

Scott Hobbs Planning

Planning Statement on behalf of:

CA Eyre Place (Edinburgh) Property Owner
Limited and CA Europe UK Operating Company,
Ltd

Date:

28 July 2022

Pre-Application Consultation Report

Proposed Purpose-Built Student
Accommodation And nine Townhouses
Development
Eyre Place Lane, Edinburgh





Info

Pre-Application Consultation Report:

Proposed erection of purpose-built student accommodation and nine Townhouses development, with associated amenity space, access, cycle parking, car parking and landscaping.

Eyre Place Lane,
Edinburgh

Summary

This report advises on the Pre-Application Consultation process and is submitted in support of applications for planning permission for a mixed-use development comprising purpose built student accommodation and townhouses. The pre-application process related to a previous student-only development and the planning applications now submitted are a result of the outcome of that process. The proposals seek to redevelop and improve the existing site and have been designed sensitively to consider the context of the surrounding area. As submitted to City of Edinburgh Council, the proposals have taken a balanced view of all representations submitted to the Applicant during the pre-application consultation process, and the process overall has resulted in an improved development with a mixed-use scheme which will have a positive impact on the local area.



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1.0 Introduction

- 1.1 This Pre-Application Consultation ('PAC') Report is prepared on behalf of CA Eyre Place (Edinburgh) Property Owner Limited and CA Europe UK Operating Company Limited ('the Applicants') who are seeking detailed planning permissions for a purpose-built student accommodation (PBSA) development and nine residential townhouses respectively, at 72 – 74 Eyre Place, Edinburgh. These two proposals form part of a wider mix-use masterplan for the overall site.
- 1.2 The description of developments for both the planning application are as follows:
- For Purpose-Built Student Accommodation application,
- 'Proposed erection of a purpose-built student accommodation development with associated amenity space, access, cycle parking and landscaping.'*
- For nine Townhouses application,
- 'Proposed erection of nine Townhouses with associated amenity space, access, cycle parking, car parking and landscaping.'*
- 1.3 This PAC Report is voluntarily submitted in support of two planning applications for local developments. The overall site was the subject of a formal Proposal of Application Notice (PAN) submitted in December 2021 for a single PBSA development at the site, and this PAC Report summarises the consultation process involved as part of that PAN process. One of the outcomes of that process is the change in the scale and mix of development proposed at the overall site which no longer represents a major development as it is submitted in the form of two separate planning applications.
- 1.4
- 1.5 This PAC Report forms part of a suite of supporting documents submitted with both the planning applications as outlined below. These supporting documents are in addition to the formal planning application documents comprising the planning application form and certificates and the accompanying plans, sections, and elevations. For full details of the proposed development, reference should be made to their respective Planning Statements.
- Planning Statement,
 - Design and Access Statement ('D&AS'),
 - **Pre-Application Consultation Report,**
 - Heritage Statement
 - Archaeological Desk Based Assessment
 - Archaeological Written Scheme of Investigation
 - S1 Sustainability Form
 - Daylight & Sunlight Analysis
 - Air Quality Impact Assessment

