

# Development Management Sub-Committee Report

**Wednesday 12 June 2024**

**Application for Planning Permission  
140 Causewayside, Sciennes, Edinburgh**

**Proposal: Demolition of existing building and development of purpose-built student accommodation with landscaping, infrastructure, access, and associated works.**

**Item – Committee Decision  
Application Number – 23/07375/FUL  
Ward – B15 - Southside/Newington**

## **Reasons for Referral to Committee**

The application has been referred to committee at the discretion of the Chief Planning Officer due to the wider public interest in the provision of student accommodation.

### **Recommendation**

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

### **Summary**

The proposal will make a positive contribution to the City's accommodation provision for those undertaking further and higher education and is acceptable in this location. The development plan encourages well-designed, compact urban growth that is sustainable and allows for 20-minute neighbourhood principles to be delivered. The proposal is compatible with these principles.

The impact of development on the setting of nearby listed buildings, character and appearance of the adjacent Conservation Areas and the wider townscape has been considered and is acceptable in this regard.

The proposal is not considered to have a significantly adverse impact on surrounding residents and will provide an acceptable amount of indoor and outdoor amenity space for future residents. Non-conformities with the relevant non-statutory guidance in relation to sunlight and daylight are justified in this instance.

Subject to recommended conditions, the proposal is acceptable and complies with National Planning Framework 4 and the aims of the 2016 Edinburgh Local Development Plan. There are no material considerations that outweigh this conclusion.

## **SECTION A – Application Background**

## Site Description

The site measures 1,789 sqm and is located at 140 Causewayside in the Grange/ Newington area in the south side of the city.

The site's boundary is formed in a parallelogram shape. The site is generally flat and is currently occupied by a vacant former office premises and an area of surrounding car parking/ hardstanding. A substation is located to the south of the site.

The existing building on site comprises a three-storey block, with partial fourth storey at the rear. The ground floor of the building extends to the rear (west) boundary of the site and was previously in use as a library facility for the previous occupiers, the Scottish Law Commission. Land to the north of the ground floor extension is set out as a car parking area and land to the south of the extension comprises an area of hardstanding and the substation unit.

There are no trees located within the site boundary. There are trees in adjacent property grounds to the north, west and south of the site.

Causewayside has a dense, mixed urban character with a range of uses in the vicinity of the site including the National Library of Scotland which is situated directly opposite the site. Other uses include ground floor retail and commercial space, mainstream residential and purpose-built student accommodation.

The building's front (east) elevation is set back from the Causewayside street frontage by a layby which provides a drop off area. Access to the rear car parking area is provided via an existing access lane to the north of the building.

To the west the site is bounded by rear private garden grounds of the residential property at No 8 Grange Road. This property is Category B listed (reference LB30393, listing date 15.01.1992). Land to the west of the site has a distinctly different character from the denser development of Causewayside, and is characterised by lower density residential villa development, set within generous garden grounds.

To the north the site is bounded by a row of Category C listed tenements along Nos 1 to 7 Grange Road which adjoin with Nos 128-138 Causewayside at the corner (reference LB30387, listing date 15.01.1992).

To the south, the site is bounded by an existing mixed-use development 160 Causewayside, which comprises commercial space at ground floor level (a Tesco convenience store) with office accommodation above. This building is an L-shaped five to six storey structure, with undercroft parking set in an area of hardstanding/ parking.

There are a number of existing bus stops within close proximity of the site on Causewayside, Grange Road, Salisbury Place and Newington Road/ Minto Street. These are within 200-300m of the site (approx. 2-3 minutes' walk).

The site is not located in a conservation area but is located adjacent to the boundary of the Grange Conservation Area to the west and Blacket Conservation Area to the east. The boundary of the South Side Conservation Area is also located in close proximity to the site, around 30m to the north east at the junction of Causewayside and Salisbury Place.

## **Description of the Proposal**

Planning permission is sought for the demolition of the existing building on site and erection of student accommodation including communal amenity space, outdoor amenity space, associated landscaping, site access and associated works.

### *Accommodation*

The accommodation provides 174 student bedrooms rooms in total. The accommodation comprises six cluster flats, each containing six, eight or nine bedrooms with shared kitchen/ lounge facilities providing 48 bed spaces (28%) and 126 studio rooms (72%) of which nine will be accessible studio rooms.

Internal amenity space is provided including an informal communal lounge area at ground floor level which faces onto the principal Causewayside street frontage. Additional communal amenity space is provided at lower ground floor level, comprising a general amenity space and a quiet study area.

Ancillary space is provided at ground floor level including an amenity lobby, bin storage area, WC/ shower room, cycle storage and sub-station and at lower ground floor level including two plant rooms.

### *Building design*

The proposed building is broadly L-shaped, forming a frontage along Causewayside with a leg extending westwards into the site to the rear. The Causewayside elevation will extend to five storeys in height, with the fifth floor set back from the principal elevation. The front elevation is cut back at the north east corner of the building in response to the category C listed tenement building at 128-138 Causewayside which is positioned adjacent to the site boundary.

To the rear, the building footprint at ground floor level extends into the site and is positioned around 4m from the rear site boundary. The building steps down into the site at the rear to include a lower basement level. The development massing to the rear of the building is cut back on the fourth and fifth levels on the rear (west) and gable (north) elevations, creating a stepped building form.

The proposed building will have a contemporary tenemental appearance and will use a mix of materials, based around a natural colour palette. Natural stone is proposed as the predominant material on the primary elevation onto Causewayside. Dark masonry will be provided at ground floor level on the front elevation and at the northern gable of the building. The ground floor elevation onto Causewayside will be largely glazed allowing visibility between the internal communal area and the street frontage. The remainder of the ground floor frontage housing the bin stores/ plant room areas will be finished with curtain walling.

The top (fifth) floor on all elevations is clad in a metal grey standing seam sheeting.

To the rear and side elevations, buff and white brick will be used as the principal material.

PPC coated metalwork will be used on windows, curtain walling, flashings, coping and screens across the building.

### *Landscape design.*

Usable open space is provided in a rear courtyard area in the north of the site (540 sq. m) and smaller outdoor study area (103 sq. m) in the south of the site. The north area of open space is split over lower ground and ground floor level and incorporates terraced stepped areas between the two levels and a range of amenity spaces for use by residents including areas for seating and recreation. An accessible path will run through the upper level of the courtyard space providing access to secure cycle storage areas.

The rear landscaped courtyards will be treated within a mix of hard and soft landscaping treatments. It is proposed that ten new trees will be planted within the new courtyard area.

Direct access to the north courtyard space from the building is via level access points at lower ground and ground floor levels. There is also a secure gated access point between the rear open space area onto Causewayside at the north of the site.

The rear south study space will be located at lower ground floor level and will be accessed from an internal quiet study room. It will comprise hard and soft landscaping details including sunken planted areas and outdoor seating.

The rear courtyard areas will incorporate lighting to allow for safe access after dark.

A new area of public realm will be provided at the front of the building. The existing drop kerbs on the pavement will be removed to form a continuous pavement. The street space immediately to the front of the building will incorporate sunken bioswale planting and seating areas along the building edge and at the main entrance at the northeast corner of the building.

The building will include wildflower meadow green and brown roofs which will contribute to SUDs provision for the development. Roof mounted photovoltaic panels and also proposed for the development.

### *Access and parking*

The principal pedestrian access to the building is provided on the street frontage at Causewayside, at the north east corner of the site. Pedestrian access and access to cycle storage at the rear of the site will be via a secure gated access path at the north of the building.

The building is wheelchair accessible internally and all entrances to the buildings will provide level access.

No vehicular car parking is proposed on site.

The cycle parking provision will comprise 120 spaces (0.69 spaces per bedroom) which will be arranged as follows.

- 40 standard Sheffield spaces (33% of provision)
- 22 non-standard Sheffield spaces (19% of provision)
- 58 two-tier spaces (48% of provision)

### *Sustainability*

Sustainable energy generation is proposed at the development through the use of centralised air source heat pumps and solar photovoltaic panels, both of which will be roof mounted. The applicant has undertaken an Embodied and Whole Life Carbon analysis for the development and is taking a Fabric First Approach to maximise the performance of materials of the building fabrics. The development is implementing BREEAM and is targeting an "Excellent" certification.

