

Development Management Sub Committee

Wednesday 30 August 2017

**Application for Planning Permission 17/00077/FUL
At 36 Russell Road, Edinburgh, EH11 2LP
Student accommodation comprising 266 student bedrooms
within 56 apartments with reception, common rooms, car
parking, gym, laundry, external open space/public realm, bin
+ cycle stores, access + infrastructure works along with
demolition of existing buildings.**

Item number	7.2
Report number	
Wards	A07 - Sighthill/Gorgie (Pre May 2017)

Summary

The proposed development accords with LDP Policy Hou 8 in that it is in an accessible location and its development would not result in an excessive concentration of students in this part of the city. However, the suitability of the access in safety terms is unacceptable and is contrary to LDP Policy Des 7.

The proposal is contrary to Policy Emp 9 of the LDP as the proposed use for student housing will prejudice the activities of nearby employment use, and will not contribute to the comprehensive regeneration and improvement of the wider area.

The principle of student housing on this site is contrary to the Local Development Plan.

The proposal is contrary to LDP Policy Des 5 of the LDP as there will be adverse effects on the amenity of future occupiers of the proposed development due to the noise levels from adjacent industrial operations.

The proposal is contrary to Policy Des 2 as the height and scale of the proposal will compromise the effective development of adjacent land.

In terms of Policy Des 4 and Des 11, the height and scale of the building is considered excessive within the context of the wider townscape and the proposed height does not tie in with the prevailing heights of properties in the immediate vicinity.

The proposal is contrary to the development plan and there are no other material considerations which would justify approval of the application. It is therefore recommended that this application is refused.

Links

<u>Policies and guidance for this application</u>	LDEL01, LDES01, LDES02, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LEN20, LEN21, LEN22, LEMP09, LHOU08, LTRA02, LTRA03, NSG, NSGD02, NSGSTU, NSMDV,
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Report

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Student accommodation comprising 266 student bedrooms
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Recommendations

1.1 It is recommended that this application be Refused for the reasons below.

Background

2.1 Site description

The application site is approximately 0.23 hectares and is roughly square shaped.

Russell Road forms the eastern edge of the site. Beyond Russell Road to the east is a landscaped embankment at the top of which are more industrial uses at Sauchie Bank. To the north, south and west of the site are existing industrial uses and associated car parking. The Edinburgh/Glasgow railway line runs further to the north of the site, and the Western Approach Road is further south.

The railway line, Western Approach Road and Russell Road form a wedge-shape area of land which is entirely in industrial/business and storage use. The application site is on the eastern edge of this wedge-shaped area and is also in industrial/storage use.

2.2 Site History

18 July 2012 - Planning consent granted for the change of use and redevelopment of a former bowling club to form builders yard and construction of new access (application reference: 12/00498/FUL).

Main report

3.1 Description Of The Proposal

The proposal is for the demolition of existing buildings and the development of a new purpose built student accommodation block which is 10 storeys including pavilion flats and a lift overrun on the top two storeys. The proposal will provide a total of 250 bedrooms in a mixture of cluster flats and 16 self-contained studio units with shared cooking/lounge facilities. There are six cluster flats per floor from the first to the sixth floor. The main entrance provides access to the reception area, laundry, common room, seminar rooms, office/post room and cycle storage.

The building is a U-shaped block with a central courtyard/garden space. One leg of the 'U' runs parallel to Russell Road. The second leg of the 'U' is parallel to the industrial site to the west. The east elevation of the first to sixth floors are hard on to Russell Road. The accommodation on the seventh floor has been set back from the building perimeter.

Four principal materials have been selected for the external facades. These are a light coloured brick, timber high pressure laminate panels and white high pressure laminate panels. The windows have anthracite, grey powder coated aluminium frames, sills and flashing. Glazed curtain walling will predominate on the ground floor frontage on to Russell Road.

There are two main landscaped amenity areas. The principal one is the hard surfaced central courtyard. This second is to the north west of the site.

Vehicular access to the site and the parking area in the courtyard is from Russell Road via a controlled entrance pend. The courtyard is elevated from Russell Road. There will be parking for six cars for staff and visitors. Secure cycle parking for 140 cycles is incorporated at the lower ground floor. Access will be controlled by key fob.