- Noise Impact Assessment
 - Bat Roost Potential Survey
 - Surface Water Management Plan (inc. Flood Risk Assessment)
 - Transport Statement
 - Phase 1 Site Investigation
- 1.6 The objective of the PAC process is for *'communities to be better informed about major and national development and to have an opportunity to contribute their views before a formal planning application is submitted to the planning authority'* (Scottish Planning Series Circular 3/2013: Development Management Procedures). The purposes of the process are to improve the quality of planning applications and to air, address and mitigate community issues where practicable. Circular 3/2013 asserts, however, that there is no imperative to incorporate changes to accommodate every view expressed by the community in finalising those proposals.
- 1.7 The Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 provide amendments to the previous requirements for pre-application consultation. In accordance with the guidance provided in the Scottish Government Guidance: Covid 19 Emergency and Pre-Application Consultation and Requirements for a Public Event, alternative consultation methods have been utilised by the Applicant team.
- 1.8 This PAC Report will demonstrate that robust consideration has been given to the views expressed by the community and by statutory and non-statutory consultees. It will also demonstrate that appropriate pre-application consultation measures have been carried out which exceed the requirements of City of Edinburgh Council ('CEC'), whilst meeting the most recent Scottish Government guidance concerning Covid-19. It will illustrate:
- Who was consulted,
 - What steps were carried out to comply with the minimum statutory requirements and those of City of Edinburgh Council,
 - Evidence to demonstrate that the required actions were taken,
 - The steps taken to explain the nature of the PAC,
 - The nature of the comments received, and issues raised during the PAC; and,
 - Consideration given to amending the proposal to incorporate views expressed by the community, the planning authority, and other statutory and non-statutory consultees.
- 1.9 The PAC process involved the creation of a website, <https://eyreplace.consultationonline.co.uk/> which was publicly accessible from 23 February 2022. An online consultation event, where members of the Applicant Team were available to provide instant feedback, took place on the website from 3pm - 7pm on 3 March 2022.
- 1.10 As detailed at Section 2 of this PAC Report, statutory pre-application consultation regarding the proposed development at that time was carried out by the Applicant team, in accordance with the Town and Country Planning (Development Management Procedures) (Scotland) Act 2013, as amended by the Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020.

1.11 In addition, best practice has been adopted by the Applicant team involving comprehensive pre-application consultation with the CEC. This consultation is detailed at Section 3.

1.12

Background

1.13 The Proposal of Application Notice ('PAN') was submitted to CEC on 21 December 2021 for:

'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.'

1.14 A copy of the PAN is attached in Appendix 1. As required by legislation, it provided the following information:

- The description of the proposed development,
- The postal address of the site,
- A location plan showing the outline of the site,
- Details as to how the prospective applicant may be contacted and corresponded with; and,
- Details of the proposed public consultation event & newspaper advert.

1.15 The following parties were notified of the PAN submission:

- New Town & Broughton Community Council
- Councillor Gavin Barrie
- Councillor Max Mitchell
- Councillor Hal Osler
- Councillor Ian Whyte
- Friends of King George V and Scotland Yard Parks

1.16 This PAN was validated on 22 December 2021 (reference 21/06729/PAN) and approved on 12 January 2022 subject to additional consultation (confirmation of website address & issuing of PAN details to Stockbridge / Inverleith Community Council).

1.17 Stockbridge / Inverleith Community Council were sent details of the PAN on 18 January 2022.

1.18 The consultation dates were revised, and all parties originally notified of the PAN were made aware of these new dates on 4 February 2022.

1.19 A total of 200 letters were distributed to the local area on 23 February 2022 to notify the local community of the online consultation.

1.20 A public notice was also published in a local newspaper, the Edinburgh Evening News on 23 February 2022, to advertise the online consultation in accordance with the statutory requirement. A copy of this public notice is attached as Appendix 2.

- 1.21 An email address (eyreplace@consultationonline.co.uk) was established to give the community direct access to the project team.

2.0 Public Consultation

- 2.1 In accordance with legislation and latest guidance regarding the Covid-19 pandemic, the following public consultation was carried out:
- Information relating to the proposed development was available online at <https://eyreplace.consultationonline.co.uk/> from 23 February 2022. Visitors could submit comments using a feedback form on the website.
 - An online consultation event then took place on the website from 3pm - 7pm on 3 March 2022. Representatives of the applicant were available during this event to provide instant feedback via a Chaport feature embedded on the website.
- 2.2 During the online consultation event, a minimum of two members of the Applicant team were available on Chaport at any one time to provide instant feedback. The following notification of the consultation was undertaken by the Applicant team:
- A total of 200 letters were distributed to the surrounding area on 21st February 2022, advertising the public consultation.
 - A public notice was also published in a local newspaper, the Edinburgh Evening News on 23rd February 2022, in accordance with the statutory requirement. A copy of this public notice is attached as Appendix 2.
- 2.3 The following stakeholders were independently notified of the public consultation by email:
- New Town & Broughton Community Council
 - Stockbridge / Inverleith Community Council
 - Councillor Gavin Barrie
 - Councillor Max Mitchell
 - Councillor Hal Osler
 - Councillor Ian Whyte
 - Friends of King George V and Scotland Yard Parks
- 2.4 In addition to the feedback form and Chaport features embedded on the website, interested parties could also contact the Applicant team via eyreplace@consultationonline.co.uk or by phoning the agent.
- 2.5 The initial proposals for the sites were developed following a series of meetings with CEC, a thorough review of planning policy, previous decisions, and applications for development in this area; and a thorough assessment of market requirements which informed the form and scale of development proposed. This background research formed the basis of the information presented on the website.