### **Supporting Information**

- Pre application consultation (PAC) report.
- Design and Access Statement.
- Planning Statement.
- Transport Statement.
- Travel Plan.
- Waste and Servicing Strategy.
- Socio Economic Assessment.
- Purpose Built Student Accommodation Management Plan.
- Surface Water Drainage Strategy.
- Flood Risk Assessment.
- Noise Impact Assessment.
- Verified Visualisations.
- Sustainability Statement.
- Edinburgh Student Accommodation Demand and Supply Report.
- Daylight and Sunlight Amenity Report and Appendices.
- Archaeology Desk-based Assessment.
- Ecology BREEAM report including Preliminary Ecological Assessment, Bat Survey and Biodiversity Enhancement Plan.
- Tree Survey and Arboricultural Report.
- Arboricultural Impact Assessment.
- Tree Protection Plan.
- Geotechnical Reports (Phase 1 and Phase 2).
- Redevelopment Feasibility Assessment.

### **Relevant Site History**

No relevant site history.

### **Other Relevant Site History**

None

### **Pre-Application process**

Pre-application discussions took place on this application.

### **Consultation Engagement**

Environmental Protection.

Waste Services

Flooding

Scottish Water

Grange and Prestonfield Community Council

Archaeology

Refer to Appendix 1 for a summary of the consultation response.

## **Publicity and Public Engagement**

**Date of Neighbour Notification:** 27 December 2023

**Date of Renotification of Neighbour Notification:** Not Applicable

**Press Publication Date(s):** 5 January 2024

**Site Notices Date(s):** 28 December 2023

**Number of Contributors:** 15

## **Section B - Assessment**

### **Determining Issues**

Due to the proposals relating to a listed building(s), this report will first consider the proposals in terms of Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997:

- Is there a strong presumption against granting planning permission due to the development harming the listed building or its setting?
- If the strong presumption against granting planning permission is engaged, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh it?

This report will then consider the proposed development under Sections 24, 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Having regard to the legal requirement of Section 24(3), in the event of any policy incompatibility between National Planning Framework 4 (NPF4) & Edinburgh Local Development Plan 2016 (LDP) the newer policy shall prevail.

Do the proposals comply with the development plan?

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

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

In the assessment of material considerations this report will consider:

- equalities and human rights.
- public representations; and
- any other identified material considerations.

## **Assessment**

To address these determining issues, it needs to be considered whether:

### **a) The proposals harm the listed building or its setting.**

The following HES guidance is relevant in the determination of this application:

- Managing Change: Listed Buildings - Setting

Section 59 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 states.

*"In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*

Historic Environment Scotland's document 'Managing Change in the Historic Environment - Setting' states.

*'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated, and experienced.*

The applicant has undertaken a heritage assessment and has provided an assessment including site visualisation viewpoints agreed with the planning authority.

The listed building at 1-7 Grange Road and 128-138 Causewayside is a three/four storey tenement building. The building is located to the immediate north of the site. The building has gable windows on its south elevation, which face southwards along Causewayside. The building's rear elevation overlooks the development site.

The existing building on the site is set back on the street from the road edge by 7.66m. It sits further back into the site than the position of the gable windows of the tenement building, meaning that they have a clear view southwards along Causewayside and form an architectural feature on the building when viewed from the street. The proposed development will bring the principal elevation of the building further forward onto the street frontage than the arrangement of the current building. The building line will come forward by a distance of around 3.86m, compared to the current position of the building on site.

The proposed building footprint and position of the front elevation has been considered in the context of the adjacent listed building and includes a cut back section at the north-east. This widens the pavement in this area to a distance of 6.62m in front of the gable windows of the tenement and provides an offset to the listed building. The principal elevation of the building has been aligned to position it into the site beyond the extent of the gable windows on the tenement building.

It is recognised that by bringing the principal elevation of the proposed building further forwards onto the street frontage, the relationship between development on the site and the listed building will change. However, the proposed footprint and site layout is considered to provide the listed building with an acceptable offset which will allow views of the gable windows to be retained from the street and for the intended building form to continue to be read as it currently is.

The applicant has provided verified visualisations of the proposed development in the context of the gable windows, which demonstrate that clear views to these will be retained from the street. In addition, views southwards from the gable windows, whilst altered slightly by the new development in that more of the new building would be visible as part of these views, will be retained.

With regards to the wider setting of the listed tenement, the footprint of the proposed building will be largely offset from the rear of the tenement by a minimum distance of 21.5m, with the exception of a small section at the northwest side elevation where the distance reduces to 15.1m, due to a small projecting section of the proposed building which sits opposite a curved section of the building which protrudes from rear elevation.

The massing to the rear of the building is stepped in on the west and north elevations on the upper floors. This further sets back the upper floors of the building from the tenement. The fourth floor of the building is stepped in from the rear (west) elevation by around 4m. The fifth floor of the building steps in by around 12m to the rear (west) elevation and between around 3m and 6m on the north (gable) elevation. This means that across all floors, the building will be located between 15.1m (but predominantly 21.5m) and 26.7m from the adjacent listed tenement.

It is recognised that the building will introduce a larger massing to the rear of the site in the context of the listed tenements than is currently present on site. However, it is also noted that there is already an existing visual relationship between the tenements and large-scale development on the site at present and on the adjacent site at 160 Causewayside, which is occupied by a five-storey building which extends into the rear of that site.

Furthermore, it is noted that there are existing mature trees positioned within the garden grounds of the tenement building which already soften the buildings outlook towards the site.

In addition, the provision of a landscaped rear courtyard behind the student accommodation building will provide an improved quality of open space environment from the existing areas of car parking/ hardstanding that are present on the site. It is considered that this change will have a beneficial impact on the outlook from the listed tenement properties.

On balance, it is considered that the proposed building design provides an acceptable response to the setting of the listed tenement building by being offset by an adequate distance from the site boundary and incorporating a reduced level of massing on the upper floors of the building.

The listed building at 8 Grange Road is a detached residential villa. The building is a single and two-storey irregular plan gabled villa and is set in generous garden grounds which extend along most of the rear (west) boundary of the development site. The property is bounded by stone walls which are included in the property's listing details.

The development footprint of the proposed building has been amended during the pre-application design process to pull the footprint in from the rear site boundary with 8 Grange Road by a minimum distance of 4m. This will provide an increased buffer between development on the site and that property compared to the existing building footprint of the building on site, which extends right up to the boundary wall (albeit in a single storey form at the rear of the building).

The stepping in detail of the rear massing of the proposed building detailed above will move the rear (west) and gable (north) elevations in further from that site boundary. The fourth storey of the building will be set back from the rear site boundary by 8.13m and the fifth storey will be set back from the rear boundary by 16.47m. There are a number of mature trees positioned in the rear garden ground of 8 Grange Road which currently act as a visual buffer between the site and the private garden grounds of that property.

The applicant has provided verified visualisations which show the proposed scale and massing of the development in the context of the 8 Grange Road. These demonstrate that there will be slight increase in building massing visible behind 8 Grange Road in comparison to the massing of the existing building on site. The slight increase is not considered to be significant in the context of these viewpoint which also takes in the surrounding density and massing of development already present around the site on the corner of Grange Road/ Causewayside. This is acceptable.

On balance, it is considered that the proposed set back and existing landscaping features of the adjacent garden provide a clear separation between the proposed development and the setting of the listed building. It is concluded therefore that the scale, proportion, positioning, form, and design of the proposals would not detract from the setting of the listed building located close to the site.

### **Conclusion in relation to the listed building**

The proposals preserve the setting of the adjacent listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and relevant HES guidance.

#### **c) The proposals comply with the development plan.**

National Planning Framework 4 (NPF4) was adopted by the Scottish Ministers on 13 February 2023 and forms part of the Council's Development Plan. NPF4 policies supports the planning and delivery of Sustainable Places, Liveable Places and Productive Places and are the key policies against which proposals for development are assessed. Several policies in the Edinburgh Local Development Plan (LDP) are superseded by equivalent and alternative policies within NPF4. The relevant policies to be considered are:

- NPF 4 Sustainable Places policies 1, 2, 3, 7, 9, 11,12, and 13
- NPF 4 Liveable Places policies 14, 15, 16, 18, 22, 23
- LDP Infrastructure Delivery policy Del 1
- LDP Housing Policies Hou 1, Hou 8
- LDP Design Policies Des 1 to Des 8
- LDP Employment Policy Emp 9
- LDP Environment policies Env 9, Env 12, Env 16, Env 21, Env 22
- LDP Transport policies Tra 2 to Tra 4
- LDP Resources and Services policy RS6

The non-statutory 'Listed Buildings and Conservation Area' guidance is a material consideration that is relevant when considering NPF 4 Policy 7. The Edinburgh Design Guidance is a further relevant material consideration in the assessment of this application.

