

Planning Committee

10am, Thursday, 6 August 2015

Edinburgh Planning Guidance: Student Housing – Revised for consultation

Item number	6.2
Report number	
Executive/routine	Executive
Wards	ALL

Executive summary

Purpose-built student accommodation is required to support the city's higher educational establishments. Both the Edinburgh City Local Plan (ECLP) and the emerging Local Development Plan (LDP) include a policy to guide its location. To assist with the implementation of this policy, non-statutory planning guidance has been in use since 2010.

An Issues Paper on Student Housing was approved for consultation at the 4 December Planning Committee. The purpose of this report is to set out the findings of the consultation exercise and seek Committee approval to consult on the revised non-statutory planning guidance. The comments received during the consultation have been taken into account when preparing the revised guidance. The findings of the consultation on the revised non-statutory planning guidance will be reported back to Committee prior to a finalised guideline being approved.

Links

Coalition pledges	P15
Council outcomes	CO7 , CO8 , CO19 , CO21
Single Outcome Agreement	SO1 , SO4

Edinburgh Planning Guidance - Student Housing – Revised for consultation

Recommendations

- 1.1 It is recommended that the Committee notes the findings of the consultation on the Student Housing – Issues Paper and approves the Revised Student Housing Planning Guidance for consultation.

Background

- 2.1 In February 2014, Planning Committee noted the annual programme for the review of planning guidance. It stated that a review of the guidance for assessing applications for purpose-built student accommodation was to take place in late 2014.
- 2.2 Following a review of the existing guidance and publication of the 2011 census data, Planning Committee approved an Issues Paper for consultation in December 2014.
- 2.3 This report sets out the findings of the consultation exercise on the Issues Paper. The comments received during the consultation have been taken into account when preparing the revised guidance.
- 2.4 This report also presents a revised student housing planning guidance for consultation. Its purpose is to continue to assist in the interpretation of Policy Hou 10 Student Housing in the Edinburgh City Local Plan (ECLP) and Policy Hou 8 in the emerging Local Development Plan (LDP).

Main report

Context

- 3.1 Edinburgh's universities and colleges play a major part in the economy and life of the city. One of the core aims of the ECLP is to 'support the growth of the city as a centre of learning and higher education'. Likewise, Aim 3 of the emerging LDP recognises higher education as one of the key sectors in contributing to the strength of Edinburgh's economy.

Report on Consultation

- 3.2 Public consultation was carried out on the Issues Paper between 16 March 2015 and 24 April 2015. A total of 185 responses were submitted electronically through the Council's Consultation Hub. An additional nine written submissions were received. A full report of all representations is contained in Appendix 2.

- 3.3 Representations were received from Marco Biagi MSP, Sarah Boyak MSP, Sheila Gilmore (former MP), Grange/Prestonfield Community Council, Old Town Community Council, Cockburn Association, Blasket Association, Grassmarket Residents Association, NHS, University of Edinburgh, Edinburgh Napier University, Unite, National Association of Landlords, Castle Rock Edinvar Housing Association, Edinburgh University Students' Association, Homes for Scotland, and a number of individuals.
- 3.4 The consultation asked eight questions relating to issues associated with student housing, such as, the need for student housing, the continued need for locational guidance and the use of the concentration thresholds. In addition there was an opportunity to submit any other comments.
- 3.5 The representations contained a wide range of comments which are summarised in Appendix 1: Report of Consultation on Student Housing – Issues Paper along with the Council's responses. In summary the responses reflected:
- A continued support for higher education and its role in Edinburgh's economic and social activity;
 - A qualified support for additional purpose built student accommodation;
 - Support for the identification of specific sites for student accommodation;
 - A preference for locating students in purpose built accommodation;
 - A feeling that student accommodation rents are expensive;
 - Support for continued use of a 30% concentration threshold or lower;
 - Need for more general and affordable housing over students; and
 - Support for requiring housing as part of mix of uses on larger sites.
- 3.6 An engagement meeting was held on 26 March with Community Councils and representative community organisations. The communities were represented by:
- Joan Carter- South Side Association;
 - Stephen Carter- South Side Association;
 - Richard Price- New Town and Broughton Community Council;
 - M. Clyde- Merchiston Community Council;
 - Iain Black- Tollcross Community Council;
 - Michael Lister- Tollcross Community Council;
 - Tony Harris- Gracemount/Prestonfield Community Council ;
 - Adrian Graham- Leith Central Community Council;
 - Ann Wigglesworth- Tollcross Community Council; and
 - Roger Colkett- Tollcross Community Council.
- 3.7 An engagement meeting was held by Edinburgh University and the South Side Association. A Planning officer attended this event. Further meetings have taken place with representatives of the universities to better understand student and universities accommodation requirements. During the forthcoming

consultation period, Council officers will continue to liaise with the universities to gather additional information on the location of students, and their accommodation patterns, during their time in education, and potentially beyond.

- 3.8 The full responses to the representations are contained in Appendix 2. These comments have been considered and have influenced the revision of the guidance.

Revised Guidance

- 3.9 The revised guidance is proposed in light of research, monitoring work and the comments received, during the consultation period for the Issues Paper. The proposed guidance takes into account issues arising from the appeal decisions at Bernard Terrace/Lutton Court (PPA-230-2122) and St Leonard Street (PPA-230-2146). In these cases the implementation of the developments will result in student concentrations of 60% and 62% respectively. The reporter found that the development “would not result in too high a concentration of student accommodation in the area” (St Leonard Street (PPA-230-2146)).

The existing guidance contains a concentration figure of 30% across the city. As a result of these appeals this figure is no longer considered appropriate for all communities and the proposed guidance addresses this. While the reporter’s findings are noted, it is not accepted that communities with 60% and 62% student concentrations would constitute sustainable balanced communities. Circular 2/2012 Houses in Multiple Occupation identifies “a high number of transient residents leading to less community cohesion”. While it is acknowledged that the length of time which students reside in a place varies they are considered a temporary component of the community. The potential impact on community cohesion clearly justifies guiding development to an appropriate place to support maintaining a balance within a community. Therefore, the revised guidance sets out a range of location specific concentrations which seek to guide new student accommodation in response to the wider needs of the communities. The revised guidance is attached at Appendix 3.

- 3.10 The intention is to provide greater clarity and ensure that regard is had to the character of each site’s particular context, whilst continuing to promote or safeguard mixed, sustainable communities. This issue is inter-related to the need for general and affordable housing, and the revised guideline, seeks to encourage the provision of housing in sustainable locations, to address the issue of housing need and maintaining balanced communities.

Accommodating Student Growth

- 3.11 The limited provision of purpose-built student accommodation combined with the increase in student population has resulted in a noticeable increase in student concentration in and around the city centre, as well as expansion into Leith and along arterial routes in the west of the city. The most densely concentrated areas are located within easy walking distance of the University of Edinburgh’s George

Square campus. Future student numbers and the demand for purpose built accommodation will continue to evolve and therefore it is important to continue to monitor the demand for purpose built accommodation through engagement with the universities.

- 3.12 Despite the increasing proportion of purpose built student accommodation in recent years there is no evidence to suggest the number of students living in general housing or HMOs has reduced (Map 2). Therefore there is a need for more purpose built student housing in order to free up general housing stock through an increased offer and increased competition. It is preferable that student needs are met as far as possible in well managed and regulated schemes. The demand for accommodation continues to be directed primarily at campus sites and the city centre and the revised guidance continues to support these locations while ensuring that their impact is balanced with other objectives, including community needs.

Impact of Students

- 3.13 A high student population in one location can bring benefits, for example in supporting local services. Purpose-built accommodation can reduce potential antisocial aspects of locating significant numbers of students within the community. However, the quantity of students can place pressures on the land uses and social infrastructure of an area and change the area's character. The concentration of students, as a proportion of the transient population, can undermine the social and land uses which contribute to a community and place.
- 3.14 It is acknowledged that students only represent one component of the transient population and that there is a range of types of accommodation which they can access, including mainstream residential properties and HMOs. While it is beyond the scope of the Planning Authority, and the council, to control the specific occupancy of all types of accommodation the guidance will influence a development form which can have a significant impact on communities and infrastructure.

Balanced Sustainable Communities

- 3.15 A significant element of Edinburgh's character is the balanced sustainable communities which make up the whole city including the city centre. These communities are made up of groups of people with common interests which are located in one place. Balanced sustainable communities require the dominant residential component to be permanent and not transient. The student population, (where not living at home), can be a significant element of the transient population. While students make many positive contributions to society, in excessive concentrations they can significantly change an area's character and potentially undermine a community. Where the student population is dominant, exceeding 50% of the population, there will be a greater potential imbalance within the community. This may result in a poor quality of place, a diminished sense of community and make an area less attractive to all sections of the population.

3.16 Edinburgh's communities are varied in character and the mix of residents contributes to these different characters. It is therefore appropriate to consider a range of different thresholds in different locations to safeguard the individual character of the place and the community.

3.17 Purpose-built student accommodation can have a significant impact on the physical environment and the overall quality of a place. Creating Places - A policy statement on architecture and place for Scotland sets out the six qualities of successful places which all development should consider, these are;

- distinctive;
- safe and pleasant;
- easy to move around;
- welcoming;
- adaptable; and
- resource efficient.

It is particularly important that the design of purpose-built student accommodation should create safe and pleasant places for residents and the wider community. The aim is to create a mix of uses avoiding a single land use and ensure adaptability.

3.18 Edinburgh has a housing requirement set out in the Local Development Plan (LDP). It is the role of the LDP to determine how the housing requirement up to 2024 will be met, taking account of the contribution made from existing sites and other allowances such as completions from windfall sites and demolitions. The windfall assumption is set out in the Housing Land Study (June 2014). Meeting this windfall assumption relies on brownfield sites identified as having a high development potential to be delivered for general housing. It is appropriate to apply specific guidance to these sites to encourage the delivery of much needed housing and help mitigate the impact of purpose built student on communities.

3.19 Large mono-use development has significant potential to harm the character of an area. Locational and design guidance criterion f) seeks to guide the mix within larger proposals to ensure a balance between the need for student accommodation and housing, while mitigating the impact upon the character of an area. Development in accordance with this criterion could achieve a neutral impact on student density within a community.

Assessment Methodology

3.20 In assessing the degree of student concentration, factors to be taken into account are the nature of the locality in terms of mix of housing types, and the existing and proposed number of students in the locality. Approvals will continue to be dependent on it being demonstrated that, individually or cumulatively, such developments would not undermine the achievement of mixed, sustainable communities in that locality of the city.

- 3.21 It is considered that the numerical method be amended to better reflect the issue of transient population. The proposed method is to remove students who are living as part of a family household from the student component. These students may be at higher or further education and are likely to contribute to the community as they are permanent residents. This will result in data which more accurately reflects the issue of the transient element of a population.

Revised Locational Guidance

- 3.22 Once approved, a finalised version of the guidance will continue to inform the use of ECLP Policy Hou 10 Student Housing and LDP Policy Hou 8. These policies state:

Planning permission will be granted for purpose-built student accommodation where:

- a) the location is appropriate in terms of access to public transport and university and college facilities; and*
 - b) the proposal will not result in an excessive concentration of student accommodation in any one locality.*
- 3.23 The revised guidance continues to propose an approach which focuses new student housing developments in or bounding main university campuses. The word 'adjacent', however, has been replaced with sites 'sharing a boundary with' to improve clarity of interpretation. These locations have concentrations of academic facilities and for that reason offer sustainable locations for further development. Only those considered to be the main campuses have been identified in the revised guideline (Appendix 3 Map 1).
- 3.24 The revised guidance balances the needs of communities and gives due consideration to the decisions of the reporter, outlined in para 3.9. In supporting purpose-built accommodation in locations which are close to the university campuses, the revised guidance also proposes that locations within 800m (10 minutes) walking distance of an identified campus will generally be acceptable provided that they do not result in a student population of over 50% or more in the locality (using data zones). Giving due consideration to Planning Advice Note 75: Planning for Transport, the observed locational choices made by students and the sustainable transport options available, a walking distance of 800m is considered appropriate to guide this higher concentration level. From previous consultations with community groups it is recognised that the increase from 30% to 50% will be controversial. However, the reasoning for the 50% concentration is set out in paragraph 3.15. On larger sites additional requirements have been added to mitigate the impact of student concentrations on character of the area and to promote good placemaking.
- 3.25 In recognising the economic benefits students bring to the city and their contribution and support to local services, the revised guidance proposes that those locations within a 400m (5 minutes) walking distance of a defined town centre (Appendix 3 Map 3) will generally be acceptable provided that they do not result in a student population of over 40%. The increase from 30% to 40%

concentration reflects the move to supporting town centres as more sustainable locations for student accommodation. This approach is supported by the Town Centre First principle set out in Scottish Planning Policy. The 400m distance is consistent with Scottish Planning Policy, Planning Advice Note 75 and Designing Streets in relation to walkable neighbourhoods and access to public transport.

- 3.26 Outwith the main campuses, where access to public transport facilities is good, purpose-built accommodation will generally be acceptable, provided that the proposal will not result in a student population of over 30%. The hierarchy of locational guidance and use of a range of concentration thresholds is designed to direct development to locations which are best suited to meet student's needs. The concentration range will also guide the level of change in character of an area, ensuring the retention of balanced sustainable communities and avoiding the dominance of a single land use within any area.
- 3.27 Elsewhere, purpose-built student housing in locations that do not meet the criteria set out in ECLP Policy Hou 10 (and LDP Policy Hou 8) will generally not be permitted.
- 3.28 The percentage thresholds provide useful guidance for the public and other stakeholders and inform the retention or creation of sustainable communities. The percentage thresholds reflect the roles and character of different areas, and are a useful measure by which to assess the impact of development upon each particular community. The Council continues to explore alternative sources of more accurate data with the universities. The percentage bands are chosen to avoid a majority of students in any one locality, based on their location in relation to University campuses, town centres and public transport accessibility.
- 3.29 An additional requirement to provide general housing as part of a mix on sites greater than 0.25ha will rebalance the mix of land uses and help meet the concentration thresholds stated above. While student accommodation will not be prohibited, this requirement will ensure larger developments contribute to the essential delivery of housing. Development which accords with this requirement will have a minimal impact on the student concentration in any area.
- 3.30 The guidance reflects a strategy for meeting the continued need for student accommodation in suitable sustainable locations whilst delivering this in conjunction with much needed market and affordable housing.