The refuse for the site is contained within a secure bin store accessed via the internal courtyard. This specific waste facilities comprise 21 128 litre Euro Bins and two 300 litre bins.

A 2.1 metre high brick wall incorporating feature lighting will enclose the building.

The following documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Transport Statement;
- Planning Statement;
- Design and Access Statement;
- Pre-application report;
- Noise Impact Assessment;
- Sustainability Report;
- Landscape and Visual Report;
- Drainage Statement; and
- Site Investigation Report.

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 is acceptable;
- b) The proposed scale, design and materials are acceptable;
- c) The proposal is detrimental to the amenity and safety of occupiers;
- d) The proposal is acceptable in terms of parking and access;
- e) The proposals meet sustainability criteria;
- f) Any equalities or human rights have been addressed;
- g) There are other material planning considerations; and
- h) The representations raised have been addressed.

a) Principle of development

Policy Hou 8 of the adopted Local Development Plan (LDP) sets out the criteria against which planning permission for purpose-built student accommodation will be granted. Part (a) of Policy Hou 8 requires that the location is appropriate in terms of access to university and college facilities by walking, cycling or use of public transport. The site is situated approximately 360 metres walking distance from Dalry Road, which has cycle lanes linking the site to the city centre and its university campuses, as well as providing good access routes to Heriot-Watt University via off-road cycle facilities. The location of the site is also 1km walking distance from Haymarket Rail Station. In terms of distance, this development complies with part (a) of Policy Hou 8 in relation to student housing. However, given the site's location within an industrial area, the safety of students accessing the accommodation at night is a concern.

Policy Hou 8 (b) states that the proposal must not result in an excessive concentration of student accommodation in any one locality to an extent that it would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality. The site is not in an area where there is a high concentration of student accommodation. The development therefore complies with part (b) of Policy Hou 8.

The council's non-statutory Student Housing Guidance identifies that 'student housing will generally be supported on sites with less than 0.25 hectares developable area' and 'sites with greater than 0.25 hectares developable area must comprise a proportion of housing as part of the proposed development'. The developable site area at Russell Road extends to 0.23 hectares and the proposal is therefore not required to provide an element of housing for general needs.

The site is identified as open space in the LDP. Policy Env 18 of the LDP aims to protect all open spaces, both public and private. Development of open space will only be permitted in exceptional circumstances, where the loss would not result in detriment to the overall network and to open space provision in the locality. The history of the development site indicates that planning consent was granted for change of use and redevelopment of a former bowling club to form a builders yard and construction of new access in 2012. This consent has been activated and the builder's yard completed. A precedent has therefore been set and the open space allocation is no longer relevant.

Employment Policy

Policy Emp 9 of the LDP states that proposals to redevelop employment sites or premises for uses other than business, industry or storage will be permitted provided a) the proposed use will not prejudice or inhibit the activities of any nearby employment uses. The proposed development is 10 storeys in height and the proposed use is student housing. The introduction of student housing into the centre of this predominantly industrial area could inhibit the activities of nearby employment use. Future occupiers may complain about noise levels from employment uses especially those operating 24 hours a day. It is considered the proposal will prejudice the activities of adjacent employment uses.

Criterion b) of this policy allows uses other than business use provided the proposal will contribute to the comprehensive regeneration and improvement of the wider area.

There are currently no proposals for the regeneration of the wider Russell Road area. However this may happen in the future. The applicant has submitted an indicative master plan to show the regeneration potential of the wider area and how the current proposal would fit with this. Whilst this provides useful information, the master plan has not been subject to community engagement or input from other landowners or consultees. It therefore has limited weight at this time. Furthermore as set out in section 3.3 b), there are concerns about the impact this proposal will have on the development potential of neighbouring sites due to its height, massing and positioning. The application therefore does not demonstrate that it will contribute to the comprehensive regeneration and improvement of this area.

