



**Scottish Natural Heritage**

All of nature for all of Scotland

Lesley Carus  
City Development, Planning and Strategy  
City of Edinburgh Council  
G2 Waverley Court  
4 East Market Street  
Edinburgh  
EH8 8BG

28 October 2010  
Our ref: CNS/DC/ED  
Your ref: 10/02830/FUL

Dear Ms Carus

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997  
THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999**

**THE ERECTION OF NEW PORTOBELLO HIGH SCHOOL AND ASSOCIATED ANCILLARY BUILDINGS, SITE WORKS, CAR PARKING, LANDSCAPING, PITCHES, AND FLOODLIGHTING AT PORTOBELLO PARK AND GOLF COURSE, 20 STANLEY STREET, EDINBURGH, EH15 1JJ.**

Thank you for consulting Scottish Natural Heritage (SNH) on the above proposed development of the new Portobello High School.

**SNH Position**

We have **no objection** to this development. The Environmental Statement is thorough and contains the required surveys and assessments, as well as robust mitigation proposals. Specific advice on the chapters of relevance to SNH is provided below.

**Appraisal of the Impacts and Advice**

**Ecology**

Bats

Survey work has established that this site is used by bats, which are European Protected Species (EPS), for foraging and commuting. Mitigation has been described which is thorough and comprehensive, such as using bat-sensitive lighting and retaining the 'Millennium Plantation' woodland intact. It is worth mentioning that retaining this woodland strip will also provide biodiversity, landscape and amenity value to the site.

Providing the development is carried out in accordance with the mitigation plan described in section 8.6 and Appendix 8.3 of the Environmental Statement, the proposal is unlikely to result in an offence under Regulation 39 of the Habitats Regulations 1994 (as amended).

We therefore recommend that the bat mitigation proposals described in section 8.6 and Appendix 8.3 are secured if consent is granted.



**Scottish Natural Heritage, Lothians Area Office, Silvan House, 3<sup>rd</sup> Floor East, 231 Corstorphine Road, Edinburgh, EH12 7AT**  
Tel 0131 316 2600 Fax 0131 316 2690 email: [forename.surname@snh.gov.uk](mailto:forename.surname@snh.gov.uk) [www.snh.org.uk](http://www.snh.org.uk)

### Breeding birds

The mitigation plan in section 8.6 correctly identifies that vegetation clearance should take place outside the bird breeding season (March to August). Breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended). We therefore recommend that this mitigation proposal is secured if consent is granted.

### **Land Use, Access and Recreation**

Our main concern is the permanent loss of open space which cannot be fully compensated for. However, the mitigation methods described in this chapter will help protect existing key features such as the 'Millennium Plantation' woodland and create new features of value such as new paths and recreation areas.

Therefore we recommend that the mitigation proposals described in section 5.5 are secured, particularly the following:

- A new path will be constructed which will circle the entire Portobello Park and Portobello Golf Course;
- Retention and enhancement of the existing 'Millennium Plantation' woodland shelterbelt;
- Reinstatement of grassed areas on the southern boundary of the site - restored to allow recreational uses.

Finally, we support the proposal to set aside of a sum of money to offset the loss of open space, and suggest that this is allocated to projects in the immediate vicinity of the new high school in agreement with the surrounding communities.

### **Townscape and Visual Amenity**

We agree that there will be a local impact on visual amenity of the area through the loss of open space and new development. However mitigation proposals are described which will maintain and enhance the existing woodland which should help protect and improve the amenity of the area. We recommend that the mitigation measures as described in section 6.7 are secured, particularly the following:

- Compensation for removal of woodland and trees;
- Protection and improvement of woodland and trees;
- Bring the woodlands into an active management programme.

We also recommend that compensation planting in and around the woodland areas is comprised of native tree species of local provenance. This will add to the biodiversity value of the woodland area.

I hope the above comments are useful, should you require any further information then do not hesitate to get back to me at the above address.

Yours sincerely

Carolyn Clark  
Area Officer  
Edinburgh