

# Non-Statutory Planning Guidance

Student Accommodation Consultation Draft

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# 1. Introduction

This non-statutory guidance seeks to ensure the provision of good quality purpose-built student accommodation (PBSA) in appropriate locations whilst protecting the character of existing areas.

Where relevant this guidance will be considered as a material consideration when determining planning applications.

It is important to read this guidance in conjunction with the policy framework of City Plan 2030 (adopted November 2024), which is Edinburgh's Local Development Plan (LDP) and National Planning Framework 4 (NPF4) that together make up Edinburgh's development plan, and other Council guidance including the [Draft Edinburgh Design Guidance 2024](#).

This guidance applies to all types of PBSA developments, including new build, change of use and conversion. The reuse of existing buildings can provide opportunities for the provision of PBSA and is supported by NPF4.

## 1.1 What is PBSA?

Students occupy a range of accommodation types. This guidance does not seek to address students living at home, or in privately rented flats, including Houses in Multiple Occupation (HMO). PBSA is managed communal accommodation that is built, or converted, with the specific intent of being occupied by students undertaking a full-time course of higher or further education. It may be located on –or off – campus, and owned or managed by a university, private or third sector provider such as a co-op.

PBSA differs from mainstream housing and can have similarities to a hotel in its operation, as it often includes management arrangements for day-to-day functioning and on-site facilities such as laundry, reception and common rooms. PBSA has no formal definition within the planning system and is considered 'sui generis' (or unique/of its own class).

PBSA is considered a form of commercial development. It is non-permanent, communal accommodation and is not included in the estimates of future need and demand on which the LDP housing land requirement is based. LDP Hou 1, Housing Development, is provided to ensure the provision of mainstream homes (including affordable homes and homes for varying needs). The LDP allocates housing proposals for the purpose of meeting the housing land requirement. PBSA does not provide housing units which contribute to meeting this requirement. While it is important to provide for PBSA, this should not be at the expense of mainstream housing for which there is a significant identified need. Proposals for other uses, including PBSA, on allocated housing sites resulting in the provision of a lower number of units than identified in the LDP would impact on the delivery of mainstream housing, including affordable housing, to meet the housing land requirement. The LDP makes a separate policy provision for student accommodation under Hou 5.

## 1.2 Students and PBSA in Edinburgh

The student population in Edinburgh contributes to the city's economy, diversity, and vibrancy. The city is home to three universities: University of Edinburgh, Edinburgh Napier University and Heriot-Watt University, as well as Edinburgh College. Queen Margaret University is located just outside the Council area and has implications for accommodation provision.

Student enrolments at Edinburgh's universities had been increasing in recent years until 2021/22, however in 2022/23 numbers dropped back from 74,7105 to 73,045. 63,640 were full-time students, and 14,145 were first year undergraduates. The number of international students also fell in this period from 27,005 to 26,660. This was 36% of all students enrolled in the four Edinburgh universities.<sup>1</sup> A further 29,342 students were enrolled in Edinburgh College.<sup>2</sup>

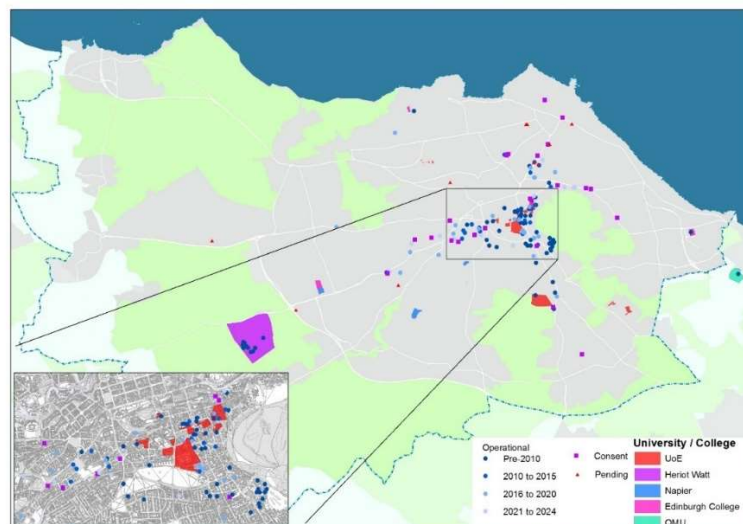
To support the health and wellbeing of students, it is essential that they are provided with appropriately located, high quality accommodation. While many students will choose to live in other forms of accommodation PBSA is a key part of the accommodation offer, alongside their access to mainstream housing.