The proposal does not comply with a) and b) of Policy Emp 9. The principle of student housing on the site is therefore unacceptable.

b) Scale, design and materials

LDP Policy Des 2 states that planning permission will be granted for development which will not compromise a) the effective development of adjacent land. Due to the height of the proposal at 10 storeys and the fact that the building extends close to the edges of the site, it is considered that this development would compromise the effective development of adjacent land on the northern, western and southern edges.

LDP Policy Des 2 also states that planning permission will be granted for development which will not compromise the comprehensive redevelopment and regeneration of a wider area as provided for in a masterplan. As mentioned previously an indicative masterplan has been submitted for the wider wedge-shaped area. However, there are concerns about the impact that the proposal would have on the development of adjacent sites, due to the height and massing of the proposed building.

The proposal does not comply with LDP Policy Des 2.

Policy Des 4 of the LDP ensures that new development will have a positive impact on its surroundings, including the wider townscape and landscape, and existing views. Criterion a) of the policy requires that the proposal is an acceptable height and form. The height of the building is 10 storeys and the elevation on to Russell Road coincides with the back of the footpath. The prevailing heights of surrounding properties are two to three storeys in the immediate environs and four to five storeys several hundred metres away in Roseburn and Dalry. The height of the proposal is considered excessive within the context of the wider townscape. The scale of the building by virtue of its height, and building line hard on to Russell Road is also not in keeping with the surrounding townscape.

Similarly, the depth of the building extends close to the site boundary at the western edge and will have a detrimental impact on any future development on that adjacent site.

Policy Des 11 of the LDP states that planning permission will only be granted for development which rises above the prevailing building heights of the surrounding area in certain situations. The proposed height of the building is 10 storeys to Russell Road, excluding roof plant, rising to 79.2 metres AOD. The height of surrounding buildings at Russell Road industrial estate is no more than three storeys, whilst the prevailing residential context is four storey tenements at Murieston Crescent, Dalry and Gorgie Road to the south and at Roseburn to the north. Later 20th century flats at Russell Road and Duff Street are similar in scale rising to six and five storeys respectively but with lower floor to ceiling heights. The proposed development therefore exceeds the prevailing building height by some six to seven storeys.

Criterion a) of Policy Des 11 allows increased height where the proposal creates a landmark that enhances skyline and surrounding townscape and is justified by the proposed use.

Student accommodation would not normally justify a landmark building. In the vicinity of the proposed development, landmarks such as Donaldson's School, Corstorphine Hill, St Mary's Cathedral, Edinburgh Castle and Arthur's Seat form landmark features of the skyline. The proposed student accommodation is not comparable to these landmark buildings in either its intended use or its architectural design.

It has not been demonstrated that the proposal enhances the skyline. The proposal seeks to create a landmark by virtue of its height. However, the wider indicative masterplan shows the proposal set within a group of buildings of similar height, mass and scale which would diminish any local landmark effect.

The presence of artificial embankments of up to 10 metres surrounding the site further reduces the ability for the building to stand out as a landmark in the wider context. Criterion b) allows increased height where the scale of the building is appropriate in its context. As described above, the proposal exceeds the prevailing building heights and is not appropriate in its context.

Paragraph 166 of the LDP states that '... the height of new buildings may need to be suppressed where necessary so that the city's topography and valley features continue to be reflected in the roofscapes.'

The wider local townscape of Gorgie, Dalry and Roseburn traces the natural topography of flat and low-lying ground and rises towards the city's southern hills, and Corstorphine Hill and Ravelston Dykes to the north. The presence of artificial landform does not justify additional height of development.

The proposal will impact adversely on the approach to the city at Haymarket by tram and rail and from the Roseburn cycle path, where the building is incongruous in backdrop views across the townscape towards the Pentland Hills.

It is accepted that the character and visual amenity of Russell Road is industrial at street level and that appropriate redevelopment with a high quality and active frontage could enhance the streetscape. However, it is considered that the scale and loss of open sky in a street already enclosed by embankments and bridges could detract from attempts to improve the visual amenity for pedestrians and cyclists.