Next steps

- 3.31 The revised guidance will be the subject of public consultation. The comments received during the consultation process will be taken into account in the finalisation of the guidance.
- 3.32 The finalised guidance will be reported to Committee for approval in December.

Measures of success

- 4.1 The development of student housing in locations supported by the guidance and the maintenance of mixed sustainable communities.

Financial impact

- 5.1 There are no direct financial impacts arising from this report.

Risk, policy, compliance and governance impact

- 6.1 There are no perceived risks associated with this report. The preparation of non-statutory planning guidance is supported by circular 6/2013: Development Planning.

Equalities impact

- 7.1 The impacts of this report in relation to the Public Sector Equalities Duty and the ten key areas of rights have been considered. The revised guideline has no negative impacts on the three equality duties with regard to the eight protected characteristics. In terms of the ten key areas of rights, the revised guideline enhances the right to health by encouraging students to travel short distances or use public transport to access university facilities. In addition the revised guideline also encourages the provision of housing in sustainable locations. Standards of living will be enhanced by ensuring the right mix of land use. The revised guideline will have no negative impacts on the ten key areas of rights.

Sustainability impact

- 8.1 The proposals in this report will:
- reduce carbon emissions because it supports purpose-built student accommodation within walking distance of main university campuses, town centres and public transport services;
 - help achieve a balance of land uses, including the provision of housing, to support sustainable communities; and
 - help achieve a healthy and resilient economy in support of town centres where a wide variety of local businesses choose to locate.

Consultation and engagement

- 9.1 Pre-revision engagement has taken place with internal stakeholders only.
- 9.2 The Second Proposed Plan was published for a statutory period of representations from 22 August to 3 October 2014.
- 9.3 It is proposed that consultation on the revised guidance will involve:
- Internal focus groups with Development Management teams;
 - Meetings with the main Universities (University of Edinburgh, Napier University, Heriot Watt University and Queen Margaret University);

- Workshop with the main private student housing providers;
- Use of the consultation hub to obtain views of all interested parties.

Background reading/external references

[Annual Review of Guidance report](#) to Planning Committee (27 February 2014)

[Edinburgh Planning Guidance](#) – Student Housing (August 2010)

[Student Housing – Issues Paper report](#) to Planning Committee (4 December 2014)

[Student Housing – Issues Paper](#) – Consultation Hub (16 March to 24 April 2015)

Full record of consultation responses to Student Housing Issues Paper.

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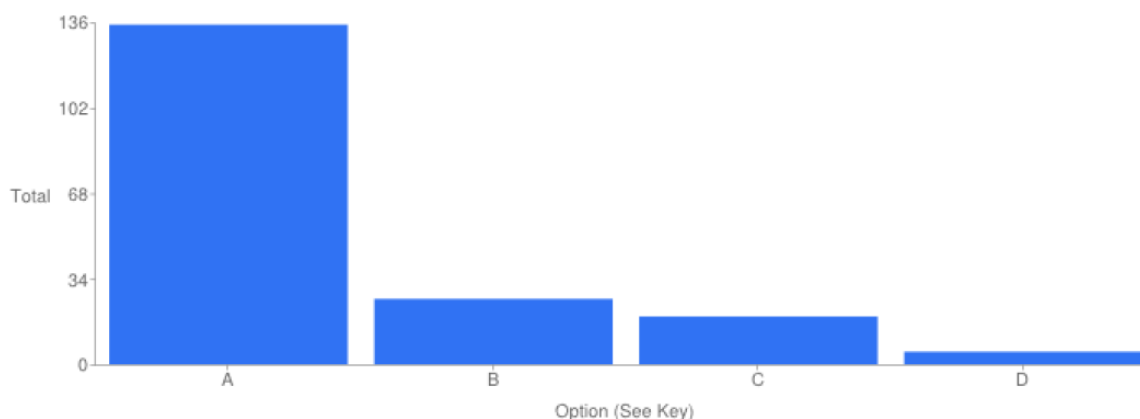
Links

Coalition pledges	P15 Work with public organisations, the private sector and social enterprise to promote Edinburgh to investors
Council outcomes	CO7 Edinburgh draws in new investment in development and regeneration CO8 Edinburgh's economy creates and sustains job opportunities CO19 Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm CO21 Safe – Residents, visitors and businesses feel that Edinburgh is a safe city.
Single Outcome Agreement	SO1 Edinburgh's economy delivers increased investment, jobs and opportunities for all SO4 Edinburgh's communities are safer and have improved physical and social fabric
Appendices	Appendix 1: Report of Consultation on Student Housing Issues Paper Appendix 2: Revised Student Housing Guidance

Appendix 1: REPORT OF CONSULTATION - STUDENT HOUSING ISSUES PAPER

The tables contained in this document reflect the 185 consultation responses submitted through the Council's Consultation Hub. The content of all representations, including the 9 not submitted through the Hub, are contained in the summary of responses.

QUESTION 1: Do you feel that the Council should continue to support the growth of further and higher education in Edinburgh?



Key	Option	Total	Percent of All
A	Yes	135	73.37%
B	No	26	14.13%
C	Don't know	19	10.33%
D	Not Answered	5	2.717%

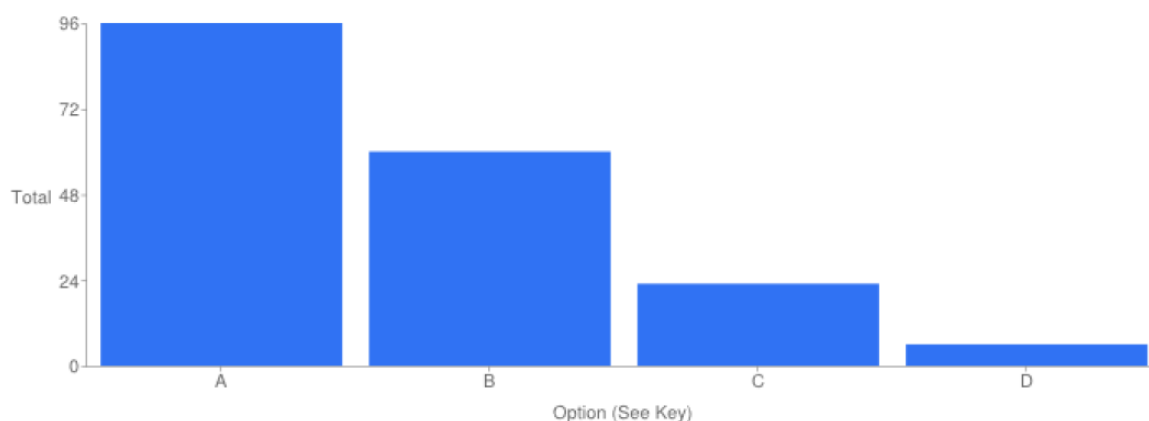
Summary of all responses

- It is stated by many of the respondents that education and Universities are a key part of Edinburgh and a key generator of economic and social activity in the city. Reference was made to National Planning Framework 3 para 2.2 which states that universities are one of Scotland's key sectors. Likewise, SPP para 94 supports the delivery of education and recognises universities as a key sector with particular opportunities for growth. Likewise, SESplan identifies the sector as being one of a number of sectors that will be of strategic importance to the economy of the area. However, it is stated by some respondents that support for higher education does not have to mean growth.
- For some of the community councils', whilst supportive of education, they feel strongly that the Council should instead spend more of it's limited resource to support the residents of the city. The retention of balanced sustainable communities is discussed as being of paramount importance.

The Council's response

The Council recognises the important contribution that higher education makes to the city. Aim 3 of the emerging LDP recognises higher education as one of the key sectors in contributing to the strength of Edinburgh's economy. The revised draft guidance will continue to support this.

QUESTION 2: Do you feel that the Council should continue to support the development of purpose-built student housing?



Key	Option	Total	Percent of All
A	Yes	96	52.17%
B	No	60	32.61%
C	Don't know	23	12.50%
D	Not Answered	6	3.261%

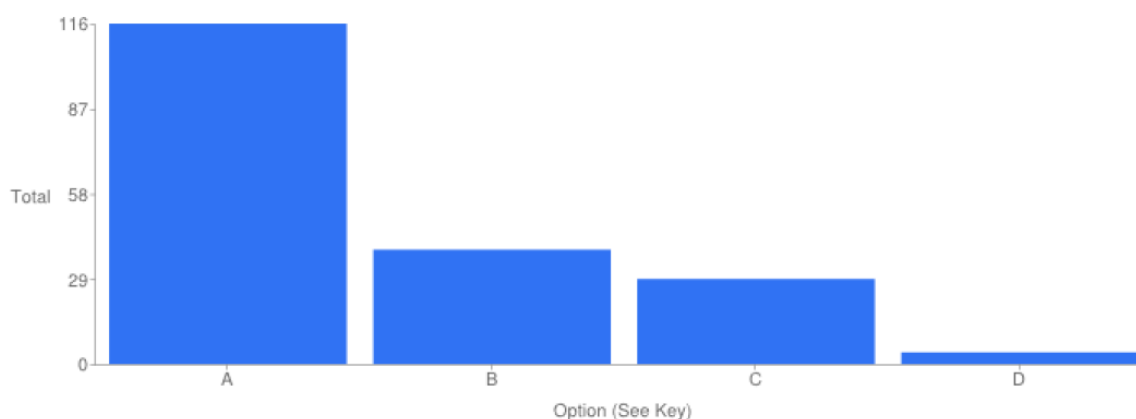
Summary of all responses

- The majority agree that the Council should continue to support the development of purpose-built student housing as it reduces the pressure on traditional tenemental accommodation.
- However, some people still express concerns, for example, that steps are needed to ensure that it does not result in an excessive concentration.
- There is a large proportion who do not agree that the Council should continue to support the development of purpose-built student housing, for reasons such as;
 - there is more than enough
 - students should be integrated with the community
- Some concern raised over the qualities of many of the purpose-built student accommodation blocks, whilst others have raised the issues surrounding the lack of quality within some HMO properties.
- Some responses disagree that students should be segregated in large gated enclaves.

The Council's response

The revised draft guidance will continue to support purpose-built student accommodation in the right locations. These include in and close to University Campuses.

QUESTION 3: Should the revised guidance identify preferred sites for purpose-built student accommodation?



Key	Option	Total	Percent of All
A	Yes	116	63.04%
B	No	39	21.20%
C	Don't know	29	15.76%
D	Not Answered	4	2.174%

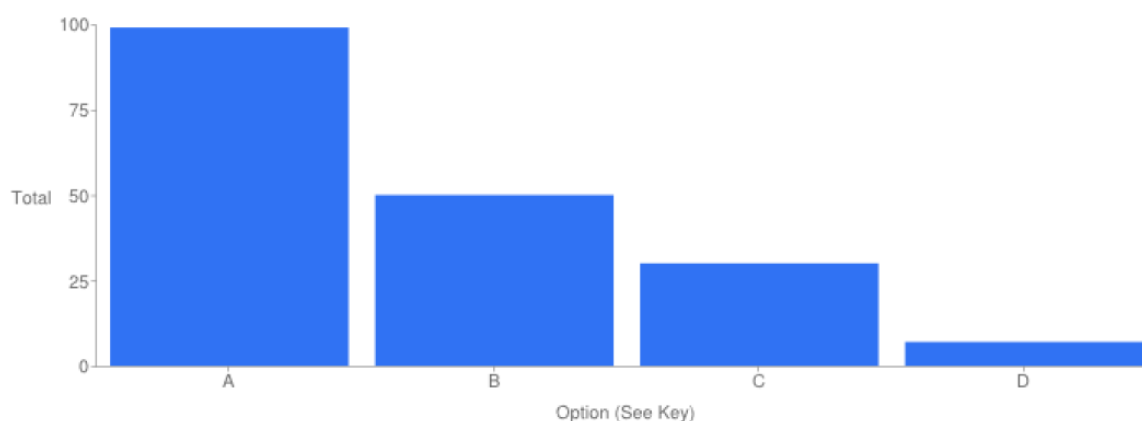
Summary of all responses

- Preferable for the Council not to be prescriptive but to take a flexible approach to assessing applications which come forward on their own merits having regard to their proximity to the universities and colleges, their scale, accessibility and other planning considerations.
- Preference for the Council to identify sites either on the periphery, for example Granton, Pilton, Nidrie, or in areas where the students study such as Queen Margaret's, Heriot Watt University, Napier Sighthill and Craiglockhart and Kings Buildings. Preference from a few that students should be located away from the central area, including the southside.
- The revised guidance should identify preferred locations rather than specific sites, on the base that the market will determine what sites become available for student accommodation.
- The sites should be located in areas of controlled parking as the Council has policies not to issue residents parking permits to residents in purpose built student housing.
- Student housing should be considered as an asset and a positive advantage to any local community and encouraged (rather than restricted to specific areas), in the same way that social/affordable housing is considered a necessary component of any proposed housing development.

The Council's all response

It is considered appropriate to identify preferred sites for purpose built student accommodation, but instead continue to provide guidance on preferred localities based on proximity to the University Campuses and mix of uses. The University campuses are identified and should continue to be identified as the preferred sites for further purpose-built student accommodation.

QUESTION 4: Should student 'needs' be met as far as possible in well managed, purpose-built student accommodation?



