

Development Management Sub Committee

Wednesday 25 February 2015

**Application for Planning Permission 14/02288/FUL
At 195 - 213 Causewayside, Edinburgh, EH9 1PH
Demolition of existing printing works and development of
new purpose built student residential accommodation in flat
and townhouse format. Associated student reception/social
hub to ground floor - Scheme 2.**

Item number	5.1
Report number	
Wards	A15 - Southside/Newington

Summary

The proposal complies with part a) and b) of the adopted policy Hou 10 and would not result in an excessive concentration of students within the locale.

It is considered that the additional information submitted and assessed addresses the issues raised by Committee on 19 November 2014. Approval is now recommended subject to the conditions and informatives set out in the addendum to this report.

Outcome of previous Committee

This application was previously considered by Committee on 19.11.2014

It was recommended for refusal. The application was continued by Committee for further detailed information to be submitted on the following issues:

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- Daylighting;
 - overlooking and loss of privacy;
 - impact on neighbouring amenity;
 - cycle parking;
 - design and finishes;
 - surface water management plan; and
 - economic development views on relocation of printing works.
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This additional information has been assessed and it is now considered that the proposal is acceptable. The assessment of the additional information is set out in the addendum to the report. Approval is now recommended.

Links

[Policies and guidance for this application](#)

LPC, CITD1, CITD3, CITD4, CITD6, CITE9, CITH4, CITH10, CITEM4, CITT5, NSG, NSGSTU,

Report

Application for Planning Permission 14/02288/FUL At 195 - 213 Causewayside, Edinburgh, EH9 1PH Demolition of existing printing works and development of new purpose built student residential accommodation in flat and townhouse format. Associated student reception/social hub to ground floor - Scheme 2.

Recommendations

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

Background

2.1 Site description

The application site is an 'L' shaped area of 1894 square metres located to the south of the city centre. The site currently fronts Causewayside with a two storey 1960's style building and is located between a five storey tenement building to the north of the site and a four storey red brick building to the south that is Category B listed (Ref 43147). There are a number of buildings to the rear of the site that vary in size, style and design covering a large footprint as well as an electricity substation that does not fall within the application boundary. The area is characterised by a mixture of residential and commercial uses. To the east of the site lie three storey stone built residential properties on Upper Gray Street which are located adjacent to a modern four storey 'u' shaped flatted development.

The site is presently occupied by Paramount Printers.

2.2 Site History

There is no relevant planning history for this site.

Main report

3.1 Description Of The Proposal

The amended scheme is for the demolition of the existing buildings and for the development of new purpose built student residential accommodation in flat and townhouse format. This will provide a total of 152 study bedrooms in a mix of studio bedrooms with compact kitchens for self catering and study bedrooms in three storey townhouse accommodation with kitchen/living/dining space on the ground floor.

The building is proposed to have its main frontage onto Causewayside (Block A) and is four storeys high with the fifth and sixth storey stepped in from the adjacent building at number 215 Causewayside and back from the front building line.

This elevation will have a vertical emphasis punctuated with large windows. To the rear of this building is a five storey finger block which will project 18.5 metres back into the site and sit 4.9 metres off the boundary to the north west. This will be flat roofed and will have windows on both the north and south elevation. The materials proposed are a grey/buff blend brickwork with a roman brick base random bonding for the ground floor with aluminium windows.

To the rear of the site, two lower blocks (Block B and C) are proposed following the north to south boundary. These will be three storeys in height with windows proposed on the front and rear elevation and green roofs. Materials proposed are brick, metal cladding panels to the windows.

Access for vehicles and cycles is proposed to be taken via an existing access between the printworks and the building at 215 Causewayside. There are no car parking spaces provided within the site with the exception of two parking spaces which will be adjacent to the ground floor. Access at the beginning and end of term will be organised by the management of the accommodation to allow for dropping off. There are 60 cycle spaces provided in a secure covered area to the rear of the building fronting Causewayside.