The proposal complies with criterion c) of the policy as there is no adverse impact on important views of landmark buildings, the historic skyline, landscape features, or the landscape setting of the city. The proposal was tested from four relevant viewpoints identified in the Edinburgh Skyline Study. In three of the views, the proposal is fully screened either by existing vegetation or buildings. This applies from Viewpoint 5 - Western Approach Road - raised bridge; Viewpoint 7- Carrick Knowe-railway footbridge and Viewpoint 6 - A902 Telford Road.

The materials proposed are a light brick and High Pressure Laminate (HPL) timber finish. The proposed materials are acceptable in this location.

c) Amenity and Safety of occupiers

Policy Des 5 of the LDP ensures that the amenity of existing neighbouring developments is not adversely affected and that future occupiers have acceptable levels of amenity in relation to noise, daylight, sunlight, privacy or immediate outlook. The amenity of future occupiers and neighbouring developments must be secured through the proper design of the proposed development.

It is only the amenity of existing residential use which is protected through this policy. As the uses adjacent to the proposed development site are businesses, no protection of amenity is provided.

Environmental Protection has reviewed the noise impact assessment submitted by the applicant. It notes that the assessment has attempted to model the likely noise levels experienced by the future occupiers of the student housing, and the applicant proposes various mitigation measures to reduce external noise to acceptable levels. Environmental Protection is of the view that the proposed mitigation measures are ineffective. The proposal seeks to introduce housing into close proximity to active industrial properties, some of which operate 24 hours a day. There are already a number of complaints made by residents in nearby flats against noise from works carried out at the railway servicing yard.

The proposal does not comply with Policy Des 5 in that the amenity of future occupiers would be adversely affected by the existing industrial activity on adjacent areas of land.

The applicant has stated that the student accommodation can be adapted to create around 42 flats should student accommodation not be practical. This complies with b) of Policy Des 5. However, in terms of noise open space, daylighting, overshadowing and privacy, the conversion to mainstream housing is unlikely to be considered acceptable.

The proposal is contrary to LDP Policy Des 7 e) because, due to the location of the site within an industrial area, safe and convenient access for pedestrians in and around the development is not achieved.

Policy Des 8 of the LDP ensures that all external spaces included within the development have been designed as an integral part of the scheme. Criterion a) states that the design of these areas and the materials used must be appropriate for their intended use. The student housing will generate around 260 students. A central courtyard and perimeter landscaping are provided at upper ground level enclosed by a 2.1 metre high brick wall. The central courtyard (amenity area 1) is predominantly hard-surfaced, providing access for vehicles from Russell Road via a controlled access pend. Only limited planting is proposed close to the building line and hard on the site boundary. Despite high quality tree stock being specified, limited space exists for new trees to establish and achieve maturity in terms of above and below ground constraints. Paving continues to the perimeter of the proposal with a larger planted space (amenity area 2) to the north west of the building.

Whilst the two amenity areas analysed will receive more than three hours of daylight on 21 March, it is considered that the design and use of the external spaces will be compromised by the extent of hard surfacing. In addition the central courtyard is a shared surface for use as a car park and access point for waste vehicles. Both of these compromise the amenity of future occupiers.

The public realm and landscaping as proposed is contrary to Policy Des 8 as it offers future occupiers an unacceptable level of amenity due to its poor design and location. Should committee be minded to approve the application, it should be continued to seek amendments to the public realm and landscaping.

The proposal does not comply with Pol Des 5 and Policy Des 7 e) of the LDP in terms of the amenity and safety of the future occupiers.

d) Parking and access

Vehicular access to the development will be from Russell Road. An entrance barrier will provide controlled access.

Policy Tra 4 of the LDP sets out the design considerations for off street parking areas. The car park serving the development is located to the south of the building and accessed at ground floor level. The surface car park is not located directly in front of the new building and complies with criterion a). The location of the car park does not comply with b) as it is provided at street level. However, it does not preclude the provision of an active frontage on to Russell Road. Planting is provided on the edge of the parking area which meets criteria c). The car parking area is effectively a shared surface for cyclists, pedestrians and amenity users, and is therefore in conflict with criterion d).

