

Mr David Givan
Chief Planning Officer
The City of Edinburgh Council
City Chambers
High Street
Edinburgh
EH1 1YJ

Date: 4 July 2025
Our ref: 68760/03/NWO/EC/33906400v6

Dear Sir

Request for a Screening Opinion - Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

On behalf of our client, Mollie's Motels Limited ('the Applicant'), we request that The City of Edinburgh Council ('the Council') provides a formal screening opinion to confirm if there is a requirement for an Environmental Impact Assessment ('EIA') to accompany a planning application in respect of a hotel (Use Class 7) and restaurant (Use Class 3) development ('the Proposed Development') on land 140 metres north of 15 Lochside Avenue, Edinburgh. The Site is outlined in red on the Location Plan (Annex 1).

This request is made in pursuance of Regulation 6 of the Town and Country Planning (EIA) (Scotland) Regulations 2017 ('the 2017 EIA Regulations').

To enable your consideration of this issue, we set out below the following information:

- 1 Description of the Site and its surroundings;
- 2 Description of the Proposed Development; and
- 3 Review of the requirement for an EIA.

Item (3) is dealt with by reviewing the Site and its surroundings and a consideration of the issues set out in the 2017 EIA Regulations. This submission meets the requirements of the 2017 EIA Regulations, as set out in Table 1 below.

Table 1 Information provided within this request for an EIA Screening Opinion, in accordance with Regulation 8 of the 2017 EIA Regulations

Regulation 8(2) Requirements	Conformity
A description of the location of the development, including a plan sufficient to identify the land	Yes
A description of the proposed development, including in particular-	Yes



Regulation 8(2) Requirements	Conformity
(i) a description of the physical characteristics of the proposed development and, where relevant, of demolition works (ii) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected	
A description of the aspects of the environment likely to be significantly affected by the proposed development	Yes
A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from— (i) the expected residues and emissions and the production of waste, where relevant; (ii) the use of natural resources, in particular soil, land, water and biodiversity.	Yes
Such other information in addition to the above to provide a description of any features of the proposed development, or proposed measures, envisaged to avoid or prevent significant adverse effects on the environment	Yes

1. Description of the Site and surroundings

The Site is approximately 0.62 hectares in West Edinburgh. It is located within the Southern Phase of the Edinburgh Park masterplan area, which received Planning Permission in 2022 (ref. 20/02068/FUL). The Site comprises vegetated and previously undeveloped land.

To the north, the Site is bounded by an undeveloped plot of land included within the Edinburgh Park masterplan, allocated for Build to Rent ('BtR') residential development. The Site is bounded to the east by an undeveloped plot of land, beyond which is the Premier Inn Edinburgh Park Hotel, approximately six storeys in height. To the south, the Site is bounded by Station Park Road, and rail and tramlines to Edinburgh Park Station, beyond which is the Novotel Edinburgh Park hotel (approximately six storeys in height) and the Hermiston Gait Commercial Centre. Tram lines also bound the Site to the west, beyond which is an undeveloped plot of land allocated for private residential development under the Southern Phase of the Edinburgh Park masterplan consent. Approximately 200m west of the Site is the A720 The City of Edinburgh Bypass junction with the M8 which separates the Site from agricultural land.

Access to the Site is from Lochside Court to the northeast or Station Park to the South, both of which connect the Site to the wider Edinburgh Park masterplan area. Currently vehicles must follow Station Park to access the Site from the east, as an access road to the west of the Site from Station Park is barred. The Site is connected to Edinburgh via the local cycle network including National Cycle Network Routes 75, 76, and 754, nine bus routes including Lothian Night Bus services accessible within approximately 500m of the Site, and tram and rail services approximately 200m south of the Site from Edinburgh Park Station. Edinburgh Airport is located just three miles from the Site and is accessible in under 20 minutes by tram or bus.