The number of PBSA bedspaces in Edinburgh has more than doubled since 2005 when there were 7,350 bedspaces. In November 2024 there were 22,310 bedspaces. 11,987 university owned or managed bedspaces, 10,217 private bedspaces<sup>3</sup> and a further 106 bedspaces are provided by Edinburgh Student Housing Co-op.

In terms of scale, the majority (58%) of PBSA is provided in developments of less than 200 bedspaces.

As shown in Map 1 below, PBSA is most prevalent in the central area, with more recent development extending out from this area.

**Map 1: Location of PBSA**



<sup>1</sup> University of Edinburgh, Edinburgh Napier University, Heriot-Watt University, Queen Margaret University. Source: <https://www.hesa.ac.uk/data-and-analysis/students/table-1>

<sup>2</sup> [Edinburgh by Numbers 2023](#), CEC

<sup>3</sup> CEC Planning, October 2024

## 2. Policy Context

Edinburgh's Development Plan sets out policies which will apply in the assessment of planning applications for PBSA. The main policies are listed below:

### LDP Hou 5 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,*
- b. it provides suitable amenity to students, including open space,*
- c. no more than 10% studio flats are provided and,*
- d. there will be no adverse impact on the established character of the area*

*3.195 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.*

*3.196 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. Where compatible and appropriate within the site context, at least 50% of the site is provided for housing. The affordable housing policy of 35% will apply. This will not apply in self-contained campus locations. Council Guidance sets out further details.*

*3.197 To avoid additional pressures on existing local amenities and open space there is a need for purpose-built student accommodation to provide students with high quality living and adequate on-site amenity spaces and communal facilities. Student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. Standards are provided in Council guidance.*

*3.198 Studio flats can lead to social isolation and in high concentration do not foster healthy student communities. Cluster flat arrangements allow the opportunity for students to interact and improve wellbeing. This policy seeks to provide flexibility for future conversion to other residential uses studio can pose issues for conversion.*

*3.199 This policy applies to all types of student accommodation developments, including new build, change of use and conversion.*

## LDP Econ 2 Commercial Development

*Proposals for commercial uses within the urban area on sites 0.25 ha or larger, should where compatible and appropriate within the site context, provide at least 50% of the site for housing.*

*3.247 This policy supports the approach of the plan to create sustainable communities, maximise opportunities for housing and avoid large mono use developments. It applies to development for commercial uses including student housing, retail, leisure, hotels and other commercial development.*

## LDP Env 2 Co-ordinated Development

*Development proposals will be supported in principle if they can demonstrate that:*

- a. they would not compromise the effective development of adjacent land, or*
- b. they would accord with the comprehensive development and regeneration of a wider area provided for in a master plan, place brief, site brief, and/or development principles approved by the Council.*

*3.99 The Council encourages a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks, master plans, development briefs or place briefs to identify the full design potential for creating successful places. Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved.*

## LDP Env 31 Useable Open Space in New Development\*

*All proposals containing new- build development (except householder development and housing proposals covered by policy Env 5) shall include the provision of good quality, attractive, useable and where appropriate publicly accessible open space that forms at least 20% of the total site area. Wherever possible, this provision shall take the form of extensions and/or improvements to the green and blue network.\*\**

*\* This policy ensures that development proposals (other than private and affordable housing development) include appropriate open space provision. This includes specialist housing built for occupation by groups such as students or the elderly. The supporting text for Env 32 also sets out an explanation of how open space should be provided as well as what type of space should be counted as open space, with this addressed further in the Edinburgh Design Guidance and associated appendices.*