Pedestrian access is proposed to be taken from the main entrance on Causewayside where there will be a reception area. Access to the student accommodation is via the main reception. Access to the townhouses at the rear will be via the paved mews area.

Landscaped areas will be provided on the either side of Block A and around the perimeter of Block B and C.

Scheme 1

The scheme has been reduced from 187 units. The scale of the rear finger and townhouses has been reduced in both scale and numbers.

Supporting Statement

The applicants have submitted a supporting statement. This information is available to view on the Planning and Building Standards On-line Services.

3.2 Determining Issues

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 is acceptable;
- (b) the proposed scale, design and materials are acceptable;
- (c) the proposal is acceptable in terms of the impact on the amenity of neighbours;
- (d) the proposal is acceptable in terms of road safety, parking, drainage and archaeology;
- (e) the proposal is acceptable in terms of equalities and human rights; and
- (f) material representations have been addressed.

a) Principle of Development

Paragraph 6.37 of the Edinburgh City Local Plan acknowledges there is a need for more purpose built student housing and that it is preferable in principle that student needs are met as far as possible in purpose built and managed schemes rather than in the widespread conversion and use of family housing stock.

The proposals need to demonstrate they are consistent with the relevant policy criteria in ECLP Hou 10 (Student Housing) (a) and (b). The non statutory guideline on student housing is supplementary to the Edinburgh City Local Plan Hou 10 and is a material consideration in the determination of this application. The criteria in Policy ECLP Hou 10 are applied to proposals for student accommodation using the locational guidance set out in the guideline.

Part (a) of Policy Hou 10 requires that the location is appropriate in terms of access to public transport, university and college facilities. Causewayside is centrally located and is well served by a number of bus routes. It is also within easy walking distance to the University of Edinburgh (George Square) approximately 0.9 miles and the Kings Buildings campus approximately 1.0 miles. This development therefore complies with Part a) of the Policy Hou 10 in relation to student housing.

Policy Hou 10 (b) states that the proposal must not result in an excessive concentration of student accommodation in any one locality.

Student housing is generally acceptable in and adjacent to main campuses. In other locations with good access to university and college facilities by public transport purpose built student accommodation will be acceptable provided it does not result in a student population of 30% or more in the locality. The area is characterised by a range of land uses including residential, retail and office use. The site is also located a short distance from Minto Street and South Clerk Street which has a bustling commercial character. The application site is located across two census data zones (S01001981) and (S01001983) and the existing combined concentration of student accommodation for these two data zones is 30.37%. The proposal to accommodate a further 152 bed spaces would increase this concentration to 36.24%. This exceeds the 30% concentration threshold set out in the approved 2009 Student Housing Non Statutory Guideline.

Taking account of the overall character of the area and the balance of commercial and residential use, it is considered that 36.24% is not an excessive concentration of student accommodation in this locality. This proposal is an acceptable exception to the guideline and therefore complies with Policy Hou 10 (b).

The non statutory guideline on Student Housing is currently being reviewed and a recent appeal decision relating to student housing at Bernard Terrace/Lutton Place (PPA-230-2122) is subject to a legal challenge. It is not considered that these factors should be given any weight as material considerations in the determination of this application.

As this proposal involves land that is in employment use, Policy Emp 4 is also relevant. This policy states that development incorporating uses other than business, industry or storage will be permitted provided the proposal includes a significant element of new floorspace designed to provide a range of business users. It also states that the introduction of non-employment uses should not prejudice or inhibit the activities of any nearby employment uses, and that the proposal should contribute to the comprehensive regeneration and improvement of the wider area. The proposed development would be contrary to policy Emp 4 criterion a) as the current employment use is not being replaced as no new floorspace is being proposed.

The supporting statement outlines that the premises currently occupying part of the site is coming to the end of its useful life as a feasible printers operation. The owner is currently in discussion with Economic Development and Scottish Enterprise regarding the relocation and availability of premises.

The applicant provided an Economic Impact Assessment which concluded that the redevelopment and relocation of the printers would increase employment from 20 FTEs to 30 FTEs.