The nearest Statutorily Designated site is the Wester Craiglockhart Hill Site of Special Scientific Interest ('SSSI'), approximately 4.6km southeast of the Site. The nearest historical sites are Former HMSO Store, 11 Bankhead Broadway, Sighthill Industrial Estate (LB30250), approximately 650m southeast;

Millburn Tower (GDL00286) containing Gogar Station Road, Gogar Stables (Former Carriage Block) (LB27320); its Garden Store, Walled Garden And Gatepiers (LB27306); and Gogar Station Road, Millburn Policies, South Lodge Walls And Gatepiers (LB27313), approximately 1km northwest of the Site; and Gogar Station Road, Gogar Bank House, North Lodge (LB27285), Walled Garden and Bridges (LB27292), and Greenhouse (LB27277), approximately 1.3km southwest of the Site. The Site is not within a flood risk zone from river, surface water, or coastal water.

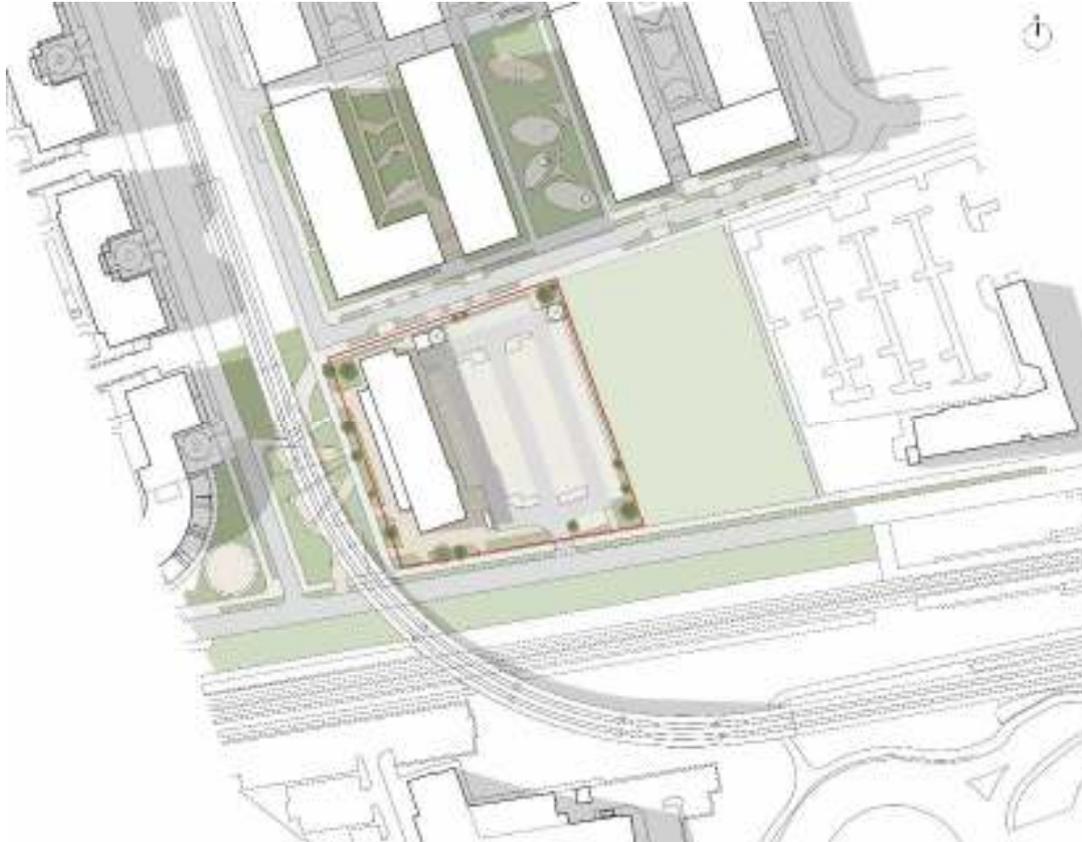
2. Description of the Proposed Development

The Proposed Development comprises a hotel (Use Class 7) with up to 210 guest bedrooms, restaurant (Use Class 3) with associated infrastructure, works, landscaping, access and car parking. Figure 1 below provides an illustrative site plan of the Proposed Development.

The Proposed Development will include a single, eight storey building located on the western area of the Site, designed to respond to other proposed buildings as part of the Edinburgh Park masterplan. Pedestrian and cycle access will be provided from a new connection between Lochside Court and Lochside Way to the west of the Site. Vehicle access and parking is proposed in the east of the Site, with landscaping proposed along Site boundaries.