*\*\* A proposal which does not meet the full requirements of this policy on-site may be supported if appropriate provision or financial contribution is made to implement an action which improves park/open space/green network provision in the area (or access to these), with this normally needing to be an identified action in this Plan and/or Open Space Strategy.*

## LDP Env 33 Amenity

*Development will be supported by this policy where it is demonstrated that the amenity of future occupiers of the development and occupiers of neighbouring developments are not adversely affected by ensuring acceptable levels of amenity, particularly in relation to odour, space standards, noise, daylight, sunlight, privacy or immediate outlook.*

*3.172 This policy protects the amenity of neighbouring and occupiers of proposed buildings as well as public and private amenity spaces. The Edinburgh Design Guidance and associated appendices provides further information on how to ensure proposals provide acceptable levels of amenity for new occupiers and neighbouring developments, including in relation to amenity spaces. Where a proposal may cause some existing or future occupiers to suffer inadequate amenity then further information may be required as necessary to assess whether the proposal complies with this policy and guidance noted above, for example such as daylight/sunlight assessments.*

In addition to the policies set out above, proposals for student accommodation should meet with the other relevant policies of the development plan set out in NPF4 which together with the LDP forms the development plan for Edinburgh.

## 3. Overarching Principles

High quality accommodation in the right location is key to providing a positive experience of studying living in the city and essential to students' wellbeing. LDP Hou 5 aims to ensure high quality PBSA of an appropriate scale, in appropriate locations. The intention is to balance the provision of PBSA with the need for new residential dwellings while respecting the existing character and communities of Edinburgh.

### 3.1 Mixed Communities

The LDP aims to provide mixed use sustainable communities. Large scale or groupings of one type of accommodation do not provide this. PSBA is a more intensive use than housing and provides for one cohort of the population. It can - where not appropriate in scale or location - create issues for existing communities, particularly in terms of amenity or character of areas.

### 3.2 Requirement for Housing on Larger Sites

Development of housing alongside PBSA provides an opportunity to balance the mix of land uses while also contributing to the delivery of mainstream housing to create mixed communities. LDP Hou 5 and Econ 2 require sites greater than 0.25 Ha to provide 50% of the site for housing. In establishing the applicability of this requirement, the site size is defined as the total site area identified within the red line boundary on the application's location plan.

LDP Econ 2 and Hou 5 support the approach of the LDP to create sustainable communities, maximise opportunities for housing and avoid large mono use developments. To ensure that this can be achieved and provide the best opportunity for a coordinated approach, required by Env 2, sites should not be sub-divided. Applicants should demonstrate that the site did not form part of a larger area, within a

single control or ownership prior to the introduction of the principle of the provision of 50% housing on such sites, established in the Student Housing Guidance February 2016. Where not demonstrated, the requirement for housing as part of PBSA proposals will apply.

The gross floor area of housing shall represent a minimum of 50% of the total housing and PBSA gross floor area.

Proposals will be required to meet open space requirements separately for PBSA as set out in LDP Env 31, and housing as set out in LDP Env 32. Further detail of open space provision for PBSA is set out in section [4.2.7](#) of this guidance.

The housing proposed should meet with the relevant development plan policies and requirements of the [Draft Edinburgh Design Guidance 2024](#). LDP Policy Hou 2 requires that developments including conversions, consisting of 12 or more units should normally provide affordable housing amounting to 35% of the total number of units proposed. This will apply to the housing element of the proposal.

The provision of housing should be compatible with site context. Within the grounds of existing university/college facilities there is no requirement to provide housing.

### 3.3 Integration with Existing Community

Places should feel cohesive, welcoming and safe for all. Developers are encouraged to consider any wider benefits that could be offered voluntarily to local communities. Incorporating publicly accessible uses such as shops and services, open space, and community facilities such as gyms and meeting space within the development can help ensure PBSA integrates with the local community. These uses can add to the amenity offer for students, providing employment and volunteering opportunities that can also benefit the community. Along with other shared amenity spaces for residents of the student accommodation, these uses can also help activate ground floors.

