Development Management Sub Committee

Wednesday 16 December 2020

Application for Planning Permission 20/03478/FUL At 65 London Road, Edinburgh, EH7 6AA Demolition of existing buildings and erection of purposebuilt student accommodation and associated landscaping and infrastructure.

Item number

Report number

Wards

B14 - Craigentinny/Duddingston

Summary

The proposal complies with the development plan and other material considerations. The development is acceptable in this location and will not lead to an overconcentration of the area's student population. The overall design concept responds effectively to the surrounding context and is acceptable in terms of its scale, form and design. There will be no unacceptable impact on residential amenity, road safety or air quality. The proposal is acceptable and there are no material considerations that outweigh this conclusion.

Links

Policies and guidance for this application

LDPP, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LHOU08, LEN21, LTRA02, LTRA03, NSG, NSGD02, NSGSTU,

Report

Application for Planning Permission 20/03478/FUL At 65 London Road, Edinburgh, EH7 6AA Demolition of existing buildings and erection of purposebuilt student accommodation 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 0.17 hectares in size and is situated on the south side of London Road. The site is currently occupied by a car wash with a vehicular access to the eastern end of the site directly onto London Road. The wider area has a mixture of residential and commercial uses.

To the north is the site of the new Meadowbank Sports Centre, which is currently underway. The site immediately to the west is currently under development for student accommodation. The developer of the neighbouring site has acquired the application site with the intention of combining the two buildings. To the east is the entrance to the narrow Clockmill Lane with a BT Exchange building beyond. Clockmill Lane continues to bound the site to its south with the East Coast Mainline beyond.

2.2 Site History

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 five storeys, comprising 30 flats, and including all associated landscaping, parking and ancillary facilities (as amended) (reference number - 17/03633/FUL).

Adjacent Sites

61-63 London Road

27 June 2019 - Planning permission granted for the erection of mixed-use development including student accommodation and ancillary uses, commercial unit, and associated landscaping and infrastructure (reference number - 19/01149/FUL).

Meadowbank Stadium

8 October 2020 - Application approved for matters specified in condition 1 of 18/00154 PPP for the proposed redevelopment of surplus land at Meadowbank Sports Centre

with mixed uses including residential and commercial, together with roads, landscaping, drainage and ancillary works (reference number- 20/00618/AMC).

- 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).

Main report

3.1 Description Of The Proposal

The proposal is to demolish the existing car wash building on the site and erect a sixstorey block of purpose-built student accommodation. The student accommodation will comprise 76 student bedrooms provided in the form of 72 studio bedrooms and four accessible studio bedrooms. A total of 199sqm of amenity space will be provided within the development, including common rooms and entrance lobby.

Planning permission has previously been approved on the site for a residential development. However, this proposal entailed building over a sewer that runs beneath the site's frontage with London Road. Subsequent discussions with Scottish Water have established that this sewer cannot be built over, thereby rendering the residential scheme undeliverable.

As a result, the site was re-marketed and acquired by the developers of the neighbouring site at 61-63 London Road, to which it is proposed to link the development.

Due to the location of the sewer beneath the site and the positioning of the adjacent block, the building will be set back from London Road. The building will be six storeys in height with a turret element on its eastern corner. The predominant facade material will be brick with a pre-cast concrete plinth around the base.

A corridor link is proposed between the proposal and the development at 61-63 London Road. This link between the buildings is at levels 1 to 5 and is set back from the building line fronting London Road.

Access is proposed via London Road and will be shared with the adjacent development on the site's northern boundary. The existing access point on the east of the site will be removed.

Ancillary elements such as cycle parking, bin stores, sub-stations and landscaping will be consolidated between the site and its neighbour. A non-material variation will be submitted for the neighbouring proposal to reflect the changes.

Cycle parking will be provided in a secure enclosure with capacity for 198 bicycles with an additional 12 visitor spaces in Sheffield stands. No car parking spaces will be provided but the occupants will have the use of the two disabled parking spaces and two car club spaces within the building's curtilage and provided through the neighbouring development.

Supporting Information

The following information was submitted in support of the application:

- Design and Access Statement;
- Planning Statement;
- Drainage Strategy and Surface Water Management Plan;
- Flood Risk Assessment:
- Air Quality Impact Assessment;
- Archaeological Desk-Based Assessment;
- 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; and

e) The representations have been addressed.

a) Principle

LDP policy Hou 8 (Student Accommodation) supports the development of purpose-built student accommodation subject to the following two requirements. 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.

