

Eyre Place Lane Owners' Association,  
20 Eyre Place Lane,  
Edinburgh,  
EH3 5EH

CA Student Living (CASL)  
c/o Liberty One  
80 George St,  
Edinburgh,  
EH2 3BU.

Tuesday 22nd March 2022.

To whom it may concern,

Re: Public Consultation.  
Proposed demolition of existing buildings and structures and erection of a purpose-built student accommodation development, with associated amenity space, access, cycle parking and landscaping. at 72 - 74 Eyre Place, Edinburgh, EH3 5EL.

REFERENCE NUMBER: 21/06729/PAN

On behalf of the Eyre Place Lane Owners' Association, residents of Eyre Place, Rodney Street, Rodney Place, Logan Street and Canonmills, please find attached observations regarding the proposed development of purpose-built student accommodation on Eyre Place.

We request receipt of this submission by email to: [info@eyreplace.co.uk](mailto:info@eyreplace.co.uk)

Sincerely,

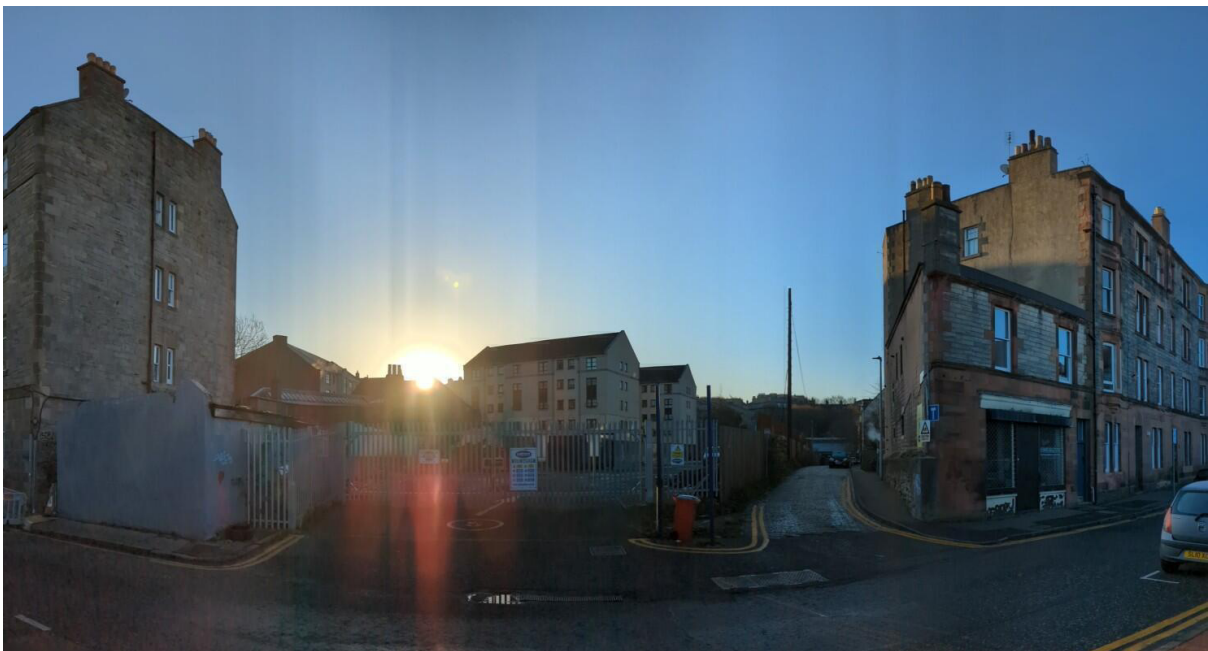
The residents of Canonmills.



Submission on behalf of the Eyre Place Lane Owners' Association and residents of Eyre Place, Rodney Street, Rodney Place, Logan Street, and Canonmills Special Interest Group to the Public Consultation Document prepared by Scott Hobbs Planning and Fletcher Joseph Architects on behalf of CA Ventures.

REFERENCE NUMBER: 21/06729/PAN

22nd March 2022



## Preface

As a long-established community, we are aggrieved that no representative of CA Ventures communicated with the Canonmills residents about the proposal of student flats before preparing the Public Consultation Document showing bed numbers, architectural drawings, and landscape proposals. Had the developer, or its representative, met with the community they would have understood the breadth of anger and resistance throughout Canonmills that the proposal has generated. Fundamentally, the majority of the community in Canonmills does not want 200+ beds of student accommodation built on 72-72 Eyre Place.