#### Setting of Listed Buildings

This has been assessed in section (a). The proposal complies with the development plan in this regard.

#### Setting of Conservation Area

NPF4 Policy 7 seeks to protect historic assets and places and to enable positive change as a catalyst for the regeneration of places. The policy supports development in or affecting conservation areas where it has been demonstrated that the character and appearance of the conservation area and its setting is preserved or enhanced.

LDP policy Env 6 Conservation Areas - Development seeks to ensure that development within a conservation area or affecting its setting sufficiently preserves and enhances the special character or appearance of the area, preserves the features of the conservation area, and demonstrates high standards of design and materials that are appropriate to the historic environment.

The site is located out with a conservation area, but borders two conservation areas, Grange Conservation Area and Blasket Conservation and is within 20m of the South Side Conservation Area.

## *Grange Conservation Area*

The Grange Conservation Area Character Appraisal emphasises the high quality stone built architecture of restricted height enclosed by stone boundary walls, the uniformity resulting from the use of local grey sandstone for buildings and boundary walls and Scots slate for roofs, the formal and picturesque detached and semi-detached dwellings of generous scale and fine proportions, the low density grain of the area, and the spacious and uncluttered streetscape.

The rear boundary of the site will sit adjacent to the boundary of the Grange Conservation Area. Whilst the site is out with the conservation area boundary, it is recognised that development on the site may impact on the setting and appearance of the conservation area, given that the site is positioned on its boundary on two sides to the west and north.

Causewayside has an established built character which is spatially different from the low density, leafy appearance of the Grange Conservation Area. Built form on the western side of Causewayside is characterised by taller building heights (three to five storeys in height), a strong (albeit variable) building line to the street and fingers of built development of varying heights stretching westwards into the rear of sites.

The existing building on the site is three storeys in height, with a rear single storey block extending fully into the site and adjoining the Grange Conservation Area boundary. The supporting Heritage Statement provides aerial photographs of the site and surrounding area which demonstrates that historically the boundary between the Grange Conservation Area and Causewayside has been defined by a clear shift in density between the lower density villa development pattern of the Grange with higher, denser industrial buildings stretching into the plots to the rear of Causewayside. The existing building footprint is part of that pattern, as are the existing buildings on adjacent plots to the site.

The proposed development includes a higher and more dense form of development in the rear of the site than currently exists, which will make a change to the existing relationship between the character of the site and the conservation area. However, it also is noted that the existing building on site is also lower in height than the surrounding buildings to the north and south. The applicant has reduced and refined the overall massing to the rear of the building during the pre-application process in order to respond to the surrounding built context. The building footprint has also been brought in from the site boundary by a minimum of 4m to increase its set back in relation to the edge of the conservation area, and the rear massing of the building has been stepped in to further pull the upper floors of the building in from the conservation area boundary.

The applicant has also undertaken a visual assessment which considers the impact of the proposed higher building form on the setting of the conservation area. This considers key viewpoints from number of locations within the Grange Conservation Area.

In the immediate context of the site from within the Grange Conservation Area, only glimpsed views are possible towards the site due to the location of existing buildings. Two viewpoints have been assessed from within the Conservation Area - Grange Road and Findhorn Place.

From the viewpoint on Grange Road, the general height of the proposed building will appear slightly higher than the bulk of the existing building on height, but no part of the proposed building will appear higher than the stair tower of the existing building. The visual assessment concludes that the change to this view from the Conservation Area would be neutral.

From the viewpoint on Findhorn Place, there will be change in the built form visible. At present the north stair tower and caretaker's flat of the current building are visible and this would change to allow views to the upper floor of the building. It is noted that views to the site would likely be obscured during the summer due to existing foliage but are likely to be visible during the winter months. The visual assessment concludes that the change to this view from the Conservation Area would be neutral.

Overall, the visual assessment concludes that whilst the development will increase the volume of built form on the site, this is generally well absorbed into the existing townscape. The impact of development on the character and appearance of the Grange Conservation Area is therefore considered to be acceptable.

### *Blacket Conservation Area*

The Blacket Conservation Area Character Appraisal emphasises the mix of substantial villas and terraces, the unified architectural form and materials, the sense of spaciousness derived from the generously proportioned gardens and large mature trees, and the predominance of residential uses.

The west side of Causewayside where the development is situated is visually distinct from the main characteristics of Blacket Conservation Area. The development site is positioned directly opposite National Library of Scotland building which acts as a dominant landmark building form onto the Causewayside frontage and provides a level of separation between the site and the characteristic areas of the conservation areas to the east and northeast.

There is already a predominance of dense frontages on the western side of Causewayside, with which the proposed building will provide an appropriate fit. The building has been designed to have a contemporary tenemental frontage which is well proportioned and compatible with the existing buildings within the streetscape and will include an appropriate mix of materials such as sandstone on the principal elevation. It is considered that the setting and appearance of the Blacket Conservation Area would not be affected to any significant extent by the proposed redevelopment of the site.

### *South Side Conservation Area*

The South Side Conservation Area Character Appraisal emphasises the harmonious scale, massing and materials and the significance of key institutional buildings within the area.

The South Side Conservation Area is physically separated from the site by around 20m. It is not considered that the development will have a direct impact on the character or appearance of the South Side Conservation Area.

### **Conclusion in relation to the conservation area**

The proposal is acceptable in relation to its impact on the character and appearance of the Grange, Blacket and South Side Conservation Areas. It conforms with LDP policy Env 6 Conservation Areas - Development.

#### Acceptability of the development in principle

Policies 1 and 2 of the NPF 4 give significant weight to the global climate and nature crisis to ensure that it is recognised as a priority in all plans and decisions. It is intended to be considered in the round and applied together with the other policies in NPF 4. Their weight must be considered when considering the principle of the development proposal in the context of the development plan and material considerations.

NPF4 Policy 16 part (c) supports development proposals for a range of housing types and provision that improves affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision. This includes the provision of purpose-built homes for people undertaking further and higher education.

LDP Policy Hou 1 part (d) prioritises the delivery of housing land supply within the urban area, providing proposals are compatible with other policies. The application site is not identified as a housing site in the LDP, and there is no obligation for housing to be considered as a use on windfall sites over other potential land uses. The principle of student accommodation as a land use on the site is therefore considered to be appropriate in the context of policy Hou 1, provided that other relevant policy criteria in the LDP can be met.

NPF4 Policy 14 aims to ensure that development proposals will be designed to improve the quality of an area regardless of scale. The site is within an urban area. There are a mix of commercial and residential uses in the surrounding area at present. The proposal would contribute to local placemaking by increasing the density of development on the site, and providing a mix of uses which are compatible with the character of the area.

As the previous use of the site for an office development, LDP Policy Emp 9 is applicable in the assessment. Policy Emp 9 requires development sites above 1ha in size to include floorspace for a range of business users within any redevelopment proposals. The site area is 1,789 sqm therefore the proposed development does not fall within the threshold which requires floorspace for business use.

NPF4 Policy 9 aims to encourage, promote, and facilitate the reuse of brownfield, vacant and derelict land, and empty buildings, and to help reduce the need for greenfield development. Given the need to conserve embodied energy, demolition is considered to be the least preferred option. Outcomes should maximise use of existing assets, minimise land take, contribute to nature recovery and productive green space, and regenerate to improve well-being and transform places.

The previous land use of the existing building on site was for office accommodation. The applicant has provided supporting information providing marketing details for the building which demonstrates that there has been no interest in the site for future office use.

The applicant has also undertaken a redevelopment feasibility study for the site which has considered the option of reusing the existing building for PBSA development. This assessment has identified that the building faces considerable challenges for reuse as a PBSA redevelopment, including a prohibitive hybrid building structure, existing shallow foundations which would prevent the provision of a basement level and constraints in the existing structure which would limit the opportunity to increase the building height. In addition, it is noted that reinforced autoclaved aerated concrete (RAAC) construction has been used in the existing construction, and the building is categorised as being at amber risk in this regard.

The redevelopment of the existing building for the proposed development purpose is therefore concluded to be significantly constrained.

