

4 June 2025

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By email only

Dear Kenny

**Screening Opinion Request
Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Land 200 Metres East of 1 Waterfront Avenue, Granton, Edinburgh**

On behalf of **Vattenfall Heat UK/Vattenfall Networks Ltd**, Savills is preparing an application for Planning Permission (FUL) for the following development:

Erection of energy centre, primary substation, electrical cabling and sections of district heat network pipes associated with the wider Granton Waterfront development

Pre-application discussions are currently underway in respect of the proposal (Ref: 25/00844/PREAPP).

The subject application site is located on land at Waterfront Avenue and to the north/east of Waterfront Broadway in the Granton area of Edinburgh. The site extends to approximately 1.61 hectares (see accompanying Site Location Plan).

The subject site forms part of a wider redevelopment area and is located within Phase 1 of a wider residential masterplan currently being developed by The City of Edinburgh Council and Cruden Homes. Phase 1 aims to deliver 847 new homes alongside complimentary commercial units, public realm and enabling works for the proposed primary school and the subject primary substation and energy centre (Ref: 24/02610/FUL). This wider development was subject to a formal EIA Screening Request. (EIA Not Required, 01 November 2024).

Schedules 1 & 2

The site does not fall into any category under Schedule 1 and therefore does not automatically require an EIA.

Development types listed in Schedule 2 are developments where an EIA may be required under specified circumstances, typically where the development is to be carried out in a sensitive area or meets/exceeds a size threshold listed in the Schedule. The proposal fits the descriptions of an energy project under 3(a) and 3(b) of the table in Schedule 2 i.e. (respectively) 'Industrial installations for the production of electricity, steam and hot water' and 'Industrial installations for carrying gas, steam and hot water'.

In respect of 3(a), the energy centre footprint will be 0.05ha, but will be located within a compound (also comprising a primary sub-station) of 0.22ha. By both measures, the proposal is under the threshold of 0.5ha.

The associated pipework would most accurately fall under 3(b), which has a size threshold of 1ha. The pipework is relatively limited (c. 225 metres), but within an overall site area of 1.61ha. In following a precautionary approach, for the purposes of this Screening Request, it is assumed that the proposal would comprise Schedule 2 development by virtue of category 3(b).

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Schedule 2 development does not automatically require an EIA to be submitted, rather, that consideration be given of the likelihood that the proposal will have significant effects on the environment by virtue of factors such as nature, size and location. Determination is made using the selection criteria set out in Schedule 3 of the 2017 Regulations and the advice contained in Circular 1/2017 The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. The consideration of these is set out below.

Schedule 3

In considering the selection criteria for Screening Schedule 2 development:

1. Characteristics of Development

This considers criteria such as the size of development, cumulation with other development, use of natural resources, production of waste, pollution and nuisances, the risk of major accidents/disasters and risks to human health.

Taking a holistic approach to proposals assessment, the proposed energy centre and associated primary sub-station building structures will be functional in form/design due to the proposed use. The industrial style design language and materials proposed (including the metal profiling for the building) will provide commonality with the more industrial style buildings to the west of the site. The building/structure height and massing has been minimised and at c. 16 metres (thermal stores highest point) and c. 13.5 metres (energy centre highest point / top of parapet), is not materially obtrusive within the wider urban context. A single boundary wall will extend around the energy centre and sub-station.

The district heat pipework included under the subject application will be both relatively limited (c. 225 metres) and located under an existing road. Although the overall site area extends to 1.61ha, the pipework will not utilise or disturb any substantive amount of land, minimising any impact.

Importantly, the energy centre would take excess heat from the Scottish Water sewer ('wet well') i.e. a non-combustion facility, rather than a combustion-based heat energy centre or thermal energy centre, thereby avoiding adverse air emissions of particulate matter. The operational development will therefore not generate any significant waste or pollution. The proposal is intended to support the reduction of CO₂ emissions in the heat sector.

2. Location of Development

The site has already been earmarked for this use through Planning Permission Ref. 24/02610/FUL. Through the process of that application, it was accepted that this was the most appropriate location to deliver the energy centre for a district heat network.

3. Characteristics of the Potential Impact

Any impacts would therefore be localised, small-scale and temporary in nature, relating to the construction phases for the energy centre, primary substation and associated pipes/cabling which will be carried out at the same time as more significant works approved (and screened) under the wider Planning Permission Ref. 24/02610/FUL. Operational noise from the energy centre can be mitigated through the design of the building (and will be assessed as part of the planning application). There are no potentially significant impacts identified relative to the location of the site.

Given the foregoing, we are of the opinion that by virtue of the size, characteristics and nature of the proposed development, relative the existing location and as emerging development context, it is unlikely to give rise to significant environmental effects sufficient to trigger an EIA.

We therefore conclude that the proposed development does not constitute EIA development and a Screening Opinion is requested from the Council to confirm this.

Notwithstanding, the forthcoming application for planning permission will be accompanied by the following core documents:

- Architectural & Landscape Drawings:Design
- Daylighting/Overshadowing Assessment
- Design and Access Statement
- External Lighting Design and Photometry
- Heritage Statement
- Landscape and Habitat Management Plan
- Noise Impact Assessment
- Planning Statement
- Preliminary Ecological Appraisal (PEA)
- Site Investigation
- Surface Water Management Plan (including Flood Risk)
- Sustainability Statement (S1 Form)
- Transport Statement
- Tree Survey and Arboricultural Impact Assessment

Any further supporting technical reports will be prepared as deemed appropriate. We consider that the studies outlined above will provide a robust and appropriate level of information to aid the application determination process.

[REDACTED] do not hesitate to contact me or my colleague Joanne Plant [REDACTED] should you require additional information prior to forming the Screening Opinion.

Yours sincerely

[REDACTED]
Adam Richardson
Director

Encl.

cc. Vattenfall Heat UK/Vattenfall Networks Ltd