In addition, policy Emp 9 of the Second Proposed Local Development Plan is a material consideration. Criterion c) of Emp 9 states that when redeveloping sites for uses other than business and industry if the site is larger than one hectare, new floorspace for a range of business users must be provided. Since the site is less than one hectare, no new floorspace for business and industry would be required.

Therefore, due to the revised policy in the emerging Local Development Plan, the constraints of the site, adjoining residential land uses and difficulty in renting the units, the proposal is a justified exception from adopted policy Emp 4.

Conclusion

The principle of student housing development on this site is acceptable.

b) Scale, form and design

Policy Des 3 states that developments should have a positive impact on their setting having regard to the positioning of buildings on the site, their height, scale and form, materials and detailing and wider townscape and impact on views. The neighbouring buildings fronting Causewayside are of varying heights and the appropriate reference within this streetscape should be the cornice level of the adjacent listed building.

The overall height of the proposed building sits at odds with the adjacent historic buildings. Whilst the upper two floors have been stepped in from the neighbouring building and back from the front building line, this creates an over dominant feature. The scale and proportions of the elevations on Causewayside also create an inharmonious relationship with the historic streetscape.

Whilst the rear of the site is densely covered with buildings of a varied age, style and design, which has evolved with the commercial nature of the site, the proposed five storey finger building coupled with the two blocks of townhouses creates an over dominant form to the rear of this urban block detrimental to the character of the wider area.

The use of brick is considered appropriate to the area.

c) Neighbouring amenity

Policy Des 3 states that the amenity of occupiers or neighbours should not be materially harmed by effects on privacy, daylight, sunlight or immediate outlook. While it is acknowledged that the frontage of the proposed development does not cause any detrimental impacts on amenity, the proposed buildings to the rear present a level of development that requires a rigorous assessment under this policy.

The applicant submitted a Daylight and Sunlight Assessment for Scheme 1; however no assessment was submitted with regards to Scheme 2. A full assessment could not be made on the impact the development would have in respect of the adjacent properties to the site, their garden spaces and the new amenity spaces created within their own site.

The finger building sits approximately 5 metres off the boundary with the neighbouring tenement. In townscape terms this is not considered a reasonable privacy distance and the proposal will result in increased overlooking to the neighbouring gardens to the detriment of their amenity. The scale of the townhouses (Block C) result in five of the windows on the rear elevation at the first and second floors being angled to address overlooking to the gardens of the residential properties on Upper Gray Street. Given the scale of the development and the proximity to the rear boundary, approximately 3 metres, it is not considered that the windows will provide an adequate separation distance to the boundary. In Block B, one window is proposed on the ground floor of the rear elevation with none at the upper levels. Windows are proposed on the north and south elevations and whilst the building is approximately 3.5 metres off the boundary to the north, this will overlook a car park and will not result in any privacy issues.

Environmental Assessment has assessed the Noise Assessment submitted and on the basis of the information submitted they cannot recommend support of the application at this time.

d) Roads, Parking and Drainage

Transport has indicated that there are no objections to the access and parking arrangements for the proposed development. They have raised concerns regarding the number of cycle parking spaces provided in Scheme 2.

The development proposes to provide 60 on site cycle spaces. This is not in line with the current council parking standards which requires a minimum of one cycle space per bed and will not be supported.

With regards to drainage, there is insufficient information relating to a surface water management plan and details would need to be submitted and approved prior to any development taking place on the site.

With regards to archaeology, there is no objections to the application subject to conditions being applied relating to a written scheme of investigation being applied to any consent for the site.

e) Equalities and human rights

The application was assessed in terms of equalities and human rights. In summary, the building would be fully accessible to those with varying needs relating to the mobility, sight impairment, hearing impairment and varying degrees of disability. An Equality and Human Rights Assessment is available to view on the Planning and Building Standards Online Service.

f) Public comments

The material points raised were;

- over concentration of students -this has been addressed in section 3.3a).
- scale and density of proposed development - this has been addressed in section 3.3b).
- loss of privacy - this has been addressed in section 3.3c).
- traffic issues - this has been addressed in section 3.3d).
- lack of cycle storage - this has been addressed in section 3.3d).