## Introduction

The residential communities of Eyre Place Lane, Eyre Place, Rodney Street, Rodney Place, Logan Street, wider Canonmills and regular visitors to the area have contributed to the drafting of this document. We are a grassroots organisation of neighbours that has come together to oppose the proposed purpose-built student accommodation. In short, it is our view that the proposal, to insert 200+ students into a small site in our community, will have disastrous affects on our living environment, local amenities, public transport, traffic, and primary healthcare, such as GPs, dentists and pharmacies.

As a community, we frequently discuss the future of the former Jewson's site at 72-74 Eyre Place. However, in line with a variety of Edinburgh City Council statutory guidance documents, we had expected sustainable family housing to be built on the site. We believed this to be an eventuality and welcomed the idea of new permanent neighbours joining our small community.

The proposed development is part of site '151, Eyre Place' shown in the LDP Housing Land Study (June 2014). This document states that the whole site is 'a potential site for housing'. Specifically: 7 houses and 44 flats, totalling 51 dwellings over the entire '151' site. However, the proposed planning application by CA Ventures is for a 'commercial' development of 200+ beds of purpose-built rentable student accommodation not a 'housing' development as stated in statutory guidance. Purpose-built student accommodation is closer, in terms, to a hotel, with its frequent transient residents, than housing.

## **The Canonmills community reject the proposal for purpose-built student accommodation on 72-74 Eyre Place.**

The following infographic was prepared by Canonmills community members. It shows the findings of a residents' survey and a petition to determine the level of opposition to the proposal and what the community want to see built on 72-74 Eyre Place Lane.

A survey that involves input from local residents, such as the one below, is undertaken as an essential part of research for an urban site prior to any development proposals. This research, however, was not undertaken by the developer either through negligence or in the understanding that the proposal would knowingly go against the overwhelming interests of the local community.

It is noteworthy that although the developer issued 200 letters to local residents, the volume of objections received through the petition and survey exceeds this number by a significant margin (237 petition responses have been received to date). We are also aware that a high number of objections have been submitted through the pre-application consultation process so far.

This is a highly significant response from the local community, indicating how detrimental the proposed development would be to the character and residential amenity of Canonmills and surrounding areas. The views of those who know the local area best should not be ignored.

Please find the infographic on the following page.

# 72-74 Eyre Place Residents Survey

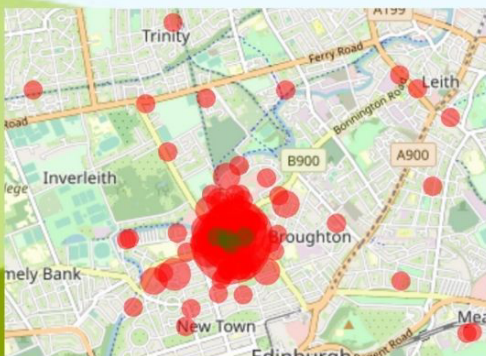
**We asked residents and regular visitors of Canonmills their views on the plans for a student housing development at 72 - 74 Eyre Place:**

**Residents oppose the plans:**

As of 22nd March, nearly all 188 respondents strongly opposed (81%) or opposed (15.3%) the plans for the development. Those who supported (3.7%) did so with caveats, such as that the development should not be too large.



**Survey (left) and petition (right) responses came from the whole community around the site:**



**Visit [eyreplace.co.uk](http://eyreplace.co.uk) for more information on the Community response.**

Many responses raised concerns about use of the site for student accommodation, including:



**Overprovision of student accommodation nearby (77%)**



**Potential for noise, disruption, litter and anti-social behaviour (72%)**



**Negative impacts on wellbeing of local residents, including loss of daylight (70%)**



**Additional demands on parking and access (63%)**



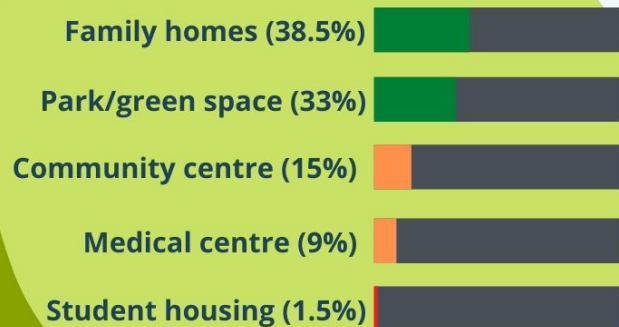
**Excessive pressure on local healthcare services (56%)**

