

TOLLCROSS COMMUNITY COUNCIL

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EDINBURGH
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Head of Planning
Department of City Development
City Development – Planning & Strategy
Waverley Court
4 East Market Street
Edinburgh EH8 8BG

**Marchmont, Meadows And Bruntsfield Conservation Area
Demolition of existing buildings and erection of student residential development with
associated landscaping. at 7 Lower Gilmore Place Edinburgh
20/02976/FUL**

Case Officer: Christopher Sillick christopher.sillick@edinburgh.gov.uk

Dear Mr Sillick,

Tollcross Community Council(as an official consultee) would like to object to this planning application.

We consider that this development would lead to an even greater overconcentration of students in this locality. Furthermore, we believe that the location for this proposal is inappropriate. The scale of the proposed building is also inconsistent with local policies. We further believe that a residential development would be preferable. Also several neighbours to the proposal have complained about overlooking and loss of privacy.

Edinburgh City Council has produced planning guidance on all these issues, such as to prevent these over concentrations of students and to direct student residences to appropriate sites.

The aims are stated in **Policy HOU 8** of the current LDP and in in Non-Statutory Guidance – Student Housing Guidance (2016). **Policy HOU 1** also allude to the preference for residential developments. We support these policies and believe if upheld, this proposal will be rejected.

We have consulted widely in this area with residents' associations and individuals. Not a single person has approved of this development which reflects the complete local opposition to another student residence.

1. Local Concerns

For over a decade now, local people have been buying into development plans and master plans which have stated that the aim of developments in this 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, hotels, apartment hotels or flatted blocks for commercial tourist type letting. Unfortunately, this vision of a new locality has not materialised. So far, we have seen the building of hotels, apart-hotels, a school, many student residences and the burgeoning of short-term let accommodation. This means that the new population of the area 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. Granting permission for another student residence can only make this situation worse.

Local opinion is not against students and acknowledges the vital role of higher education in Edinburgh. However, when the concentration of students in residential areas reaches a certain level it is felt to be a distorted demography which undermines community cohesion. There is ample evidence around the UK and elsewhere for the problems that this causes.

Our views are expressed in the CEC Student Housing Guidance: *'The concentration of students, as a proportion of the transient population, can undermine the social and physical fabric which defines a community and place. In recent years the development of a significant number of larger student developments, in the Old Town, South Side and Fountainbridge have been on sites where much needed housing would previously have been delivered. Balanced sustainable communities require the dominant residential component to be permanent and not transient.'*

2. Quantifying the Overconcentration of Students

One problem is that a Locality is not defined in the planning guidance. Local people consider the area encompassing Tollcross, Fountainbridge and the residential part of North Bruntsfield to be a locality. It is where people meet, shop, live and find entertainment and recreation.

The developer's Planning Statement addresses the issue of student concentration by inventing a locality with the development on the very edge of this invented locality (p 18 Fig. 4). This locality contains mostly, the residential areas around Gilmore Place, Leamington Terrace, Viewforth and Bruntsfield. It excludes shops and leisure and recreation areas. They acknowledge 4 student residences in this area, all approximately 200 metres from the proposal. These have a total capacity of 836 students. There are several other student residences (built or approved) very close by which would be considered to be in any definition of, even a small locality. There are a further eight other student residences close by (within 430 metres) which have a student capacity of 2185. This is in addition to the 836 acknowledged by the developer and the students in non-purpose-built residents must also be added.

If you examined the data census area (a rather small area), SO1008665, in which the proposal sits then in 2011 the student concentration was 36% (440 students and 746 non students). When Canal point opened, this student percentage went up to 48% and when the Vita residence on Fountainbridge opened the percentage went up to 57% (1007 students and 746 non students). The current proposal would raise this further. Also, the St. Joseph's proposal, now approved, (230 students) is on the border of this data zone and is only 180 metres from the proposal.

Any reasonable person would see the developer's invented locality as an attempt to minimise student numbers so as to appear to be within the Council's guidelines.

Past planning rules have looked at data census areas which are, of course too small and out of date if 2011 data are used. The proposal is in SO1008665 with a current 57% students. Using 2011 data and updating with built and approved numbers, surrounding data zones are SO1008638 at 42%, SO1008666 at 56% and SO1008661 which reached 70% when Bainfield House opened.

The 2 main ways to see an over-concentration are firstly to see Fig. 1 below with its list of residences (Table 1) which are (built or consented) within a 15 minute walk of the proposal. There are 33 such residences. They account for 6500 beds. 8 – 10 are within a 5 minute walk. This is in addition to students living in HMOs which are plentiful in this area with a lot of tenements and other flats. This southern wedge of Edinburgh already had one of the highest student concentrations before the burgeoning of student residences. This Locality has seen more than one extra student residence per year for quite some time. Secondly, an overconcentration is demonstrated by so much local feeling about the loss of the established community due to too many students and other short term residents. These feelings are now commonly expressed locally, on blogs and in local newspapers and have even led to the setting up of campaigning groups concerned about the amenities for local communities.