Key	Option	Total	Percent of All
A	Yes	99	53.80%
B	No	50	27.17%
C	Don't know	30	16.30%
D	Not Answered	7	3.804%

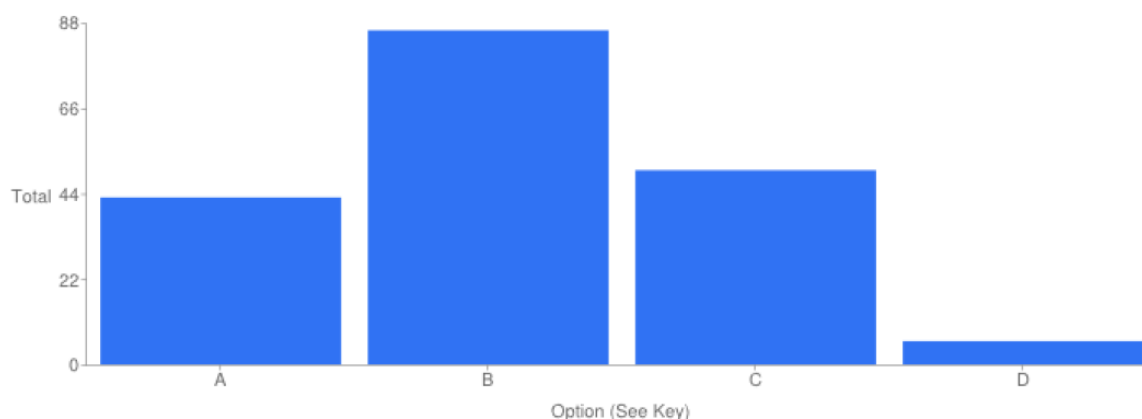
Summary of all responses

- Students will decide what type of property experience they want, private, halls, student accommodation etc.
- The needs of first-year students straight from school may well be met best in well managed, purpose-built student accommodation but once they have "found their feet" many of them will benefit from experiencing a more independent lifestyle.
- Purpose-built student accommodation will alleviate the pressure on the private-renting housing stock, allowing for a greater mixture of tenant types.

The Council's response

It is unknown whether purpose-built student accommodation will alleviate the pressure on the private-renting housing stock. Purpose built accommodation can reduce potential antisocial aspects of locating significant numbers of students within the community. However, it is the quantity of students that can place pressures on the physical and social infrastructure of an area and change the area's character. The concentration of students, whether in purpose built or HMOs, as a proportion of the transient population, can undermine the social and physical fabric which defines a community and place.

QUESTION 5: Do you believe that purpose-built student accommodation is affordable for students and/or helps address the overall need for places for students to live?



Key	Option	Total	Percent of All
A	Yes	43	23.37%
B	No	86	46.74%
C	Don't know	50	27.17%
D	Not Answered	6	3.261%

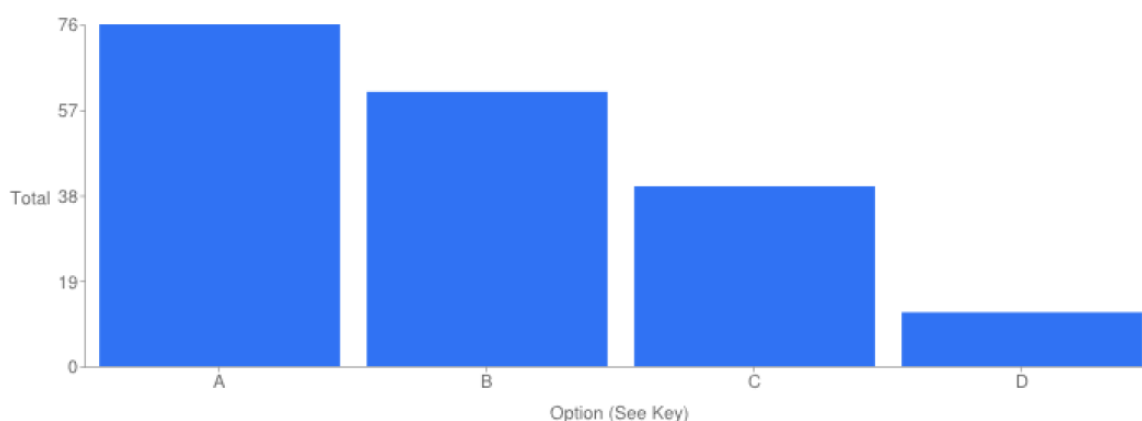
Summary of all responses

- The rents are far too high with a lack of provision pushing up prices in both purpose built and HMOs. The student equivalent of affordable accommodation/social housing should be provided included not-for-profit accommodation.
- Accommodation is varied in type and scale of rent and meets the needs and demands of the market to provide accommodation for students. Encouraging increased competition will deliver best value.
- Not the Council's job to regulate the affordability of student accommodation, educational institutions should deal with the issue.
- University run and managed halls are generally affordable.
- Does not address the bigger problem of affordable accommodation for all. Sites should be used for housing and 'affordable' housing for its residents.
- Consider placing them on bus routes further from the city centre where land prices are lower.
- The quality of design and amenity is poor and represents poor value.

The Council's response

The guidance seeks to address the established need for student accommodation whilst balancing this with other council objectives. The relatively recent increase in the provision of purpose built accommodation, in addition to the established student halls, has not resulted in a reduction in the number of students within general housing or HMOs. Planning's intervention with regards to affordability issues is limited to the level of support for new purpose built development. Recent development has been focused centrally and therefore commands the highest land values and commands relatively high rentals. The guideline seeks to encourage a more dispersed sustainable provision of new accommodation which may result in the provision of additional lower priced accommodation.

QUESTION 6: Should we continue to use a 30% threshold or introduce different thresholds to reflect the roles of different areas?



Key	Option	Total	Percent of All
A	Yes	76	41.30%
B	No	61	33.15%
C	Don't know	40	21.74%
D	Not Answered	12	6.522%

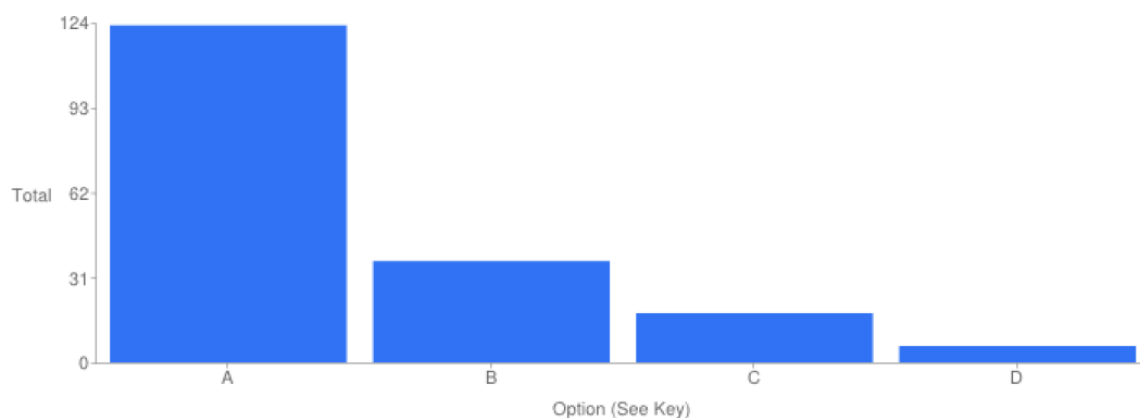
Summary of all responses

- Council should apply different thresholds and these should be different in each area.
- The 30% concentration is appropriate as a balance between transient and long term residents to create balanced mixed communities.
- The census data zones are too small.
- More flexible thresholds would be difficult to apply and abused by developers.
- The threshold is too generous and should encourage more dispersed development.
- The threshold is too restrictive and has no basis. It will not deliver adequate developments.
- Guidance should be based on criteria for preserving amenity.
- The threshold is already exceeded in many areas which makes it worthless.
- The threshold only relates to students and not all single people.
- Highest densities should be around university campus.
- The definition of campus needs careful consideration and “adjacency” should be removed.
- Definition of excessive needs to be clearly set out and justified.

The Council’s response

It is accepted that students are only one section of a potentially transient community and that communities continue to evolve. The impact of this type of development can have a significant detrimental impact on a community if not balanced with other land uses. The local plan seeks to encourage a balanced delivery of appropriate accommodation to meet the needs of all sections of the community. The preference for students to locate centrally and the greater sensitivity of communities with lower student concentrations to additional students requires the use of varying locational guidance. The general continued support for student accommodation in a variety of locations will allow the further provision for students. The definition of excessive is clearly set out and the term “adjacency” is removed from the guidance. The use of concentrations based on census data zones is the most reliable data on student concentrations.

QUESTION 7: On larger sites, should the Council be requiring a proportion of general housing as part of the proposed development?



Key	Option	Total	Percent of All
A	Yes	123	66.85%
B	No	37	20.11%
C	Don't know	18	9.783%
D	Not Answered	6	3.261%

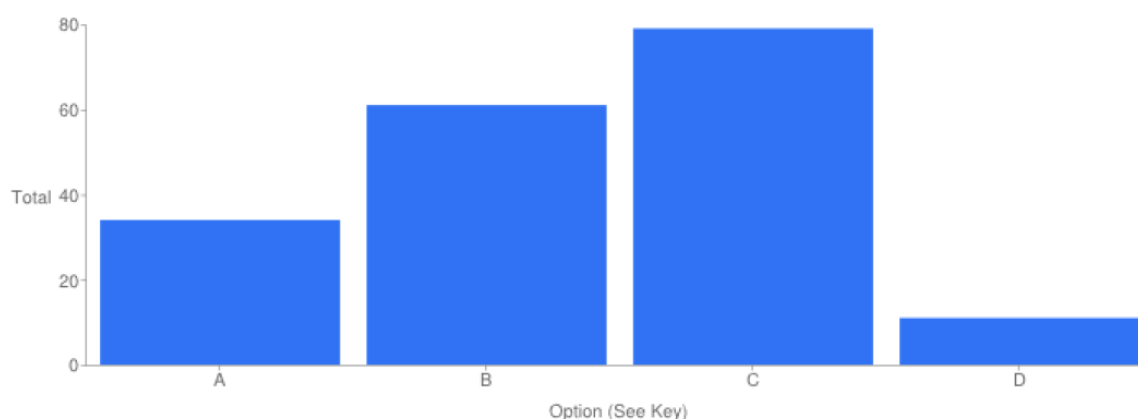
Summary of all responses

- Is essential for the existing community, creating mixed communities and avoiding student “ghettos”. A 50/50 development split is suggested.
- It should all be general housing including different housing types.
- Mixed development would create a better environment and encourage students to become community members.
- Students have different needs and should be seperated.
- This would help to deliver much needed housing. Should be used for affordable housing.
- Developers would not build mixed developments and people would not want to live in them.
- Not appropriate. We should maximise land of student accommodation in best locations.
- Centrally located housing development should be required to incorporate student accommodation.
- Windfall sites should be for general housing or affordable housing.
- Commercial uses may also be appropriate.
- Guidance should not seek to address other housing issues.

The Council’s response

The guideline sets out how general housing will be required on larger sites and on windfall sites, with a high probability of being developed for residential use. Other uses may be appropriate as part of mixed use developments. The guideline balances the need for student accommodation with the need for affordable housing and housing for sale. The continued integration of appropriate student numbers within Edinburgh communities is encouraged. It is not accepted that mixed use development will not be viable or attractive to end users. Student housing is directly related to the provision of other housing needs and the guideline acknowledges this. Encouraging student housing in a range of sustainable locations is considered preferable to requiring their provision centrally.

QUESTION 8: Do you agree with the numerical methodology currently being used to calculate student concentration?



Key	Option	Total	Percent of All
A	Yes	34	18.48%
B	No	61	33.15%
C	Don't know	79	42.93%
D	Not Answered	11	5.978%

Summary of all responses

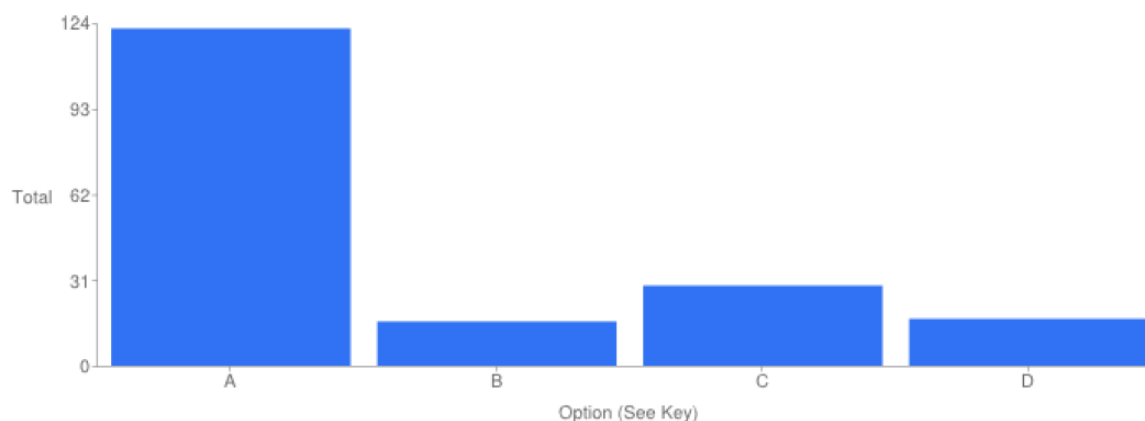
- It is unsystematic, should be based on more up to date figures.
- Calculations should use student tax exemptions.
- Data zones are the smallest and most accurate data to base calculations.
- There is insufficient information on calculations and cannot see what data zone you are in.
- Should be calculated on area basis not just a single data zone.
- Calculation should be available on the council website.
- It is flawed, as this will include all 16 and 17 year old school students living at home with their families.
- Other factors such as services and crime should be added to the methodology.

The Council's response

Council tax exemption data does not capture all students and is therefore unreliable. Obtaining data from the Universities, with regards to all term time addresses, will be explored further during the consultation period. The calculations now seek to remove students living at home. The locational guidance, including the walking distances, seeks to encourage development in locations which meet the needs of students. Data zones are groups of Census output areas having populations of between 500 and 1,000 residents. As far as possible they respect physical boundaries and natural communities containing households with similar social characteristics, and provide readily available population data. They are considered an appropriate size to measure impact on community. More than one data zone may be considered dependant upon the size and location of the proposal. The public accessibility of the calculation through our website will be explored.

QUESTION 9: Are there other issues, which revised planning guidance should address?