The development is in Zone 3a of the Council's parking standards and requires between 22 and 44 car parking spaces for the development of 266 student rooms, plus provision for staff. The applicant proposes to provide six spaces. Given the restricted nature of the site, the proximity to public transport and a financial contribution towards city car club spaces, this is considered acceptable.

The standards also require one cycle parking space per bed which would equate to 266 spaces. The development proposes spaces for 140 cycles. The cycle storage is within a secure and integrated location and is acceptable in quality. However, the quantity is insufficient and should the application be granted, a condition should be attached seeking 100% cycle provision.

Infrastructure

Should the application be granted, the applicant will be required to contribute £341,270 to the Edinburgh Tram in accordance with the approved Developer Contributions and Infrastructure Delivery Supplementary Guidance. The applicant will also be required to contribute £7,000 towards the provision of car club vehicles in the area.

e) Sustainability

The applicant has submitted a sustainability statement in support of the application.

The proposal has been classed as a major development and has been assessed against Part B of the standards. The points achieved against the essential criteria are set out in the table below:

Essential Criteria	Available	Achieved
Section 1: Energy Needs	20	20
Section 2: Water Conservation	10	10
Section 3: Surface Water run off	10	10
Section 4: Recycling	10	10
Section 5: Materials	30	30
Total Points	80	80

The proposal meets the essential requirements of the Edinburgh Design Standards for Sustainable Buildings.

f) Equalities and human rights impacts

This application was assessed in terms of equalities and human rights. No adverse impacts were identified. An Equality and Rights Impact Assessment Summary is available to view on the Planning and Building Standards Online Services.

g) Other material considerations

Waste Management

Waste Management Services have confirmed that a waste strategy agreement has not been reached. The swept path analysis provided indicates the entrance/exit is too tight which could cause damage to the building or vehicle when exiting the site.

Flooding and Surface Water Management

Information has been submitted on flooding and surface water management. There are some matters which remain outstanding which prevent a full assessment of the application.

Should Committee be minded to approve the application, it should be continued to enable waste management and flooding matters to be addressed.

h) Matters raised in representations

Seven letters of representation were raised in response to the application. All of these were objections. Points raised are as follows:-

- Residential use is inappropriate in an industrial area; Addressed in 3.3 a).
- Insufficient onsite parking will result in overspill parking on Russell Road; Addressed in 3.3 d).
- Industrial jobs will be lost; Addressed in 3.3 a).
- Existing noisy industrial uses will have detrimental effect on amenity of future occupiers; Addressed in 3.3 a).
- There are no crossing facilities on Russell Road; Crossing facilities are not necessary.
- Too much student housing is being approved; Addressed in 3.3a).
- Massing of building is too great; Addressed in 3.3 c).
- Internal design is too difficult to adapt for residential use; Addressed in 3.3 c).
- The proposal represents piecemeal development; Addressed in 3.3 a).
- Indicative masterplan has no formal status; Addressed in 3.3 a).
- Scale and proportion is out of character of surrounding area; Addressed in 3.3 c).
- Adjacent sites will be overshadowed and future development will be compromised. Addressed in 3.3 b).

Conclusion

The proposed development accords with LDP Policy Hou 8 in that it is in an accessible location and its development would not result in an excessive concentration of students in this part of the city. However, the suitability of the access in safety terms is unacceptable and is contrary to LDP Policy Des 7.

The proposal is contrary to Policy Emp 9 of the LDP as the proposed use for student housing will prejudice the activities of nearby employment use, and will not contribute to the comprehensive regeneration and improvement of the wider area.

The principle of student housing on this site is contrary to the Local Development Plan.

In terms of amenity of neighbouring developments and future occupiers the proposal is contrary to LDP Policy Des 5 as there will be adverse effects on the amenity of future occupiers of the proposed development due to the noise levels of adjacent industrial operations.

The proposal is contrary to Policy Des 2 as the height and scale of the proposal will compromise the effective development of adjacent land.

In terms of Policy Des 4 and Des 11, the height and scale of the building is considered excessive within the context of the wider townscape and the proposed height does not tie in with the prevailing heights of properties in the immediate vicinity.

There are no other material considerations which would justify approval of the application. It is therefore recommended that this application is refused.

It is recommended that this application be Refused for the reasons below.