The design of Mollie's Motels generally refer to a 'Diner' style frontage. Pedestrian designations shall be included in the proposals for new hard and soft landscaping to provide dedicated cycle and car parking with electric vehicle charging points. The proposed landscaping strategy, while still being developed, will seek to integrate with the wider Southern Phase masterplan landscaping strategy. A sustainable urban drainage system ('SuDS') shall be implemented.

Figure 1 Illustrative Site Plan of the Proposed Development



The Proposed Development fits within the Edinburgh Park masterplan area and its design has been developed to contribute to the mix of uses provided.

Within the Planning Permission for the Southern Phase of the Edinburgh Park masterplan, (ref. 20/02068/FUL), granted to Parabola in 2022, the Site was allocated for Build to Rent ('BtR') residential development. An apart hotel (Use Class 7) was approved under this permission approximately 200m east of the Site; this site is now approved for development of an arena (Use Class 11) (ref. 24/00820/FUL), addressed below. The Southern Phase of the Edinburgh Park masterplan was determined not to require EIA by the Council on 2 April 2020 (ref. 20/00260/PAN), concluding that there are no designations within 2km of the proposal, and it was not considered that the scale of the proposals and extent of the operations justify the submission of an EIA.

3. Requirement for an EIA

The Proposed Development is one to which the 2017 EIA Regulations may apply as it is considered that it falls within Schedule 2 of the 2017 EIA Regulations, where:

- a any part of that development is to be carried out in a sensitive area; or



- b any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

In terms of (a), with reference to the description of the Site and surroundings above, the Site is not partly in a sensitive area as defined by Regulation 2(1) of the Regulations. It does however exceed criterion (b), because the development falls within Part 10(b) of Schedule 2 as an urban development project where the area of development exceeds 0.5ha.

For Schedule 2 developments, the EIA Regulations require that an EIA be undertaken where the development is “likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

In determining whether the Proposed Development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the EIA Regulations. This identifies three categories of criteria:

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health).
- 2 Location of the development (by reference to the environmental sensitivity of the area).
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

Development characteristics

Table 2 provides a review of the characteristics of the Proposed Development in respect of Schedule 3 of the 2017 EIA Regulations.

Table 2 Review of the Characteristics of the Proposed Development

Development Characteristics	Review of the Proposed Development
Size and design of the development	<p>The Proposed Development is up to eight storeys in height, positioned to the west of the Site toward the tram/ railway bridge over Station Park between Edinburgh Park and Edinburgh Park Central stations. The proposed block form and scale will be consistent with the surrounding buildings and those approved within the Edinburgh Park masterplan, integrating the Proposed Development with its surroundings.</p> <p>Construction transport is expected to utilise links from M8 Junction 1 southwest of the Site, the A720 ‘The City of Edinburgh Bypass’ to access Lochside Avenue to Station Park or alternatively the A8 ‘Glasgow Road’ via the Gogar Roundabout north of the Site to Lochside Court.</p> <p>Façade materials will be grey with a consistent rhythm of windows for each hotel room. Lit ‘Mollie’s Motel’ signage is likely to be proposed over the entrance facing tram/ railway lines, at the entrance from the new access from Station Park, and on the top-left of the west elevation.</p> <p><u>Summary:</u> The Proposed Development’s size and design shall be consistent with existing surrounding buildings, including the Premier Inn Edinburgh Park Hotel and the Novotel Edinburgh Park hotel. Surrounding rail and road</p>