Table of "Other issues"



Key	Option	Total	Percent of All
A	Yes	122	66.30%
B	No	16	8.696%
C	Don't know	29	15.76%
D	Not Answered	17	9.239%

Summary of all responses

- Take into account buy-to-lets, short term letting, aparthotels and other accommodation for transient population. Students in HMOs to be accounted for and HMOs revoked.
- Differentiate between under and post graduate accommodation if guidance targetting specific need.
- The development should consider socio-economic make up of areas and respect the character of the area in terms of aesthetics, build quality and green space.
- Retail commercial space may be required.
- Guidance should be linked to the consideration of HMO concentrations and sensitive areas.
- Support co-operative accommodation and not-for-profit providers.
- Edinburgh south side should not be an extended student campus and should have a reasonable mix of residents.
- Management of facilities and impact on car parking need detailed consideration.
- The guidance may impact on housing need.
- Retrofit to housing.

The Council's response

It is acknowledged that students are one section of the population who are potentially transient. The policies contained within the LDP, in respect of HMO and Student Accommodation, and their related guidance both seek to balance the varied needs of the population for additional accommodation with the need to ensure a balanced sustainable community. Residents of communal establishments are removed from the HoNDA calculations and therefore the issue is directly related.

The make up of residents in HMOs is outwith the control of the Planning Authority and similarly it is not possible to stipulate whether accommodation is for under or post graduate student. LDP policies and the guidance acknowledge the need for additional land uses and sustainability issues.

Appendix 2

REVISED DRAFT STUDENT HOUSING GUIDANCE

Introduction

This constitutes non-statutory planning guidance that supports the application of Edinburgh City Local Plan Policy Hou 10 and the emerging Edinburgh Local Development Plan (LDP) Policy Hou 8, which both state:

Planning permission will be granted for purpose-built student accommodation where:

- a) The location is appropriate in terms of access to public transport and university and college facilities; and*
- b) The proposal will not result in an excessive concentration of student accommodation in any one locality*

The guidance sets out how the Council will encourage the further provision of purpose-built student accommodation in locations which balance the needs of the existing community and the need for general housing. This guidance applies to new buildings and changes of use for student accommodation.

Context

The Council recognises the important contribution that higher education makes to the city. Aim 3 of the emerging LDP recognises higher education as one of the key sectors in contributing to the strength of Edinburgh's economy.

Analysis of 2011 census data shows that full-time students comprise over 12% of Edinburgh's population. The most visible impact of students is in the accommodation sector. This comes in a number of forms including university-provided halls of residence, private purpose-built student accommodation, or shared properties in the private rented sector, often in the form of licensed Houses in Multiple Occupation (HMOs).

Student accommodation is defined as managed communal accommodation which forms student's primary residence. This form of development shall be considered to fall outwith a specified use class and is defined as Sui Generis. Planning permission is therefore required for a change of use to or from student accommodation including other Sui Generis uses such as flats.

Student population and concentration

Data from the Higher Education Statistics Agency (HESA) shows a 26.6% increase in the number of full time students at the three universities in the Council's area (University of Edinburgh, Edinburgh Napier University and Heriot-Watt University) between 2001 and 2012. The HESA data also shows that the number of full time students since 2011/12 has remained almost constant at just under 44,000.

The total number of students does not automatically translate into demand for purpose-built student accommodation, as a large number of students choose to stay at home or live in privately rented accommodation. Where students have to rent accommodation they have gravitated towards privately rented housing stock. This, and the relative lack of purpose-built student accommodation, continues to fuel the demand for HMOs.

The limited provision of purpose-built student accommodation combined with the increase in student population has resulted in a noticeable increase in student concentration in and around the city centre, as well as expansion into Leith and along arterial routes in the west of the city. The most densely concentrated areas are located within easy walking distance of the University of Edinburgh's George Square campus, as identified on Map 1. Map 2 uses the 2011 census data to show full time students (ages 16+) as a percentage of the total population. These are split into data zones which are fixed small areas, created from census output areas.

Impact of student accommodation

A high student population in these central areas can bring benefits, for example in supporting local services. Purpose-built accommodation can reduce potential antisocial aspects of locating significant numbers of students within the community. However, the quantity of students can place pressures on the physical and social infrastructure of an area and change the area's character. The concentration of students, as a proportion of the transient population, can undermine the social and physical fabric which defines a community and place.

Historically the increasing number of licensed HMOs has led to the loss of larger flats, which might otherwise have been occupied by families with children. This has resulted in:

- a rapid turnover of population;
- less stable communities; and
- properties left vacant for extended periods in the summer.

Despite the increasing proportion of purpose built student accommodation there is no evidence to suggest the number of students living in general housing or HMOs has reduced (Map 2). Therefore there is a need for more purpose built student housing in order to free up general housing stock through an increased offer and increased competition. It is preferable that student needs are met as far as possible in well managed and regulated schemes.

A significant element of Edinburgh's character is the balanced sustainable communities which make up the whole city including the city centre. These communities are made up of groups of people with common interests which are located in one place. Balanced sustainable communities require the dominant residential component to be permanent and not transient. The student population, (where not living at home), can be a significant element of the transient population. While students make many positive contributions to society, in excessive concentrations they can significantly change an area's character and potentially undermine a community. Where the student population is dominant, exceeding 50% of the population, there will be a greater potential imbalance within the community. This may result in a poor quality of place, a diminished sense of community and make an area less attractive to all sections of the population.

The existing level of students living centrally, is a result of a number of historic factors including, the attraction of city centre living, the availability of suitable accommodation and the location of further education buildings. It is logical to locate purpose-built student accommodation close to campuses, however, this must be balanced with the needs of the existing communities and the suitability of sites for housing to meet the need identified in the LDP. These considerations are reflected in locational and design guidance criteria a) and b), including the support for development within campus and the application of a 50% threshold within 800m walking distance.

In recognition of the services required by students and the economic benefits students bring to the city including their contribution to supporting local services, and in line with the Town Centre First principle set out in Scottish Planning Policy, an intermediate threshold of 40% is set out in relation to town centres.

Locations outwith main campuses and defined Town Centres are less suitable in meeting the needs of students locally and sustainably and this is reflected in the lower concentration level of 30%. Where access to public transport facilities is good, purpose-built accommodation will generally be acceptable up to 30%. Good access to university and

college facilities by public transport is defined as being within 400m walking distance of a public transport stop/halt which provides direct access to a main campus at a minimum frequency of four services per hour at peak times.

Purpose-built student accommodation can have a significant impact on the physical environment and the overall quality of a place. Creating Places - A policy statement on architecture and place for Scotland sets out the six qualities of successful places which all development should consider. It is particularly important that the design of purpose-built student accommodation should create safe and pleasant places for residents and the wider community, create a mix of uses avoiding a single land use and ensure adaptability.

Edinburgh has a housing requirement set out in the Local Development Plan (LDP). It is the role of the LDP to determine how the housing requirement up to 2024 will be met, taking account of the contribution made from existing sites and other allowances such as completions from windfall sites and demolitions. The windfall assumption is set out in the Housing Land Study (June 2014). Meeting this windfall assumption relies on brownfield sites identified as having a high development potential to be delivered for general housing. It is appropriate to apply specific guidance upon these sites to encourage the delivery of much needed housing and help mitigate the impact of purpose built student on communities.

Large mono-use development has significant potential to harm the character of an area. Locational and design guidance criterion f) seeks to guide the mix within larger proposals to ensure a balance between the need for student accommodation and housing, while mitigating the impact upon the character of an area.

Locational and design guidance

The criteria in ECLP Policy Hou 10 and LDP Policy Hou 8 will be applied to proposals for student housing using the locational and design guidance set out below:

- a) In locations within or sharing a boundary with (or separated only by a road) a main university or college campus, as identified in Map 1, student housing will be generally be acceptable.
- b) Outwith locations identified in a) and within 800m walking distance from a university or college campus boundary, as identified in Maps 5-13, student housing will generally be acceptable provided it will not result in a student population of **over 50%** in the locality (data zone).*
- c) Outwith locations identified in a) and b) and within a 400m walking distance from a defined town centre boundary, as identified in Maps 14-21, student housing will

generally be acceptable provided it will not result in a student population of **over 40%** in the locality (data zone).*

- d) Outwith locations identified in a), b) and c), where there is good access to university and college facilities by public transport, walking and cycling, student housing will generally be acceptable provided it will not result in a student population of **over 30%** in the locality (data zone).
- e) Elsewhere student housing will generally not be permitted.

Notwithstanding the aforementioned guidance the following points should be observed:

- f) Outwith locations identified in a) sites identified as a high probability of delivering housing within Map 4 taken from the LDP Housing Land Study (June 2014) and sites with greater than 0.25ha developable area must comprise a proportion of housing as part of the proposed development, to balance the mix of land uses and to contribute to housing land need. On these sites the new build residential net floor area shall represent a minimum of 50% of the total gross new build housing and student accommodation floor area. Additional alternative uses may be required in addition to student accommodation and housing.
- g) Development should be designed to positively contribute to place through the location of alternative ground floor uses where this is characteristic of the street or area.

*The 2011 census data showing 16+ full-time students as a percentage of the total population should be used as a starting point in the assessment. As 17 year olds comprised 10.7% or 1,150 of the new intake for all Edinburgh universities in 2012, data for 16-24 years old is used in the assessment calculation. Students living in the same residence as their parents are likely to be permanent members of the community and therefore it is reasonable to remove these students from the overall student proportion of the data as they are not judged to be transient.

The guidance will not be applied in isolation and consideration must be given to other matters addressed in the LDP and planning guidelines including The Edinburgh Design Guidance. Development should be of an appropriate design to positively contribute to the areas character or appearance. Development should accord with the Developer Contributions and Affordable Housing Guidance.

Student accommodation is a primary place of residence and therefore it is critical that design is of a high quality with adequate amenity to contribute to healthy and sustainable lifestyles. The Edinburgh Design Guidance 2013 applies to all development, and of particular relevance to amenity is section 2.9 Daylight, sunlight, privacy and outlook. Where development cannot reasonably accord with the associated technical guidance, which sets out the minimum standards required, development will not be supported.

For the purpose of the application of locational and design guidance criterion f) set out above, developable area is the application site area less any areas of existing highway retained within the boundary.

List of Figures

Map 1 identifies the main university and college campuses where it is deemed that further student housing would be acceptable in principle.

Map 2 illustrates student concentrations based on the 2001 and 2011 census.

Map 3 identifies the town centre boundaries, as defined in the Edinburgh City Local Plan and emerging LDP.

Map 4 identifies sites in the LDP Housing Land Study (March 2014)

Maps 5 – 13 illustrate the 800m/10 minute walk from each main campus

Maps 14 – 21 illustrate the 400m/5 minute walk from each defined town centre

Table 1 illustrates the methodology table used to calculate student concentration

Assessment methodology

Proposals should be accompanied by a planning statement justifying the suitability of the location for purpose-built student housing. This applies to all proposals except those within or sharing a boundary with a main university campus.

The protection and formation of balanced communities with adequate amenity is a concern in areas where the transient population is concentrated. For this reason, applications should be accompanied by information on existing student housing provision and the impact of the proposal upon the population demographics. Excessive concentration of students is defined

differently for different situations to encourage student accommodation in suitable locations and while achieving balanced sustainable communities;

- Over 50% within a 800m/10 min walking of a university or college campus
- Over 40% within a 400m/5 min walking of a town centre
- Over 30% elsewhere

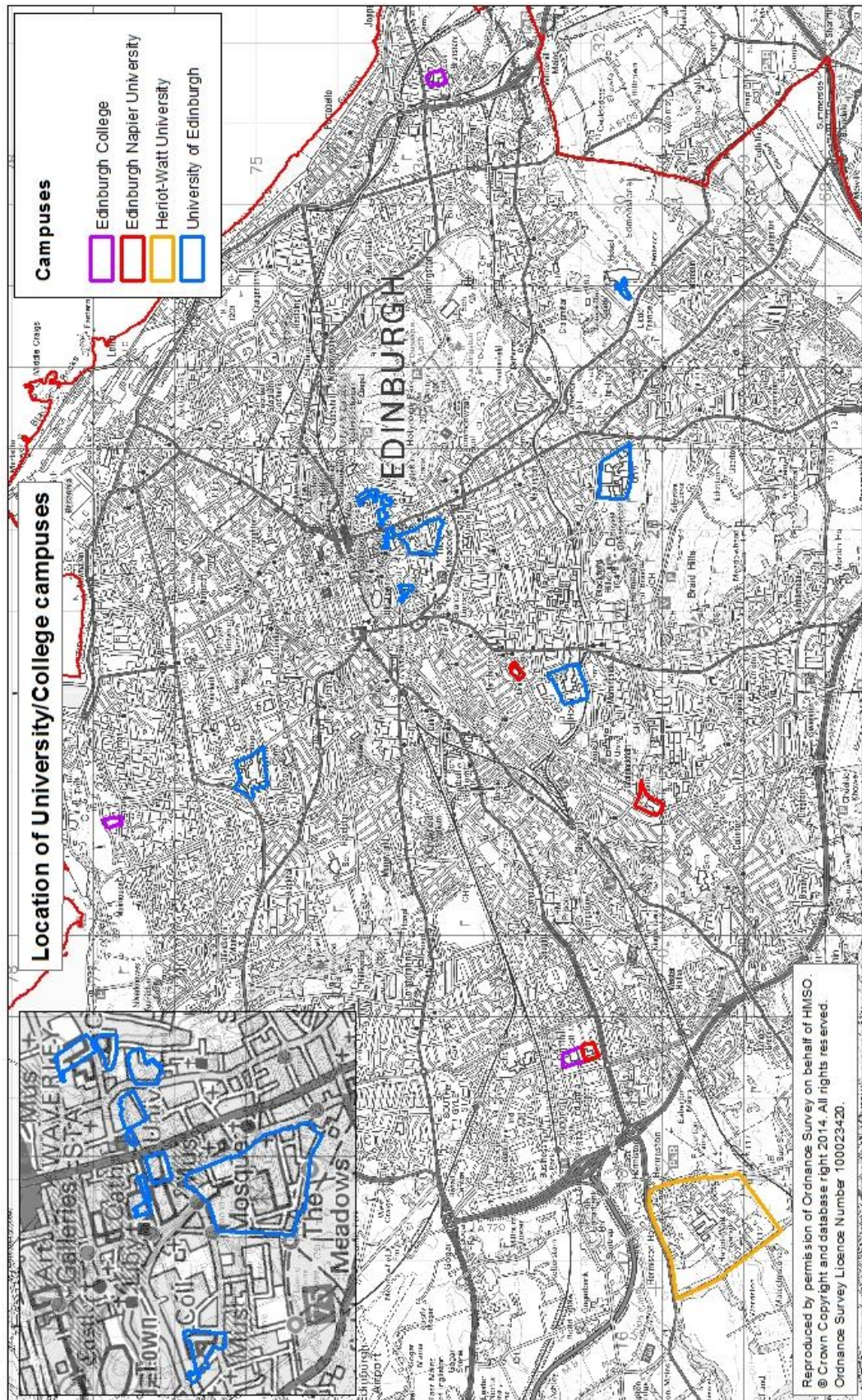
These levels are intended to address the issues, as identified in the 'Impact of student accommodation' section above.

