

10th December 2025

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Waverley Court
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Edinburgh
EH8 8BG

Dear Laura

CAMERON TOLL SHOPPING CENTRE, 6 LADY ROAD, EDINBURGH

EIA SCREENING OPINION REQUEST

Lady Road Investment SARL are progressing proposals for the development of Cameron Toll Shopping Centre, 6 Lady Road, Edinburgh.

An application for Planning Permission in Principle for the comprehensive redevelopment of the site, and a detailed application for Planning Permission for the delivery of uses including retail, commercial, residential, student accommodation, later living accommodation, hotel, office space, sports/leisure and community uses and associated public realm are currently being prepared. The proposed description of development for each application is as follows:

Planning Permission in Principle

Planning Permission in Principle (PPP) for Redevelopment of Cameron Toll Shopping Centre to provide mixed use development comprising retail, commercial and public realm, with other uses potentially including residential, student accommodation, later living accommodation, hotel, office space, sports/leisure and community uses along with associated landscaping and infrastructure.

Detailed Planning Application

Mixed use development potentially comprising retail, commercial, residential, student accommodation, later living accommodation, hotel, office space, sports/leisure and community uses and public realm, along with associated landscaping and infrastructure.

This letter is a formal request for an Environmental Impact Assessment Screening Opinion to be provided by Edinburgh City Council under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations).

The EIA process is the mechanism by which development proposals are appraised in terms of environmental and socio-economic criteria, in addition to the engineering and technical considerations. The EIA process defines the context of the proposed development and examines the issues considered pertinent.

In determining the requirement for an EIA, Schedule 1 of the EIA Regulations sets out the types of development for which an EIA is a mandatory requirement. Whilst Schedule 2 lists the projects where the "need for an EIA is

judged on a case-by-case basis; depending on whether a proposal is likely to cause significant environmental effects or is in a sensitive area as defined by the EIA Regulations.”

In this instance, the proposed development does not fall within Schedule 1, nor is it considered to breach the impact criteria for a Schedule 2 development, as defined by the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

This is because whilst the development breaches the threshold for Category 10 (b) due to the scale of the site being above 0.5ha, the development is not likely to have significant effects on the environment. In considering the need for EIA, paragraph 28 of Circular 1/2017 –Environmental Impact Assessment and the Regulations confirms that the key question to be addressed by the Council is: *“Would this particular development be likely to have significant effects on the environment?”*

The EIA Regulations and accompanying Circular make it clear that for all projects listed in Schedule 2 of the EIA Regulations, the planning authority must make its own formal determination of whether EIA is required. Paragraph 10 of the Circular confirms that *“only a small proportion of development will require EIA”*, but it is equally stressed that EIA is not discretionary. For Schedule 2 projects, this means that those which are considered likely to have significant effects on the environment will require EIA.

In considering the potential for significant environmental effects associated with Schedule 2 projects, the Circular confirms in paragraph 31 that factors such as the nature, size and location of the proposed development are key.

Paragraph 32 of the Circular states that *“In the majority of cases, it will however be necessary to consider the characteristics of the proposed development in combination with its proposed location in order to identify the potential for interactions between it and its environment and therefore determine whether there are likely to be significant environmental effects”*.

In considering screening requests, the Circular emphasises in paragraph 35 that the basic test of the need for EIA in a particular case is the likelihood of significant effects on the environment. In some cases, a large scale and complex development in a non-sensitive location may result in EIA being requested. In all cases, paragraph 37 of the Circular confirms that the relationship between a proposed development and its location is a crucial consideration. The same paragraph states that for any given development proposal, the more environmentally sensitive the location the more likely it is that the effects will be significant and will require EIA.

Paragraph 37 of the Circular confirms that for the purposes of the EIA Regulations, 'sensitive areas' comprise:

- Sites of Special Scientific Interest;
- Land subject to Nature Conservation Orders;
- European Sites;
- National Scenic Areas;
- World Heritage Sites;
- Scheduled Monuments;
- National Parks; and
- Marine Protected Areas.

Paragraph 41 states that the Planning Authority must take into account any proposed mitigation measures, as well as the description of the proposed development, in reaching their Screening Opinion.

It is important to note that the site principally comprises previously developed land, there are no salient sensitive areas on or near to the site that it would have a negative impact on. Furthermore, the site is not located in a 'Sensitive Area'.