- 2.6 16 members of the local community discussed the proposals with the Applicant team during the online consultation event. 27 feedback forms were received independently of the online consultation event and 144 emails were received. On this basis, it is considered that the event and general consultation was well advertised and generated a good attendance rate.
- 2.7 The opportunity to provide feedback was given to the community via feedback forms by emailing eyreplace@consultationonline.co.uk or by phoning 0131 226 7225. A deadline of 23 March 2022 to submit feedback was provided, although flexibility has been allowed to permit the community to submit comments or questions beyond that period.

Feedback and Outcomes

- 2.8 The key concerns raised during the public exhibition and in the written responses related to the following:
- Increase in a transient student population being detrimental to the character of the surrounding area.
 - Many student accommodation developments already in the surrounding area.
 - Distance of the site from university and college facilities making it unsuitable for a student accommodation development.
 - Impact on local parking provision.
 - Loss of private views and daylight; the impact on wider surrounding views.
 - The impacts to the streetscape because of the proposed development increased building mass.
 - Increased pressure on local services because of the new student residents, combined with residential developments in the surrounding area.
 - Potential construction impacts on neighbouring properties and roads.
 - Noise and general nuisance from future residents of the proposed development.
 - That swift bricks should be included as part of the proposed development.
 - Use of site for short term holiday accommodation outside of term-time.
- 2.9 These comments have been taken into consideration when revising the scheme. The fundamental change since the pre-application consultation is the significant reduction in the size of the PBSA scheme, and the introduction of family homes as part of the overall mix of uses being proposed for the site. This change is captured in two separate planning applications. In relation to the other comments received, the changes incorporated in to revised proposals are summarised below.
- It is accepted there have been recent purpose-built student accommodation developments in the wider area, i.e., Beaverbank Place and McDonald Road. However, as noted above, this area is also characterised by high-density residential uses, in addition to a variety of commercial and leisure uses typical of such a central and urban area. Therefore, the proposed scheme consists of a mix of residential and PBSA as opposed to 100% PBSA scheme submitted during pre-application consultation. The local student population density is assessed in detail by the accompanying Planning Statement and has been found to be acceptable in terms of the current student guidance.

