

7 November 2015

Mr Bruce Nicolson
Department of City Development
City Development – Planning & Strategy
Waverley Court
4 East Market Street
Edinburgh EH8 8BG
bruce.nicolson@edinburgh.gov.uk

Public Consultation on the Draft Revised Student Housing Planning Guidance

Dear Mr. Nicolson,

Tollcross Community Council would like to comment on this draft planning guidance. We certainly endorse the spirit of Policy Hou 10 and emerging Hou 8. We acknowledge the importance of higher education and students to Edinburgh's reputation and wellbeing. Furthermore we endorse the analysis in the Guidance of the problems for communities of overconcentration of students. We are particularly pleased that the Guidance will require general housing along with student residences on larger sites but the 0.25 hectare value should be lower as a 50 metre square site could still be a large development, particularly if it is 6-10 storeys high.

However we have serious reservations about whether part b) ***[The proposal will not result in an excessive concentration of student accommodation in any one locality]*** will be properly addressed by the guidance. These reservations fall into two main categories: the interpretation and measurements of campuses and localities.

Our local concerns are as follows:

For over a decade now, local people have been buying into development plans and master plans which have stated that the aim of development in the wider Tollcross area is to create a new community where people can live and work. What we should be seeing is mixed-use development that blends a combination of residential, commercial, and cultural uses, where those land uses are physically and functionally integrated, where there are active street level floor frontages and pedestrian connections to the surrounding area. Family, social and affordable housing should predominate, not student housing, apartment hotels or flatted blocks for commercial tourist type letting. Unfortunately this vision of new communities has not materialised. So far we have seen the building of hotels, apart-hotels, a school and many student residences. This means that the new population is a transient one and not forming a

sustainable community. The area is at risk of becoming more a student campus, almost a student ghetto more than what it should be, a permanent residential urban community.

1. CAMPUSES

It is good that the guidance tries to locate students with easy access to campuses. No definition of a campus is used. Is it a major site or a building where a few tutorials are held? The guidance should show some discrimination about the number of students on campuses. For instance, greater encouragement could be given to use sites near large concentrations of students such as Sighthill or Rickerton. As an example, several recent developments and some in the planning stage have cited the nearness of the Art School on Lauriston Place. There are now more student beds in that area than students at the Art School. Future developers will keep citing nearness to the Art School and the Guidance will not preclude that argument for the development. This is disingenuous as they cannot all serve the same few, relatively small campuses. The fact is that centrally located residences are not near many larger campuses such as King's Buildings, Queen Margaret's University, Herriot-Watt, Edinburgh Napier Craiglockhart and Sighthill, Edinburgh College and the Scottish Agricultural College. In fact most students in Edinburgh do not study close to this central area.

2. LOCALITIES

Communities and localities are difficult to define but virtually never cover areas as small as census data areas, of which there are 597 in Edinburgh. They are also dynamic and ever changing. The data are compiled only every ten years and to use these data as a baseline for a decade during rapid development does not meet the spirit of the aim to curtail over concentration of students. Secondly, the zones are so small that not a single one of the 597 zones could accommodate a medium size student residence without breaching the 30% rule. I do not expect that the CEC intend that no residences should be built. The average population in an Edinburgh data zone is 798. With the average number of students, then a new residence would breach the 30% rule. In a small area represented by 8 data zones around us here in Tollcross/Fountainbridge there are 5071 students from a total population of 9451 (some data from 2011) which represents 53%. Clearly previous guidelines have not been adhered to as we have seen approvals for residences in data zones with greater than 50% students.. Therefore we wonder about the robustness of any new guidance.

These census data are used because they are readily available, if not very useful. Other cities compile more up to date data from information such as student council tax exemptions by street or council ward. The Guidance suggests that data census areas might have to be aggregated to represent localities but this can be manipulated by choosing which ones to aggregate and is very imprecise. Once you accept that census data areas have to be aggregated (as in the Guidance), then it would be sensible to redefine localities. Being imprecise about 'localities' makes it more likely that appeals would be more successful.

The allowance of 50% students within almost a kilometre of a campus needs to be judged in the context of other uses. For instance, if there is already a large concentration of other transient residents in hotels, apart-hotels etc., then 50% students would be enough to make the locality cease being a settled community.

Whilst Hou 8 is what we all aspire to, we feel that greater prescription and clarity would help to stop conflict and appeals.

3. INCLUDING HOUSING IN LARGER DEVELOPMENTS

At first we welcomed this move as a means of helping create more mixed communities. On examining some recent student developments, we find that the 0.25 hectare limit (50m x 50m) is sufficiently high so that large student developments would not be affected. For instance, Canal Point in Fountainbridge is well within that area, as is the recently approved 327 bed residence on the site of the Mecca Bingo Hall. In fact the 778 bed residence, Bainfield House, on Fountainbridge is possibly only just over this limit. Therefore, developers would be quite happy to build blocks within 0.249 hectares for 500 students or so as they appear not to want to build general housing at the moment. Unless this area is reduced or a limit of say, 150 students, is used instead, then the rule is meaningless in practice as developers would simply develop piecemeal within the 0.25 hectare envelope.

We hope that you can take account of our comments in formulating the new Guidance.

Yours faithfully,

Paul Beswick for Tollcross Community Council