Locality is defined by census data zones. These are introduced across the whole of Scotland by Scottish Neighbourhood Statistics. They each represent the key small area statistical geography in Scotland and are common, stable and consistent. Data zones are groups of census output areas and as such, provide readily accessible population data. Where the proposed site straddles or lies along the boundary of two or more data zones, the data should be combined to provide a more realistic representation of the locality in which the site is located.

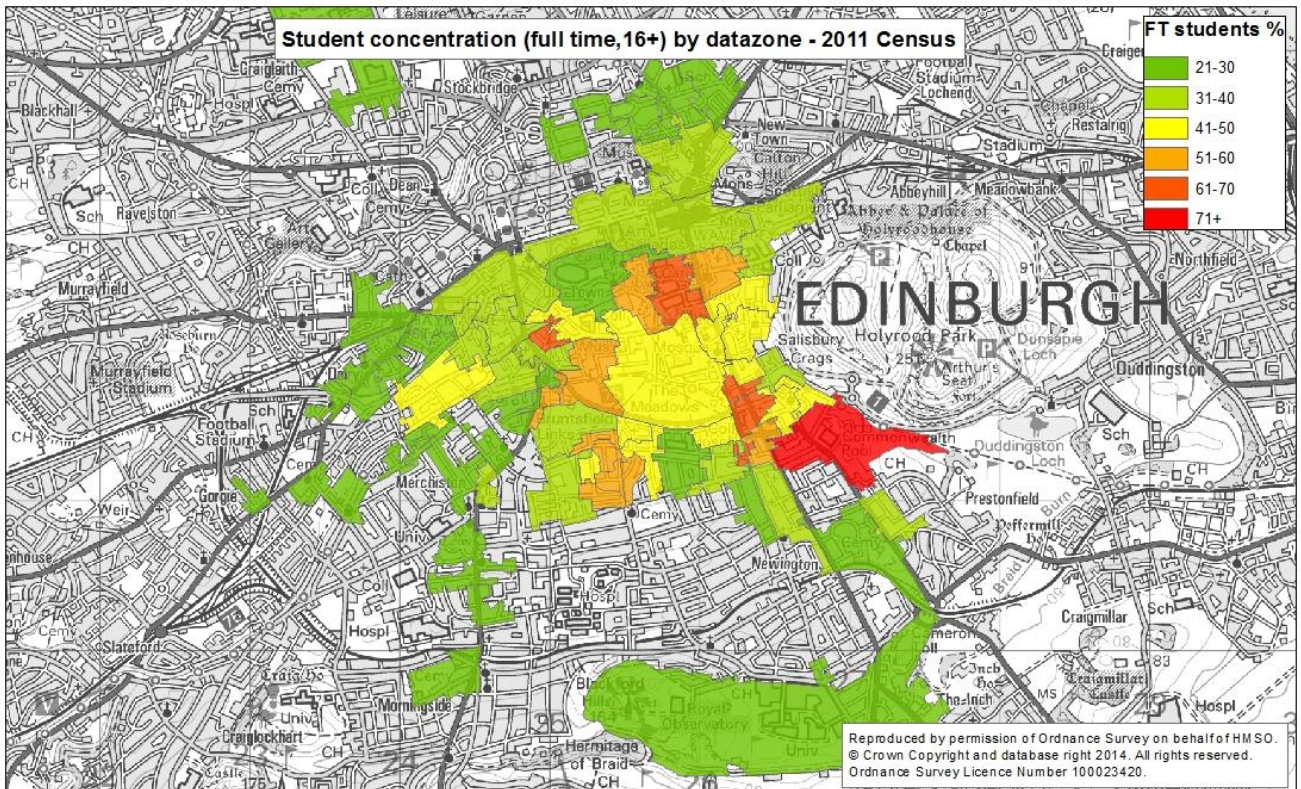
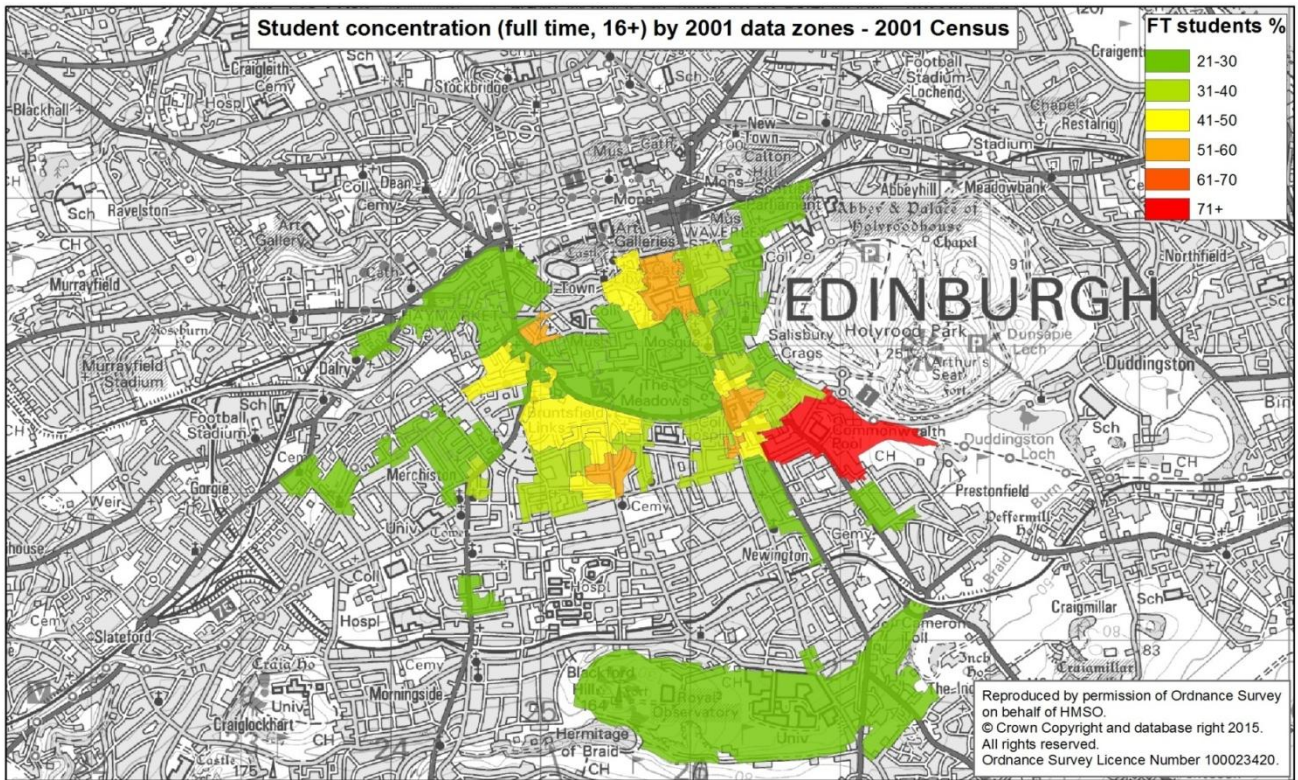
Supporting statements are required to use the Council's concentration calculation table (Table 1). The information relating to student and general housing figures can be obtained from the Council. The Council holds the following information:

- Population figures for each data zone
- A schedule of planning applications for student accommodation and general housing development. This includes information on their status (i.e. proposal of application notice, pending consideration, granted, minded to grant) and if permission has been implemented.
- Housing Land Audit - includes housing sites under construction and completed and sites in the adopted local plans.
- LDP Housing Land Study (June 2014)

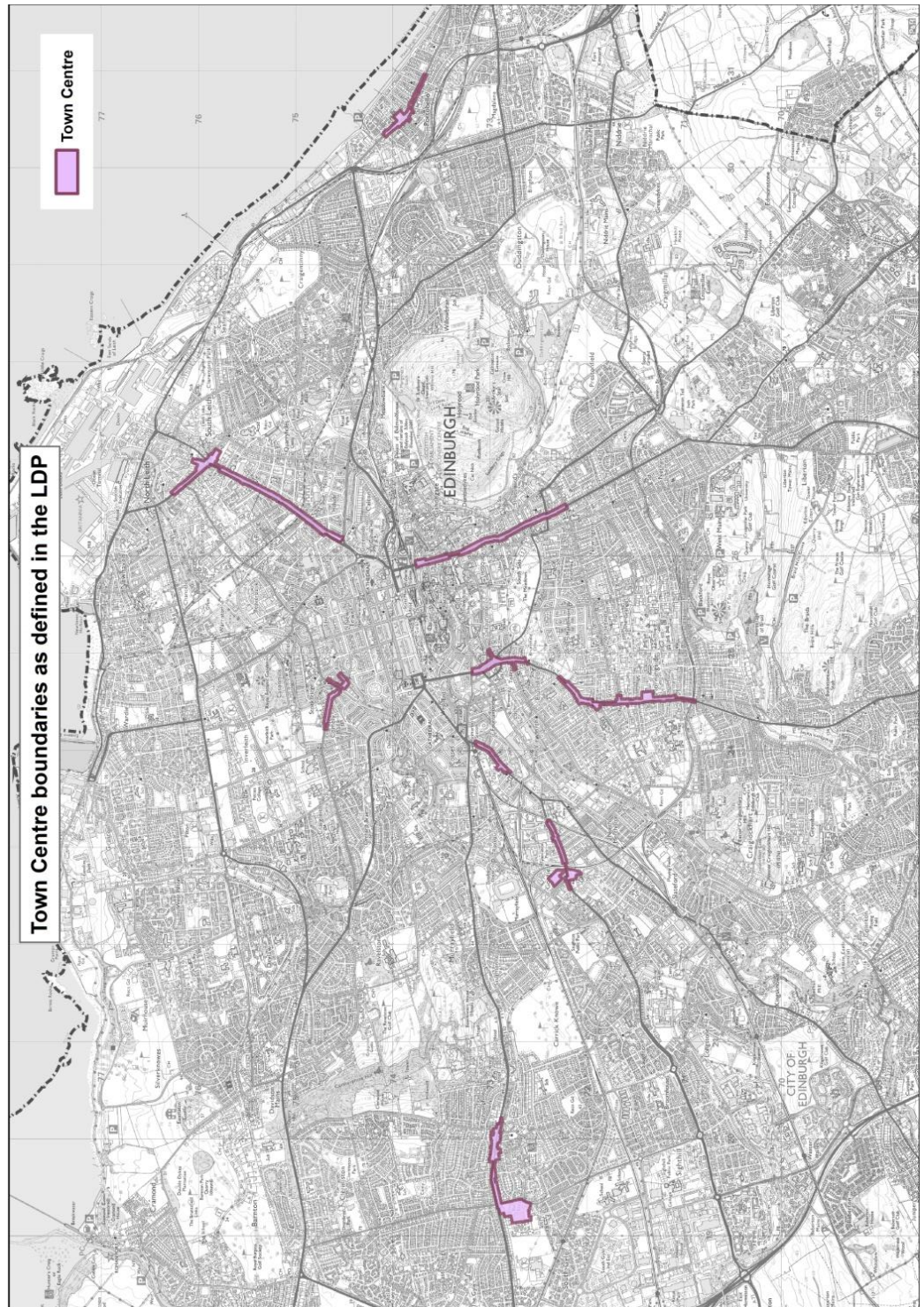
Map 1: Locations of university and college campuses



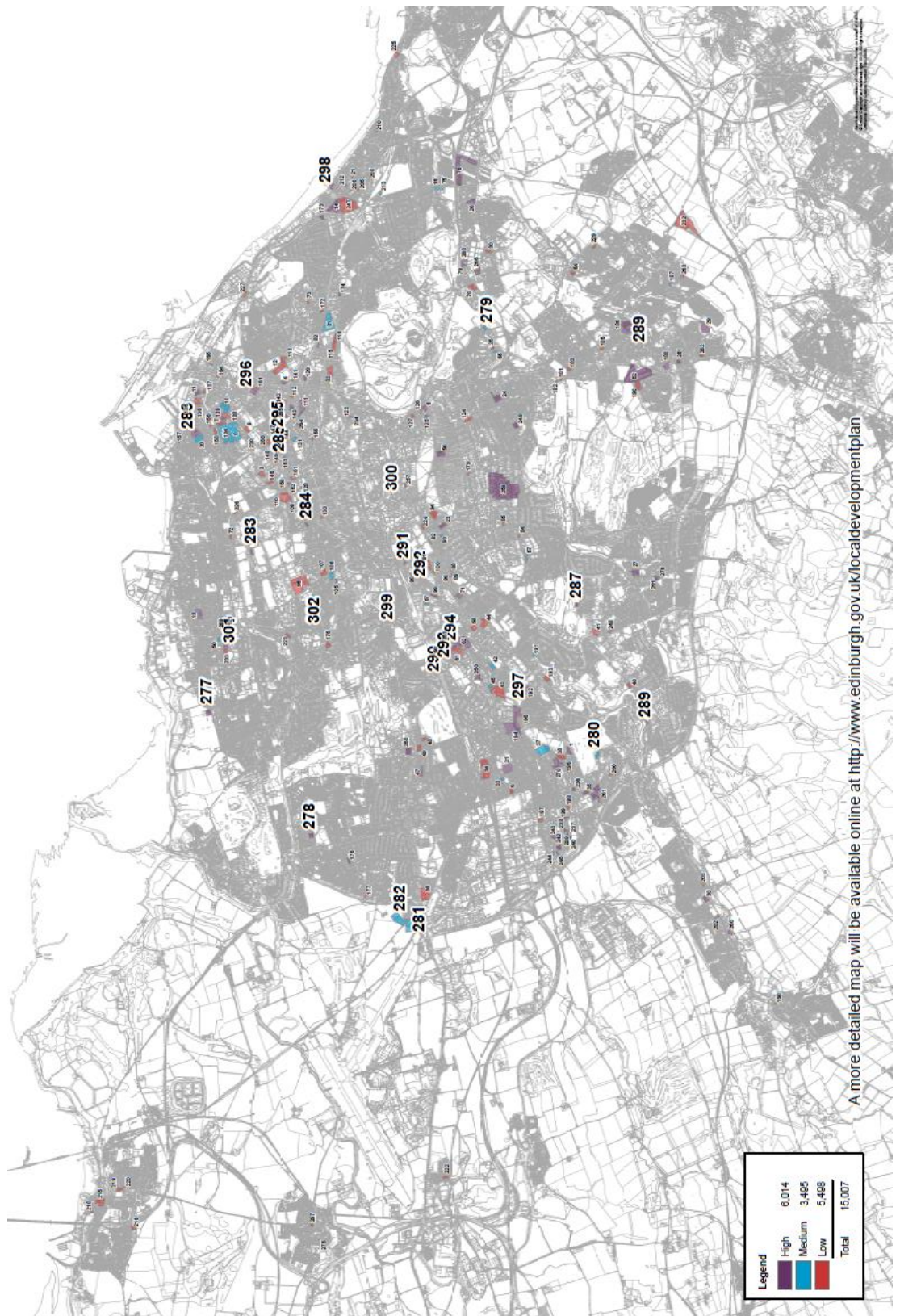
Map 2: 2001 and 2011 census data on student population