3.4 Conditions/reasons/informatives

Reason for Refusal:-

1. The proposal is contrary to policy Emp 9 of the adopted Local Development Plan. The proposed use will prejudice the activities of nearby employment uses. The proposal will not contribute to the comprehensive regeneration and improvement of the wider area.
2. The proposal is contrary to policy Des 2 of the adopted Local Development Plan. The height of the proposal will compromise the effective redevelopment of adjacent land.
3. The proposal is contrary to policies Des 4 and Des 11 of the adopted Local Development Plan. The height and scale of the building is considered excessive within the context of the wider townscape.
4. The proposal is contrary to policy Des 5 of the adopted Local Development Plan. There will be adverse effects on the amenity of future occupiers of the proposed development due to the noise levels of adjacent industrial operations.
5. The proposal is contrary to policy Des 7 of the adopted Local Development Plan because, due to the location of the site within an industrial area, safe and convenient access for pedestrians in and around the development is not achieved.

Financial impact

4.1 The financial impact has been assessed as follows:

If the application is approved, a legal agreement would be required to secure developer contributions towards the Tram and city car club provision.

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 no impacts 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

A Proposal of Application Notice was submitted and registered on 22 July 2016.

Copies of the Notice were also issued to:

- Gorgie/Dalry Community Council;
- Murrayfield Community Council; and
- Ward Councillors.

A public exhibition was held on 20 October 2016 in St Martin's Church, Dalry Road. Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online services.

A pre-application report on the proposals was presented to the Committee on 12 October 2016. The Committee noted the key issues outlined in the report and requested that the following issues be addressed:-

- That the applicant was aware that there should be a mixed development in this area with the correct proportion of student housing;
- To identify the percentage of student accommodation in the area; and
- That the members should be made aware of any forthcoming development in the area.

8.2 Publicity summary of representations and Community Council comments

Seven representations were received, including one from the Cockburn Association. Six of these letters objected to the application and one letter supported it. These are addressed in sections 3.3 of the main 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 is within the Urban Area, as shown on the adopted Local Development Plan Proposals Map. It is also allocated as open space.

Date registered

20 January 2017

Drawing numbers/Scheme

02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15A, 16A, 16A, 17A, 18A, 19A, 20A, 21A, 28, 29, 30, 31, 32, 33, 34,

Scheme 1

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

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Links - Policies

Relevant Policies:

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

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 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 Des 11 (Tall Buildings - Skyline and Key Views) sets out criteria for assessing proposals for tall buildings.

LDP Policy Env 20 (Open Space in New Development) sets out requirements for the provision of open space in new development.

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

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

LDP Policy Emp 9 (Employment Sites and Premises) sets out criteria for development proposals affecting business and industrial sites and premises.

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

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 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.

Non-statutory guidelines on 'MOVEMENT AND DEVELOPMENT' establish design criteria for road and parking layouts.

Appendix 1

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Consultations

Police Scotland comment

We can confirm that we have begun the Secured By Design consultation process for this development. A meeting is scheduled with the Architect and Developer on 15th February 2017 to further discuss Secured by Design principles and crime prevention through environmental design.

Archaeology comment

The site remained open relatively undeveloped until the construction of the bowling club at the start of the 20th century. Given the sites location and modern development history, it is unlikely that significant archaeological remains will occur in situ and that it is considered therefore that this application has no significant archaeological impact.

Network Rail comment

After examining the proposal Network Rail considers that it will have no impact on railway infrastructure and therefore have no comments/objections to this application.

Environmental Assessment comment

We have had a look at the noise impact assessment submitted and would like to highlight that we do still have concerns with noise. Furthermore the plans are not clear making it difficult to assess properly. For example the location of windows bedrooms, living areas and outside space is not clear. We have included the plan for the seventh floor to demonstrate this. We think ultimately we will have concerns with this site being developed for residential use due to the noise from transport and industrial sources. The noise impact assessment is probably as good as can be expected, although there are some key pieces of information missing.

Has the HMO team been consulted, the layout does indicated that a licence will be required and the rooms and windows do look small and could be problematic for the HMO team.