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. While criterion b) advises that 'outwith criterion a) student housing will generally be supported on sites with less than 0.25 hectares of developable area'. This site does not share a boundary with a university or college campus. However, the total site area is 0.17 hectares. Therefore, the proposal complies with both criteria, provided that there is no cumulative impact from student housing.

Criterion c) advises that 'outwith criteria a) and b) sites identified as having a high probability of delivering housing within Map 5 taken from the LDP Housing Land Study (June 2014) and sites with greater than 0.25 hectares of developable area must comprise a proportion of housing as part of the proposed development'.

The site is identified in the LDP Housing Land Study as having a low probability of delivering housing and therefore does not contribute towards the housing land supply.

The site also complies with the second part of criterion c) as the site is less than 0.17 hectares. However, the current proposal is by the developer of the neighbouring site. If the sites were combined, they would have a total area of 0.46 hectares. The supporting text for the SHG locational criteria states that 'to avoid the sub-division of sites the applicant shall be required to demonstrate that the site did not form part of a larger area, within a single control or ownership, on 25th February 2016'. It has been confirmed that the sites were under separate ownership and control in February 2016, with the opportunity for the current developer to acquire the site arising as a result of the unimplementable permission granted in 2018.

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

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.

The area is calculated using data zones from the 2011 census. As the individual data zones are tightly drawn, considering them in isolation does not give an accurate reflection of the population demographic within the local area. While there is no definition of what constitutes an 'area' for the purposes of calculating student population, it is normal procedure to use the proposed development's data zone and those that surround it. Using this method considers a wider catchment and provides a more accurate representation of the local population.

The student population within the area is based on 2011 census data and the National Records of Scotland's Special Area population Estimates 2018. This data is then adjusted to include consented developments in the area to provide a 2020 figure. The 2020 figure assumes that all pending and consented applications for Purpose Built Student Accommodation (PBSA) have been granted and are fully occupied. However, it should be noted that the Meadowbank Stadium site, which proposes 596 residential properties, is within the area but is not included in the calculation. While there will be no PBSA on the site, the properties may be attractive to students wishing to live in private lets. However, there is no way of establishing accurate data on future population demographics within the development at this stage.

The student population figure in the calculated area, including the proposed development, would be approximately 25%. This proportion would not lead to an overconcentrated student population in the area and meets criterion b) of policy Hou 8 and the SHG.

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. However, the recent approval of a masterplan for the redevelopment of the Meadowbank Stadium site is demonstrative of the significant change taking place in the area.

In terms of its height and massing, the building matches the scale of the adjacent development. The design and form are simple, utilising rhythmic fenestration to tie through with its neighbour at 61-63 London Road. The building acts as a bookend to the urban block and features a turret element on its corner to replicate the turrets contained on the corners of traditional tenements in the area. The proposal demonstrates a clear design concept and the architecture includes modest contemporary elements that are appropriate in its context.

The façade of the building will be set back from the site boundary. While this setback is necessary due to the sewer beneath the site, the scale of the building ensures that the frontage addresses the street and will be in keeping with the traditional built form in the area. This form of development will strengthen and improve the existing street frontage along this edge and is appropriate in this context. The rear of the building will provide passive surveillance to Clockmill Lane, creating a more welcoming pedestrian environment.

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. 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 facade materials will be facing brick with a pre-cast concrete plinth at ground floor and dark grey window frames. The brick detailing will be high quality and selected to complement the tone and colour of the neighbouring development and nearby tenements. The proposed mix of materials is acceptable in principle, subject to a pre-commencement condition requiring the submission of a detailed specification.

As the proposal will effectively be an extension of the ongoing development on the neighbouring site, ancillary facilities such as cycle parking, bin stores and sub-stations will be consolidated within the site. This will allow these elements to be provided in specific parts of the site and prevent the area in front of the building from appearing cluttered.

In summary, the building heights and massing responds effectively to the surrounding context and allows the proposal to integrate into the surrounding area. The proposal is a contemporary design that is appropriate to its location. The impact of the development on its setting has been assessed and the redevelopment of the site will not have a detrimental impact on the setting and wider townscape. The proposed development is an acceptable form of development 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. As a result, a Noise and Vibration Impact Assessment (NVIA) has been submitted in support of the development. The NVIA 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 has confirmed that the mitigation measures outlined in the NVIA are sufficient to ensure a suitable level of residential amenity for the occupants of the accommodation.