3. Location

This location is inappropriate for yet another student residence. LDP Policy, HOU 8 states that *Developments should be close to the universities and colleges and accessible by public transport.* Map 1 in Student Housing Guidance shows where the main campuses are. Section a) in this locational guidance suggests that being adjacent to these sites is the best option.

The proposal is near to certain University buildings but all the local student residences stress this same point. This is disingenuous as they cannot all serve the same few small campuses. The student website, Student.com, lists 11 student residences near Edinburgh College of Art. The fact is that they are not near many major 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 area.

The developer's Planning Statement points to good bus services but journey times to some campuses such as Heriot Watt and Queen Margaret's can be quite long so this does not contribute to decreasing the need for travel with students located on or adjacent to campuses.

In the Luton Court appeal the Reporter states that the objective of the policy as a whole is to support purpose-built student accommodation in locations which are close to higher education facilities but as already stated it cannot be the objective to have all the residences near to one or two smaller facilities. There are far more residences in this area than the educational facilities of the area warrant and far too few residences in areas where they are needed if they are to meet the location criteria.

4. Residential amenity

There have been 3 applications and 2 appeals for the development of this site. On the first appeal, the reporter was concerned about overlooking and privacy for the residents of Gilmore Place. This

was because of living areas looking directly into the gardens and windows of residents. The developer took this on board in the next application and made sure only bedrooms and bathrooms were to the rear. In this new application, half of the students will have their living spaces facing the gardens and windows of the residents on Gilmore Place. This would take us back to the situation that the reporter used as a reason for rejecting the appeal.

5. Scale and Massing

Tollcross Community Council highlighted concern over the scale and massing with regard to Application No. 19/00789/FUL and this was supported by the CEC Planning Committee when they rejected the Application because *'it would fail to comply with Edinburgh Local Plan Policies Des 1, Des 2, Des 3, Des 4, the Fountainbridge Development Brief and the Edinburgh Design Guidance by virtue of the building's excessive massing, which would lead to an unsympathetic and over-dominant addition to the surrounding streetscape'*. As this application maintains the same scale and massing our concerns remain. The 3 storeys envisaged in the Fountainbridge development Brief would seem more appropriate.

FIGURE 1



**PROPOSAL SITE
PROPOSAL**

STUDENT RESIDENCES

WITH FIFTEEN MINUTE WALK OF THE

TABLE 1

Stu. Nos.

314	IQ Fountainbridge 114 Dundee Street
308	Arran House 5 Drysdale Road The Student Housing Company
321	IQ 69 Grove Street
778	Bainfield Street (Napier),
202	123 Fountainbridge The Bridge House (Old Napier) Unite
117	Mansion House 129 Fountainbridge Back of Bridge House. Mansion Apts.
240	Canal Point, 22 West Tollcross The Student Housing Company
269	Riego Street
96	Morrison Circus (Napier)
106	Wright's Houses Bruntsfield
234	Unite Lady Lawson Street
252	Unite Chalmers Street
168	Warrender Park Crescent On Links, Edinburgh Uni
155	West Bryson Road Napier
327	125A Fountainbridge (Vita Student) – new end of canal
108	Warrender Park Road/Spottiswood St.
180	Nido Haymarket 5 W Park Place Haymarket
245	Bairds Close 27 Kings Stable Road
229	Portsburgh Court Student Halls 56 Lady Lawson Street. Private Halls
75	Student Flats at Archer's Hall N Meadow Walk
138	Meadow Lane/46-56 Buccleuch St.
323	Sylvan Place (Sick Kids) Approved
225	Dundee Street (Telford Underground) Approved for building + addition
180	Meadow Court 13-29 Sciennes 148 bedrooms + 5/6 bed Mews houses
43	Lady Nicholson Court 38 Potter Row – Bristow Square
52	24 Potter Row. Under Construction
39	St. Kentergens student development Approved
280	Richmond Place next to George Square Edin. Uni.
72	91 Buccleuch Street Hello Student Accommodation U Homes

104	22 Haymarket Yards. Approved
12	91 Lothian Road. Approved
230	St. Joseph's Gilmore Place. Approved
74	Proposal Lower Gilmore Place

Total 6496

It is for the reasons given above that Tollcross Community Council ask that this application should be rejected. We hope that you will give our concerns due consideration.

Yours faithfully,
Paul Beswick for Tollcross Community Council