In terms of embodied carbon, the proposed new build option provides a more efficient building. The applicant has submitted a sustainability statement in support of the application. This sets out the sustainable measures proposed as part of the development. The proposals are found to meet the required sustainability standards and exceed the requirements in several areas.

The applicant has also undertaken an Embodied and Whole Life Carbon analysis. This assessment concludes that the proposed development will meet 2025 targets in this regard and is in line with Climate Change/ Net Zero aspirations.

In relation to the biodiversity potential for the site, the supporting Preliminary Ecological Assessment summarises the existing ecology value on site as slight or negligible. The proposed landscaping strategy will provide ecological enhancement for the site which will increase biodiversity opportunities within the local area.

On balance, redevelopment of the site complies with the overall policy objective to direct new development away from greenfield sites and support re-use of sites within the urban area, including brownfield, vacant and derelict land, and empty buildings. The proposal complies with the intentions of NPF Policy 9 in this regard.

#### Acceptability of student housing

LDP Policy Hou 8 provides policy to be applied to student accommodation. It requires that:

- a) *The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport.*
- b) *The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.*

#### *Location*

The site is within walking distance of Edinburgh University main campus, Lauriston Place and Kings Buildings, which can all be reached within a fifteen-to-twenty-minute walk. Edinburgh Napier University is located within a 30-minute walk from the site.

Although the site is not within or immediately adjacent to a main campus the site is considered to be within a reasonably accessible location to access.

Further locational and design guidance is set out in the non-statutory Student Housing Guidance, February 2016. It provides a set of criteria against which proposals for purpose-built student accommodation should be considered. Part a) accepts student housing in locations within or sharing a boundary with a main university. This clause does not apply to the application site. Part b) states that out with criteria a), student housing will generally be supported on sites with less than 0.25ha of developable area. The site falls under criteria b) The site has a developable area lower than 0.25 Ha and is not allocated as high priority in the Housing Land Study 2014, therefore does not require to provide housing.

The site therefore considered to be appropriately located in terms of access to further education institutions and to comply with policy Hou 8 criterion (a) and the non-statutory Student Housing Guidance.

NPF4 Policy 15 seeks to ensure that new development is planned to improve local living in a way which reflects local circumstances. It states that the objective should be to ensure that people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling, or cycling or using sustainable transport options. As well as being well located for accessibility to university campuses, the proposal is well positioned to meet the requirements of the policy with regards to the site's proximity to supporting facilities for student accommodation development.

Nicolson Street/ Clerk Street Town Centre provides a good range of supporting facilities and is located around 250m to the west of the site, Ratcliffe Terrace Local Centre provides additional supporting facilities located around 300m south of the site and there is a Tesco Express supermarket located adjacent to the site at 160 Causewayside.

### *Student Concentrations*

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 Council's Student Housing Guidance clarifies that where the student population is dominant, exceeding 50% of the population, there will be a greater potential imbalance within the community.

While there is no definition of what constitutes an area for the purposes of calculating student population, the data zones from the 2011 census area provide a reasonable basis for determining this. However, these data zones are tightly drawn, therefore considering them in isolation does not give an accurate reflection of the population demographic within the local area. The Council has typically used the data zone that the site falls into alongside surrounding data zones that fall within an 800m radius, an approximate 10-minute walk from the application site in order to assess the level of student concentration in the local area. Using this method considers a wider catchment and provides a more accurate representation of the local population.

In relation to recent appeal decisions, notably the Tynecastle High School appeal, Scottish Ministers have accepted as appropriate the methodology used by the Council to calculate concentration levels and establish locality when considering proposals for student accommodation.

The data zones from the 2011 census area provide a reasonable basis for determining the concentration of students, however as these data zones are tightly drawn, considering them in isolation does not give an accurate reflection of the population demographic within the local area. As such it is normal procedure to use the data zones that fall within an 800m radius, an approximate 10-minute walk from the application site. Using this method considers a wider catchment and provides a more accurate representation of the local population.

It is noted that there has been growth in student housing provision in proximity (within 800m) of the application site in recent years. These include completed developments at 199 Causewayside (187 bedspaces), the redevelopment of the former Royal Hospital for Sick Children site at Sciennes Road (323 bed spaces) which is currently under construction and an existing consent for 64 student studios at East Newington Place.

It is not possible to calculate an exact student concentration due to limitations of data. An estimated student concentration can be calculated based upon the latest available census data from 2011. Within the 800m area the 2011 census shows an overall population of 18,670 and a student population of 8,590. Post-2011 population estimates become less certain, and so only a maximum concentration of students can reasonably be arrived at. Using 2020 population estimates as a base and taking account of student accommodation developments since 2011, along with the proposed 174 units proposed at the application site results in an estimated student population within the 800m area equal to 52% of the population. Within the tightly drawn individual data zone of the development the estimated student population would be 44%.

It is noted that the estimate of student concentration in the area should be considered a maximum as it does not allow for any displacement which may have occurred of students who may have been living in dwellings but have moved to student accommodation which has been built in that period.

The non-statutory Student Housing Guidance, February 2016 acknowledges that the concentration of students can undermine the social and physical fabric which defines a community and place. Where the student population is dominant, exceeding 50% of the population, there will be a greater potential imbalance within the community. In considering any potential imbalance it is necessary to consider the character of the area and the existing level of students within it.

Without the addition of further student bed numbers set out in this proposal, the estimated student concentration for the data zones within the 800m radius is 51%. The proposal would result in an estimated increase in concentration to 52%. The proposal alone therefore results in a small increase in the potential student concentration in the 800 m area. However, the overall concentration must also be considered as even small cumulative increases may have an impact depending on the character of the area and its existing uses.

The site is located close to Edinburgh University and the 800m assessment area includes a large amount of University accommodation concentrated within Pollock Halls. It therefore to be expected that this area of the city will have a high concentration of students within purpose-built accommodation but also those in other private accommodation who chose to live close to the university.

Much of the existing PBSA within the assessment area is located to the north of the proposal site and to the east where Pollock Halls is located. The closest PBSA is at 199 Causewayside which provides 187 bedspaces. This sits alongside a range of other uses including the national library, retail units with residential above, residential units and business units.

The wider area is mixed including educational institutions, commercial uses, residential along with private purpose built and university student accommodation. Given the existing character and nature of the area, that the estimated student concentration is a maximum and that the impact of the proposal on the concentration level is small (1% increase) it is considered unlikely that this proposal would have cause such change in the area that would be detrimental to the balance of the community or to the established character of the area. Based on this assessment, the proposed increase in student concentration is acceptable and is not considered to be likely to have an adverse impact on the maintenance of a balanced community.

The proposal is acceptable in principle with reference to NPF policies 9, 14 and 16 as well as LDP objectives set out in policies Hou1, Hou 8 and the Council's Student Housing Guidance Further policy considerations are addressed below in relation to other policy themes.

## Design

### *Context and layout*

NPF4 Policy 14 aims to ensure that development proposals will be designed to improve the quality of an area regardless of scale and sets out six qualities that should be achieved in order to develop successful places. LDP Design Policies Des 1 to Des 8 set 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 a high quality of design which is appropriate in terms of height, scale and form, layout, and materials.

The application was presented to the Edinburgh Urban Design Panel and comments raised during that discussion have influenced the design process undertaken for the scheme.

The surrounding built environment has a mixture of characteristics. There is a clear distinction between the character and form of existing development along Causewayside and Grange Road to the north, east and south of the development site which is characterised by dense tenements and commercial buildings and the lower density, leafy green character of the Grange Conservation Area to the west of the site.

The site's principal elevation faces onto Causewayside and is flanked by dense built form on either side. The proposed building elevation provides an appropriate fit in terms of fit and form with the existing frontage and will strengthen the existing building line onto the street. To the rear, the building has an important role to play in terms of the interface between the Causewayside and the Grange Conservation Area. Further consideration of this is provided in relation to height and massing in the paragraphs below.

In terms of layout, the building form is broadly L-shaped with a principal frontage onto Causewayside and projecting leg of built form extending into the depths of the site.

The existing building on site sits as a detached position which is set back from the building line of the two buildings on either side of it. There is a vehicular access drop off area at the front of the building at present, which creates a break in the predominant pattern of built form facing directly onto the street frontage which prevails along this part of the street. Given that there is a predominance of buildings sitting flush onto the street frontage, it is not considered to be inappropriate to bring the building form on this site forwards to replicate the pattern that exists elsewhere on the street frontage. However, it is also of importance to ensure that due respect has been given to the setting of the adjacent listed tenement building at 128-138 Causewayside, particularly in relation to the gable windows of that building and their view southwards along Causewayside.

