

Development Management Sub Committee

Wednesday 19 June 2019

**Application for Planning Permission 19/01149/FUL
At Land At 61 And 63, London Road, Edinburgh
Erection of mixed-use development including student
accommodation and ancillary uses, commercial unit, and
associated landscaping and infrastructure.**

Item number	7.3
Report number	
Wards	B14 - Craigtinny/Duddingston

Summary

The proposal complies with the development plan. The development is acceptable in this location and will not lead to an overconcentration of students in the area. The development is acceptable in terms of its scale, form and design. There will be no unacceptable impact on residential amenity, road safety or air quality. There are no outstanding matters relating to biodiversity. The proposal is acceptable and there are no material considerations that outweigh this conclusion and approval is recommended.

Links

<u>Policies and guidance for this application</u>	LDPP, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LHOU08, LEN16, LEN21, LTRA02, LTRA03, NSG, NSGD02, NSGSTU,
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Report

Application for Planning Permission 19/01149/FUL At Land At 61 and 63, London Road, Edinburgh Erection of mixed-use development including student accommodation and ancillary uses, commercial unit, and associated landscaping and infrastructure.

Recommendations

1.1 It is recommended that this application be Granted subject to the details below.

Background

2.1 Site description

The site is 0.29 hectares in size and is situated on the south side of London Road. The site is currently occupied by two separate single-storey buildings, one that previously operated as a Boots Opticians and the other operates as Ashley Ann interior showroom. Access to the site is from London Road.

To the north is the site of the recently demolished Meadowbank Stadium. Planning permission has been granted for a new sports centre immediately opposite the application site. To the east is an existing car wash where planning permission has been granted for a new residential development comprising 30 flats and rising up to 5 storeys. The narrow Clockmill Lane runs immediately to the south of the site with the East Coast mainline beyond. To the west is a free-standing McDonald's fast food restaurant with a drive thru that operates 24 hours.

The wider area has a mixture of residential and commercial uses with Meadowbank Stadium having previously served as a dominant landmark in the locality. The proposed Sports Centre will be of a similar scale, mass and position as the main stand of the stadium and will also be visually prominent within the local area, particularly in views along London Road.

2.2 Site History

There is no planning history for the site.

Adjacent Sites

65 London Road

15 November 2018 - Planning permission granted for the demolition of existing single storey car-wash unit and erection of new residential flatted development rising up to 5 storeys, comprising 30 flats, and including all associated landscaping, parking and ancillary facilities (as amended) (reference number - 17/03633/FUL).

Meadowbank Stadium

11 December 2018 - Planning permission in principle granted for the proposed redevelopment of existing Sports Centre site to provide new Sports Centre facilities and redevelopment of surplus land for mixed uses including residential, student accommodation, hotel and commercial uses, together with car parking, landscaping, drainage and ancillary works (reference number - 18/00154/PPP).

11 December 2018 - Planning permission granted for the re-development of Meadowbank Sports Centre. The detailed proposals include the development of a new sports centre facility, including a new sports centre building with offices for Edinburgh Leisure, the retained athletics track, new spectator stand, sports pitches and floodlighting, with associated access, roads, car parking, landscaping and ancillary works (reference number - 18/00181/FUL).

St Margaret's House

10 November 2016 - Planning permission in principle granted for up to 21,500sqm of mixed use development including Residential, Retail/Commercial, Hotel and Student accommodation (reference number - 14/05174/PPP).

Main report

3.1 Description Of The Proposal

The proposal is to demolish the existing buildings on the site and erect a six storey block of purpose-built student accommodation with commercial space at ground floor level. The student accommodation will comprise 198 student bedrooms provided in the form of 17 cluster flats containing five single bedrooms and a kitchen, 102 studio bedrooms and 11 accessible studio bedrooms. In addition there will be a communal laundry, lobbies and student amenity space for the use of all residents. The commercial unit will have a floorspace of 84 sq/m and will be located at the front of the building on the ground floor.

The proposed building is formed of two conjoined blocks orientated east-west with the western section set back to avoid the sewers that run beneath the site. The building will be six storeys in height and will be of a brick construction.

Cycle parking will be provided in two secure enclosures with capacity for 198 bicycles. In addition, two disabled parking spaces and two car club spaces will be provided within the development's curtilage.