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 under the consent for the neighbouring site. The residents of this proposal will also have access to this area. This area is south-facing at the rear of the building and will provide an adequate outdoor space for the residents.

Other than the neighbouring development, the proposal is not located in close proximity to any residential development. Therefore, the development will not impact on the amenity of any residential accommodation in the area in terms of loss of sunlight, daylight, overshadowing or privacy. In addition, the proposal will provide an appropriate level of amenity for future occupants.

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

d) Transport and Air Quality

Transport

Parking for vehicles and cycles will be rationalised across the two neighbouring developments. The development proposes no general car parking spaces with two disabled car parking spaces and two car club spaces having been previously approved on the adjacent site. An additional 76 cycle parking spaces will be provided in a secure, covered enclosure. The previously approved enclosure for the neighbouring site will be relocated and enlarged to provide the additional capacity in a single location on the site. An additional 12 visitor cycle parking spaces will also 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.

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. Environmental Protection has confirmed that the AQIA demonstrates compliance with the relevant air quality objectives.

(e) Public Comments

- Site should be developed with residential homes, not student accommodation addressed in section 3.3(a);
- The height of the proposal is too high addressed in section 3.3(b);
- No need for more student housing in the area addressed in section 3.3(a);
- Overshadowing of existing properties addressed in section 3.3(c);
- Impact on air quality addressed in section 3.3(d);
- The proposal ruins views addressed in section 3.3(b);
- Parking in the area is currently difficult and the development will exacerbate this issue - addressed in section 3.3(d); and
- Impact on GP surgery infrastructure not identified as a requirement in the Finalised Supplementary Guidance.

CONCLUSION

The proposal complies with the development plan. The development is acceptable in this location and will not lead to an overconcentration of the area's student population. The overall design concept responds effectively to the surrounding context and is acceptable in terms of its scale, form and design. There will be no unacceptable impact on residential amenity, road safety or air quality. The proposal is acceptable and there are no material considerations that outweigh this conclusion.

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

3.4 Conditions/reasons/informatives

Conditions:-

- 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.
- 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. No demolition/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.
- 6. Prior to the first occupation of the development, the mitigation measures as detailed in the Sandy Brown Associates Noise Impact Assessment, ref: 20311-R01-A, dated 6 August 2020, should be implemented; namely: the following facade sound insulation is required, with appropriate passive ventilation:

 North facing facades: R'w+Ctr 35 dB

 South and west facing facades: R'w+Ctr 33 dB.

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.
- 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 safeguard the interests of archaeological heritage.
- 6. In order to protect the amenity of the occupiers of the development.

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.
- 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. The applicant should be required to provide 3 motorcycle parking spaces in a secure and undercover location to meet Council parking standards.

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 is not subject to 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

A total of 25 representations have been received. Of the representations, 23 objected to the proposal and two were in support.

A summary of the comments is contained in the assessment section of the report.

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 24 August 2020

Drawing numbers/Scheme 01 - 11,

Scheme 1

David R. Leslie
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Alex Gudgeon, Planning Officer E-mail:alexander.gudgeon@edinburgh.gov.uk

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 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 20/03478/FUL At 65 London Road, Edinburgh, EH7 6AA Demolition of existing buildings and erection of purposebuilt student accommodation 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 demolition of existing buildings and erection of purpose-built student accommodation and associated landscaping and infrastructure.

As described in AOC Archaeology's Desk-Based Assessment (Report 25203) the site lies on the northern side of Clock Mill Lane, the medieval road linking the Canongate with Restalrig. The western edge of theist may also overly a post-medieval drainage ditch/burn. I concur therefore with the report's 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), PAN 02/2011, HES's Historic Environment Policy for Scotland (HEPS) 2019 and CEC's Edinburgh Local Development Plan (2016) Policies ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

The proposed development will require significant ground breaking and landscaping works associated with demolition of current building occupying the site and the construction of the new development. I concur with AOC's conclusions that such works have a moderate-low impact with 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 demolition/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 20/03478/FUL for the development of student accommodation at 65 London Road, Edinburgh.

Commentary on existing uses

The application relates to a car wash at 65 London Road. The economic impact of the existing building cannot be estimated, but is unlikely to be significant.

The site is 0.16 hectares. Accordingly, the requirement set out in policy EMP 9 of the Edinburgh Local Development Plan for the redevelopment to incorporate "floorspace designed to provide for a range of business users" does not apply.