- The accompanying Transport Statement details the accessibility of the site to local university and college facilities, being within a 15-minute cycle / 20-minute bus journey to the University of Edinburgh George Square campus and a 22-minute cycle / 35-minute bus journey from the Edinburgh Napier University Merchiston campus. It is considered that the site is highly accessible to local university and college facilities, in addition to other amenities and services, by sustainable transport methods
- The proposed PBSA development will be car free, with cycle parking provided in accordance with CEC guidance. The student accommodation operator also provides bikes for the use of all residents, who will be discouraged from bringing their own cars and will be ineligible for CEC on-street parking permits. The residential development proposes car parking provision to be provided within the site along with cycle parking provision. Considering the proximity of the site to active travel and public travel links, the use of car will be to a minimum.
- Loss of private views is not a material consideration. However, these planning applications are supported by Design & Access Statement and a Daylight & Sunlight Analysis which demonstrate there will be no unacceptable loss of daylight, sunlight, or privacy because of the proposed developments. Key local and wider views are also assessed as part of this planning application. The scale, massing and design of the proposals have been carefully developed following extensive pre-application consultation with CEC to ensure there will be no unacceptable impact on the local streetscape and wider surrounding area.
- Regarding impacts on local services, the site is situated within the Urban Area as defined by the Edinburgh Local Development Plan and the proposed developments will help to provide a sustainable housing density at this highly accessible site. This housing density will help support local services and public transport. An appropriate legal agreement will be made between CEC and the Applicant to provide developer contributions which are deemed to be required.
- Regarding construction impacts, a Construction Management Plan is likely to be requested to control the construction, including hours of working. This will ensure that, during the demolition / construction phases, there are not any unacceptable impacts on neighbouring buildings or the surrounding community.
- A Noise Impact Assessment accompanies these applications and demonstrates that the proposals will not have an unacceptable impact on neighbours as a result of noise. The PBSA development will be operated by Novel Student, an in-house development management company. Wardens will be available to deal with any complaints regarding anti-social behaviour and it is considered that the introduction of increased activity and natural surveillance into the lane due to residential accommodation will improve feelings of public safety.
- The Applicant is content for appropriately located swift bricks to be required by condition on any planning permission for the proposed development.
- In relation to the Townhouses application, if these are to be used for short-term lets this will require a separate planning application and permission is not being sought for this use at this time. In addition, for the PBSA development, the majority of student leases will be for the full year meaning the units are unlikely to be vacant for extended periods of time.

2.10 The Applicant team has endeavoured to respond individually to all questions raised during the pre-application consultation process.

3.0 Other Key Stakeholders

- 3.1 As detailed at Section 2 of this PAC Report, statutory pre-application consultation regarding the development proposed at that time was carried out by the Applicant team, in accordance with the Town and Country Planning (Development Management Procedures) (Scotland) Act 2013, as amended by the Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020.
- 3.2 In addition, best practice has been adopted by the Applicant team involving comprehensive pre-application consultation with CEC, New Town & Broughton Community Council and The Yard. Details of this consultation is provided below.

Pre-Application Advice

- 3.3 A formal pre-application advice request was submitted to CEC on 17 August 2021. This pre-application advice request was submitted along a Pre-Application Discussion Document ('PADD'), which contained detail of the site, local planning history and wider context had been extensively analysed to provide a starting point for development of the proposals.
- 3.4 Pre-application meetings were held between CEC and the Applicant team during September, October, November 2021 and during January, March and May 2022. A formal pre-application advice letter was then received from CEC on 23rd May 2022.
- 3.5 As per the pre-application advice letter, CEC were satisfied with the revisions in terms of design, roof form, massing, density and materials. The applicant was advised to address the following issues:
- loss of employment land;
 - impact on setting of the conservation area;
 - impact of the proposal on future development in the area;
 - impact on surrounding local views;
 - plans relating to landscaping and maintenance;
 - wider pavement along Eyre Place and Eyre Place Lane;
- 3.6 A further informal response was received from CEC on 22nd June 2022. According to this response, CEC were content with the revised scheme of the development into a mixed-use development as it would allow for greater compliance with the LDP and non-statutory guidance. For the Townhouses development, the applicant was advised to increase the soft landscaping towards the rear of the block, include the provision of cycle parking and EV charging points. For PBSA development, CEC advised to consider the potential impact on the surrounding local and key views due to the proposed sawtooth roof structure.
- 3.7 Key CEC consultees such as Environmental Protection, Transport and Urban Design, Scottish Environmental Protection Agency (SEPA), Scottish Water, Historic Environment Scotland, Archaeology, Flooding and Drainage, Waste and CEC Natural Environment were also involved in pre-application discussions.

New Town & Broughton Community Council

- 3.8 Members of the Applicant team met with the New Town & Broughton Community Council on 2 March 2022 to present and discuss the draft proposals. The main discussion points related to the principle of student accommodation use, impact on local infrastructure, daylight / sunlight / privacy / noise impacts and vehicular access / parking constraints. These points have been addressed by Section 2 of this PAC Report.