Supporting Information

The following information was submitted in support of the application:

- Design and Access Statement;
- Planning Statement;
- Surface Water Management Plan;
- Flood Risk Assessment;
- Air Quality Impact Assessment;

- Archaeological Desk-Based Assessment;
- Economic Impact Statement;
- Noise and Vibration Assessment;
- Site Investigation Report;
- Transport Statement;
- Ecology Report, and;
- Pre-Application Consultation (PAC) report.

These documents are available to view on the Planning and Building Standards Online Service.

3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) The principle of the development complies with the Development Plan
- b) The proposals provide a development of appropriate scale, form and design;
- c) The proposals provide an acceptable level of amenity for residents;
- d) The transport and air quality impacts are acceptable;
- e) There are any ecological impacts; and
- f) The representations have been addressed.

a) Principle

LDP policy Hou 8 has two requirements for assessing student accommodation. Firstly, proposals must be in a suitable location in relation to university and college facilities, and be well connected by means of walking, cycling or public transport. Secondly, it must not lead to an excessive concentration of student accommodation or transient population in the locality to an extent that would adversely affect the area and its established residential amenity or character.

The Council's Non-statutory Student Housing Guidance (SHG) re-enforces the requirements of policy Hou 8 and identifies that student accommodation needs should be met in well managed and regulated schemes where possible. The SHG also recommends that development should be designed to positively contribute to place through the location of alternative ground floor uses where this is characteristic of the street or area.

Location of Student Housing

In terms of criterion a) of policy Hou 8, the application site is in a central location on London Road with good connections to public transport, offering high frequency bus services to all parts of the city. Higher education campuses can also be accessed by bicycle and in some cases by walking.

The SHG sets out additional locational and design guidance to be applied for student housing. Criterion a) accepts student housing in locations within or sharing a boundary with a main university or college campus, or out with criterion a) student housing will generally be supported on sites with less than 0.25ha of developable area. Where the site area is larger than 0.25ha then the proposal should provide a proportion of housing as part of the development.

This site does not share a boundary with a university or college campus and the total site area is 0.29ha. However, the northern part of the site has two sewers running beneath it, both of which have an offset that Scottish Water has advised will preclude building over. This offset prevents any significant structures being built along the northern section and north-west corner of the site and in turn reduces the developable area to 0.21ha. This offset further reduces the site's suitability for the provision of mainstream housing by limiting onsite parking and, by pushing the building back in the plot, reducing the availability of external amenity space.

The location of the accommodation is suitable and accords with policy Hou 8 a).

Concentration of Student Housing

Criterion b) of policy Hou 8 seeks to limit the concentration of student accommodation where it would have an adverse impact on the maintenance of balanced communities, or to the established character and residential amenity of the locality. The SHG advises that where the student population is dominant, exceeding 50% of the population, there will be a greater potential imbalance within the community.

Based on 2011 census data, approximately 10.7% of the residents in the immediate datazone are full time students aged above 16. Including the proposal, this figure would rise to 24.4%. Within the surrounding Meadowbank area the figure is currently approximately 14.6% and would rise to 17.5% if the proposed development is included. These figures have been adjusted to include consented developments in the area but does not include the former Meadowbank Stadium site as the quantum of student accommodation is not known at this stage.

This proportion, as proposed, would not lead to an over-concentrated student population in the area and meets criterion b) of policy Hou 8 and criterion b) of the SHG.

Commercial use

The SHG advises that development should contribute to place through the location of alternative ground floor uses where this is characteristic of the area. As two business units will be lost as a result of the development, it is proposed to provide new business space at ground floor level. If the application is granted, a local charity organisation has advised of its intention to move its headquarters to the commercial space within the building. The provision of a ground floor commercial use complies with the advice contained in the SHG and is acceptable.

Conclusion

Policies within the LDP aim to deliver a range of development types across the city. Policy Hou 8 Student Housing states that purpose-built student accommodation will be supported. The proposal includes a mix of uses at the site and would not result in an over-concentration of students in the area.

Overall, purpose-built student accommodation at this site is supported by the LDP and will ensure varying accommodation needs are met in the city. The proposal is acceptable in principle, subject to compliance with other policies in the LDP.