Applicants should demonstrate how the proposal will support integration with the local community, through its design, layout and uses.

### 3.4 Living Well Locally

NPF4 Policy 15 requires development proposals to contribute to local living. As well as access to their place of study, students should be able to meet their daily needs within a reasonable distance of their accommodation.

The following are considered key facilities to have within a short walking/wheeling distance of a PBSA proposal:

- Local green space (good quality, accessible greenspace measuring at least 500 square metres.)
- Sport and recreation facilities
- Health centre (GP or pharmacy)
- Local shops (including a food shop).
- Bus or tram stops

Applicants should provide a map showing the proposal, and all the nearest key facilities. Walking/wheeling distances should be calculated using an expected



walking route. When assessing walking distances, criteria defining 'walkable' routes set out in the [Draft Edinburgh Design Guidance 2024 \(1.5.1 Prioritising Sustainable Transport\)](#) must be used. Information should be provided as a walkability ratio. The walkability ratio is how many of the key facility categories can be met within the distances (400m for bus or tram stops and local green space, 800m for the other key facilities). For example, if a proposed development has 3 of the 5 categories that are met within these distances, the walkability ratio would be 3/5. This will be taken into consideration when assessing the suitability of the location.

## 3.5 Design

Proposals should meet with the relevant development plan policies and requirements of the [Draft Edinburgh Design Guidance 2024](#).

### 3.5.1 Safety

Design and layout play a key role in deterring and preventing crime and anti-social behaviour and promoting and enhancing people's perception of safety in streets and public spaces. Development of PBSA should incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime.

Ensuring more activity and lines of sight can help discourage criminal and antisocial behaviour. This is important to help make surrounding streets and public space feel safer for all, including the students themselves.

An active frontage, including at night, where the ground floor is designed to promote visual contact and pedestrian movement between inside and out can provide a feeling of safety.

Provision of active frontage should be considered from the outset of the design process and opportunities taken to maximise this element of the design.

It is important that students feel safe in their living environment. Consideration should be given to the perception of safety of the area in which the proposal is located. Streets and spaces that attract high footfall or offer good passive surveillance are more likely to signal that an area is safe, particularly at night.

### 3.5.2 Accessibility

Design of PBSA should provide for the needs of people with a range of disabilities and impairments, not just those requiring wheelchair access. This includes not only within individual study bedrooms and studios ([see 4.2.5](#)) but also within the accommodation as a whole and along key access routes to and from the site.

This could include but is not limited to other mobility, sensory, dexterity and learning difficulties, as well as needs arising from particular mental health conditions. Design responses should consider the use of colour, light, sound proofing and wayfinding; and the ease of opening doors and windows.

Applicants should demonstrate how they are meeting the needs of people with varying needs.

### 3.5.3 Adaptability

PBSA should be designed so that it can be adapted and reconfigured internally and externally to meet the needs of mainstream housing use. A sustainability statement should be provided in line with LDP Env 7 Sustainable Developments.

### 3.5.4 Parking

Standards for car and cycle parking are set out in the [Draft Edinburgh Design Guidance 2024](#). PBSA is expected to be zero car parking. However, care must be taken to meet the needs of mobility impaired drivers and passengers. If there are insufficient accessible parking spaces in proximity to the site, it may be necessary to provide accessible spaces as part of the development. Cycle parking should be provided at 0.5 spaces per bed and conform to requirements set out in the parking standards. Any proposed reduction in the number of spaces will require clear justification.