The proposed layout of development on the site will create a strong defensible boundary onto the Causewayside street frontage whilst providing an opportunity to widen the existing footpath and remove the current vehicular access area in front of the existing building, which does not make a positive contribution to the character streetscape in terms of its current use and provides an obstacle to pedestrian movement by allowing cars to cross the footpath.

The alignment of the principal elevation has been designed to provide a cut back in the building frontage which allows the gable end of the adjacent listed tenement of 128-138 Causewayside to retain its setting within the streetscape and for the gable windows of that building to retain their views southwards and remain visible from the street frontage. It is considered that the proposed design responds appropriately to the adjacent tenement building in this regard.

The proposed layout will allow for the formation of a clear areas of public street frontage and a shared private outdoor space to the rear of the building.

### *Height, scale, and massing*

LDP Policy Des 4 (Development Design - Impact on Setting) requires development to demonstrate that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views.

The scale and massing of the proposed scheme has been carefully considered and the height, scale and massing of the building has been reduced during the planning process in response to pre-application advice.

The applicant has provided section and elevation drawings which demonstrate the relationship between the proposed building and surrounding built form. The proposed building will be six storeys in height onto the Causewayside frontage. The sixth storey is set back from the frontage, minimising its visual impact from the street. The eaves line of the proposed building at fifth floor level will reach 91.55m AOD which provides a good fit with the eaves of the adjacent building at 160 Causewayside which has an eaves height of 91.65m AOD.

The overall height of the building is also broadly similar to the height of the adjacent listed building at 128-138 Causewayside which has an eaves height of 90.447m AOD. Whilst there is a slight increase in height of the proposed building's eaves line, the substantial roof area of the tenement building rises higher, and the overall fit between the two building heights is considered to be appropriate. In addition, the corner massing of the building is stepped back which provides space around the adjacent listed building at 128-138 Causewayside and allows the windows on its gable elevation to remain open and visible to the streetscape.

On the opposite side of Causewayside, the National Library of Scotland building has a varied eaves line and large roof, which extends to a height of 94.1m AOD onto the street frontage. The proposed building will provide an appropriate fit with this building.

In terms of the proposed height and massing of the building with the surrounding lower built form to the rear (west) of the site, there is an existing pattern along the rear of plots on the west side of Causewayside where the built form has projecting leg of development into the rear of the plots, and the proposed building will follow this pattern. The development has a similar footprint to the existing building on site to the rear but will result in an increased building height.

The visual appraisal undertaken for the site considers local views of the site from six surrounding local viewpoints. This demonstrates that in terms of local views, the impact of the development will be largely neutral in the context of the surrounding height and massing of existing built form. In this respect, the additional massing of the building to the rear will form part of the existing dense development pattern which is already present along the west side of Causewayside when viewed from the immediate vicinity of the site.

The applicant has also undertaken a number of long view visualisations of the site from which provide a contextual view of the development within the wider townscape pattern. These demonstrate the proposed scale and massing the development is not noticeably different from existing neighbouring schemes. On this basis, it is considered that the proposed form of development provides an appropriate response to the character of the surrounding area.

### *Density*

With regards to proposed density of the development, the development proposal is for 174 student bedrooms on the site, which extends to 1,789 sq. m. This equates to a density of 972 student beds per hectare. Across the city there are examples of other student housing schemes with a comparable student density to that proposed in this application.

On balance, the proposed density of student housing provision on the site is noted to be high but is not considered to be excessive given the site's location and context in a densely developed urban area when considered alongside other policy objectives in the development plan. It is noted that the local area also benefits from a good range of local amenities, which would be supported by an increase in student population numbers in the local area.

### *Materials and detailing*

Materials and boundary treatments for the proposal show a clear design concept for the building. The development proposes a neutral palette of materials with the predominant principal elevation material being natural stone, with dark masonry and curtain walling detailing provided at ground floor level to define the ground floor and break up the elevation.

The use of natural stone will provide an appropriate fit with the adjacent buff sandstone listed tenement building at 128-138 Causewayside and will bring a good quality of building elevation treatment to the mixed character of this part of Causewayside. Detailing to the elevation including horizontal coursing and scale and proportion of the windows respond to the traditional elevations of the adjacent tenement building and are appropriate.

To the rear and side elevations, the use buff and white break will provide an appropriate fit with the character of the surrounding stone-built tenements and villas to the north and west and adjacent office building to the south. The scale and proportion of windows on the front elevation is replicated on the other elevations and will provide an acceptable design response to the surrounding buildings.

The upper floor will be set back from the building frontage and clad in a metal grey standing seam sheeting. The set back design and choice of dark materials will reduce the visual impact of the upper floor from the streetscape and will assist in integrating it with the adjacent buildings.

The building will include a foyer and student lounge area at ground floor which will include glazed windows onto the street providing an active frontage for around 60% of the street frontage. It is noted that part of the ground floor principal elevation (40%) will be utilised for plant/ bin storage, and this will be finished with dark grey curtain walling.

Whilst it would be preferable to create a fully active frontage onto Causewayside, the applicant has noted operational reasons for the inclusion of these uses within this part of the ground floor of the building, and has noted that locating these areas elsewhere would impact on the amenity value of the proposed open space to the rear of the building. On balance, it is considered that the level of active frontage provided will be a significant improvement on the existing situation, will provide natural surveillance opportunities and will have an overall positive impact on the street setting and public realm.

Overall, the proposed mix of materials demonstrate a design concept for the building which are acceptable and compatible with the surrounding built context. A condition is recommended to ensure that material specifications are approved prior to construction on site.

## Amenity

Policy 23 of NPF 4 supports development that will have positive effects on human health and protect people and places from environmental harm. Policy Des 5 (Development Design - Amenity) sets out further policy requirements for new development to achieve a good standard of amenity for new development and to protect sensitive neighbouring land uses.

### *Open space*

For future residents, outdoor open space is provided in two areas, in a larger, split level courtyard area of 540 sq. m to the north of the site and a smaller outdoor study courtyard area of 103 sq. m to the south of the site. It is recognised that the area to the south will be overshadowed due to its location at lower ground floor level and this area is therefore not included in the open space calculations for the site.

The north area of open space alone comprises 30% of the total site area. This area of open space will comprise a mix of hard and soft landscaping features which will provide a good level of amenity for occupiers. There are no minimum open space standards set for student accommodation development, however there is a requirement set out by the Council's Student Housing Guidance for a reasonable amount of open space to be provided. The proposed open space meets the requirements of the guidance and is acceptable.

### *Indoor amenity space*

The Edinburgh Student Housing Guidance notes that student accommodation is a primary place of residence and should therefore provide adequate amenity to contribute to healthy and sustainable lifestyles. The proposal includes provision for indoor communal facilities including an informal lounge area at ground floor level and additional communal space, a quiet study area and ancillary open space at lower ground floor level. The proposed indoor amenity spaces provided within the development are acceptable.

Criteria d) of the Edinburgh Student Housing Guidance requires that a mix of accommodation type should be provided and that this should include cluster units. The proposal is for 117 studios (67%), 48 cluster flats (28%), and 9 accessible studios (5%). While it is preferred that most accommodation is provided in cluster flats in terms of meeting with the guidance there is no threshold set for the proportion of accommodation types to be provided, and the proposal does provide a mix which would meet with the general terms of this guidance and provide a sufficient choice to future occupiers.

### *Daylight to existing properties*

LDP Policy Des 5 Amenity seeks to ensure that new development meets the needs of the users and occupiers, with consideration given to impacts on neighbouring properties to ensure no unreasonable noise impact or loss of daylight, sunlight, or privacy. The Edinburgh Design Guidance provides further advice in relation to assessing that adequate sunlight, daylight and outlook is achieved for new and existing residents.

The applicant has undertaken an assessment on the impact of the development on daylight to existing properties using the vertical sky component (VSC) and average daylight factor (ADF) approaches recommended in the Edinburgh Design Guidance (EDG). A total of 62 windows have been assessed. The daylight assessment concludes that sixty (97%) of these windows pass the VSC targets set out in the EDG, with two windows falling short of the targets.