Commentary on proposed uses

The application proposes the comprehensive redevelopment of the existing site, delivering 76 student bedrooms.

Sui generis (student accommodation)

The development as proposed would deliver 76 new student bedrooms. These would not be expected to directly support any economic activity. However, the bedrooms could be expected to support economic activity via the expenditure of the students. Based on average levels of household expenditure in Scotland, the residents of the 76 bedrooms could be expected to collectively spend approximately £1.49 million per annum. Of this £1.49 million, it is estimated that approximately £1.29 million could reasonably be expected to primarily be made within Edinburgh. This £1.29 million could be expected to directly support approximately 16 FTE jobs and £0.64 million of GVA per annum (2017 prices).

SUMMARY RESPONSE TO CONSULTATION

It is estimated that the proposed development would support approximately 16 FTE jobs and £0.64 million of GVA per annum. The economic impact of the existing buildings cannot be accurately estimated but is unlikely to be significant.

This response is made on behalf of Economic Development.

Environmental Protection

Environmental Protection has no objections to this application subject to the below conditions:

1. Prior to the use being taken up, the mitigation measures as detailed in the Sandy Brown Associates Noise Impact Assessment, ref: 20311-R01-A, dated 6 August 2020, should be implemented; namely: the following facade sound insulation is required, with appropriate passive ventilation:

North facing facades: R'w+Ctr 35 dB

South and west facing facades: R'w+Ctr 33 dB

- 2. Prior to the commencement of construction works on site:
- a. A site survey (including intrusive investigation where necessary) must be carried out to establish to the satisfaction of the Planning Authority, 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 remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.

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 to the satisfaction of the Planning Authority.

The proposal plans to develop student accommodation at the site of a current car-wash unit. The site is bounded to the south by a railway line and to the north by London Road, a major arterial route into the city.

Environmental Protection has concerns over the historic use of the site, as this may have resulted in ground contamination. A condition is recommended to ensure the site is suitable for the proposed use.

As this part of London Road forms part of the Central Air Quality Management Area, an Air Quality Impact Assessment has been submitted by the applicants, demonstrating compliance with the relevant air quality objectives.

Environmental Protection did have concerns in relation to the residential amenity of the occupants of this development due to noise and vibration from the various transport sources. The applicant has submitted a noise impact assessment by Sandy Brown Associates, which demonstrates that noise and vibration from the railway movements would meet our expected standards. It also concludes the noise from traffic on London Road will be unacceptably high in the proposed residential dwellings facing onto the road and therefore suggested mitigation measures.

Environmental Protection considers that the recommended measures are likely to ensure a suitable level of residential amenity for the occupants of the proposed property

Environmental Protection therefore has no objections to this application, subject to the above conditions.

Flood Prevention

This application can proceed to determination with no further comments from our department.

Scottish Water

Thank you for allowing Scottish Water to review and comment on the above site I have assessed these sites and make the below comments.

Existing Infrastructure within Site

Scottish Water Records indicate that there is a 375mm Vitrified Clay combined sewer on site that currently flows from east to west beneath the existing building.

Please note that Scottish Water records are indicative only and your attention is drawn to the disclaimer at the bottom of this letter. It is the applicant's responsibility to accurately locate the position of the pipe for line and depth on site and confirm the size and its material of construction.

The stand-off distance for this asset is 3.0 - 6.0 m the outside edge of the sewer, dependent on its confirmed depth. No building, private garden or other obstruction should be located within the stand-off distance of a sewer. If this access distance cannot be met, the sewer should be diverted around the perimeter of the new development.

An asset impact application showing proposals should be submitted to Scottish Water for review by the Asset Impact Team as soon as possible to prevent any possible delays to construction.

Scottish Water Disclaimer: "It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Transport

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

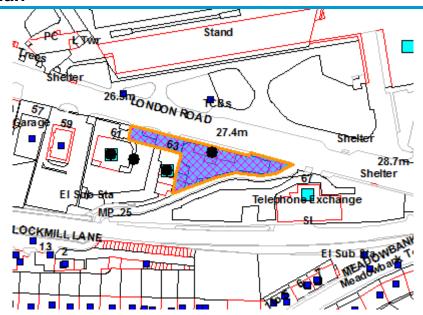
1. The applicant should be required to provide 3 motorcycle parking spaces in a secure and undercover location to meet Council parking standards.

Note:

The proposed 76 student and 12 visitor cycle parking spaces and zero car parking is acceptable.

A draft travel plan has been submitted.

Location Plan



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