## 4. LDP Hou 5 Student Accommodation Policy Criteria

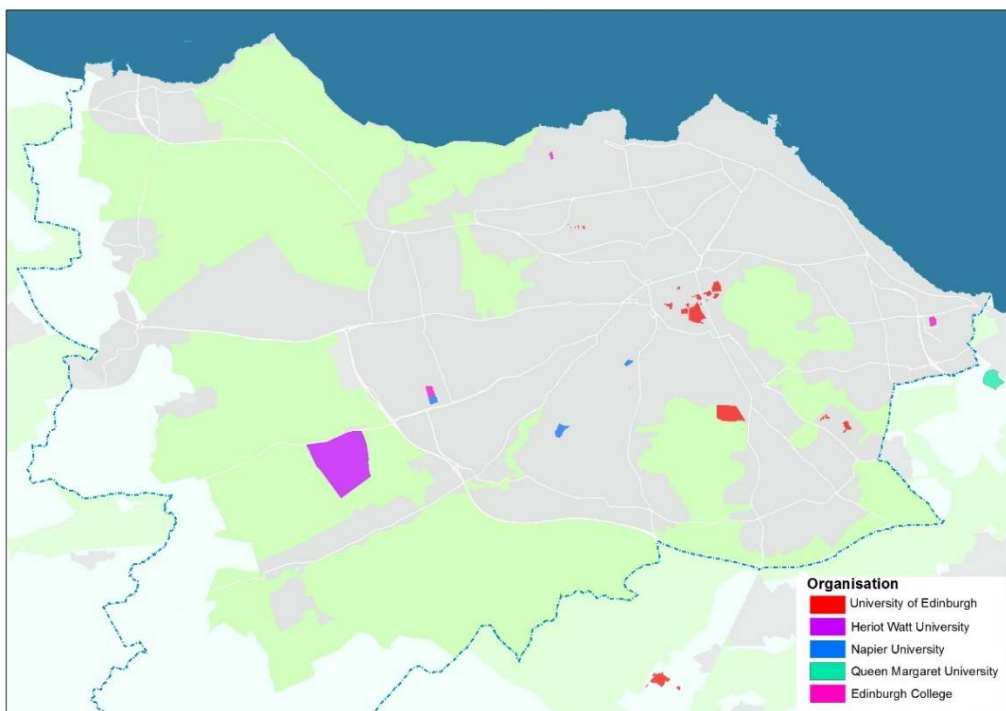
### 4.1 LDP Hou 5 a) Accessibility to Universities and Colleges

LDP Hou 5 a) requires that PBSA is located to provide easy access by active travel and public transport to the universities and colleges they are designed to serve.

Applicants should submit information setting out the accessibility of the development to the main academic buildings it is intended to serve. Information should include:

- total journey time by walking, cycling and public transport and;
- an assessment of suitability of routes, including for disabled students.

#### Map 2: University/College Main Academic Buildings



Journey times should be reasonable by walking/wheeling, cycling and public transport. This is important as no single method will be suitable for all. While there is no threshold, a total journey time of more than 30 minutes may be beyond that which could be reasonably considered to provide a convenient journey.

Walking/wheeling and cycling routes should be convenient and safe, providing access at all times of day/evening/night.

Where public transport is required, the following factors will be considered:

- Distance from bus/tram stop
- Safety of route to stop
- Frequency of service
- Total journey time
- If the service is direct
- Time of day/night of services

## 4.2 LDP Hou 5 b) Healthy Living Environment

### 4.2.1 Amenity

PBSA is a 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 [Draft Edinburgh Design Guidance 2024](#) sets out requirements to protect the amenity of future occupiers and neighbouring developments. PBSA must meet with these requirements which include:

- Daylight
- Sunlight
- Privacy and outlook
- Noise

### 4.2.2 Form of accommodation

PBSA is generally provided in 2 forms:

Cluster flat- A self-contained flat containing a group of study bedrooms (a bedroom that provides space for independent study, sleeping and storage of personal possessions which may include en-suite facilities) which share kitchen / dining / living facilities and shared bathrooms where required.

Studio – A self-contained unit where the sleeping area and living area is combined with all the basic needs for everyday life provided behind a door that only the occupier can use, including kitchen facilities, bathroom and toilet.

PBSA may also be provided in other forms such as family housing.