The Yard

- 3.9 As an important neighbour to the site, the Applicant team consulted with The Yard during the application preparation. A meeting took place on 31 March 2022 between the Applicant team and The Yard to allow the proposals and any concerns / suggestions to be discussed.
- 3.10 The main discussion points related to overshadowing, site access and privacy, which are addressed in Section 2 above. The Yard also had safety concerns due to recent vandalism of their facilities. The Applicant team explained during the meeting that the accommodation will be fully managed by an in-house team, with CCTV and a live in warden. The student leases require residents to leave the accommodation if their behaviour is in breach of their lease. It was discussed that the overall safety of Eyre Place Lane could be improved through the provision of increased natural surveillance, activity, and lighting.
- 3.11 The Applicant will continue to engage with The Yard during the course of the application and during construction / operation of the development.

4.0 Applicant Response

- 4.1 After considering the response from CEC in the formal advice letter that was provided on 23rd May 2022 and informal response provided on 22nd June 2022, the applicant revised the scheme as summarised below:
- A mixed-use scheme of 142 student bedspaces and 9 Townhouses is proposed which will contribute to sustaining the community within the immediate vicinity and the wider area. The proposals will regenerate the site, previously occupied by derelict buildings, enhancing the character or appearance of the nearby conservation area.
 - Regarding the impact of the proposal on future development in the area, there is an opportunity to create an east-west connection through the PBSA site creating a wider public realm and providing more green space. This has been considered within the proposals where access routes have been left available to be engrained into future developments. The site has been outlined as part of the new local development plan (ref.H17) for future residential development.
 - The impact on the surrounding local and key views due to both the proposed developments are addressed in their respective Design and Access Statements which shows how the proposal can enhance the visual amenity of the area.
 - The pavement along Eyre Place has been widened to provide an enhancement to the existing streetscape and towards the crossing across the Eyre Place Lane has been improved by the introduction of a continuous pedestrian priority crossing point. New footway has been proposed along Eyre place Lane with soft landscaping.
 - To address the soft landscaping issues along the rear of Townhouses, the applicant introduced trough planters that will support a variety of planting between decks and terraces.

- Cycle parking and EV charging points have been introduced in the proposed Townhouses development.

5.0 Conclusions

- 5.1 The statutory-minimum 12-week PAN period for the proposed development began on 21 December 2021 enabling an application for planning permission to be submitted after 21 March 2022. This PAC Report summarises the activity throughout the pre-application consultation period. In accordance with statutory requirements, community and stakeholders have been given the opportunity to view the proposal and make their comments.
- 5.2 Extensive background research and assessment was carried out prior to presenting the proposed development to the community. Following discussion and receipt of responses to the consultation process, full consideration has been given to the expressed preferences for the site.
- 5.3 The proposals have now been developed following a detailed consultation exercise, with full consideration being given to the issues expressed during this process. The Applicant has determined that the initial presentational plans met many of the views expressed by respondents.
- 5.4 The applicant considers that the PAN process has been thorough, positive and has resulted in a design-led development. The proposals seek to redevelop and improve the existing site and have been designed sensitively to consider the context of the surrounding area.
- 5.5 As submitted to CEC, the proposal has been significantly amended to take a balanced view of all representations submitted to the Applicant during the pre-application consultation process, resulting in a fully compliant mixed use development which is entirely suitable for this brownfield site, making a positive impact on the local area.

6.0 Appendices

Appendix 1- Proposal of Application Notice

P2	• EDINBURGH • THE CITY OF EDINBURGH COUNCIL	FOR OFFICIAL USE ONLY
		Reference No : / / PAN Associated Application No : Registration Date :
Proposal of Application Notice (to be completed in respect of national and major categories of development)		

Under the Town & Country Planning (Scotland) Act 1997 as amended by the Planning Etc (Scotland) Act 2006

The planning authority will respond within 21 days of receiving the Notice. It will advise whether the proposed Pre-Application Consultation is satisfactory or if additional notification and consultation above the statutory minimum is required. The minimum consultation activity includes consultation with the relevant community council(s), the holding of one public event and its advertisement in a local newspaper.