The matters for consideration as per Schedule 3 of the regulations are discussed below:

Characteristics of development	
1. The characteristics of development must be considered with particular regard to—	
a) the size and design of the whole development;	<p>The scale and massing, as well as final design proposals of any forthcoming development will have regard to the visual impact on the surrounding area.</p> <p>Proposed building parameters outlined through the PPP application will be designed to meet the technical and functional constraints of the site and surrounding land uses.</p> <p>The scale of development will sit within the existing precedent set by surrounding developments and will compliment the established character of the area.</p> <p>Final design proposals will have regard to the site context with use of a suitable material palate.</p>
b) cumulation with other existing development and/or approved development;	<p>The site falls within the urban area where there are a number of existing and proposed development opportunities of varying scale. Careful consideration will be had to the sitting of the development with regard to the surrounding context to ensure that the proposals would not result in a negative cumulative impact on surrounding environs.</p> <p>The site is located adjacent to Braid Burn and Inch Park, both of which present opportunities utilise and to enhance surrounding natural resources as part of the proposed development. The site is also subject to a TPO.</p>
c) the use of natural resources, in particular land, soil, water and biodiversity;	<p>A benefit will be brought to the site by any future proposals in regard to landscaping, ecology, and water/ drainage, including the potential de-culverting of the Braid Burn which currently passes under the site.</p> <p>Future proposals will be accompanied by an Ecological Assessment, Tree Survey and Arboricultural Impact Assessment, Ground</p>

	Contamination Assessment, Hydrological Assessment and Drainage Statement.
d) the production of waste;	On-site construction waste will be minimised. The proposals will be designed and built out with sustainability at the forefront. A noise impact assessment will be submitted alongside any application. The proposed development is not expected to result in a significant increase in the ambient noise level in surrounding areas.
e) pollution and nuisances;	External lighting will have consideration to the setting of the site. With respect to car usage, it is not envisaged that the proposals would result in any increase beyond that already present at the site.
f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;	The site will be assessed against the risk framework set out in the National Planning Framework (NPF 4) which indicates that an annual probability of occurrence of 0.5% (or 1 in 200-year event) defines what may be taken to be an acceptable risk of flooding for developments of this type. An accompanying sustainability statement will assess any impact to/from the development with respect to climate change.
g) the risks to human health (for example, due to water contamination or air pollution).	No risks are envisaged. A contaminated land assessment will be carried out prior to the commencement of any construction.

Location of development

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—

a) the existing and approved land use;	The site currently comprises a shopping center and associated parking.
b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	The site sits adjacent to Inch Park. The site is subject to a TPO. Furthermore, Braid Burn which runs under/ adjacent to the site provides water and biodiversity interest, with the potential de-culverting of the burn being assessed via the application process.

	Proposals would have due regard to the existing natural resources at the site with appropriate surveys, assessments and reports to be submitted alongside any development proposals.
c) the absorption capacity of the natural environment, paying particular attention to the following areas—	
i. wetlands, riparian areas, river mouths;	Not Applicable
ii. coastal zones and the marine environment;	Not Applicable
iii. mountain and forest areas;	Not Applicable
iv. nature reserves and parks;	The site lies adjacent to Inch Park. The proposals would aid connections from the park to surrounding areas. The proposed development would not significantly alter the present character of the park.
European sites and other areas classified or protected under national legislation;	Not Applicable
v. areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;	Not Applicable
vi. densely populated areas;	The site is within a medium density area. Development proposals will be of an appropriate scale and massing to the surrounding context. Furthermore, the proposed introduction of additional uses to the area will provide a benefit of users of the site and surrounding area.
vii. landscapes and sites of historical, cultural or archaeological significance.	The site is located within a conservation area and in close proximity to a number of listed buildings and structures. Proposals will have regard to the setting and significance of surrounding assets with the submission of a TVIA, Heritage Assessment and Desk Based Archaeological Assessment to demonstrate that there will be no unacceptable impacts to which an EIA development would be constituted.

Types and characteristics of the potential impact

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

	The site area is approximately 10.48ha.
a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	Owing to the character of the site as existing, and the location of the proposed development within the urban area, any impact of the development would be limited to the immediate locale of the site.
b) the nature of the impact;	The proposals seek the redevelopment of previously developed land. The proposals will allow the continued use of the site, ensuring its long term viability and contribution to the character of the area. With consideration to design of proposals and proposed use classes, an overall benefit is considered to arise from proposals in respect of the surrounding context.
c) the transboundary nature of the impact;	No effects considered in this respect.
d) the intensity and complexity of the impact;	No effects considered in this respect – proposals would not lead to a significant impact in this regard.
e) the probability of the impact;	There is a low probability of significant effects. Any potential impacts will be assessed through accompanying reporting documents.
f) the expected onset, duration, frequency and reversibility of the impact;	As above
g) the cumulation of the impact with the impact of other existing and/or approved development;	As above
h) the possibility of effectively reducing the impact.	As above

Therefore, we are of the view EIA should not be required to be undertaken for the forthcoming proposals at Cameron Toll Shopping Centre, 6 Lady Road, Edinburgh, and should be grateful of your formal confirmation of same.

Yours sincerely,


Colin Smith
Senior Director
UK Planning and Development