It is acknowledged that some students will seek to live in studio flats as a lifestyle choice. However, studios tend to be more expensive, rendering them an unaffordable choice for many students. Cluster flats foster social interaction among students, enhancing overall wellbeing. Studios are self-contained units and are not considered to be cluster flats even where shared space may be provided for exclusive use of a group of studios.

### 4.2.3 Cluster Flats

To foster a sense of community, manage noise and keep shared facilities manageable, cluster flats should be formed of clusters of 3-8 bedrooms.

#### Communal space within cluster flats

Communal space is of key importance to the living experience of students within the cluster. The communal space should be designed to facilitate social interaction and only be accessible to those living within the cluster. It should include kitchen/living/dining area which allows for comfortable use by all of those living within the cluster.

Applicants should provide floorplans to demonstrate that the space can accommodate furniture and kitchen facilities to provide for the number of occupants.

While en-suites have become a common feature, shared facilities can offer a more affordable option. Where shared bathroom facilities are provided the level of provision should comply with HMO standards.

#### Bedroom size

PBSA falls within the definition of a House in Multiple Occupation (HMO). Statutory HMO Guidance sets out minimum standards for bedrooms which apply to all forms of HMO and are not specific to PBSA. While regard should be had to all aspects of the minimum HMO standards, the standards for sleeping rooms are designed to accommodate only the basic furniture of bed, wardrobe and chest of drawers and not the specific requirements of students. Student bedrooms are also spaces for study, storage, and private socialising. Therefore, to provide adequate space bedrooms are expected to exceed the minimum HMO standards. Sufficient space should be provided for the minimum of a bed, desk, desk chair, wardrobe, chest of drawers and adequate activity space.

Applicants should provide furnished layout plans to show that bedrooms can accommodate the necessary furniture.

### 4.2.4 Studio size

While studios within PBSA developments are not places of permanent residence, they provide self-contained living for a large part of a year.

PBSA has features, such as the provision of shared indoor space and communal facilities outwith the studio accommodation which can provide amenity equivalent to that required of housing. Nevertheless, it is still important that PBSA developments create a quality and sustainable environment for occupants within individual studios. Consideration should be given to the different living functions within a studio and the space required for that living function, such as a bedroom area, kitchen, study area, storage space and en-suite bathrooms. Applicants should provide furnished layout plans to show that the studio unit can provide for the necessary functions for self-contained living. The availability of shared amenity facilities will be a consideration.

### 4.2.5 Accessible Bedrooms/Studios

As set out in [3.5.2](#) PBSA developments should seek to incorporate a high level of accessibility and inclusive design and are required to comply with the Equalities Act 2010 requirements. Accessible bedrooms for wheelchair users should be provided within PBSA developments at a rate of one wheelchair accessible bedroom provided



for every 20 bedrooms, or part thereof, in accordance with Scottish Building Standards, Standard 4.2.

#### 4.2.6 Shared Amenity Space

Social interaction between occupiers in student accommodation supports health and wellbeing. On-site shared amenity spaces should be provided. These may include shared lounges/recreation rooms or other facilities such as laundries.

Unlike communal space within cluster flats, which should be accessible only to the occupants of the individual flat, shared amenity space should be free to use for all students living in the scheme, whether in cluster flats or studios.

The amount of internal shared amenity space required will vary depending on the layout, number and size of studio flats and study bedrooms. Developments should include a lobby at the main entrance to the building to allow students and visitors to congregate within the building.

#### 4.2.7 Open Space

Well-designed usable open space has many benefits. It can encourage social interaction and influence physical and mental wellbeing. It also has a role in responding to climate change by providing opportunities for sustainable surface water management and enhancing biodiversity.

LDP Env 31 requires good quality, attractive, useable open space to form at least 20% of the total site area. Provision of open space is in addition to any internal amenity space. The design and nature of open space should seek to take opportunities to link and complement the adjacent green blue network if these exist in the area.