Despite not fully complying with the SHG due to the size of the site and the provision of housing, the presence of sewers under the site impacts on the developable area and nonconformity is justified in this instance. The site is a good location for student housing and the proposal is acceptable.

b) Scale, Form and Design

Policies Des 1 to Des 8 of the LDP set out the policy framework for the design of developments. These policies outline a requirement for proposals to be based on an overall design concept which draws on the positive characteristics of the surrounding area, with the need for high quality design which is appropriate in terms of height, scale and form, layout and materials.

Due to the history of this area, the built environment around the site varies broadly in terms of the age and uses of the buildings, with limited architectural uniformity. This has led to the creation of a piecemeal townscape made up of individual developments that do not relate to each other and lack integration. However, the recent grant of planning permission in principle for the redevelopment of Meadowbank Stadium and its subsequent demolition are demonstrative of the significant change taking place in the area. While details of the forthcoming developments across the wider Meadowbank site are still to be proposed, detailed planning permission has been granted for the new sports centre. The proposed development will be situated opposite the corner of the new sports centre and will be the closest building to it on the south side of London Road. In terms of its height, the building will be smaller than the sports centre and will be visually subservient to it in terms of its scale and mass.

The proposal will be marginally taller than the contemporary blue brick development further west on London Road and the approved residential development on the neighbouring site to the east. However, as it is set further back than those developments it will not have an overbearing appearance.

The site lies within the view cone of key view E8 London Road, Meadowbank - Calton Hill. However, it lies on the periphery of the view cone and does not impinge on the key view from the Meadowbank Terrace junction on London Road. Further into the city, along London Road, the proposal would screen views of Calton Hill from the section to the east of McDonalds. However, on balance, although some views of Calton Hill will be lost, the key view will be maintained and the proposed development is an appropriate incursion within the urban landscape. Overall the scale and massing conform with the existing tenemental townscape and are appropriate in this location.

The design and form is simple, utilising a limited palette of materials and rhythmic fenestration to give an ordered and clutter free appearance. The proposal demonstrates a clear design concept and the architecture includes modest contemporary elements that are appropriate in its context. The facade materials will be facing brick with horizontal detailing in pre-cast concrete and dark grey window frames. The brick detailing will be high quality and selected to complement the tone and colour of the nearby tenements. The proposed materials are appropriate for the area and are acceptable.

Criterion d) of the SHG requires that a mix of accommodation types is provided to meet varying needs of students. The application proposes the provision of 17 cluster flats comprising five single bedrooms and a kitchen, 102 studio bedrooms and 11 accessible studio bedrooms. In addition there will be a communal laundry, lobbies and student amenity space for the use of all residents. The rear of the building includes widows of habitable rooms overlooking Clockmill Lane. This is important in providing visual surveillance to a currently unwelcoming and underused local connection to the south.

The cycle parking will be provided in two secure enclosures at the front of the building. Landscaping, including trees along the frontage, are proposed to soften the impact of the cycle enclosures and parking at the front of the building.

Overall, the development is of an appropriate scale, form and design and is acceptable in this location.

c) Amenity

There are a number of noise sources in the area, including transport noise from vehicles on London Road and trains on the railway to the south. The McDonald's restaurant to the west, the car wash to the east and the substations within and adjacent to the site are also potential noise sources. As a result, a Noise and Vibration Assessment (NVA) has been submitted in support of the development. The NVA makes recommendations as to the overall facade sound insulation performance requirements and provides examples of glazing and ventilation strategies that will protect the amenity of occupiers. A condition will ensure that facade finishes are implemented in line with the recommendations of the report.

Environmental Protection requested confirmation to indicate that the plant machinery from McDonald's and from the substations will meet the expected criteria. The NVA identified both the McDonald's plant and existing substation as noise sources, however the dominant noise sources were road and rail traffic. The NVA has a recommended facade performance designed to meet the internal noise level criteria, given the existing noise climate and including all noise sources present. Given that the plant and substation noise are quieter than the dominant noise sources, this demonstrates that the design is providing adequate sound insulation.

Vibration levels were also measured and the report concludes that no railway vibration mitigation measures are considered necessary in relation to the human perception of tactile vibration.