These two windows are positioned on the gable end of no 130-138 Causewayside. The EDG states that daylight to windows on the gables of existing buildings is not generally protected, however given that these windows serve habitable rooms (living rooms) within those properties, it is considered prudent to undertake further detailed assessment. The EDG recognises that in dense urban environments, it may be necessary to further interrogate daylight levels, by utilising a further ADF assessment. The applicant has provided this information and both windows are found to pass the ADF requirements set out in the EDG. The development therefore complies with the further assessment level recommended by the EDG with regards to daylight to existing properties and is acceptable.

#### *Daylight to existing properties*

For future residents, a daylight assessment has been provided using the no-skyline (NSL) approach which includes 181 rooms within the proposed development. Of the 181 rooms, 180 (99%) would achieve the required standard set out in the EDG, meaning that at least half of the overall room will receive direct sunlight. The remaining one room is positioned at lower ground floor level and is a bedroom which forms part of a larger cluster flat.

As a result, the applicant has also assessed the ADF for this room, which indicates that the room will perform above the threshold of the EDG in this regard. It is also noted that given this bedroom forms part of a cluster flat, the occupier will be able to benefit from the amenity of the shared living room, which meets the target NSL threshold.

On this basis, it can be concluded the level of daylight penetrating the development can reasonably meet the requirements of the EDG and is acceptable.

#### *Sunlight to existing open space*

With regards to sunlight, the Edinburgh Design Guidance (EDG) states that where there is an established high quality townscape sunlight will be assessed using before and after plans showing shadows for each hour on 21 March. The EDG states that at least 50% of existing garden ground should receive two hours on sunlight on that date. The qualities of the existing space and the effects of sunlight, both before and after will inform whether any loss of sunlight is considered adverse.

The applicant has undertaken a sunlight assessment, using an hour-by-hour assessment approach as per the guidance. The assessment considers the impact of development on daylight to surrounding the existing residential garden ground to the west and north of the site. The assessment demonstrates that each of the garden areas to the west of the site (8 Grange Road and Nos 2 to 8 Findhorn Road) will continue to receive significantly more than the 2 hours sunlight threshold on the 21st of March. This complies with the Edinburgh Design Guidance and is acceptable.

The hour-by-hour assessment of the shared garden ground to the rear of the tenement at 128-138 Causewayside and 1-7 Grange Road demonstrates that less than 50% of the garden ground currently receives 2 hours sunlight on 21st March. The pre-development position therefore is below the threshold set out in the Edinburgh Design Guidance.

The hour-by-hour sunlight plans for this garden space after development indicates that less than 50% of the garden ground would continue to receive less than 2 hours of direct sunlight on 21st March. Therefore, the assessment results demonstrate that following development, the results would not comply with the criteria set out within the Edinburgh Design Guidance.

The applicant has also provided an additional sunlight assessment of the gardens at 128-138 Causewayside and 1-7 Grange Road which has been carried out to BRE standards. This demonstrates that the amount of garden ground currently receiving sunlight for two hours on the 21st of March is 29%. This assessment method demonstrates that following development, the amount of garden ground receiving two hours of sunlight on 21st March would reduce to 26%. This equates to a 3% reduction in the amount garden ground that will receive sunlight.

The sunlight assessment carried out therefore demonstrates that there will be a reduction in the amount of sunlight received by the tenement gardens at 128-138 Causewayside and 1-7 Grange Road. However, the reduction in sunlight is demonstrated to affect a relatively small amount of the overall garden area (3%). On balance, this is considered to be a relatively minor change in amenity value and this failure to comply with guidance can be accepted in this instance.

#### *Sunlight to proposed open space.*

The Edinburgh Design Guidance states that for open space in new developments, a minimum of 50% of the area of open space provided should be capable of receiving potential sunlight for more than two hours during the spring equinox (March 21st). An hour-by-hour sunlight assessment of the proposed development was undertaken. This demonstrates that part of the north courtyard (less than 50% of the total area) will receive direct sunlight between 11am and 2pm, and that around 50% of the north courtyard will receive sunlight between 4pm and 5pm. The accumulation of the direct sunlight received in the north courtyard area is summarised in the report as being in excess of the required two hours of sunlight, although this is broken up over separate time periods across the day.

The south courtyard area does not receive any sunlight however this has not been counted as usable amenity space in the overall site calculations. Overall, the assessment provided demonstrates that the proposed open space is capable of receiving a reasonable amount of sunlight in those areas that will be set out for amenity use. This complies with the Edinburgh Design Guidance and is acceptable.

### *Privacy and outlook*

LDP policy Des 5 Amenity seeks to ensure that new development meets the needs of existing and new occupiers with regards to privacy and outlook. The proposed development is positioned in a dense urban area and is within proximity of several existing residential properties to the north and west. The position of the building on site places its north elevation at a minimum of 21.5m away from the rear windows of existing properties on Grange Road. This is an acceptable offset to minimise adverse impacts on existing amenity in terms of privacy and outlook.

To the west boundary, the building has been brought in from the existing development footprint on site and is offset from the boundary wall by 4m. The proposed building is significantly higher at the rear than the existing single storey part of the building, however this steps down into the site and upper floors are positioned further away from the site boundary. The existing properties on Findhorn Place and Grange Road are set within generous garden grounds and there are existing mature trees along the boundary wall with the site which offers further privacy to these properties. On balance, the development is not considered to have an adverse impact on privacy and outlook of the adjacent residential properties.

To the south the site bounds an existing office development. The proposed building will be offset from that building by a minimum of 18m which will provide an acceptable distance in order to protect the privacy and outlook of future occupiers. This is acceptable.

### *Noise*

Planning Advice Note on Noise (PAN 1/2011) promotes a pragmatic approach to the location of new development within the vicinity of existing noise generating uses. The applicant has undertaken a noise impact assessment (NIA) which considered the noise implications of the development both on surrounding and proposed noise sensitive properties.

Environmental Protection has reviewed the NIA submitted by the applicant and are satisfied that the information submitted at this stage is sufficient to ensure that noise levels connected to proposed plant and ventilation measures are within the required parameters to address any noise concerns.

The applicant has also provided additional supporting information in relation to the proposed standby generator which will be located adjacent to the northern site boundary. Noise mitigation measures are set out for this unit, and it is noted that the generator will be operational at very limited times during daytime hours only (2 hours per month).

Environmental Protection has reviewed this position and has raised concerns in relation to the siting of the standby generator and its proximity to sensitive residential receptors. On this basis, it is recommended that the position of the standby generator is not approved at this stage and a condition is recommended to allow further consideration of this matter.

Further conditions are also provided outlining proposed noise mitigation measures as set out in the NIA which will require to be implemented for the development.

## *Air Quality*

The development site is located on Causewayside, a main thoroughfare to and from the city centre. Therefore, public transport serves the environs well. The proposed development will be car free in order to promote sustainable travel. There are existing parking bays on Causewayside that can be used for loading/ unloading at the start and end of term. The development is likely to have minimal air quality impacts associated with the operational phase of the development in this regard.

Environmental Protection has raised concerns in relation to the siting of the proposed standby generator in relation to air quality. This generator is diesel fuelled and will require to be tested intermittently. Environmental Protection has noted that this may have the potential to cause fume concerns due to the proximity to nearby sensitive receptors. The location of the proposed generator is therefore not approved at this stage and a condition is recommended to allow this matter to be addressed in further detail.

In respect of amenity the proposal provides an acceptable standard in the context of LDP policy Des 5, NPF 4 policy aspirations for liveable places and health and safety and the Edinburgh Design Guidance in the majority of matters. The proposed sunlight assessment does not comply with the Edinburgh Design Guidance; however, the applicant has provided additional supporting material which demonstrates that the impact of development on existing amenity areas will be relatively minor. On balance, it is considered that the proposals comply with the development plan and are acceptable.

## Transport

NPF4 Policy 13 seeks to encourage, promote, and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably. Policy Tra 1 of the LDP aims to reduce travel demand and encourages accessibility to major development by modes alternative to the car.

Policies Tra 2 to 4 of the LDP set out the Council's approach to providing for cycle and car parking in new developments. Policy Tra 2 (Private Car Parking) states permission will be granted for development where car parking provision complies with and does not exceed parking levels set out in council guidance. Lower provision will be pursued subject to consideration of various factors including the site's level of accessibility.

The application site is well positioned for public transport accessibility. The closest bus stops are located on Causewayside, Grange Road and Salisbury Place and are within a 200m distance of the site. Further bus stops providing access to additional bus routes are located on Newington Road/ Minto Road within a 300m distance of the site.