In support of the application the following comments were made:

- the proposed development will produce additional footfall; and
- create more business activity.

Community Council

Comments relate to the scale and density of the development, noise issues, overlooking, parking issues. These points are addressed in sections 3.3b), c) and d).

Conclusion

The proposal complies with part a) and b) of the adopted policy Hou 10 and would not result in an excessive concentration of students within the locale.

The proposal is contrary to adopted policy Des 3 as the proposal by way of it's scale, height and massing creates an over dominant form to the front and rear of this urban block which is detrimental to the character of the wider area. The proposal is also contrary to the non statutory Edinburgh Design Guidance as the development will have a detrimental impact on the amenity of neighbouring premises.

It is recommended that the application is refused for the following reasons

Reasons:

The proposal is contrary to Policy Des 3 of the Edinburgh City Local Plan and the non statutory Edinburgh Design Guidance as the development will result in a detrimental impact on the amenity of the neighbouring premises.

The proposal is contrary to Policy Des 3 and Hou 4 of the Edinburgh City Local Plan, as the proposal by way of it's scale, height and massing creates an over dominant form to the front and rear of this urban block which is detrimental to the character of the wider area.

Addendum to Assessment

The application was considered at the Development Management Sub-Committee on 19 November 2014.

Committee continued the application for further detailed information on the following issues:

Daylighting

A full Daylight and Sunlight Assessment has been submitted. The daylighting assessment demonstrates that the impact of the proposed development on 191 and 215 Causewayside will improve the current situation to these neighbouring properties. Accordingly the proposed complies with the non statutory Edinburgh Design Guidance, in this regard.

Overlooking and loss of privacy

The applicant has angled the first to fourth floor windows within the finger building. The windows are positioned to look away from the neighbouring residential tenement and occupants of the development will have a restricted view of the garden looking in an easterly direction. Block C will reduce the angle of the windows at the first and second floor so the view is further restricted to the gardens of the properties on Upper Gray Street. On balance this is considered to provide an adequate level of privacy for occupants of adjoining properties.

Impact on neighbouring amenity

The impact on sunlight to existing gardens and spaces has been analysed in the Daylight and Sunlight Assessment. This demonstrates that the proposed development will result in an improvement over the current site conditions. There will be no adverse impact as a result of the development and the proposal accords with the non statutory Edinburgh Design Guidance.

Environmental Services require further information regarding noise issues. It is considered that these issues can be dealt with by condition and the following should be attached to the planning permission:

Condition

Prior to the development hereby approved, details of the sound attenuation scheme for the sub-station shall be submitted and approved by the Head of Planning and Building Standards and these details shall be implemented prior to the occupation of the development.

Reason

In order to protect the future occupiers of the development.

The following should be added as an informative:

The design and installation of any plant, machinery or equipment shall be such that any associated noise complies with NR25 when measured within any nearby living apartment, and no structure borne vibration is perceptible within any nearby living apartment.

Cycle parking

The applicant now proposes a total of 108 cycle spaces for the development. Seventy of these will be provided in secure storage on the ground floor of the building fronting Causewayside. Thirty eight spaces will be provided in a covered shelter opposite Block C. The Head of Transport has raised no objections to the number, style and location of the proposed cycle parking.

Design and Finishes

The design of the building remains largely unaltered. There have been elevational changes to Block C (East elevation) and the north elevation of the finger block. These have replaced the individual screens with vertical brick columns which address the privacy issues and add visual interest to these elevations. Revised drawings have been submitted in respect of this and are available to view on the Planning and Building Standards On line Service.

In order to assess in detail the proposed materials for the development the following conditions require to be added:-

Condition

Prior to the commencement of work on site, specification and detail drawings of adequate scale, indicating the arrangement of material junctions on external elevations, shall be submitted for written approval by the Head of Planning and Building Standards.