The applicant proposes a Combined heat and power plant can they provided details of the power in/out put proposed. They may require a chimney height calculation if it breaches the Clean Air Act thresholds. We welcome the six car parking spaces, but will recommend that they are electrified for charging electric cars.

Waste Services comment

Waste Management Responsibilities

The Waste and Cleansing Services will be responsible for managing the waste from households and any Council premises only. I am assuming this would include this development.

Although it does not appear to be pertinent for this case, for completeness, it would be the responsibility of any third party commercial organisations using the site to source their own trade waste uplifts. Architects should however note the requirement for trade waste producers to comply with legislation, in particular the Waste (Scotland) Regulations which require the segregation of defined waste types to allow their recycling. This means there would need to be storage space off street for segregated waste streams arising from commercial activities.

Any appointed waste collection contractors, appointed to manage commercial waste, could be expected to have similar requirements to the Council in terms of their need to be able to safely access waste for collection.

Compliance with Waste Strategy (Domestic Waste Only)

The provision of a full recycling service is mandatory in Scotland, so that developers must make provision for the full range of bins (either individual Containers for each property, or communal bins for multiple properties). These must be stored off street at all times, except on the day of collection (in the case of individual bins).

The waste collection teams will require safe and efficient access to these from the earliest occupation, and therefore cognisance must be taken of my comments below in relation to operational viability.

For high density properties, we would recommend communal waste containers, for: landfill waste, mixed recycling for paper and packaging, glass, and food.

Key points are:

- o each bin store must accept the full range of materials in bins, segregated as outlined above. It is not acceptable to have some types of bin in one bin storage area, and others in a different collection point, as recycling is a fully integrated part of the service;*
- o the maximum size of a food bin is 500 litres; and that of a glass bin is 660 litres, which are both smaller than other types of waste due to weight issues;*
- o provision must be made for the storage and disposal of bulky wastes such as furniture produced by the residents, and indeed access to those by our collection teams.*

Developers can either source their own bins in line with our requirements, or can arrange for us to do so and recharge the cost- this will probably be most convenient for them.

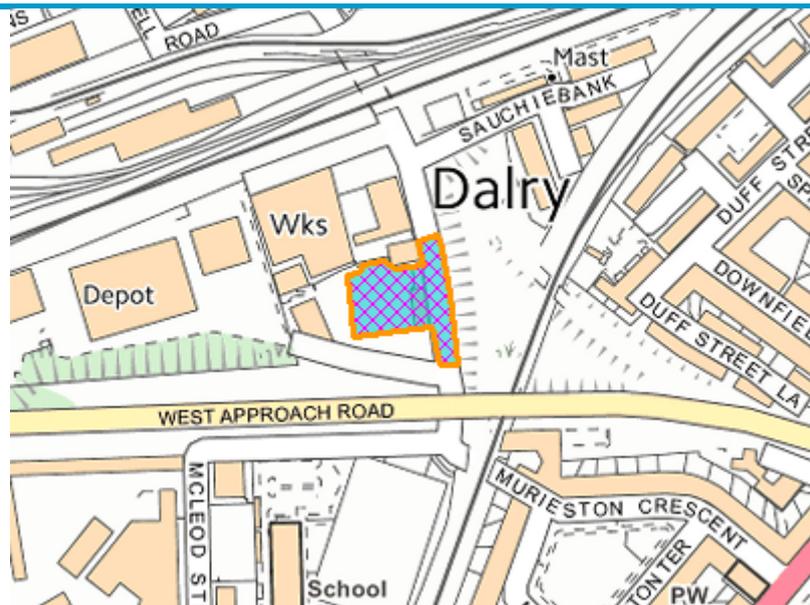
Operational Viability

Developers need to ensure that services are accessible so that our collection crews can provide the service in a safe and efficient manner, taking account of turning circles, length and width of vehicles, distance bins must be pulled, surfaces, slopes and so on. Obviously sufficient capacity must also be provided to allow successful collection of each segregated waste stream.

Open Spaces

We would like to understand who will be responsible for maintaining the open spaces within the development as full access to the site would be required.

Location Plan



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END