**The site must be put to a better use that balances the interests of the community and the site owners:**

**Preferences for the site:**

The local community believes the 0.27ha site is much better suited to mixed-use such as family homes and green space.

**First choices mentioning:**



The following sections are observations on the proposed development regarding, and in relation to, the following documents:

1. Public Consultation, CA Ventures
2. The Student Housing Guidance, February 2016, City of Edinburgh Council
3. The Edinburgh City Plan 2016 (Adopted), City of Edinburgh Council
4. The Edinburgh City Plan 2030 (Proposed), City of Edinburgh Council

## **Response to Public Consultation document drafted by CA Ventures and distributed as part of the PAN virtual consultation.**

We state that the following observations on the Public Consultation document in no way suggest any compromise by the local community to allow student flats to be constructed on 72-74 Eyre Place. The community rejects the proposal of student flats to be constructed on the proposed site. The following observations are purely on the design of any proposed structure to be located on 72-74 Eyre Place.

### **2.0 Wider Context Appraisal**

#### **2.2 Universities and colleges**

The proposed development is not located in the vicinity of any college or university. A significant number of the travel times to colleges and universities, stated in the Public Consultation document, fall outside of the guidance quoted in 'Developing 20-minute Neighbourhoods' by City of Edinburgh Council and the proposed Edinburgh City Plan 2030.

All colleges and universities stated in the Public Consultation document are outwith the 20-minute walking distance recommendation, two are over a 20-minute cycle ride and five are over a 20-minute bus commute. Furthermore, the bus travel time to Napier University, Craiglockhart Campus is stated as 26 minutes. This travel time is actually nearer to 46 minutes.

There is concern that facilities, such as a minibus, would be required to ferry students to campuses from the proposed site. Nearby purpose-built student accommodation at Beaverbank has had to lay on a minibus service for students, which is stated on their website:

“Residents benefit from a convenient and free shuttle bus service to and from the University of Edinburgh’s Kings Campus and Bistro Square Campus”.

Link: <https://www.studentcrowd.com/hall-l1002555-s1043508-beaverbank-place-edinburgh>

Although the reason for a minibus service is unclear, possibilities are that the current public transport system is not as adequate as is made out in the Public Consultation document, or that the walking and cycling distances are inconvenient for regular commuting.

Furthermore, should minibuses be required for a proposed development on Eyre Place there are no suitable facilities for the parking of large vehicles on the narrow roads in the area, which are already busy with traffic. Introducing minibuses to the current traffic demands of Canonmills is wholly impractical and would be detrimental to the residents and road users in the area.

In addition, a proposed development of 200+ students will increase delivery traffic with vans from companies such as Amazon and Argos, supermarkets (Asda / Morrison's), and clothing companies (Asos, Very, Next). This increased traffic would also impede emergency vehicles arriving at Eyre Place, Eyre Place Lane, and The Yard, which supports disabled and vulnerable children. Furthermore, Eyre Place is frequently used by fire appliances travelling from McDonald Road Fire Station to buildings in the New Town. Double parked delivery vehicles, taxis or minibuses in the area would significantly affect the response times of emergency vehicles.

The proposed development does not adequately address key matters regarding traffic to and from the site and is situated at an unsustainable commuting distance from Edinburgh's colleges and universities.

### **3.0 Local Context Appraisal**

#### **3.1 Site Context**

The documents states that the proposed site is within walking distance of a Tesco and Lidl supermarket. Not stated however, is the current strain on these amenities already by local residents in existing and new housing developments and other new student developments, such as at Beaverbank (300 students) and McDonald Road (104 students). The proposed 200+ student development at Eyre Place will add significant strain on local shopping amenities in the area.