Zero car parking is proposed for the development. The Council's Parking Standards allow for a zero-parking approach for student accommodation where justified. Pick up/ drop off associated with student activity will take place on Causewayside, adjacent to the development. There are also pay and display vehicle spaces available on the east side of Causewayside, Grange Road and Salisbury Road within close proximity of the site.

The vehicular parking proposal complies with the Council's policy and standards and is appropriate for the location as the site is well positioned in good proximity of existing public transport provision.

The development will provide 120 cycle parking spaces, which is 69% provision. This comprises a mix of parking types including 40 standard Sheffield spaces (33%), 22 non-standard Sheffield spaces (19%) and 58 (48%) two-tier spaces. Spaces are provided in three cycle store areas located at ground floor level of the site, all of which are accessed via the rear courtyard.

It is noted that the proposed cycle parking does not meet the quantitative guidance set out in the Edinburgh Design Guidance of 100% provision, however the proposed mix of cycle parking spaces complies with the guidance in this regard.

The Roads Authority has raised no concern in relation to road safety or cycle parking provision and is satisfied with the quantum and mix of cycle parking proposed. The transport aspects of the proposal comply with the aims of NPF policy 13 which supports development that promotes and facilitates sustainable travel to prioritise walking, wheeling, cycling and public transport for everyday travel.

The proposal is aligned with the objectives of the City Mobility Plan which seeks to encourage sustainable transport options due to its proximity to public transport connections and local services and provision of a satisfactory level of cycle parking. The proposal allows for reduced car dependency and is also consistent with NPF 4 Policy 15 which supports developments that contribute to local living.

The proposal complies with LDP policies Tra 2, Tra 3 and Tra 4 and is acceptable.

#### Landscape and public realm.

NPF4 Policy 14 seeks to ensure that new development takes a design-led approach in all aspects of development to improve the quality of an area.

Policy Des 8 Public Realm and Landscape Design applies to all developments proposing new public space as part of the overall scheme. It seeks to ensure that features, including streets, footpaths, civic spaces, green spaces, boundary treatments and public art have been designed as an integral part of the scheme as a whole.

The main amenity courtyard area is positioned in the northern part of the site, accessed via a secure gate entry which will be formed to the north of the building onto Causewayside. It will be formed on two levels with a sunken area positioned at lower ground floor level with seating and planted terraces built into a stepped arrangement between the two levels. The proposed landscape strategy will serve multiple functions including SUDs, increasing biodiversity, and providing amenity space for residents. A level access path will also run through the amenity space providing access to the cycle parking areas on the site. Level access will be provided to upper and lower areas of the courtyard internally via the building.

A second smaller study courtyard area will be located at lower ground floor level in the north of the site. This area has not been included in the amount of usable open space noted above as it is predominantly in shade, however, will offer an additional area of open space for student use. The study courtyard will also provide a function as a rain garden with seating area and additional planting.

In relation to public realm, the proposed repositioning of the building frontage at Causewayside will change the character of the street frontage. The increase in width of pavement is welcomed and the introduction of planting is a positive feature. The applicant will be required to ensure that the proposed sunken bioswale planted beds are adequately maintained and protected to prevent trampling. A condition requiring the ongoing maintenance and replacement of damaged plants is recommended.

### *Biodiversity*

With regards to biodiversity on site, in determining whether the reuse of a site is sustainable, the biodiversity value of brownfield land that has been naturalised should be taken into account. NPF4 Policy 3 (Biodiversity) requires that proposals for local development include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. LDP Policy Env 16 seeks to ensure that development will not have an adverse impact on any protected species.

The site is found to have generally low biodiversity value currently; therefore, the proposed redevelopment of the site provides the opportunity to develop a landscape strategy for the site which will encourage future biodiversity on the site.

Ten new trees will be planted in the north and south courtyard areas. The proposed mix of planted species includes a good mix which will encourage biodiversity enhancement. Other proposed biodiversity measures including swift bricks, bat boxes, sparrow terraces and log piles are proposed which are welcomed. The development also incorporates a SUDs scheme including a green/ blue roof system, rain gardens and bio-retention areas. These have been integrated into the landscape strategy well and are supported.

The applicant has undertaken an assessment of the proposed biodiversity measures for the site using the Defra Biodiversity metric. Biodiversity Net Gain is anticipated for the site.

It is considered that the proposed design of the courtyard space, roof terraces and public realm fully comply with the provisions of NPF4 policies 3 and 7 and LDP policy Des 8 and are acceptable.

### Trees

NPF4 Policy 6 seeks to ensure that trees and woodland on development sites are sustainability managed and protected. LDP Policy Env 12 (Trees) refers to development not being permitted that is likely to have damaging impacts on trees worthy of retention unless necessary for good aboricultural reasons. Supporting paragraph 186 states the policy recognises the important contribution made by trees to character, biodiversity, amenity, and green networks.

There are no existing trees within the site boundary, however a number of trees are located within adjacent garden grounds around the perimeter of the site within a 12m distance of the site boundary. A tree survey has therefore been undertaken for the development proposal.

The tree survey notes that the development will have a minimal impact on the neighbouring trees, as the existing boundary walls and foundations are expected to have formed a significant barrier against root encroachment into the site. The only work required to be undertaken is crown lifting of one tree (Norway Maple) located in the garden grounds of the adjacent office building at 160 Causewayside. A Tree Protection Plan has been provided by the applicant. The proposed tree protection measures are aligned with the requirements of the development plan and are acceptable.

### Flooding

NPF4 policy 22 and LDP policies Env 21 (Flood Protection) and RS 6 (Water Supply and Drainage) all seek to ensure sustainable water management and flood risk measures are in place for new development.

The application site is not located in an area of known flood risk. The applicant has provided supporting flooding information for the proposal including a surface water management plan and drainage strategy. This information has been reviewed by Flood Planning and no objections have been received subject to CEC/ Scottish Water's agreement of maintenance of the proposed drainage networks. The proposal has been designed to mitigate the risk of future flood risk and complies with the development plan in this regard.

### Contaminated Land

NPF4 Policy 9(c) and LDP policy Env 22 require development proposals to demonstrate that land that has previously been developed can be made safe and suitable for the proposed new use. The site has been developed for commercial uses for a significant time. These uses have the potential to contaminate the site. A condition is recommended which requires the applicant to provide supporting information to assess ground conditions and potential contamination in this regard.

### Zero Waste and Sustainability

NPF 4 policy 12 aims for the reduction and reuse of materials in construction, with a view to supporting the circular economy.

With regards to sustainability, the applicant has undertaken a sustainability statement, and the proposed development incorporates a range of measures. These include taking a Fabric First Approach to maximise the performance of materials of the building fabrics, a SUDS approach to surface water management, air source heat pumps to provide hot water, mechanical ventilation in all bedrooms/ studios and the provision of solar photovoltaic panels on the roof. The development is implementing BREEAM and is targeting an "Excellent" certification.

It is proposed that waste removal from the development once operational will be managed by a private operator. The Council's waste team has been consulted on this matter and has advised that this approach is satisfactory for the development.

The proposed zero waste and sustainability measures are aligned with the provisions of the development plan and are acceptable.

### Archaeology

NPF4 Policy 7 aims to protect and enhance environmental assets and places and LDP policy Env 9 (Development Sites of Archaeological Significance) aim to protect archaeological remains. 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 site is regarded as being located within an area of archaeological potential both in terms of potential medieval remains but also relating to the 18th and 19th century buildings and school which formerly occupied the site. Accordingly, the City Archaeologist has recommended a condition for a programme of archaeological works to fully excavate, record and analyse all significant archaeological remains prior to development taking place on the site.

### Developer Contributions

LDP policy Del 1 requires proposals to contribute to infrastructure provision where relevant and necessary to mitigate any negative additional impact (either on an individual or cumulative basis) and where commensurate to the scale of the proposed development.

The proposal has been assessed against the requirement for developer contributions. The site is not within a Healthcare Contribution Zone. No other financial contributions are required by the development at this time.

### **Conclusion in relation to the Development Plan**

The proposed development broadly complies with the provisions of NPF 4, the 2016 Edinburgh LDP and associated guidance. Non-compliances with non-statutory guidance in relation to sunlight and daylight are minor in nature and there are not considered to be any significant issues of conflict.