Wherever possible, communal open space should be located at ground level, maximising opportunity for high quality landscaping, SuDS and green blue infrastructure. While roof terraces may count towards open space provision it should be demonstrated that these will benefit from adequate sunlight, are adequately sheltered and preserve reasonable privacy. Safety and noise will be considerations in determining the appropriateness of their provision within the context of PBSA.

Good quality communal open space typically provides:

- A defensible, attractive outdoor environment, secluded from vehicles.
- Good passive surveillance provided by active ground floor uses.
- Planting that provides year-round visual interest and enhances biodiversity.
- Well-proportioned space that relates well to the interior spaces and uses that surround it.

The space should be designed to meet the needs of students. This could include space designed for outdoor socialising, informal sports, seating areas and food growing. The space should be accessible for users of varying abilities, including wheelchair users.

Flexibility in the space planning of furniture could provide opportunity for social events such as yoga and exercise classes, encouraging students to make connections, engage with others and increase a sense of ownership.

Planting can also play a large part in creating a social space. Raised beds could become allotments providing a shared focus.

Open space must be useable. Privacy, sunlight and shelter are key factors. These will be influenced by layout, orientation and position of built form and open space, together with trees and planting. The [Draft Edinburgh Design Guidance 2024](#) (2.3.5 Daylight, Sunlight, Shelter, Privacy and Outlook) sets requirements for sunlight standards in private open space.

Elements that provide visual amenity such as trees, planting and water features can be included provided these form part of well-designed, multifunctional open space.

Areas not considered useable include:

- Space that is sloping, heavily overshadowed or has poor outlook
- Narrow peripheral or corridor space
- Planted buffer strips, including threshold spaces abutting flats unless these allow direct access from the properties served
- Poor quality, poorly located planting
- Left-over grassed areas lacking a specific use and/or high biodiversity value

Within residential areas, consideration should be given to the potential for noise disturbance to existing residents from congregations of students in external spaces.

### 4.3 LDP Hou 5 c) Proportion of Studios

Policy Hou 5 c) states that no more than 10% studio flats are provided. This will be calculated based on the number of bedspaces provided by the proposal.

Studio flats can lead to social isolation and in high concentration do not foster healthy student communities. Cluster flat arrangements allow the opportunity for students to interact and contribute to wellbeing. In addition, this policy seeks to provide flexibility to provide for future conversion of PBSA to other uses. PBSA studios can pose issues for such conversion.

### 4.4 LDP Hou 5 d) Established Character of the Area

The character of an area is established through its physical and social features. It includes:

- The range of uses
- The level of activity
- The physical environment
- Infrastructure
- Established community
- The feel of the area

Character can change over time either through physical or social change and aspects are subject to perceptions. Any development has the potential to change the

character of an area. Changes can be positive, particularly in areas currently of poor character.

Well located, integrated, appropriately scaled and designed PBSA can improve the physical environment, provide a mixed community and increase levels of activity bringing vitality and providing footfall to sustain or support businesses.

While providing a place of residence, PBSA differs from housing. It is an intensively occupied use provided for a single population group on a non-permanent basis. The pattern of use may be different from that of any established residential community.

The impact of a proposed development on established character will be weighed up against the range of factors set out above. This will include consideration of the pattern and distribution of PBSA in the surrounding area and the presence of other land uses which contribute to a transient population, where these uses will have a detrimental impact on character.

Locations that have a mix of uses and activity may be more likely to be able accommodate PBSA without impacting adversely on the character of the area than locations that are quieter in nature.

Applicants should provide an analysis of the current character of the area and identify impacts of the proposed development. Opportunities should be taken to improve the character of the area where it may be lacking in quality or cohesiveness.

## 5. Provision of Infrastructure

New development often generates additional demands upon existing services, facilities, infrastructure and the environment. In line with LDP Inf 3, proposals will be required to deliver or contribute to the following infrastructure provision:

- Transport proposals and safeguards
- Primary healthcare infrastructure capacity
- Green/blue network actions

[Supplementary Guidance on Infrastructure Delivery and Developer Contributions](#) provides detail of the costs.



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