There is also substantial strain on healthcare amenities in the area. An extract from the Edinburgh City Plan 2030 Healthcare Appraisal for the Northwest Locality states:

“Although a new practice for West Edinburgh is already being planned to accommodate the needs of existing development proposals a further new GP practice/s would be required to accommodate the additional population in West Edinburgh. The Stockbridge Health Centre would not be able to accommodate population generated from development sites and the accommodation can not be extended. Eyre Medical Practice is also at capacity with no ability to be extended and therefore new premises would be required”.

In addition, information regarding dental practices in the area, received from NHS Lothian, state that only 25 dental practices in Edinburgh are accepting NHS patients, of these there are only two within EH3 postcode, and of these two only one is accepting new NHS Adult patients.

GP and dental services, in the area, are under significant pressure and at capacity. The introduction of 200+ students to the area, on top of the 1,000+ new residents on the former RBS site nearby, would have a detrimental effect on current primary care services. New students, and residents, would have to seek primary care elsewhere, if possible. A 200+ bed purpose-built student development is wholly inappropriate for this area due to the lack of primary care services available for new residents.



### **3.2 Local transport links**

The local authority introduced a 'no right turn' system at the junction of Rodney Street and Eyre Place (on the corner of the One Canon bar). Although unintended, this has created additional traffic concerns in the area. Cars, delivery vans, taxis and minibuses etc. are now required to loop an additional 1.25km through the New Town to access the one-way stretch of Eyre Place and Eyre Place Lane if travelling from Stockbridge or Inverleith creating additional travel time and vehicle pollution / emissions. An increase in the number of residents in this area will inevitably increase the problems of access and pollution for local residents.

### **4.0 Opportunities**

#### **4.2 Proposal Opportunities**

The Public Consultation document states that the massing of the proposed buildings respond to the height and topology of the existing residential buildings. However, this is incorrect. 3D computer generated views and elevation drawings of the proposal, provided in the Public Consultation document, clearly show that the 5-story, with recessed 6<sup>th</sup> floor, block fronting Eyre Place is significantly higher than the adjacent existing residential tenement. The proposed building breaks the existing parapet line, and the recessed 6<sup>th</sup> floor is far higher than the roof line of the adjacent tenement. By using more accurate 3D photomontage images the excessive height of the proposed development will be evident.

The proposed corner block fronting Eyre Place / Eyre Place Lane is of a height, size, mass, and bulk that will create a very narrow 'canyon' entrance to the Lane. The proposal shows a bland exterior with no variation in elevation detail, setbacks, material changes etc. that would soften the corner creating a more welcoming entry to the lane. Any proposed development, at the corner of Eyre Place and Eyre Place Lane, should have a lower section that mirrors the 2-story structure across Eyre Place Lane from it (housing a shop), and then a step back from Eyre Place Lane allowing a taller structure no higher than the existing roof line of the adjacent tenement. This will allow for a visibly wider, less over-developed entrance to Eyre Place Lane.

The proposed development significantly overlooks and overshadows the existing adjacent private gardens and tenements. The 4-story block, perpendicular to the corner block and facing onto the narrow diagonal laneway, is shown to contain windows that will overlook the private rear gardens of 76-94 Eyre Place and significantly reduce their current privacy. Furthermore, the window-to-window distances between existing and proposed buildings is narrow and will therefore reduce the current privacy of the bedrooms in the existing tenements. In addition, the height of the proposed block will significantly reduce the current daylight and sunlight received by the existing buildings on 76-94 Eyre Place and overshadow the existing rear gardens. Any building proposed in this location should take into consideration these important issues of loss of privacy, loss of daylight and sunlight, and overshadowing of existing gardens and buildings.

The proposed 4-story, plus recessed 5<sup>th</sup> floor, block on Eyre Place Lane will overlook the private gardens of 52-64 Eyre Place and significantly reduce their current privacy. Furthermore, this block responds to the height and massing of the proposed block on Eyre Place and not the mews-type dwellings on Eyre Place Lane. Any buildings proposed on Eyre

Place Lane should be in line with the height, scale, and mass of the current mews-type dwellings and no higher than 2-story with recessed 3<sup>rd</sup> floor. Furthermore, the height of the proposed block will significantly reduce the current morning daylight and sunlight received by the existing buildings on 52-64 Eyre Place and overshadow the existing rear private gardens. Any building proposed in this location should take into consideration these important issues of loss of privacy, loss of daylight and sunlight, and overshadowing of existing private gardens and buildings.