The gable elevation of the proposed flats on the eastern side of the flats includes balconies. Although gable elevations are not normally protected in this situation, the set back of the proposed building from the street will prevent the balconies from abutting the gable of this building, thereby retaining their amenity value.

While there is no specific requirement to provide external amenity space for student accommodation, an area of approximately 690 square metres is provided for residents at the rear of the building. This area is south-facing and will provide an adequate outdoor space for the residents.

Overall, the proposal will provide adequate amenity for future and neighbouring residents.

d) Transport and Air Quality

Transport

The development proposes no general car parking spaces, two disabled car parking spaces and two car club spaces. In addition, 198 secure cycle parking spaces and 5 visitor cycle parking spaces will be provided.

A Transport Statement (TS) has been submitted in support of the application. The TS advises that the proposal is forecast to generate less vehicle trips than the existing development. Therefore, there would be a net reduction in traffic impact on the road network.

The site benefits from being on a main arterial route into the city and is well served by public transport, with bus stops on London Road offering services from large parts of Edinburgh and the wider region. In total, 41 buses per hour in each direction can be accessed within a five minute walk of the site.

The site is also within walking and cycling distance of local amenities, the city centre and some university campuses.

Overall, the proposed level of vehicle and cycle parking is acceptable. The development is well connected and will have no detrimental impact on traffic, road safety or parking.

Air Quality

This part of London Road is part of the Central Air Quality Management Area (CAQMA). Therefore, an Air Quality Impact Assessment (AQIA) has been submitted in support of the application. As part of the AQIA, detailed dispersion modelling was undertaken to predict the concentrations of NO₂, PM₁₀ and PM_{2.5} due to emissions from existing road traffic in conjunction with existing background concentrations at proposed future receptor locations within the Proposed Development site. The long-term and short-term average concentrations, which are relevant for the duration of exposure of members of public within the Proposed Development, comply with the relevant air quality objectives.

Mitigation measures have been embedded into the design, including efficient hot water and heating systems, that will reduce air pollution and minimise the potential exposure of future occupants to poor air quality.

e) Ecology

An Ecology Report has been submitted in support of the application. The report notes the presence of a peregrine falcon that has been seen foraging in the area and may be nesting nearby. However, given the built-up nature and urban situation of the site, it is unlikely that construction works would cause disturbance to a nearby nest site.

The report has identified the buildings as having a low roost potential for bats. However, it recommends that further survey work is carried out to fully ascertain the status of bats within the buildings. This work will be required to be carried out by way of an informative.

f) Public Comments

- Overpopulation of general area - assessed in section 3.3(a);
- Will generate additional traffic - assessed in section 3.3(d);
- Lack of parking for proposal - assessed in section 3.3(d);
- Local services, Doctor surgeries etc, are already at capacity - assessed in section 3.3(a);
- Excessive concentration of students in the area - assessed in section 3.3(a);
- The building is too high - assessed in section 3.3(b);
- The building should be finished in sandstone not brick - assessed in section 3.3(b);
- The proposal will impact on road safety - assessed in section 3.3(d);
- 50% should be residential - assessed in section 3.3(a);
- The development will lead to an increase in air pollution - assessed in section 3.3(d);
- The building will overshadow Clockmill Lane making it unwelcoming and dangerous - assessed in section 3.3(b);
- The design is poor - assessed in section 3.3(b);
- The proposed landscaping is poor - assessed in section 3.3(b); and
- The development may impact on the peregrine falcon that has been seen foraging in the area - assessed in section 3.3(e)

Conclusion

The proposal complies with the development plan. The development is acceptable in this location and will not lead to an overconcentration of students in the area. The development is acceptable in terms of its scale, form and design. There will be no unacceptable impact on residential amenity, road safety or air quality. There are no outstanding matters relating to biodiversity. The proposal is acceptable and there are no material considerations that outweigh this conclusion and approval is recommended.

It is recommended that this application be Granted subject to the details below.