Map 3: Town Centres as defined in the adopted Local Plan and emerging LDP

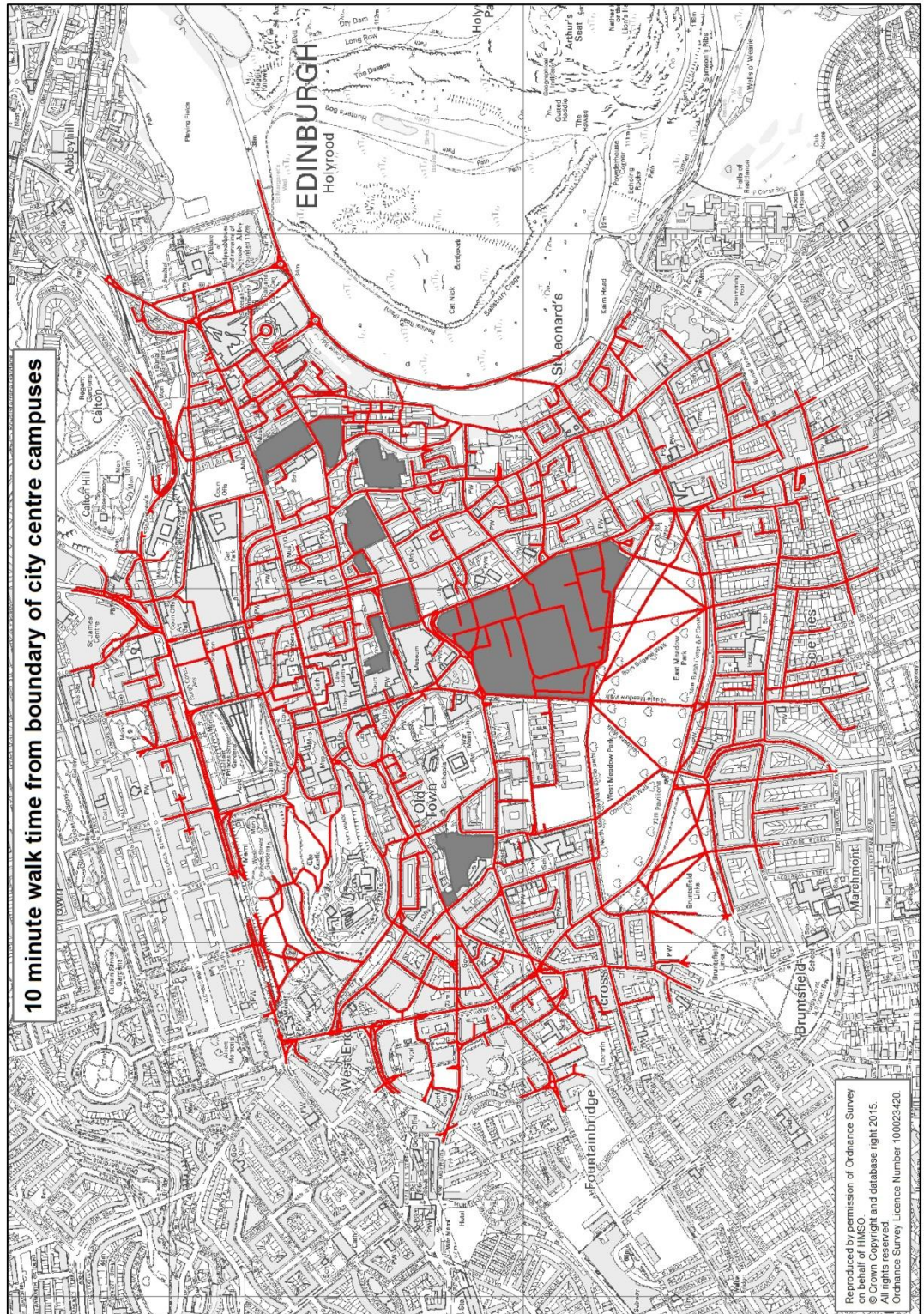


Map 4: LDP Housing Land Study – potential sites for housing (June 2014)

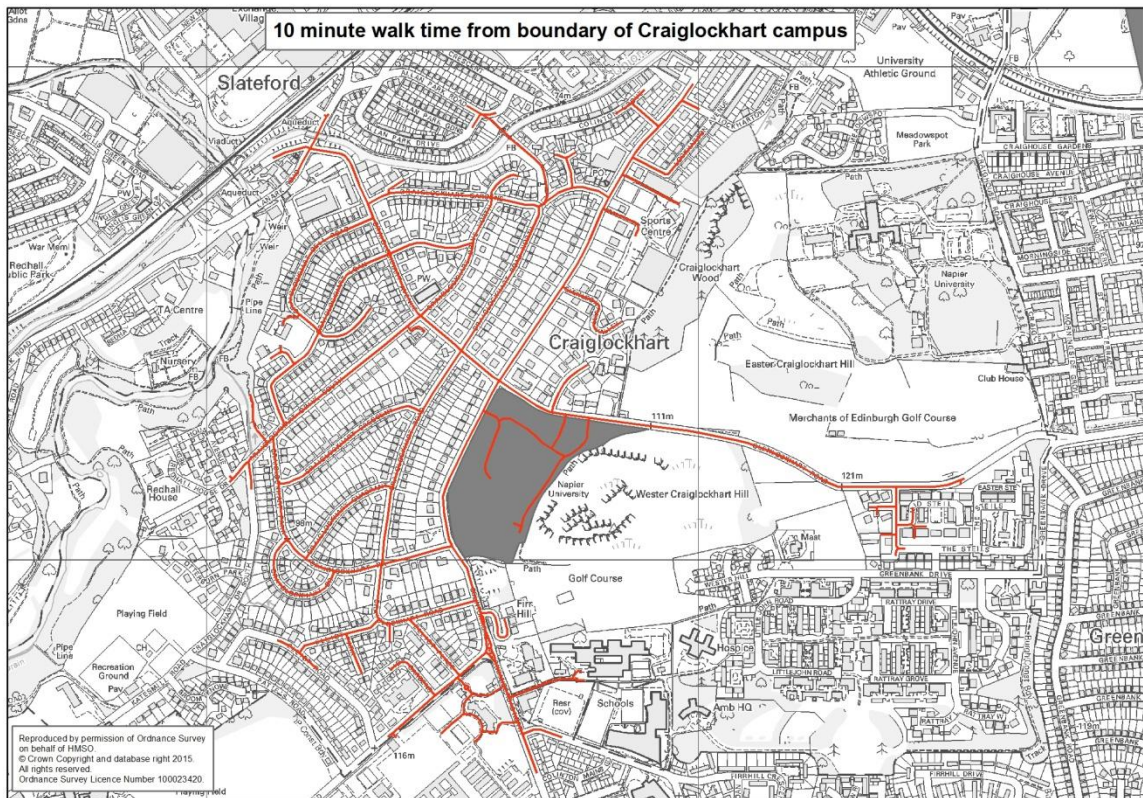


This information is available online as part of the Edinburgh Local Development Plan Second Proposed Plan interactive map.

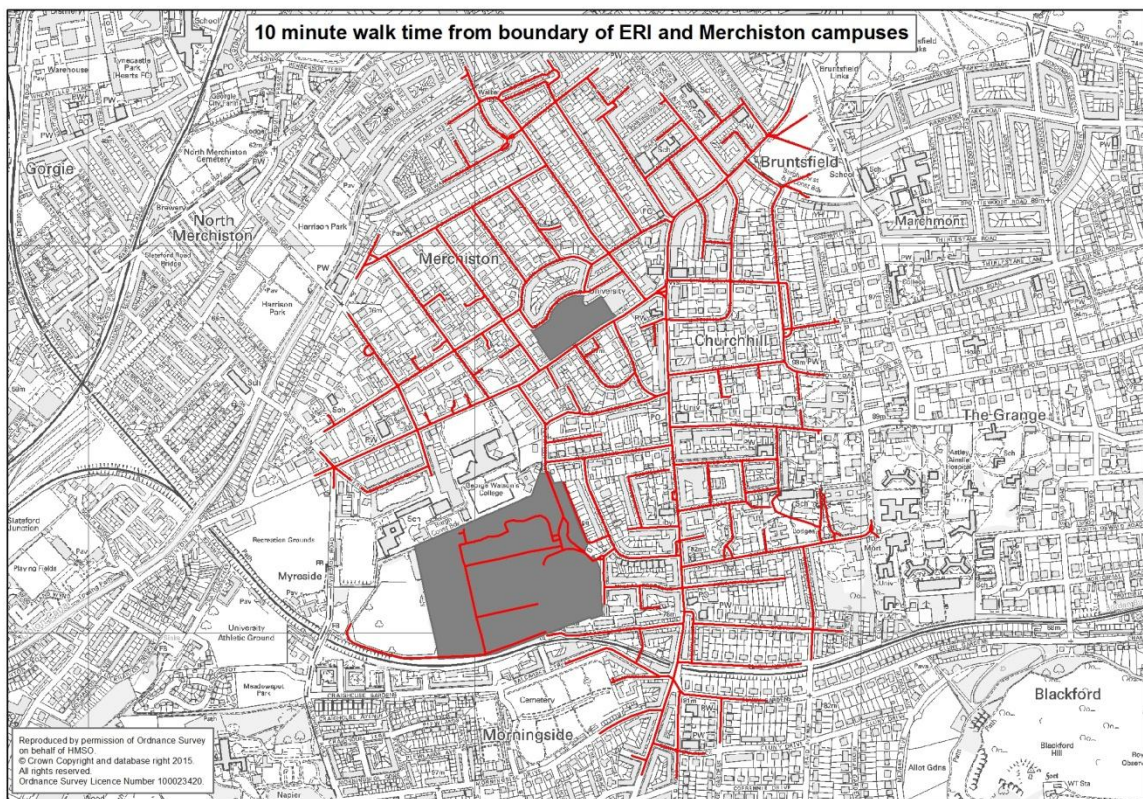
Map 5: City centre campuses 10 min walk time



Map 6: Craiglockhart campuses 10 min walk time



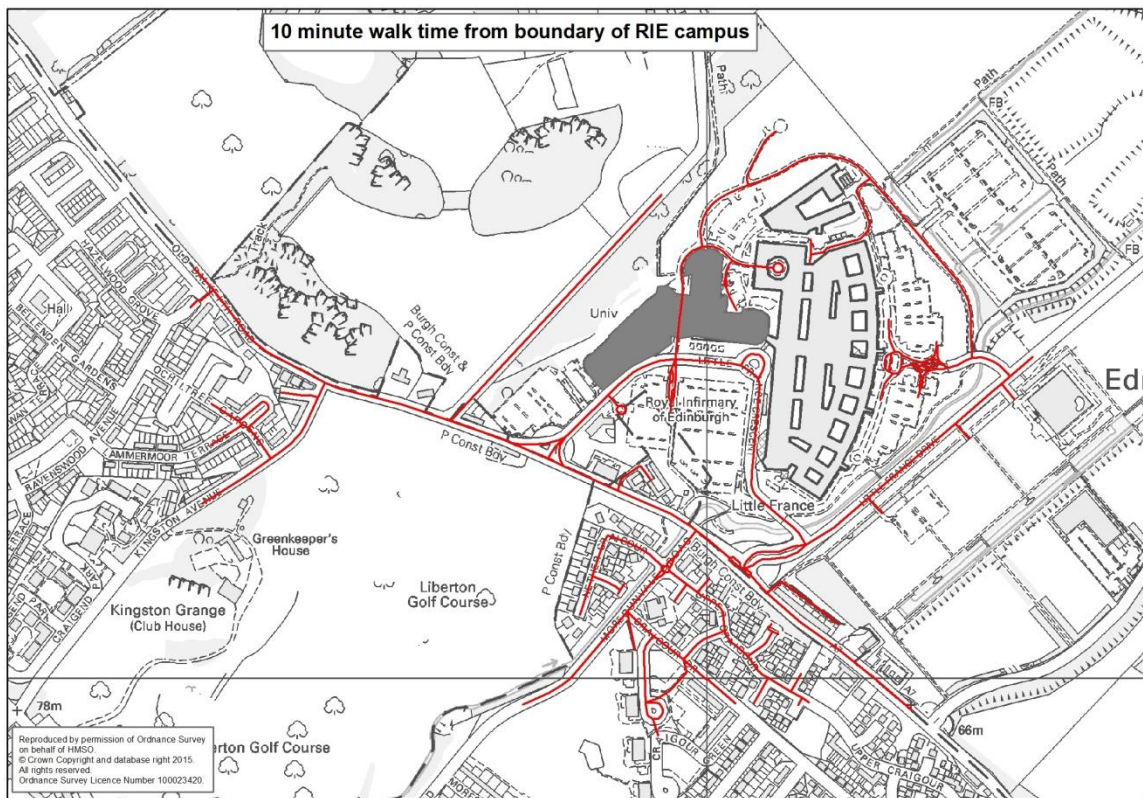
Map 7: ERI and Merchiston campuses 10 min walk time