Reason

In order to ensure the adequacy of external building materials.

Condition

Prior to commencement of works on site, sample panels, to be no less than 1.5m x 1.5m, shall be produced, demonstrating each proposed external material and accurately indicating the quality and consistency of future workmanship, and submitted for written approval by the Head of Planning and Building Standards.

Reason

In order to ensure the adequacy of external building materials.

Surface Water Management Plan

All information has been provided with regards to Drainage and Flooding and the Flood Prevention Service has no further comment to make.

Economic development views on relocation of printing works

The proposal comprises demolition and change of use of premises to form purpose built student accommodation (187 bed spaces) providing a mix of apartment and townhouse accommodation.

It is noted in the supporting planning statement that there will be a construction spend of approximately £7,500,000. This could be expected to directly support 19.7 person years of employment (equivalent to two permanent jobs). Multiplier effects would support a further 21.3 person years of employment (equivalent to two permanent jobs). This would directly support an increase in GVA of £1.69 million (2011). Multiplier effects would support a further £1.89 million. This gives a total impact from construction of approximately 41 person years of employment (equivalent to around four jobs) and uplift in GVA of £3.58 million. Economic Development is supportive of any construction related apprenticeship opportunities arising from the development if consented.

The supporting statement indicates (para 3.19) that the development is likely to reduce pressure on "traditional housing stock." This suggests that expenditure by students living in the development could be displaced from elsewhere in the city and therefore may not be additional.

It is noted in the supporting statement that the printers premises currently occupying part of the site is coming to the end of its useful life as a feasible printers operation. The printers currently employ 22 people. The relocation of the existing printers with the potential for expansion and the possibility of job creation resulting from this relocation is encouraging but subject to a number of variables that would require to be considered outwith this current planning application.

The Director of Economic Development has also stated that he would be happy to support the print works with any aspects of their relocation, should they need input.

Conclusion

It is considered that the additional information submitted and assessed addresses the issues raised by Committee on 19 November 2014. Approval of planning permission is now recommended subject to the conditions listed in this addendum and the following informatives being added:

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. The design and installation of any plant, machinery or equipment shall be such that any associated noise complies with NR25 when measured within any nearby living apartment, and no structure borne vibration is perceptible within any nearby living apartment.

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

The application was advertised on the 20 June 2014. A total of 47 letters of representation were received. These are broken down as follows:

Scheme 2

Neighbours were renotified on the 18 September 2014. This attracted 2 letters of support and 10 letters of objection. The letters of objection raised the same material issues as in Scheme 1.

Material objections were also received from the Grange/Prestonfield Community Council and West Blacket Association.

These relate to the scale and density of the development, noise issues, overlooking, parking issues.

Scheme 1

7 letters of support were received and 28 letters of objection.

The following material issues were raised:

- scale and density of proposed development;
- over concentration of students;
- loss of privacy;
- traffic issues; and
- lack of cycle storage.

Material objections were also received from the Grange/Prestonfield Community Council and West Blacket Association.

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](#)
- [Edinburgh City Local Plan and Rural West Edinburgh Local Plan](#)
- [Planning guidelines](#)

- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

The site is within the Urban Area of the adopted Edinburgh City Local Plan.

Date registered

6 June 2014

Drawing numbers/Scheme

01,03,31-33,34a-41a,43a,44a,48a,49a,51a-53a,54,55,

Scheme 2

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Links - Policies

Relevant Policies:

Relevant policies of the Edinburgh City Local Plan.

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

Policy Des 3 (Development Design) sets criteria for assessing development design.

Policy Des 4 (Layout Design) sets criteria for assessing layout design.

Policy Des 6 (Sustainable Design & Construction) sets criteria for assessing the sustainable design and construction elements of development.

Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

Policy Hou 4 (Density) sets out the factors to be taken into account in assessing density levels in new development.

Policy Hou 10 (Student Housing) supports provision of student housing on suitable sites.

