                                                                                                    |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Loss of your view                                    | There is no right to a view in planning law.                                                           |
| Effect on your property value                        | Not a planning consideration.                                                                          |
| Loss of private profit or trade                      | Competition between businesses is not a planning matter.                                               |
| The developer's identity, motives or profits         | Applications are judged on their merits.                                                               |
| Boundary disputes, title deeds, private rights       | Private legal matters, settled elsewhere.                                                              |
| Building regulations, structural safety, party walls | Covered by separate legislation.                                                                       |
| "There are already too many houses"                  | Not a reason on its own.                                                                               |
| Who might live there                                 | Comments about future occupants, tenure or affordable housing are not material and should not be made. |

## Putting a concern in planning terms

Many strongly-held concerns *can* be expressed in a way the Council must consider. The concern is usually legitimate — it needs framing in planning language.

| Instead of...                           | Say...                                                                                                                                              |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| "It will block my view"                 | "It will overshadow my garden and reduce daylight to my rear windows" — say which rooms, and when.                                                  |
| "It will devalue my house"              | "It will overlook my garden and remove my privacy", or "it is out of character with the area".                                                      |
| "The building work will be a nightmare" | "No construction management plan has been submitted, and no assessment of construction noise, vibration or dust affecting existing homes."          |
| "There are already too many cars"       | "There are 26 spaces for 124 homes, no parking controls on my street, and no survey of existing on-street capacity."                                |
| "The schools are full"                  | "No school capacity assessment has been carried out, and Boroughmuir — the catchment secondary — is not listed in the applicant's amenities table." |
| "It's just too big"                     | "Six storeys is roughly double the prevailing height nearby, and the Urban Design Panel was unconvinced by the six-storey elements."                |
| "They didn't tell us anything"          | "Neither consultation event disclosed the number of homes, the parking provision or the building heights now applied for."                          |

## How to comment

**Where.** The Council's Planning Portal: [citydev-portal.edinburgh.gov.uk](http://citydev-portal.edinburgh.gov.uk) — search for **26/02900/PPP**.

**Registration is mandatory.** Since 10 November 2025 you must register an account before commenting. It is free and takes a few minutes — *do not leave it to the last day*. Documents can be viewed without registering.

**By post instead, if you prefer:** Chief Planning Officer, Waverley Court, 4 East Market Street, Edinburgh EH8 8BG. The Council asks that email is avoided. Anonymous comments cannot be considered.

**Deadline.** On or around **6 August 2026** — but **check the portal**, which shows the advertised expiry date. The period may differ if the outstanding EIA screening changes the publicity requirements. Please do not rely on this note for the date.

### Always include:

- The application reference **26/02900/PPP**
- The site address — Scottish Water, 55 Buckstone Terrace
- **Your name and full postal address** — comments without these cannot be counted
- The date

**Privacy.** Your **name, address and comment will be published** on the portal once the application is decided, and removed three months afterwards. Email addresses, phone numbers and signatures are not published. Do not put contact details in the body of your comment. The Council cannot treat comments as confidential.

**Tick the box** to receive a copy of your own comment if commenting online.

---

## A suggested shape

1. Who you are and where you live, and how close you are to the site.
2. Your position — support, objection, or neither, and why.
3. **Two or three matters** from the material list above, in your own words, with something specific to your own circumstances for each.
4. What you would like the Council to do — for example approve, approve subject to particular conditions, seek further information, or refuse.
5. If you wish: ask for the application to be decided by committee, with a site visit, and to be notified of the date.

---

## The documents worth reading

There are more than fifty documents on the portal, which is off-putting. These five carry most of what matters, and between them they are the source of nearly everything in this guide.

| Document                                              | What it tells you                                           | Worth looking at                                                            |
|-------------------------------------------------------|-------------------------------------------------------------|-----------------------------------------------------------------------------|
| <b>Design and Access Statement</b> (7213162)          | What it would look like — heights, layout, materials        | Page 36 for access; pages 18–20 for the site description and constraints    |
| <b>Transport Assessment</b> (7213194)                 | Parking, traffic, junctions, walking and cycling            | Table 3.3 (page 33) for local amenities; paragraph 4.5 (page 37) for access |
| <b>Sunlight Assessment</b> (7213191)                  | The whole of the daylight evidence                          | It is one drawing — this is worth seeing for yourself                       |
| <b>Indicative Framework Layout</b> (7213165)          | Where the buildings, open space and drainage basin would go | The eastern boundary, if you live on Skerryvore Loan or Fairfield Gardens   |
| <b>Edinburgh Urban Design Panel report</b> , May 2025 | The Council's own design advisers' verdict                  | Height, mass and scale; the list of information the Panel asked for         |

All are at [citydev-portal.edinburgh.gov.uk](https://citydev-portal.edinburgh.gov.uk) under 26/02900/PPP. You do not need to register to view them.

---

## What happens after you comment

Knowing the sequence helps you decide what to ask for.

1. **The case officer assesses the application**, taking account of representations, consultee responses and the development plan, and writes a report of handling.

2. **The decision is made** either by officers under delegated powers, or by the Development Management Sub-Committee. Which route it takes depends partly on the level of objection and on whether councillors request it. If it goes to committee, there may be a hearing at which objectors can speak.
3. **You will be notified of the decision** if you commented and gave your details.
4. **If permission in principle is granted, that is not the end.** A further application — Approval of Matters Specified in Conditions, or AMSC — must follow, setting out the detailed layout, design, heights, landscaping and so on. There is normally a further opportunity to comment at that stage.

**But — and this is the important part — the AMSC stage cannot reopen the principle.** Once permission in principle is granted, the acceptability of residential development on this site is settled, and so is anything the Council fixes by condition now. Matters left unconditioned are largely for the applicant to bring forward later.

That is why, if there is something you particularly care about — building heights, minimum parking, tree protection, a daylight assessment — **it is worth asking for it to be secured by condition at this stage** rather than assuming it can be dealt with later.

---

## Where to get independent help

- **Planning Aid Scotland** provides free and impartial planning advice to individuals and community organisations — [pas.org.uk](https://pas.org.uk). They are independent of the Council and of the applicant.
- **The Council's planning helpdesk** — [planning@edinburgh.gov.uk](mailto:planning@edinburgh.gov.uk), or 0131 529 3550, Monday to Friday 9am to 1pm.
- **The case officer for this application** is Sean Fallon, 0131 469 3723.

---

## Petitions

The Council will accept a petition of objection or of support, provided that:

- each page is headed with the aim of the petition;
- the names and addresses of those signing are given and are legible;
- the comments are relevant in planning terms and clearly stated; and
- the name and address of the petition co-ordinator is included.

Note that only the **co-ordinator** is acknowledged and notified of the decision. A petition is not a substitute for individual comments, and generally carries less weight than the same number of people writing separately in their own words.

---

*Fairmilehead Community Council is submitting its own detailed response as a statutory consultee. That does not replace comments from residents — the Council counts them separately, and comments from people directly affected carry weight that a community council submission cannot substitute for. Whatever view you take, please make it known.*

Questions: via the FCC website — [fairmileheadcc.org](https://fairmileheadcc.org)