### 5.3 Landscape strategy – Streetscape and access

From drawings in the Public Consultation document, it appears that the entrance to the proposed development is situated at an enlarged access area adjacent to an existing diagonal laneway that runs between Eyre Place and Rodney Street. As previously observed with the corner at Eyre Place Lane, this proposed entrance design creates another 'canyon' between buildings to the diagonal laneway. Furthermore, this public entrance area will encourage noise, smoking, drinking and anti-social behaviour. There are also hidden corners and areas for people to congregate unseen. Any entrance to a proposed development should have appropriately secured outdoor space to prevent any anti-social gatherings.

## **Observations on Student Housing Guidance, February 2016**

The planning application 21/06729/PAN fails to take into account the following guidance listed in the current Student Housing Guidance, February 2016 document prepared by The City of Edinburgh Council and therefore the application should be revised and any proposed student accommodation removed.

Page 3, "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".

The current universities and college campuses in Edinburgh are: University of Edinburgh (Old College); Edinburgh College of Art; University of Edinburgh (George Square); Napier University (Merchiston); University of Edinburgh King's buildings; Napier University (Craiglockhart) and Napier University (Sighthill).

The travel times to colleges and universities from the proposed site fall outside of the guidance quoted in the 'Developing 20-minute Neighbourhoods' document by City of Edinburgh Council. Walking distances to all colleges and universities are over the 20-minute walking distance recommendation. Napier Craiglockhart and Napier Sighthill are also over a 20-minute cycle ride and University of Edinburgh (George Square), Napier University (Merchiston), University of Edinburgh King's buildings, Napier University (Craiglockhart) and Napier University (Sighthill) are over a 20-minute bus commute. This information can be corroborated by the details provided in the Public Consultation document by CA Ventures.

The proposed site is not located in an area favourable to the City of Edinburgh guidance on 20-minute walkable neighbourhoods and is wholly unsuitable for student accommodation of any kind.

Page 3, “planning permission will be granted for purpose-built student accommodation where: b) The proposal will not result in an excessive concentration of student accommodation in any one locality.

There are already a significant number of purpose-built student accommodation buildings located in and around the Canonmills area within walking distance:

1. Beaverbank: 300 units
2. Haddington Place: 159 units
3. McDonald Road: 104 units
4. Shrubhill: 247 units
5. Murano: 258: units

**Total: 1,068 units**

Stated recently in Edinburgh Live, a local media outlet:

“If approved, Eyre Place will be home to the fourth set of student halls within a one-mile radius, joining flats at Beaverbank Place, McDonald Road and Haddington Place”.

Link: <https://www.edinburghlive.co.uk/news/edinburgh-news/plans-major-new-town-student-22559451>

The proposed development would create an excessive concentration of student accommodation in the Canonmills area to the detriment of the residents.

Page 4, “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”.

Although the above statement relates to HMO accommodation, the issues raised can also be said of purpose-built student accommodation.

All student accommodation has a rapid turnover of population. Whether this is due to students leaving for summer holidays or are asked to leave by landlords in order to profit from exorbitant Edinburgh International Festival rental opportunities during the summer. There is anecdotal evidence that the majority of student accommodation leases have 11-month break clauses to allow for renting to Festival visitors between student contracts. This encourages a further rapid turnover of population and creates less stable communities. In contradiction to the Student Housing Guidance document, the idea of ‘properties left vacant over the summer’ is a nonsense as no landlord would miss the opportunity to rent to visitors or performers over the summer months in a city with limited hotel beds.

The business model for purpose-built student accommodation creates instability in local communities by bringing in transient populations that are separated from long-term neighbours in other buildings by design. HMO accommodation actually allows students to meet long-term neighbours in their buildings which generates stronger communities and

relationships between generations. We reject the idea that purpose-built accommodation will be less problematic for existing residents than HMO residences.

Page 5, "...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".

There are currently five purpose-built student residences totalling 1,068 bed spaces already realised in the Canonmills area and surrounds. This has already put pressure on local GP services, dentists, pharmacies, shopping areas and public transport. An increase of over 200 students to the area will further debilitate primary care services affecting the social fabric of the area.