3.4 Conditions/reasons/informatives

1. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
2. A fully detailed landscape plan, including details of all hard and soft surface and boundary treatments and all planting, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.
3. The approved landscaping scheme shall be fully implemented within six months of the completion of the development.
4. i) Prior to the commencement of construction works on site:
 - a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.
- ii) Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.
5. Notwithstanding the provisions of the Town and Country Planning Use Classes (Scotland) Order 1997, the property shall be used solely as class 1, class 2 or class 4 and for no other purpose.
6. No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

Reasons:-

1. In order to enable the planning authority to consider this/these matter/s in detail.
2. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
3. In order to ensure that the approved landscaping works are properly established on site.
4. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
5. In order to ensure that the nature of the use of the premises remains compatible with the character of the surrounding area, and that no activities or processes take place which may be detrimental to its amenities.
6. In order to safeguard the interests of archaeological heritage.

Informatives

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
3. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
4. Contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development.
5. The works to close the existing redundant access must be carried out under permit and in accordance with the specifications. See Road Occupation Permits http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point .
6. The applicant proposes to provide 2 car club spaces within the site. A contribution of £12,500 (£1,500 per order plus £5,500 per car) will be required but this does not require to form part of any legal agreement.

7. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables and realtime display within the building for local public transport.

8. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved.

9. The Ecology Report by Direct Ecology Ltd dated 6 March 2019 has identified buildings as having a low roost potential for bats. Further survey work, as detailed in section 4.4 of the report is therefore required.

Surveys should be carried out in accordance with the Bat Conservation Trust, Bat Survey: Good Practice Guidelines, 3rd edition, Collins, J (2016).

This work should be undertaken during the 2019 survey season, optimum period May - August.

Financial impact

4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

Risk, Policy, compliance and governance impact

5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

Equalities impact

6.1 The equalities impact has been assessed as follows:

The application has been assessed and has no impact in terms of equalities or human rights.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application meets the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

The application was advertised on 18 March 2019 and 64 letters of representation were received. This comprised 63 letters of objection, and one letter offering general comments. These included comments from the local community council.

A full assessment of the representations can be found in the main report in the Assessment section.

Background reading/external references

- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

The site lies within the urban area of the adopted Edinburgh Local Development Plan.

Date registered

6 March 2019

Drawing numbers/Scheme

01-03, 04A-10A, 11, 12A, 13-14, 15A-19A,

Scheme 1

David R. Leslie

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PLACE

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Links - Policies

Relevant Policies:**Relevant policies of the Local Development Plan.**

LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

LDP Policy Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

LDP Policy Hou 8 (Student Accommodation) sets out the criteria for assessing purpose-built student accommodation.

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

LDP Policy Tra 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

Relevant Non-Statutory Guidelines

Non-Statutory guidelines Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings, parking, streets and landscape, in Edinburgh.

Non-statutory guidelines Student Housing Guidance interprets local plan policy, supporting student housing proposals in accessible locations provided that they will not result in an excessive concentration.

Appendix 1

Application for Planning Permission 19/01149/FUL At Land At 61 and 63, London Road, Edinburgh Erection of mixed-use development including student accommodation and ancillary uses, commercial unit, and associated landscaping and infrastructure.

Consultations

Archaeology

Further to your consultation request, I would like to make the following comments and recommendations concerning the above planning application for the erection of a mixed-use development including student accommodation and ancillary uses, commercial unit and associated landscaping and infrastructure.

As described in AOC Archaeology's Desk-Based Assessment (Report 24603) accompanying this application, the site occurs to the east of Edinburgh's Old Town on the northern side of the mediaeval route (Clock Mill Lane) linking the Canongate and Restalrig. The DBA provides further information regarding ten post-medieval use of the site associated with water management.

I concur with the reports conclusion, that the site should be regarded as occurring within an area of archaeological potential. Accordingly, this application must be considered under terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and CEC's Edinburgh Local Development Plan (2016) Policies ENV8 & ENV9.

Further I concur with AOC's conclusions that this development has a moderate-low potential to disturb significant remains, principally relating to the sites post-medieval uses. Accordingly, it is essential that a programme of archaeological work is undertaken prior to/ during development to fully excavate, record and analyse any surviving archaeological remains that may be affected.

It is recommended that the following condition is attached to ensure that this programme of archaeological works is undertaken.

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

The work would be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and

resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.

Economic Development

The following are comments from the City of Edinburgh Council's Economic Development service relating to planning application 19/00149/FUL for the development of 198 student bedrooms and 84 sqm of community space at 61-63 London Road, Edinburgh.