#### **d) There are any other material considerations which must be addressed?**

The following material planning considerations have been identified:

#### Emerging policy context

On 5 April 2024, the Planning and Environmental Appeals Division published its report into the examination of the Proposed City Plan 2030 and supporting documents in terms of Section 19 of the Town and Country Planning (Scotland) Act 1997. The Council is currently considering the recommendations and modifications required to the Proposed City Plan 2030. It is the intention that the modifications will be considered by the Council before the end of June 2024. At this time in the context of the consideration of this particular application limited weight can be given to the relevant policies of City Plan 2030 until the proposed modifications have been fully considered.

## Equalities and human rights

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

## Public representations

The application has received twelve objection comments, two neutral comments and one support comment. The comments made have been addressed in sections (b) and (c) above and a summary of the representations is provided below:

### *Material objections*

- Principle of student accommodation in relation to concentrations in the local area.
- Amenity concerns - impact of development on sunlight received by existing garden grounds, daylight to neighbours, privacy, odours from cooking.
- Townscape concerns - changes to historic building line onto Causewayside and loss of space to front of building.
- Sustainability - environmental impact of demolition of existing building.
- Principle of demolition - existing building should be reused by local community.
- Impact on setting of listed buildings.
- Design matters - height/ scale/ massing.
- Impact of development on surrounding drainage networks.
- Impact of development on the stability of surrounding buildings.
- Impact of development on local water pressure.
- Concern re safety of siting of standby generator.
- Noise concerns.
- Traffic concerns - local network, parking capacity.
- Concern of inaccuracies in reports.
- roof terraces must not be publicly accessible.

### *Non-material objections*

- Construction related noise concerns

### *Material neutral comments*

- Treatment/ care of sculpture above entry door; (It is noted that this feature will be retained by the site vendor)

### *Material support comments*

- Support for the principle of student development.
- Support for the design, height, and scale of development as proposed.
- Support for the provision of streetside green space.

- The design will make a positive contribution to the streetscape (including provision of green landscape features).
- Support for the proposed landscape design.

### *Community Council comments*

Grange and Prestonfield Community Council were consulted on the application, but no response was received.

### **Conclusion in relation to identified material considerations.**

There are no equalities or human rights issues and the material considerations do not raise any matters which would result in recommending the application for refusal. Therefore, the application should be granted.

### **Overall conclusion**

The proposal will make a positive contribution to the City's accommodation provision for those undertaking further and higher education and is acceptable in this location. The development plan encourages well-designed, compact urban growth that is sustainable and allows for 20-minute neighbourhood principles to be delivered. The proposal is compatible with these principles.

The impact of development on the setting of nearby listed buildings, character and appearance of the adjacent Conservation Areas and the wider townscape has been considered and is acceptable in this regard.

The proposal is not considered to have a significantly adverse impact on surrounding residents and will provide an acceptable amount of indoor and outdoor amenity space for future residents. Non-conformities with the relevant non-statutory guidance in relation to sunlight and daylight are justified in this instance.

Subject to recommended conditions, the proposal is acceptable and complies with National Planning Framework 4 and the aims of the 2016 Edinburgh Local Development Plan. There are no material considerations that outweigh this conclusion.

## **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following.

### **Conditions**

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted. If development has not begun at the expiration of this period, the planning permission lapses.
2. 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.
3. The noise mitigation measures as specified within RMP Noise Impact Assessment Technical Report No. R-9720-NS-RGM and dated 14th December 2023 require to be installed and operational prior to occupation of the development.
4. A further assessment of the plant noise breakout, assessment and mitigation requires to be undertaken once the plant specifications and vibration control measures have been confirmed. These measures require to be submitted to the Planning Authority and agreed prior to occupation of the development.
5. Notwithstanding the approved drawings for the site, the location of the proposed backup generator is not agreed. Further information regarding the proposed location, specification, and mitigation measures in relation to noise and air quality require to be submitted to the Planning Authority for approval.
6. No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, publication, public/community engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.
7. The approved landscaping scheme shall be fully implemented within the first planting season of the completion of the development. All planting carried out on site shall be maintained by the developer to the satisfaction of the Planning Authority for a period of 5 years from the date of planting. Within that period any plants which are dead, damaged, missing, diseased or fail to establish shall be replaced annually with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme, as may be submitted to and approved in writing by the Planning Authority.
8. Prior to the commencement of development, full details of the proposed planting plan and a planned schedule for planned landscape maintenance checks require to be provided to the planning authority for approval.

9. A detailed specification, including trade names where appropriate and samples where requested, of all proposed external materials, walls and boundary treatments, shall be submitted to, and approved in writing by, the planning authority before work is commenced on site. Development shall then take place in accordance with the materials approved. Sample panels may be requested.

### **Reasons**

1. To accord with Section 58 of the Town and Country Planning (Scotland) Act 1997.
2. In order to protect the health of the building's occupants.
3. In order to protect the amenity of the existing neighbours and future occupiers of the development.
4. In order to protect the amenity of the existing neighbours and future occupiers of the development.
5. In order to protect the amenity of the existing neighbours and future occupiers of the development.
6. In order to safeguard the interests of archaeological heritage.
7. In order to ensure that the approved landscaping works are properly established on site.
8. In order to enable the planning authority to consider these matters in detail.
9. In order to enable the planning authority to consider these matters in detail.

### **Informatives**

It should be noted that:

1. 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.
2. 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.
3. The applicant should provide details of the proposed insect boxes, bee posts, bee banks and deadwood piles for the green roof and bird baths for the approval of the Planning Authority.

### **Background Reading/External References**

To view details of the application go to the [Planning Portal](#)

**Further Information - [Local Development Plan](#)**

**Date Registered: 18 December 2023**

**Drawing Numbers/Scheme**

01-03,04A, 05C, 06A-11A, 12B-14B, 15, 16,17A, 18, 19B, 20A,21-24

**David Givan**  
**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**

Contact: Julie Ross, Planning Officer  
E-mail: [julie.ross@edinburgh.gov.uk](mailto:julie.ross@edinburgh.gov.uk)

Appendix 1

### **Summary of Consultation Responses**

NAME: Environmental Protection.  
COMMENT: Concern raised re. potential noise/ air quality impact from location of standby generator. Proposals are otherwise satisfactory.  
DATE: 22 May 2024

NAME: Waste Services  
COMMENT: Development will utilise private waste management system - no issues raised.  
DATE: 10 January 2024

NAME: Flooding  
COMMENT: No objection.  
DATE: 22 January 2024

NAME: Scottish Water  
COMMENT: No objection.  
DATE: 8 January 2024

NAME: Grange and Prestonfield Community Council  
COMMENT: No response.  
DATE:

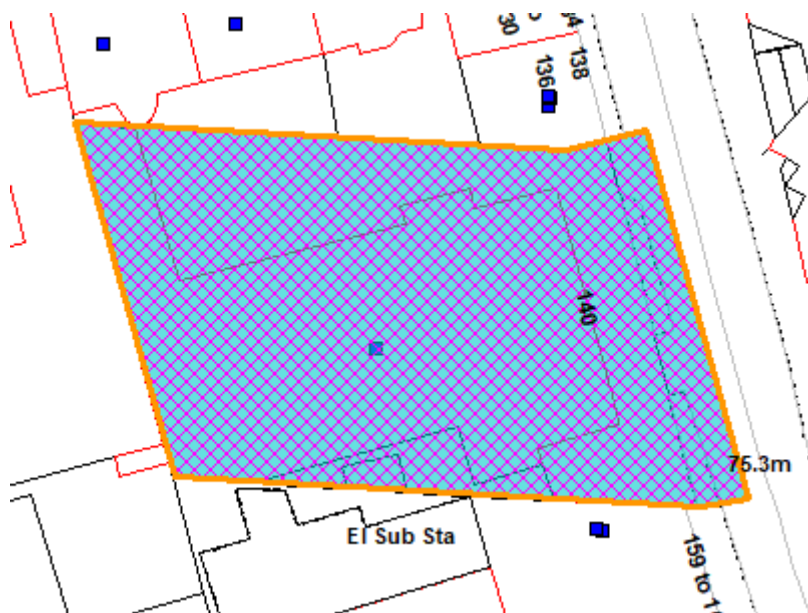
NAME: Archaeology

COMMENT: No objection. A condition is recommended for programme of archaeological works.

DATE: 17 January 2024

The full consultation response can be viewed on the [Planning & Building Standards Portal](#).

## Location Plan



© Crown Copyright and database right 2014. All rights reserved. Ordnance Survey License number 100023420