Page 5, "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".

As stated on page 114 of the Edinburgh City Plan 2016, "Edinburgh needs more housing to provide homes for an increasing population and support economic growth". Furthermore, on page 8 of the proposed Edinburgh City Plan 2030 states its aims will be met through: "Protecting the availability of housing and protecting residential amenity by presuming against the loss of housing to other uses and ensuring any uses in residential areas are appropriate.

In accordance with the 2016 and 2030 City Plans, the proposed site is more suited to permanent family homes and apartments rather than flats for a transient student population.

Page 6, "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, excessive concentrations may over time result in a poor quality of place, a diminished sense of community and make an area less attractive to all sections of the population".

There is already an over development of purpose-built student accommodation in the Canonmills area and the site in question is not suitable for a transient population of students. Any proposal for the proposed site must provide sustainable family homes and apartments only.

Page 7, "Large mono-use development has significant potential to harm the character of an area. Locational and design guidance criterion c) 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".

The proposed development is a 'large mono-use development'. This can be seen in the drawings provided in the Public Consultation document. Specific observations, regarding the height, scale, mass, and bulk of the building, have been made previously in the section of this document responding to the Public Consultation document from CA Ventures.

Page 8, "c) Outwith criteria a) and b) sites identified as a high probability of delivering housing within Map 5 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 gross floor area shall represent a minimum of 50% of the total new build housing and student accommodation gross floor area".

The proposed planning application sits on a parcel of land 0.27ha in size. Due to this, as stated in the Housing Land Study document, the site should contain a portion of housing up to 50% of the gross floor area. There has been no provision made for this in the proposed application. Furthermore, the proposed development is part of site '151, Eyre Place' shown in the LDP Housing Land Study (June 2014). This document states that the whole site is 'a potential site for housing'. Specifically: 7 houses and 44 flats, totalling 51 dwellings over the entire '151' site. Regardless of whether the proposal is for student flats or housing, the proposal of 200+ flats by the developer is grossly over the recommended density listed in the Housing Land Study Document of 124 dwellings per hectare.

Any proposal for the proposed site must provide sustainable family homes and apartments in line with the LDP Housing Land Study and Edinburgh City Plan 2016, not a commercial development as proposed.

## **Observations to Edinburgh City Plan 2016**

The planning application 21/06729/PAN fails to take into account the following material considerations listed in the current Edinburgh City Plan 2016 and therefore the application should be revised, and any proposed student accommodation removed.

Page 117, Policy Hou 8 Student Accommodation

"Planning permission will be granted for purpose-built student accommodation where: a) The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport".

The proposed development is located in an area outwith the travel times to colleges and universities quoted in the document 'Developing 20-minute Neighbourhoods' by City of Edinburgh Council and included in the proposed Edinburgh City Plan 2030. All of the colleges and universities stated in the Public Consultation document are outwith the 20-minute walking distance recommendation, two are over a 20-minute cycle ride time and five are over a 20-minute bus commute time. Therefore, the proposed site is not located in an area favourable to the City of Edinburgh guidance on 20-minute neighbourhoods and is wholly unsuitable for student accommodation.

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”.

There are already a significant number of purpose-built student accommodation buildings located in and around the Canonmills area: Beaverbank (300 units); Haddington Place (159 units); McDonald Road (104 units); Shrubhill (247 units) and Murano (258 units); totalling 1,068 in the surrounding area. A further development of 200+ student bed spaces would have a detrimental effect on Canonmills and any proposal for the proposed site should provide sustainable family homes and apartments only.

Page 118, Item 236:

“Developments should be close to the universities and colleges and accessible by public transport. In assessing the degree of concentration of student accommodation, the Council will take into account the nature of the locality in terms of mix of land use and housing types, the existing and proposed number of students in the locality. Further advice is provided in Council guidance”.

The proposed development is located in an area outwith the travel times to colleges and universities quoted in the document ‘Developing 20-minute Neighbourhoods’ by City of Edinburgh Council and stated in the proposed Edinburgh City Plan 2030. Five of the colleges / universities are located over a 20-minute bus commute time from the proposed site. Therefore, the proposed site is not located in an area favourable to the City of Edinburgh guidance on 20-minute neighbourhoods and is wholly unsuitable for student accommodation.