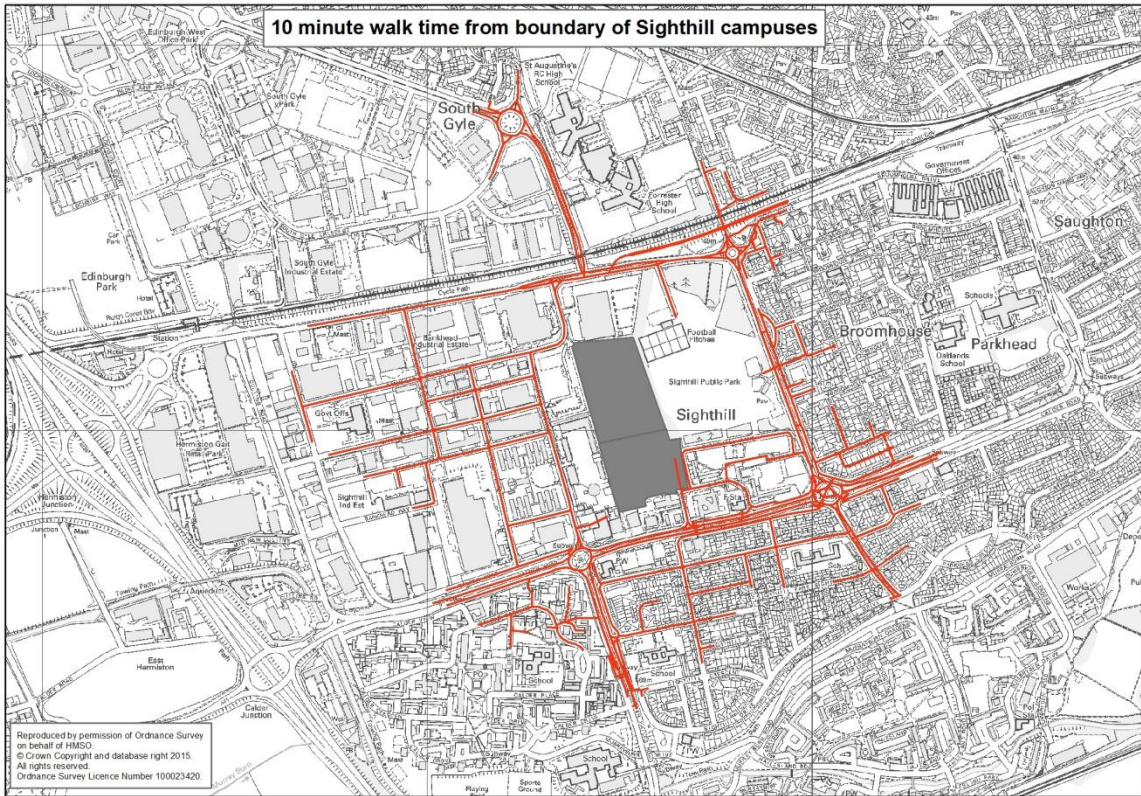
Map 10: Milton Road campus 10 min walk time



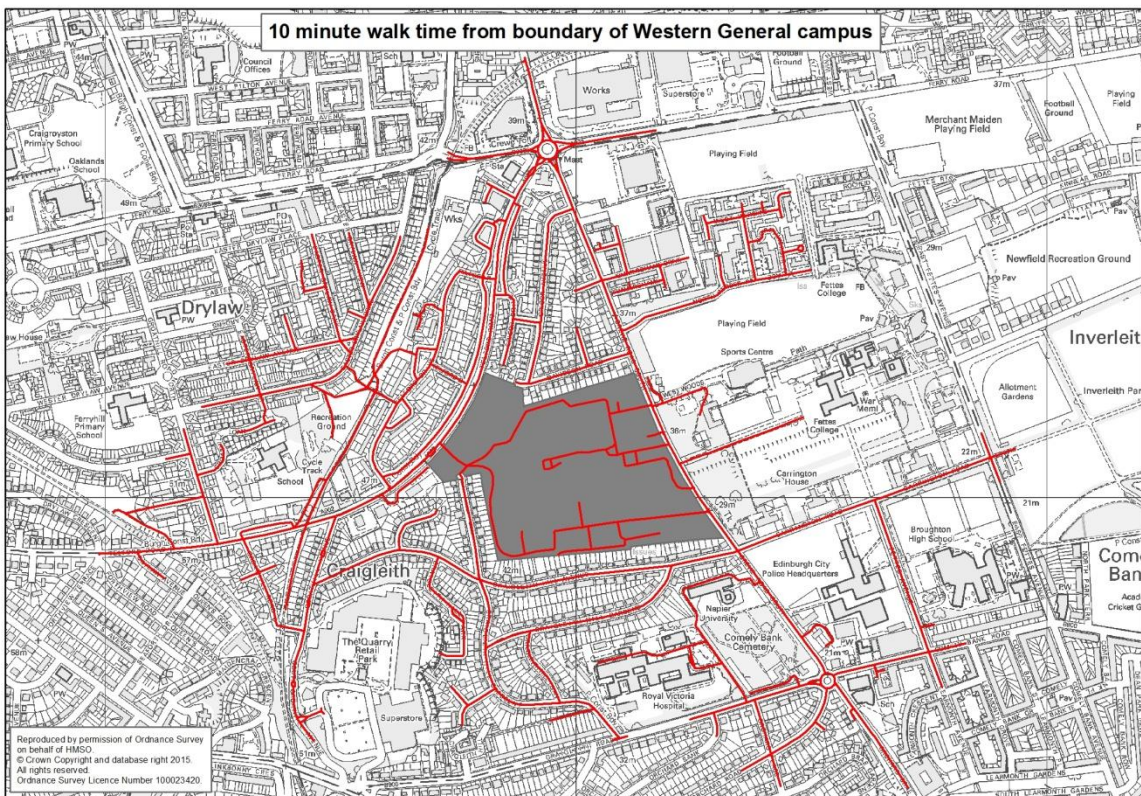
Map 11: RIE campus 10 min walk time



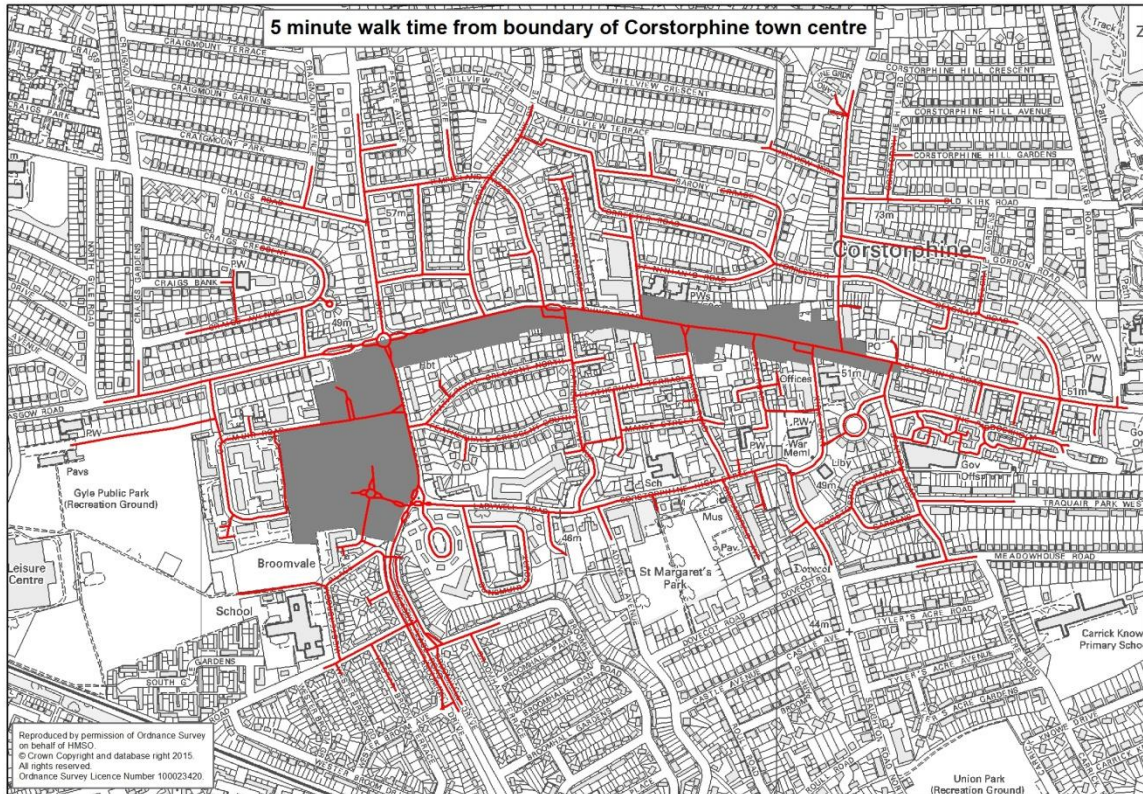
Map 12: Sighthill campuses 10 min walk time



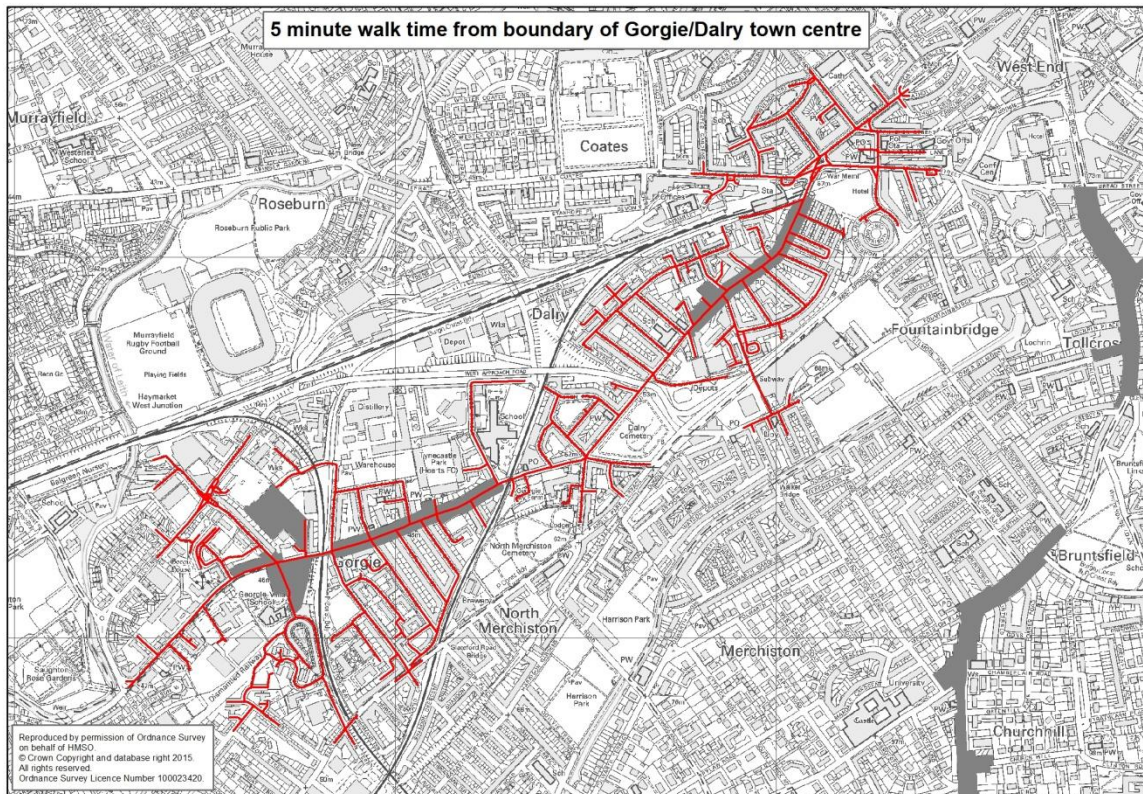
Map 13: Western General Hospital campus 10 min walk time