Policy Emp 4 (Employment Sites and Premises) sets out criteria for development proposals affecting business & industry sites and premises.

Policy Tra 5 (Private Cycle Parking) requires cycle parking provision in accordance with levels set out in supplementary guidance.

Relevant Non-Statutory Guidelines

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 14/02288/FUL At 195 - 213 Causewayside, Edinburgh, EH9 1PH Demolition of existing printing works and development of new purpose built student residential accommodation in flat and townhouse format. Associated student reception/social hub to ground floor - Scheme 2.

Consultations

Archeaology

The site occurs at the centre of the 18th century suburb of Causewayside (officially recognised by 1771 Act) built up along the medieval road into Edinburgh across the eastern Burghmuir. During the medieval period area was dominated by the Cistercian Grange (farm) located to the west, and it is probable that his site remained one farm land until post-medieval period. Roy's 1750's map of the area (AOC's accompanying WSI wrongly locates this site on Roy's map further to the SE) indicates that building s were well established along Causewayside by this period, though it is not possible to discern if the buildings shown on this occur on this actual site. As noted in AOC's accompanying WSI by the mid-late 19th century the site has become developed comprising a mix of industrial uses including a Laundry and Printing works.

Accordingly this site has been identified as occurring within an area of archaeological potential. This application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh City Local Plan (2010) policy 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.

It is considered that this proposal given the recent development history would be regarded as having a potential moderate archaeological impact. Ground-breaking works associated with both the demolition of the current building and the construction of the scheme may disturb significant remains associated with the post-medieval and Victorian development o Causewayside and potentially also medieval activity associated with the Grange Estate. Accordingly it is essential that a programme of archaeological work is undertaken to fully excavate, record and analysis any surviving archaeological remains.

In essence this will require the undertaking of an archaeological evaluation (up to a maximum of 10% of the site) linked with a programme of historic building assessment. The results of which would allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or excavation, recording and analysis of any surviving archaeological remains prior to development including any further historic building survey work prior to demolition.

Archaeological Public Engagement

Further given the potential importance of these remains in terms of the history of Edinburgh and in particular Causewayside and The Grange, it is considered important that the programme of archaeological works contain a programme of public/community engagement. The scope of this public engagement will be agreed with CECAS and informed by the results of the evaluation works but could include public lectures, viewing points, temporary interpretation boards etc during development.

Accordingly it is recommended that the following condition be attached consent, if granted, to ensure that this programme of archaeological works is undertaken either prior to or during construction.

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, historic building recording, 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 must 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.

Environmental Assessment

Scheme 2

Environmental Assessment has considered details of the above mentioned planning application. In respect to noise, a review of the noise impact assessment has been undertaken and some short-fallings noted. These are described below.

The Assessment recommends a mechanical ventilation system for properties affected by road traffic noise from Causewayside. An internal noise limit of the system of NR22 is suggested. However as a continuous noise level this is excessive and typically the Local Authority would recommend levels more in line with NR15. It should be noted that a closed windows standard is not always necessary for an assessment of road traffic noise and therefore in that respect the mechanical ventilation may not be necessary.

Other noise limits are recommended for the plant and equipment which is to be installed on the site. The report states that the noise limit should be equal to the background level. However there is no indication whether the Local Authority's standard of Noise Rating 25 (NR25) will be achievable in bedrooms and living rooms (with windows open for natural ventilation) from this noise source.

The report does not address all commercial/industrial uses in the vicinity, including the sub-station and baptise church. Due consideration is required regarding the potential for these to affect the proposed residential amenity.

In conclusion, in respect to noise, Environmental Assessment does not recommend support of the application at this time.

Furthermore we have reviewed details of the development's sustainability plans and suggest that further information is provided in support of the application to relieve concerns about the impact the development may have on local air quality.

There is an intension to install a combined heat and power (CHP) plant which might operate on a district heating scale. It should be noted that the plant may require regulatory consent - either from SEPA (the Scottish Environmental Protection Agency) or the Local Authority depending on the size of the plant and the fuel that is used.