Page 118, Policy Hou 10 Community Facilities

“Planning permission for housing development will only be granted where there are associated proposals to provide any necessary health and other community facilities relative to the impact and scale of development proposed. Development involving the loss of valuable health or other community facilities will not be allowed, unless appropriate alternative provision is to be made”.

There are already several issues with current primary healthcare provision in the Canonmills area. The Stockbridge Health Centre would not be able to accommodate a population generated from new development sites, such as student flats, and the Health Centre accommodation cannot be extended. Eyre Medical Practice is also at capacity with no ability to be extended and therefore new premises would be required. Furthermore, only two dental practices within EH3 postcode, of these two only one is accepting new NHS Adult patients.

GP and dental services in the area are under pressure and at capacity. The introduction of 200+ students to the area would have a detrimental effect on current primary care services. A 200+ bed purpose-built student development is wholly inappropriate for this area regarding the lack of availability of primary care services for new residents.

## Observations to proposed Edinburgh City Plan 2030

The planning application 21/06729/PAN fails to take into account the spirit of the material considerations listed in the forthcoming Edinburgh City Plan 2030 and therefore the application should be revised and any proposed student accommodation removed.

Page 26, 2.94

“Edinburgh has experienced a steep rise in the number of properties being used for short-term letting, impacting on the availability of homes for traditional housing need. To balance the quality of life of our residents with the demands of visitors to the city and reduce the amount of homes being lost to other uses, there is a presumption against loss of housing”.

The developer has failed to understand the importance of traditional housing needed in the area. Appropriately designed traditional flats and houses, rather than a commercial development of short-term student lets, is more suited to the needs of the local community.

Page 26, 2.95

“There is a large student population in Edinburgh and the higher and further education institutions contribute significantly to Edinburgh’s success as a city. City Plan supports the provision of purpose-built student accommodation ensuring that student housing is delivered at the right scale and in the right locations, helping to create sustainable communities and looking after students’ wellbeing”.

The proposed development, of purpose-built student accommodation, is not situated in the right location and will destabilise the current community of Canonmills by putting pressure on local GP services, dentists, pharmacies, shopping areas and public transport.

Furthermore, there is widespread concern over the wellbeing of students who live within CA Ventures’ purpose-built accommodation. Increasingly, there are negative articles and interviews about the developer in local and national press and social media being reported:

Link: <https://www.bbc.co.uk/news/uk-scotland-glasgow-west-58849933>

Link: <https://www.thescottishsun.co.uk/news/scottish-news/7809257/glasgow-students-building-halls-wires-walls/>

Link: <https://www.independent.co.uk/news/uk/home-news/student-halls-luxury-unfinished-pictures-b1935325.html>

Link: <https://twitter.com/novhellstudent>

Link: <https://glasgowguardian.co.uk/2021/10/09/accommodation-from-hell-bridle-works-students-given-construction-site-for-home/>

Page 123, Hou 6 Student Accommodation

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

a. there is good access by public transport and active travel routes to further and higher education institutions”,

The proposed development is located in an area outwith the travel times to colleges and universities quoted in the document 'Developing 20-minute Neighbourhoods' by City of Edinburgh Council and stated in the proposed Edinburgh City Plan 2030. Five of the colleges / universities are located over a 20-minute bus commute time from the proposed site. The proposed site is not located in an area favourable to the City of Edinburgh guidance on 20-minute neighbourhoods and is wholly unsuitable for student accommodation.

Page 123, Hou 6 Student Accommodation

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

d. there will be no adverse impact on the established character of the area".

There will be significant impact on the character of the area if the proposed development is realised. The building's height, scale, mass, and bulk is larger than the adjacent buildings and will create a narrow 'canyon' entrance to Eyre Place Lane. Furthermore, the introduction of 200+ students to the area will have a disastrous effect on residents' living environment, local amenities, public transport and primary healthcare, such as GPs, dentists and pharmacies.

Page 123, 3.185

"Purpose built student accommodation makes a valuable contribution to housing Edinburgh's many students. Ensuring it is delivered at the right scale and in the right locations is required to balance this with the needs of the existing community and the need for residential dwellings. It is particularly important that the design of purpose-built student accommodation should create safe and pleasant places for occupants, residents and the wider community, create a mix of uses avoiding a single land use and ensure adaptability".