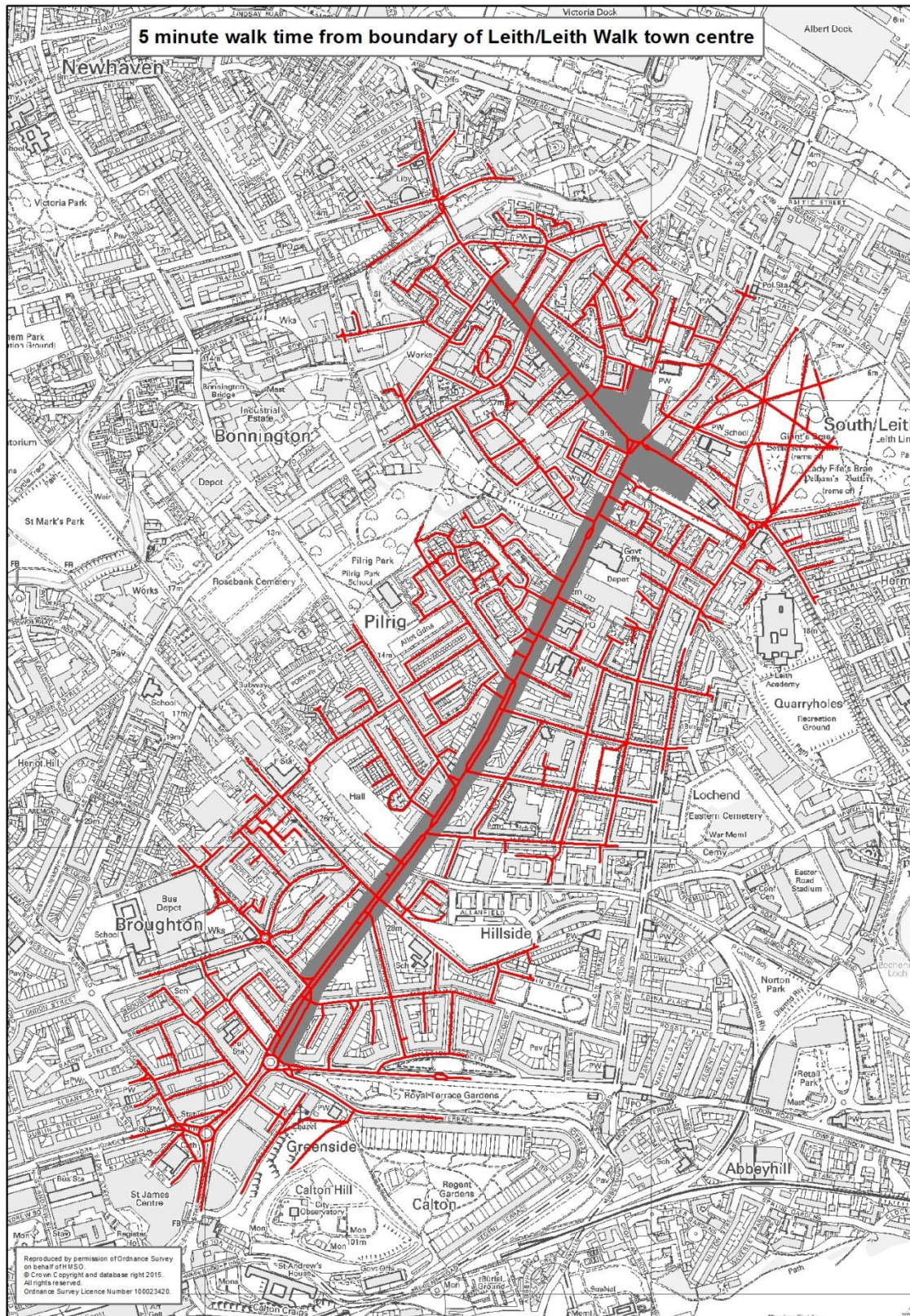
Map 14: Corstorphine town centre 5 min walk time



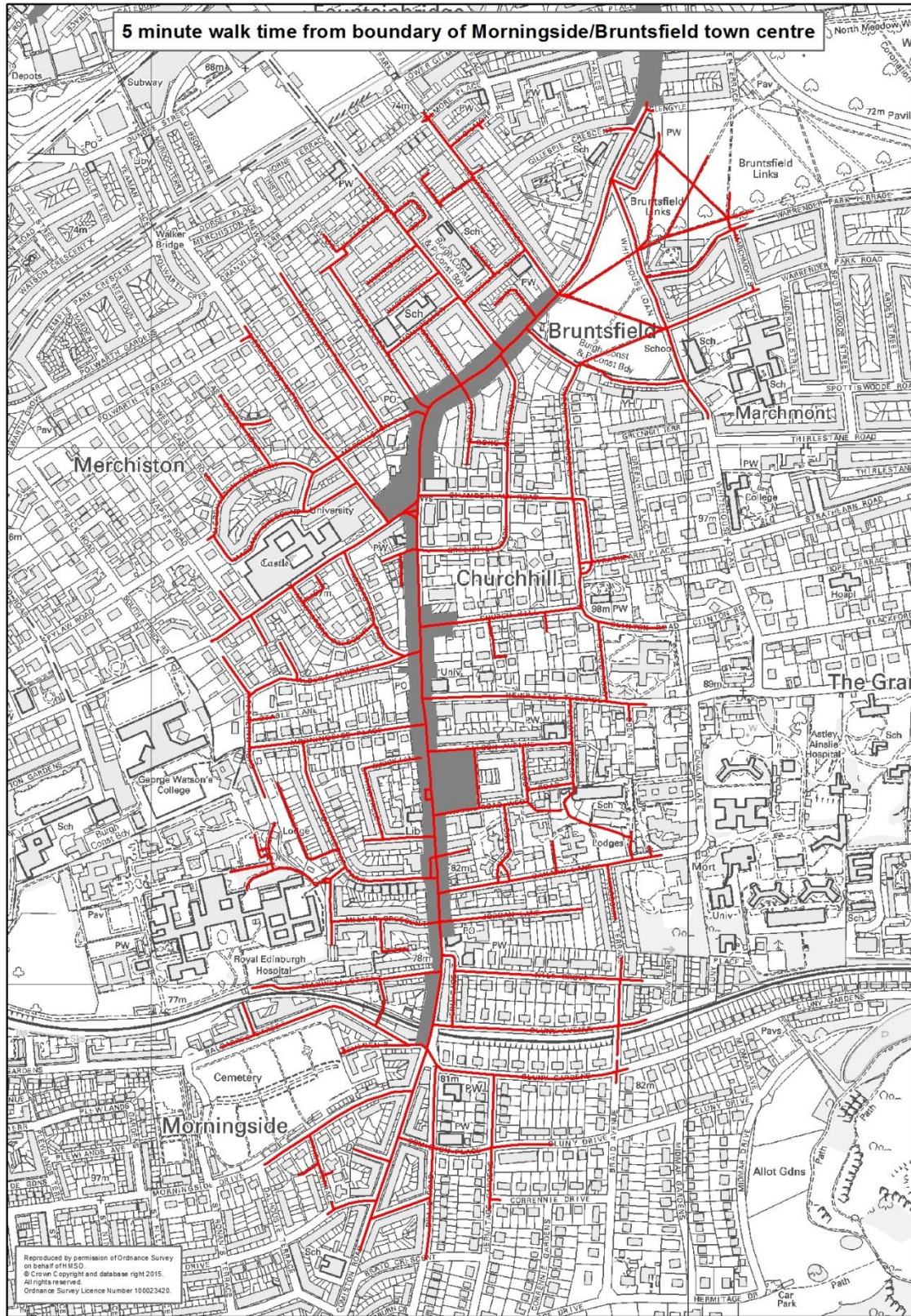
Map 15: Gorgie/Dalry town centre 5 min walk time



Map 16: Leith/Leith Walk town centre 5 min walk time



Map 17: Morningside/Bruntsfield town centre 5 min walk time



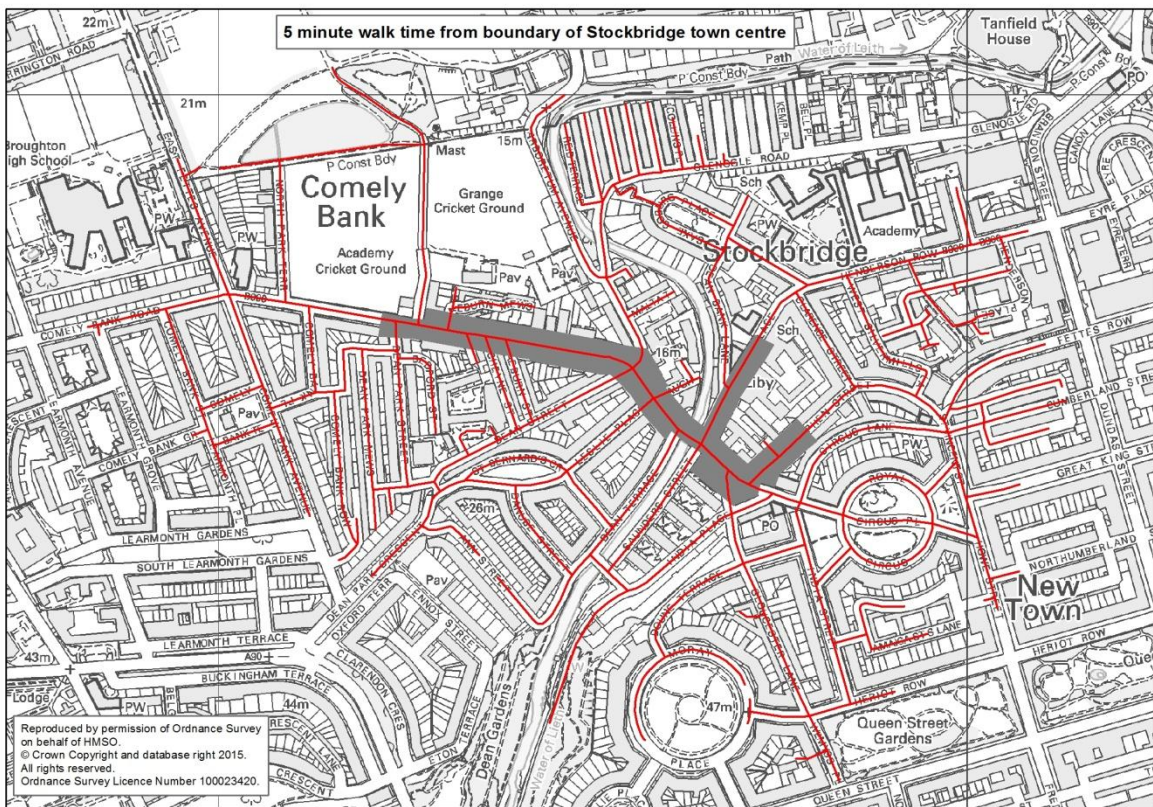
Map 18: Nicolson Street/Clerk Street town centre 5 min walk time



Map 19: Portobello town centre 5 min walk time



Map 20: Stockbridge town centre 5 min walk time



Map 21: Tollcross town centre 5 min walk time

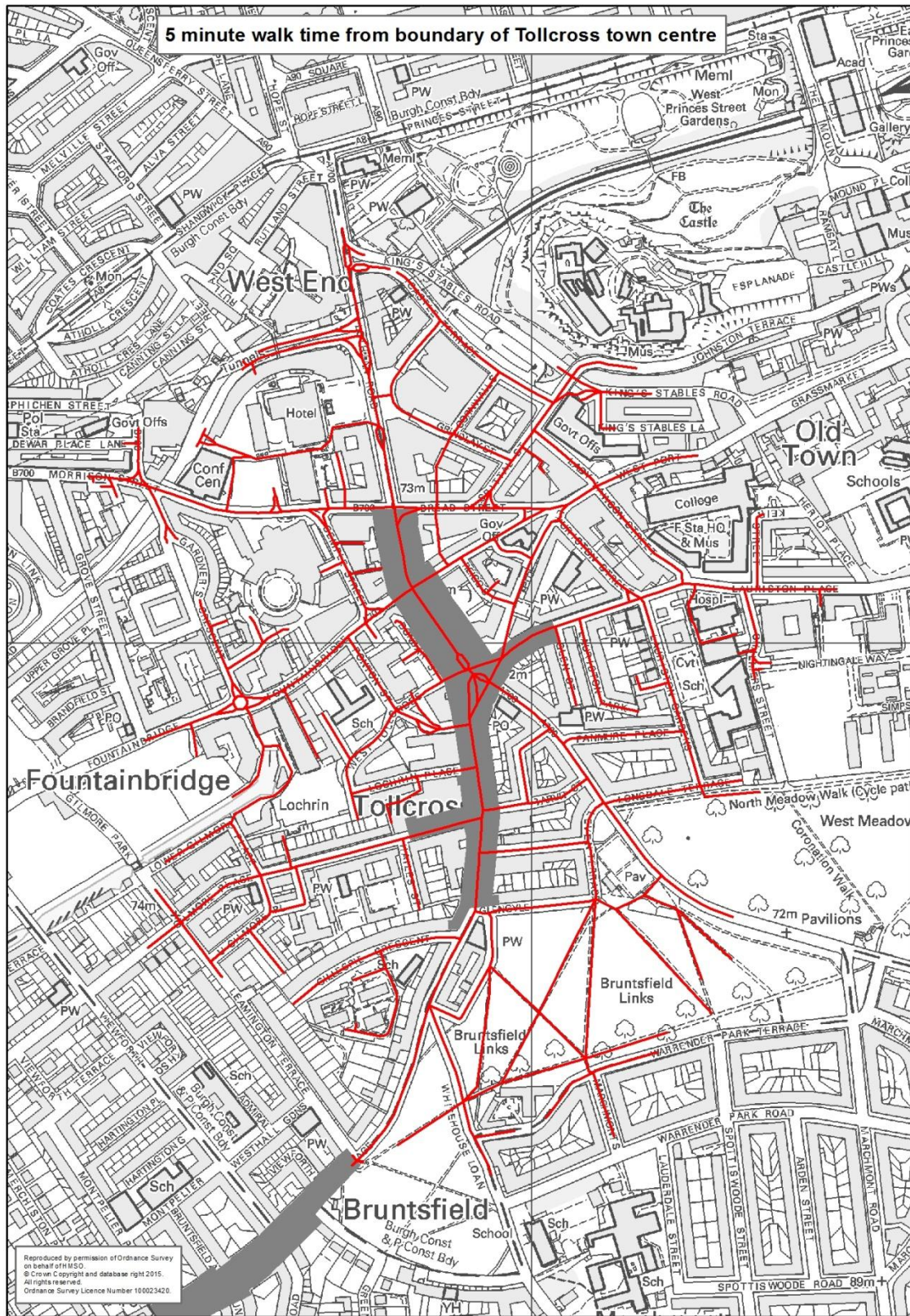


Table 1: Concentration calculation table**Student Housing Concentration**

	Data zone
2011 total Census population for the Data Zone*	
2011 student Census population for the Data Zone*	
2011 Student Census population as a percentage of total population (%) less students living with parent/s	
Number of additional student bed spaces completed after 2011**	0.00
Number of additional student bed spaces in the pipeline after 2011***	0.00
Number of additional general housing units completed after 2011**	0.00
Number of additional general housing units in the pipeline after 2011***	0.00
Local household size for each Data Zone*	
Total number of additional projected general housing occupants	0.00
Total number of additional general housing occupants after 2001	0.00
Total number of additional student bed spaces in the Data Zone after 2001	0.00
Proposed number of student bed spaces****	
Overall total student population in the Data Zone since 2001 plus proposed number	0.00
Overall total student and general housing population since 2001	0.00
Total proposed student population as a percentage of the overall total population (student and general housing) (%)	

* Information obtained from Table 1

** Figure calculated from development which has now been completed since 2011

*** Figure calculated from development which is still under construction, pending determination or in the pre-application process since 2011 and includes Local Plan Allocations for Housing

**** Number of student bed spaces being proposed by the applicant

Formulas inserted into the cells