1	APPLICANT'S DETAILS	NAME CASL Eyre Place (Edinburgh) Property Owner Ltd ADDRESS 1st Floor - 22 Cross Keys Close, Marylebone, London, _____ _____ POSTCODE W1U 2DW TELEPHONE 0131 226 775 EMAIL rm@scotthobbsplanning.com
	<small>Please tick the box if the applicant is an Elected Member, or an officer involved in the planning process, of City of Edinburgh Council, or is a partner / close friend / relative of either <input type="checkbox"/></small>	
2	AGENT'S DETAILS (if applicable)	NAME Scott Hobbs Planning ADDRESS 24a Stafford Street, Edinburgh _____ _____ POSTCODE EH3 7BD TELEPHONE 0131 226 7225 EMAIL rm@scotthobbsplanning.com
	<small>Please tick the box if the applicant is an Elected Member, or an officer involved in the planning process, of City of Edinburgh Council, or is a partner / close friend / relative of either <input type="checkbox"/></small>	
3	ADDRESS OR LOCATION OF PROPOSED DEVELOPMENT	
	Please state the postal address of the prospective development site. If there is no postal address, describe its location. Please outline the site on an OS base plan and attach it to this completed Notice. 72-74 Eyre Place, Edinburgh. Please see attached Location Plan. _____ _____ _____ _____ _____ _____	

4 Describe in general terms the development to be carried out. Outline its characteristics.

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.

State what type of planning permission this PAN will relate to (please tick):

Full Planning Permission ☒ Planning Permission in Principle ☐
 Approval of Matters specified in Conditions ☐
 State Class: National ☐ Major ☒

5 State which other parties have received a copy of this Proposal of Application Notice.

Community Council(s)	Date Notice served
New Town/Broughton Community Council	21/12/2021

Any other parties	Date Notice served
Inverleith Ward: Councillor Gavin Barrie Councillor Max Mitchell Councillor Hal Osler Councillor Ian Whyte Friends of King George V and Scotland Yard Parks	21/12/2021

6 Please give details of proposed consultation.

Proposed Public Event	Venue	Date and Time
Virtual consultation.	Online (website address tbc).	15/02/2022 - 09/03/2022.
Virtual feedback event.		23/02/2022, 3pm - 7pm.

Proposed newspaper advert date
 15/20/2022

Where published
 Edinburgh Evening News

Details of any other consultation methods (date, time and with)

Flyer distribution to neighbouring properties on 15/02/2022 to provide notification of the public consultation.

Signature Paul Scott Date 21/12/2022

(A planning application for this development cannot be submitted less than 12 weeks from the date the Proposal of Application Notice is received and without the statutory requirements having been undertaken. The application must be accompanied by the Pre-Application Consultation report)

City of Edinburgh Council, Services for Communities - Planning G2,
 Waverley Court - 4 East Market Street, Edinburgh, EH8 8BG. Tel. 0131 529 3550

Amended May 2014

PUBLIC NOTICES

PLANNING NOTICES

Town and Country Planning

(Development Management Procedure) (Scotland) Regulations 2013

**as amended by the Town and Country Planning (Miscellaneous
Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020**

PRE-APPLICATION CONSULTATION: Prospective Major Application

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.

72-74 Eyre Place, Edinburgh, EH3 5EL

An online public consultation, where members of the project team representing the applicant will be available for a question-and-answer session via interactive text, will take place on 3rd March 2022 (3pm-7pm) via the project website: **www.eyreplace.consultationonline.co.uk**

If you wish to make comments on the proposals you may do so at the above event, on the project website or using the feedback forms or via email to **consultation@scotthobbsplanning.com** no later than **16th March 2022**.

If members of the public are unable to view the material online, they should contact the development team at:

Email: **eyreplace@consultationonline.co.uk**

Post: Eyre Place Consultation, c/o Scott Hobbs Planning, 24 Stafford St, Edinburgh EH3 7BD

Tel: 0131 226 7225 - office hours only (Monday to Friday 9am-5pm).

Please note that all comments must be sent to the above and are NOT representations to the City of Edinburgh Council. There will be an opportunity to make formal representations to the Council when an application is made.



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