For smaller CHP plant (<20 MWth) the relevant regime is the Clean Air Act enforced by the Local Authority. The developer may need to formally inform the Local Authority of the installation and seek approval of any chimney (height).

Again depending on the size of the plant, the developer may be required to treat gas effluvia (with associated filtration/scrubbers) in order to control contributions to local air pollution. Full details of the plant are required in order to make this assessment.

Historical industrial use of the site indicates that there may be some contaminated land issues. However these could ultimately be addressed by way of condition on any planning permission.

In conclusion, as stated above, we do not recommend support of the application at this time.

Scheme 1

Environmental Assessment provided pre-planning advice to the applicant. It was highlighted that Environmental Assessment had several noise issues which had to be addressed in the form of a Noise Impact Assessment. This has not been carried out therefore Environmental assessment cannot support this application therefore recommend that it is refused.

Transport Planning

Scheme 2

The design and access statement for scheme two does not show the location or type or number of additional cycle space to be provided in the future if required. I understand that these spaces were to be provided in the courtyard however these would have to be secure and undercover, therefore I would assume that these would have to be indicated on the plans.

I know discussions have been had with regards to providing these additional spaces however on the basis of the scheme submitted this only shows 60 spaces which does not meet our standards therefore would not be acceptable.

Scheme 1

Whilst I have no objection to the proposed development in principle, the proposed level of cycle parking is not acceptable and is not in line with current Council parking standards.

I would therefore ask that the application be continued in order that a more acceptable level and quality of cycle parking is provided.

Reasons:

Where cycle parking for students is provided in large, high quality and secure communal areas, cycle parking numbers may be reduced to a lower rate, subject to agreement with the Council. However we consider 24% provision to be insufficient for this development given that:

- a) it is well placed to access local campuses, facilities, cycle routes and attractions by bike;*
- b) zero car parking will be provided on site and on-street parking is limited and subject to controls;*
- c) the University of Edinburgh is a major focus of cycle use growth in the city and this is expected to continue.*

The applicant should note that Transport final response will expect the following to be included as conditions or informatives as appropriate:

- 1. The footways to be continuous and access to any car parking areas should to be by dropped kerb (i.e. not bell mouth);*
- 2. The proposed cycle parking to be to the Council's satisfaction regarding specification, design, security and location;*
- 3. Any doors or gates must open inwards onto the property;*
- 4. A monitor capable of receiving an internet connection to display Public Transport Real Time information should be displayed in the reception area. (Reason to advise patrons of public transport);*
- 5. The developer / applicant to apply to Services for Communities and the relevant area roads manager for a Section 56 permit to work on or adjacent to the public highway;*
- 6. Consent should not be issued until the applicant has entered into a suitable legal agreement to:*
 - a) Provide a contribution of £10,000 to the Quality Bike Corridor between the George Square and Kings Buildings campuses. Reason - to support the use of cycles by residents of the proposed development;*
 - b) Provide a contribution of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as required for the development;*
 - c) Provide a draft Travel Plan and Management Agreement to be submitted prior to first occupation and a final Travel Plan within 3 months of that date. The Travel Plan to be monitored on a 6 monthly cycle for two years and to include financial contribution to transport promotion measures, including contributions to, or provision of, public transport season tickets and the provision of a public and sustainable transport information pack. Reason - To encourage more sustainable travel modes in line with the Local Transport Strategy policy LU 3.*

Note:

o Current Council car parking standards for student accommodation within this area (Zone 2) require zero parking provision for students, up to 1 space per 20 beds for disabled vehicles, and up to 1 space per resident staff. Therefore provision of 2 off-street parking spaces for disabled drivers is acceptable.

Flooding

Scheme 2

Please see queries/issues noted below regarding the supporting documents provided for the drainage strategy relating to the above application. The documents have been provided in response to queries raised by CEC Flood Planning via email dated 26th August 2014.

CEC Flood Planning acknowledge the receipt of MicroDrainage calculations for the 30 year, 100 year and 200 year rainfall events.