Commentary on existing use

The application relates to 0.28 hectares of vacant land bounded by London Road to the north; 65 London Road (a car wash with planning consent for redevelopment into 30 flats) to the east; Clockmill Lane to the south; and 61 London Road (a McDonalds restaurant) to the west.

The site is currently occupied by three retail warehouse units: 61(A) London Road, 61(B) London Road, and 63 London Road. The combined net internal area of the three units is 726 sqm. The potential economic impact of the existing buildings can be estimated. The Employment Densities Guide (3rd edition) published by the Homes and Communities Agency states that retail warehouses support on average one full-time equivalent employee per 90 sqm (net). This suggests that the existing buildings could be expected to directly support approximately eight FTE jobs if fully occupied ($726 \div 90$). The Scottish Annual Business Statistics published by the Scottish Government state that the average gross value added (GVA) per job for the retail sector in Edinburgh is £29,484 per employee (2016 prices). This suggests that the existing buildings could be expected to add approximately £0.24 million of GVA to the economy of Edinburgh per annum (2016 prices) if fully occupied ($\pounds 29,484 \times 8$). Multiplier effects could be expected to support a further two FTE jobs and £0.11 million of GVA per annum, giving a total impact of 10 FTE jobs and £0.34 million of GVA per annum (2016 prices).

Commentary on proposed uses

The development as proposed would deliver 198 student bedrooms along with 84 sqm (gross) of community space.

Community space

The development as proposed would deliver 84 sqm (net) of community space. Due to the variable nature of community space, it is difficult to predict what level of economic activity this space would support. Taking the median figure for "co-working space" of one employee per 12.5 sqm would suggest that the space could, if fully occupied, directly support seven FTE jobs ($84 \div 12.5$). Using the mean GVA per annum for the "other services activities" sector (which includes "organisations supporting community and educational facilities") of £21,340 per employee would give an estimated GVA per annum of £0.15 million (2016 prices) ($\pounds 21,340 \times 7$). Multiplier effects could be expected to support a further two FTE jobs and £0.07 million of GVA per annum, giving a total impact of nine FTE jobs and £0.22 million of GVA per annum (2016 prices).

Class 8 - Residential institutions

The development as proposed would deliver 198 student bedrooms. These could be expected to support economic activity via the expenditure of their residents. Based on

average levels of student expenditure in the UK (adjusted to control for lower levels of household expenditure in Scotland) the residents of the 198 bedrooms could be expected to collectively spend approximately £3.75 million per annum (2016 prices). Of this £3.75 million, it is estimated that approximately £3.24 million could reasonably be expected to primarily be made within Edinburgh. This £3.24 million could be expected to directly support approximately 44 FTE jobs and £1.75 million of GVA per annum (2016 prices), primarily in the education and real estate sectors (i.e. jobs in higher education supported by fees and jobs within the student accommodation provider supported by rents). Multiplier effects could support a further 12 FTE jobs and £1.75 million of GVA per annum (2016 prices) for a total of 55 FTE jobs and £2.62 million of GVA per annum (2016 prices).

Total impacts

Overall, it is projected that the development could directly support 51 FTE jobs and £1.90 million of GVA per annum (2016 prices). Taking multiplier effects into account would increase this to 64 FTE jobs and £2.84 million of GVA per annum (2016 prices).

Other considerations

61 and 63 London Road form part of a stretch of single-storey commercial units on the southern side of London Road that have been identified as having potential for high-density redevelopment. It is noted that the windows on the western elevation of the proposed development are very close to the site boundary which could potentially constraint any future redevelopment of 65 London Road.

SUMMARY RESPONSE TO CONSULTATION

It is estimated that the proposed development could directly support approximately 51 FTE jobs and £1.90 million of GVA per annum (2016 prices). By comparison, it is estimated that the existing buildings could, if fully occupied, directly support approximately eight FTE jobs and £0.24 million of GVA per annum (2016 prices). This indicates that the development could be expected to support an additional 43 FTE jobs and an additional £1.66 million of GVA per annum (2016 prices).

This response is made on behalf of Economic Development.