Development Characteristics	Review of the Proposed Development
	<p>infrastructure will shield the Proposed Development from rural views, so would be perceived within the context of Edinburgh Park. Construction access to the Site is suitable for this scale of development. No new or different effects from the BtR use already approved for the Site as part of the Edinburgh Park masterplan are considered likely.</p>
<p>Cumulation with other developments and/or development</p>	<p>The Proposed Development's scale, providing up to 210 rooms, has been developed with regard for the surrounding proposals within the Edinburgh Park masterplan (ref. 20/02068/FUL).</p> <p>A search of the Council's online planning register identifies an approved development of an arena (Class 11) including ancillary Class 1A (retail), Class 3 (restaurants and cafes) and hot food/bar amenities with associated public realm, access, landscaping and infrastructure (ref. 24/00820/FUL) approximately 200m east of the Site. Construction may overlap with the Proposed Development and would be brought forward with standard management plans (including CEMP and Construction Traffic Management Plan) in agreement with relevant consultees such as the highways authority. Given the different nature of use, no cumulative effects are expected during its operation.</p> <p><u>Summary:</u> No planning applications or recent approvals at or surrounding the Site would likely give rise to cumulative effects with the Proposed Development or any new or changed effects than those anticipated from the Edinburgh Park masterplan and approved BtR use on the Site.</p>
<p>Use of natural resources, in particular soil, land, water, biodiversity</p>	<p>Site survey data of May 2025, informed by a desk study and UK Habitat Classification survey identified neutral grassland, artificial unvegetated unsealed surface and sparsely vegetated urban land and scattered trees. Cotoneaster species was recorded within the Site and encroaching from the site buffer, which shall be dealt with appropriately during works to ensure no spread off-site.</p> <p>The Site offers low quality foraging for bats, and no buildings or trees are present to offer roosting features.</p> <p>Habitats on-site provide forage and ground nesting opportunities for a range of common bird species; of the birds recorded on-site during survey, one species (Herring gull <i>Larus argentatus</i>) are red listed by Birds of Conservation Concern and are a Scottish Biodiversity List species. Ground preparation works shall be undertaken outwith the bird breeding season. Site clearance works would not cause physical changes to the topography of the Site.</p> <p>A comprehensive landscaping plan shall be prepared to enhance the biodiversity value of the Site in line with the aims of the Edinburgh Biodiversity Action plan, the Pollinator Strategy for Scotland, and the Edinburgh City Plan 2030.</p> <p>The Proposed Development does not use water as a resource or produce water as a waste product. Impacts will be limited to surface water drainage and run-off, to be managed through a drainage scheme to be implemented on the Site.</p>

Development Characteristics	Review of the Proposed Development
	<p>A SuDS solution shall be implemented subject to further assessment of the Site conditions to mitigate flood risk.</p> <p><u>Summary</u> – The Proposed Development is unlikely to result in significant effects associated with the use of natural resources, nor new or different effects to those of the BtR proposals of the Edinburgh Park masterplan (ref. 20/02068/FUL).</p>
Production of waste	<p>A Construction Environmental Management Plan (CEMP) shall be implemented to ensure management of noise, traffic, dust or other emissions through standard best practice measures (considered embedded for screening process). A CEMP will be secured via planning condition.</p> <p>Waste generated during the construction and operational phases will be minimised and recycled as appropriate.</p> <p><u>Summary</u> – The Proposed Development is unlikely to result in significant effects associated with the production of waste.</p>
Pollution and nuisances	<p>Given the proposed use and distance of over 4km between the Site and surrounding statutory ecological designations, issues arising from noise, dust and hydrological links are unlikely during construction and operation, with risk minimised further through implementation of a CEMP.</p> <p>The Site is bound to the west and south by tram, railway lines and major roads, and uses to the east and south comprise other hotel uses. The Proposed Development is unlikely to result in pollution or nuisances unusual for Use Class 7 use. A Travel Plan shall be implemented to ensure promotion of sustainable modes of transport and safe routing to and from the Site.</p> <p><u>Summary</u> – The Proposed Development is unlikely to result in significant effects associated with pollution/nuisances nor new/different effects to the approved BtR use at the Site (ref. 20/02068/FUL).</p>
Risk of major accidents and/or disasters	<p>The nature of the uses within the Proposed Development are not considered likely to give rise to potential risks from accidents and/or disasters resulting in a need for EIA. Safe and suitable access to and from the Site is available from Lochside Court and shall be constructed from Station Park, with a Travel Plan and CEMP in place to ensure safe access/egress from the Site.</p> <p><u>Summary</u> – The Proposed Development and Site presents low level risk and is unlikely to result in significant effects requiring EIA.</p>
Risks to human health (for example, due to water contamination or air pollution)	<p>Low level risk (e.g. due to water contamination or air pollution).</p> <p>Any potential hazards to human health during the construction phases of the Proposed Development would be carefully managed through standard best practice construction measures in a CEMP.</p> <p><u>Summary</u> – Low level risk, unlikely to result in significant effects requiring EIA.</p>