The proposed development is a 'large mono-use development'. This can be seen in the drawings provided in the Public Consultation document. Specific observations, regarding the height, scale, mass, and bulk of the building, have been made previously. Furthermore, no housing or other mixed-use proposal has been considered as part of the proposal to mitigate the impact of student housing on the site.

Page 123, 3.186

"Larger sites provide an opportunity to balance the mix of land uses and to contribute to delivery of housing. A mix of student accommodation and housing is required on all sites greater than 0.25Ha. Housing should comprise 50% of all student accommodation units. The affordable housing policy of 35% will apply. This will not apply in self-contained campus locations. Council Guidance sets out further details".

In the spirit of the forthcoming City Plan 2030, no consideration has been made for the opportunity to provide greatly needed traditional housing as part of the proposal. As stated previously, the developer has failed to understand the importance of traditional housing that is needed in the area. Appropriately designed traditional flats and houses, rather than a



commercial development of short-term student lets, is more suited to the needs of the local community.

## **Conclusion**

The proposed development does not comply with a significant number of material concerns listed in The Student Housing Guidance document, The Edinburgh City Plan 2016 (Adopted), The Edinburgh City Plan 2030 (Proposed), and the Developing 20-minute Neighbourhoods document. The proposed site is wholly unsuitable for the insertion of a 200+ bed purpose-built student accommodation development.

In summary the key issues are:

1. Traffic

The increased traffic necessary to support any proposed student accommodation is wholly unfeasible and would be detrimental to the residents and road users in the area. Furthermore, the proposed site is not located in an area favourable to the City of Edinburgh guidance on '20-minute neighbourhoods' and is wholly unsuitable for student accommodation.

2. Parking

No provision has been made for parking. Although parking provision is not seen as a necessity for student accommodation, many students, particularly those from outside of Edinburgh may have cars. Students will attempt to park illegally on Eyre Place and Eyre Place Lane disrupting access and safety. Furthermore, no consideration has been made for delivery vans, taxis or minibuses, which shows a complete lack of understanding, by the developer, for the needs of current students.

3. Appearance of the area

Making somewhere your home instils a pride in the environment around you. Transient populations are less likely to take the time, and make investments, in an area in which they live for short periods. The introduction of 200+ students and transient summer Festival visitors, into Canonmills will significantly disrupt the environment, character of the streets and places that have been developed and cared for by many long-term residents.

4. Noise

With the provision of student accommodation comes issues with noise, and in particular, parties. The proposal is for a densely packed 200+ student population in an intimate, tightly packed set of buildings in Canonmills. Freshers' Week, Christmas, birthdays, as well as Festival party goers, will inevitably bring parties, alcohol and anti-social behaviour to the area.

5. Disturbance

The proposed development will create unacceptable levels of noise, parties, passive smoking, alcohol, and anti-social behaviour that comes with large groups of students.

6. Loss of light

The height and position of the proposed development will significantly affect the sunlight and daylight currently received by properties and private gardens on Eyre Place and Eyre Place Lane.

7. Overshadowing

The height and position of the proposed development will create overshadowing to properties and private gardens on Eyre Place and Eyre Place Lane.

8. Privacy and overlooking

As a matter of course, purpose-built student accommodation utilises CCTV as part of its security system. However, CCTV cameras also unintentionally record footage from the surrounding area. This is an invasion of privacy for local residents and visitors to the adjacent streets who do not give permission to be filmed entering or leaving their homes or being filmed through their windows or in their private gardens.

The height and position of the proposed development will create overlooking into the private garden areas of tenements on Eyre Place at either side of the site. Furthermore, the window-to-window distances between the proposed development to several properties on Eyre Place will create a loss of privacy to bedrooms in the existing buildings.

9. Transient population

There is already an over development of purpose-built student accommodation in the Canonmills area and, furthermore, the site in question is not suitable for a transient population of students.

**This document is submitted on behalf of the Eyre Place Lane Owners' Association, residents of Eyre Place, Rodney Street, Rodney Place, Logan Street, wider Canonmills, and visitors to the area. The Canonmills community reject the proposal for purpose-built student accommodation on 72-74 Eyre Place.**