Craigentiny and Meadowbank Community Council's

This letter offers comments on the application following participation in consultation with local communities and individual conversations with residents and businesses around the proposed development.

For this proposal, Summix reached out to the community council very early in the process, they have also participated in several community council meetings where they took comments and questions from the attendance, there were also two consultations which were well attended.

From the application we were able to see the efforts put into the bin management strategy and the access to cycle racks for the residents. We were disappointed to not see any provisions for carbon offset possibilities such as solar panels on the roof of the proposed build.

Local residents expressed their objections to the plans as they are concerned about the addition to the already excessive concentration of student accommodation in the area. The council would benefit from making updates to the Housing policies which relate to student accommodation and make the policy clearer for applicants and objectors.

If the application were to be granted the community council would urge the developers to encourage that the residents of the student accommodation nominated representatives to participate in the community council meetings and other local groups, this would ensure a better connection between local residents and the student population thus increasing the likelihood of students becoming part of the community.

Roads Authority

No objections to the application subject to the following being included as conditions or informatives as appropriate:

- 1. Contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;*
- 2. The works to close the existing redundant access must be carried out under permit and in accordance with the specifications. See Road Occupation Permits http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point*
- 3. The applicant proposes to provide 2 car club spaces within the site. A contribution of £12,500 (£1,500 per order plus £5,500 per car) will be required but this does not require to form part of any legal agreement;*
- 4. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables and realtime display within the building for local public transport;*
- 5. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved.*

Note:

- o Parking is proposed at the following level and is considered acceptable:*
- o zero general car parking;*
- o 2 disabled car parking spaces;*
- o 2 car club spaces;*
- o 5 visitor cycle parking spaces;*
- o 198 secure cycle parking spaces*
- o The proposed development is not expected to generate more than single figure car trips;*
- o A draft travel plan has been submitted as part of the application.*

Flood Prevention

We have reviewed the documents and are happy for this application to be determined with no further comment from our department.

Police Scotland

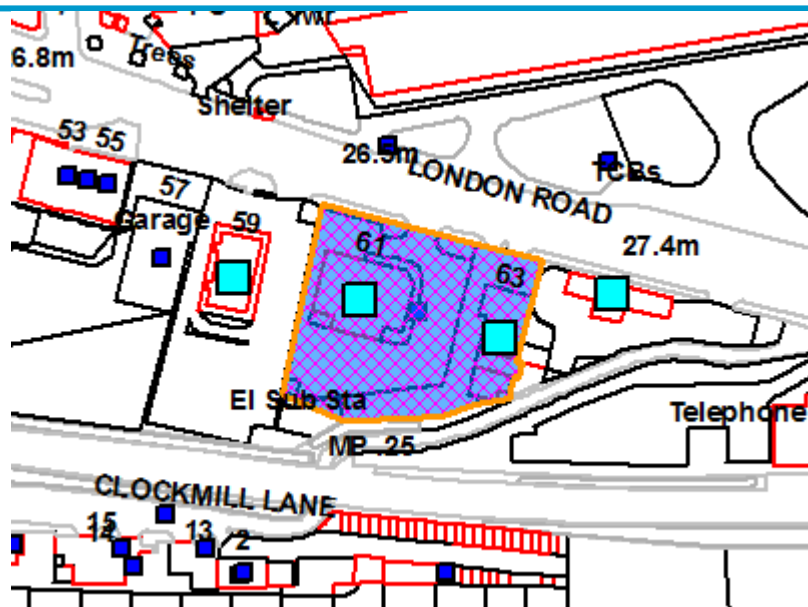
I write on behalf of Police Scotland regarding the above planning application.

We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.

Environmental Assessment

- o We need confirmation / information to indicate that the plant machinery from McDonalds and from both the existing and proposed substation will meet expected criteria (we normally look for NR20 to be met for substations due to their tonal nature).*
- o In addition, an assessment would need to be made to demonstrate the proposed equipment within the development will meet NR25 when measured in any of the living apartments.*
- o We would also need to have a much clearer idea of what the community space would be used for (e.g. Class 10 or Class 11? And we would have issues with some of the options within those classes). Once there was a clearer idea of what the space might be used for, we would need the NIA to demonstrate that noise generated from the community space will meet NR15 in the rooms above.*

Location Plan



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