The outputs show that the discharge from the proposed drainage system to the Scottish Water combined sewer has been limited to 1 l/s using a Hydrobrake of 31mm diameter based on the requirements stated by Scottish Water in their letter dated 25th September 2014. CEC Flood Planning would normally require the discharge rate to be calculated based on the Greenfield runoff rate of the impermeable area within the site boundary, though in this instance due to the site being very small, this is unrealistic.

Reducing the discharge to 1l/s requires a 31mm Hydrobreak, which is much less than the CEC Flood Planning and Sewers for Scotland recommendation of a minimum 75mm diameter discharge pipe. The minimum pipe diameter of 75mm is requested to reduce blockage risk. The developer should clarify if this is the case and discuss relaxation of the discharge to accommodate a 75mm pipe. If the 1 l/s discharge is the maximum allowable, the developer must provide details of their proposed maintenance regime for the system to ensure the risk of blockage is mitigated.

A calculation sheet has been provided which shows the required storage for a 200 year event plus 10% climate change allowance, though no outputs for the drainage network have been provided for the event. CEC Flood planning required that the 200 year plus climate change results are provided including 20% uplift. This is as stated in the latest SEPA Technical Flood Risk Guidance for Stakeholders, version 8, February 2014. Table 1, shows uplift percentages with text below stating the requirement for a 20% uplift to be applied to peak rainfall intensity.

As per the previous CEC Flood Planning response we require pre and post development flow paths provided by the developer to show flow routes in the event of an extreme event of higher intensity than the drainage system design event, or blockage of the system. The flow arrows must be supported by inclusion of detailed ground levels in the post development scenario.

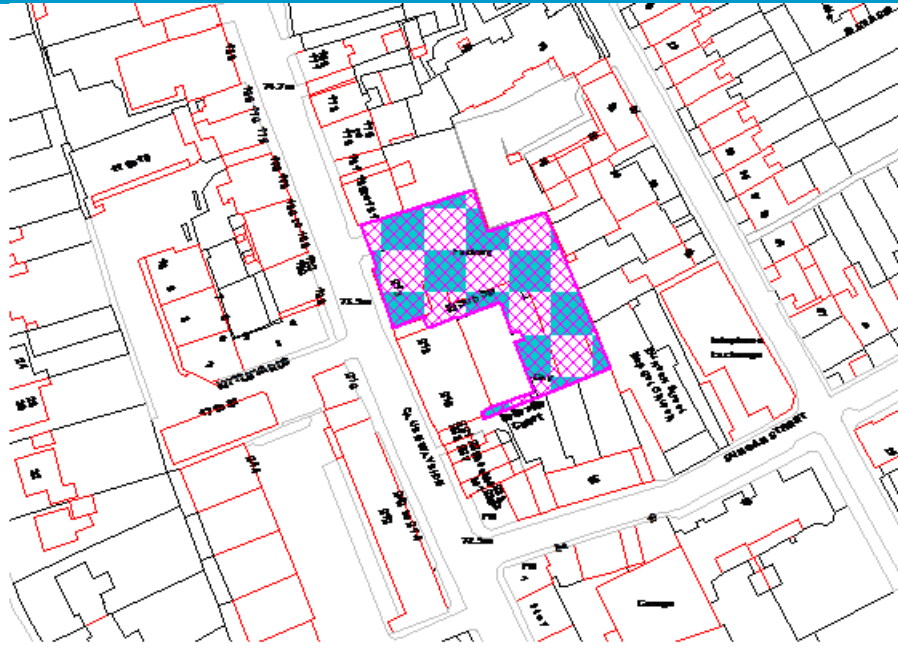
Scheme 1

With regards to the planning application 14/02288/FUL at Causewayside there is insufficient information relating to a surface water management plan included with the information provided by the developer and uploaded to the planning portal.

Please provide a copy of the CoEC summary guidelines as attached which will aid the developer in providing the information we require to undertake our consultation.

We do not require a Flood Risk Assessment for this site.

Location Plan



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