Environmentally sensitive location

The Site is not in a ‘sensitive area’ as defined in Regulation 2(1) and there are no other statutory designations of national or international importance within the boundary of the Site. The nearest SSSI (Wester Craiglockhart Hill) is over 4km southeast of the Site. Given this distance and intervening urban

development, and the implementation of a CEMP during construction, effects on the Wester Craiglockhart Hill SSSI are considered unlikely to be significant.

On site habitats present opportunities for a range of legally protected species, including bats, badger, otter, hedgehog, brown hare, reptiles and several bird species. Mitigation measures recommended as part of the 2020 Phase 1 Habitat and Protected Species Survey submitted as part of the application for the Edinburgh Park masterplan (ref. 20/02068/FUL) shall be implemented at the Site based on ongoing monitoring and survey to avoid and minimise negative effects on protected species, to be set out within a CEMP. These measures will ensure no new significant or different effects shall arise when compared to those of the BtR scheme approved on the Site.

The scale of the Proposed Development is in-keeping with those approved on adjacent plots within the Edinburgh Park masterplan area. The positioning of the building in the Proposed Development sets it back against tram and railway lines as a continued form from those approved in plots to the north within the masterplan. It is therefore unlikely that the Proposed Development would result in new, different, or significant effects on the setting of historical assets to the southeast, southwest and northwest of the Site due to existing intervening urban development.

In conclusion, no likely significant effects are therefore anticipated as a result of the Site's geographical relationship with these sensitive sites.

Environmental effects

This request for the Council's screening opinion has not identified any likely significant effects relating to the environment in its review of the Proposed Development's construction or operational phases. The sensitivity and proximity of designations in the surrounding area have been taken into consideration, as have the surrounding existing developments and context of the Edinburgh Park masterplan. The Proposed Development has sought to embed mitigation measures, such as the implementation of a CEMP, Travel Plan and drainage scheme, which would limit the potential for significant construction and operational effects that could give rise to the need for EIA. In the Proposed Development's design, which includes a maximum (i.e., worst-case) scale of development up to eight storeys and 210 rooms with a façade and site layout which would minimise adverse visual and transport-related impacts.

No likely significant effects are therefore anticipated as a result of the Proposed Development on sensitive receptors on the local scale nor the wider geographical area.

In conclusion, the magnitude and nature of the impacts arising from the Proposed Development are not considered likely to be significant and would not give rise to a need for EIA.

Planning submission

Notwithstanding your consideration of the requirement for EIA in connection with the Proposed Development, additional material will accompany the application to assist in your consideration of the proposals. The scope of the planning submission will be agreed with the Council prior to submission.

Conclusion

Our review of environmental conditions at the Site has concluded that there are no likely significant environmental effects which would give rise to the need for EIA as a result of the Proposed Development. This conclusion has been drawn through analysis of the measures embedded into the design of the Proposed Development, including its developable area and maximum heights, as well as management plans such as a CEMP which will be implemented when the Proposed Development comes forward incorporating the recommendations of specialists. It has also considered the relative likely differences in effects resulting from the Proposed Development in comparison with the approved BUR scheme under the Edinburgh Park masterplan (Southern Phase) (ref. 20/02068/FUL). This review has also not identified any potential for significant cumulative effects with other existing or approved developments in the vicinity of the Site.

We trust you have sufficient information to determine whether this is an EIA development under the Town and Country Planning (EIA)(Scotland) Regulations 2017 ('the 2017 EIA Regulations'). From the 2017 EIA Regulations, we note that the Council has 21 days (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion, having regard to the relevant criteria listed in Schedule 3. If adopting a negative opinion, we note that the Council must also state any features of the Proposed Development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact me, or my colleague Jade Scott-Meikle, Planning Director, if you have any questions.

Yours faithfully


Emily Clarke

Planner

BA (Hons) MSc MRTPI

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Seán Fallon and Paul Devaney, City of Edinburgh Council