

Student Accommodation Guidance

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THE CITY OF EDINBURGH COUNCIL

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Introduction

This document forms non-statutory guidance. It gives additional information on the policies of City Plan 2030 and National Planning Framework 4 but does not form part of the statutory development plan. The guidance is provided to assist those considering proposals for development and is used as a material consideration in the determination of planning applications.

The guidance seeks to ensure the provision of good quality purpose-built student accommodation (PBSA) in appropriate locations whilst protecting the character of existing areas. 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) (adopted February 2023) that together make up Edinburgh's development plan, and other Council guidance including the Edinburgh Design Guidance. This guidance applies to all types of PBSA development, 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.

What is Purpose Built Student Accommodate (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. 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, seeks 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.

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 each year until 2021/22 when there were 74,105 students enrolled. In 2022/23 numbers fell back slightly and this continued to 2023/24 when 72,365 students were enrolled. 62,585 were full-time students. The number of international students also fell in this period from 27,005 to 26,205. This was 36% of all students enrolled in the four Edinburgh universities[1]. A further 27,000 students were enrolled in Edinburgh College[2].

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 from 7,350 in 2005 to 21,632 in March 2025. 11,309 university owned or managed bedspaces, 10,217 private bedspaces and a further 106 bedspaces provided by Edinburgh Student Housing Co-op. A further 800 bedspaces are provided by Queen Margaret University on their East Lothian Campus.

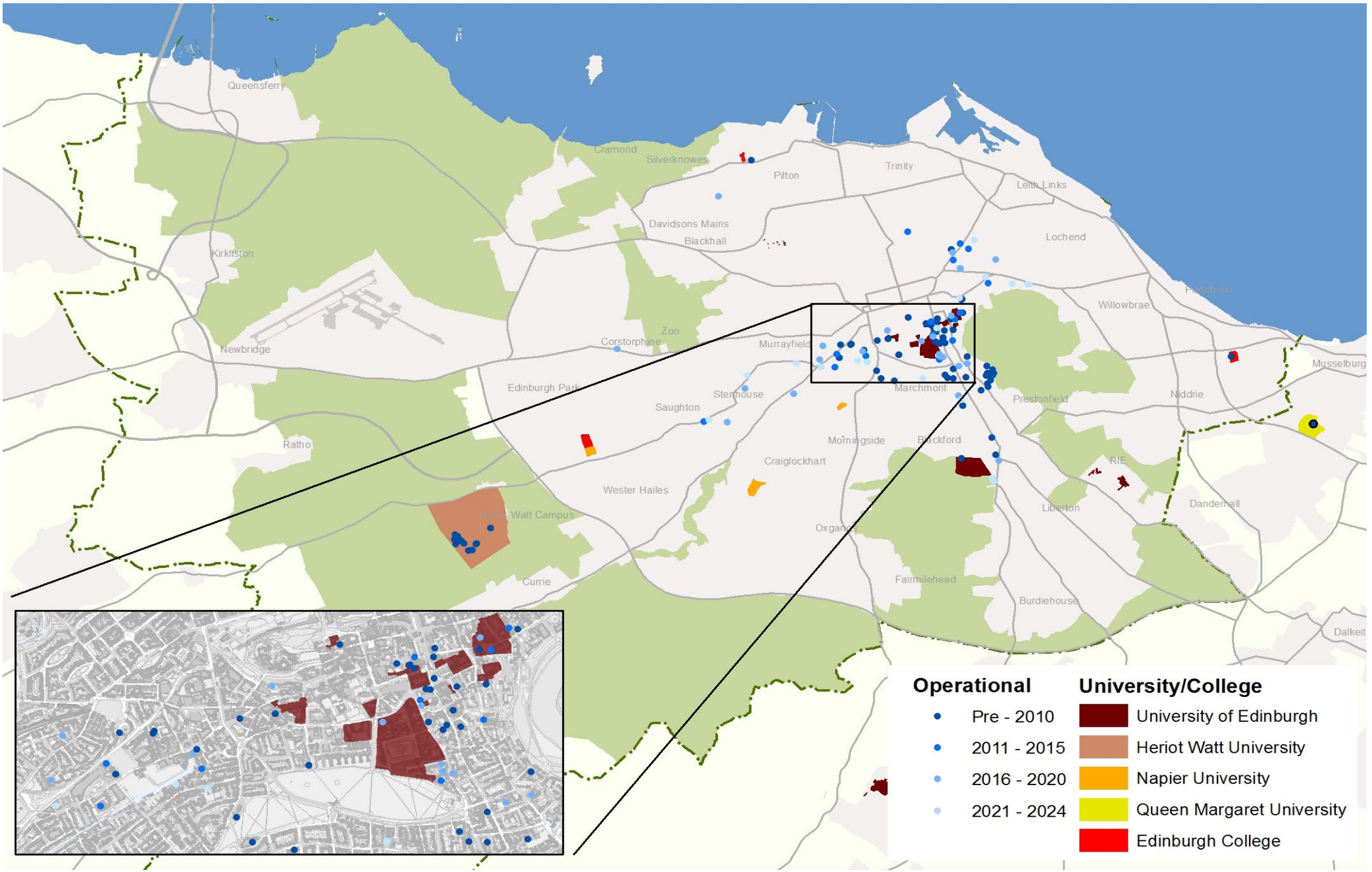
In terms of scale, the majority (58%) of PBSA is provided in developments of less than 200 bedspaces.

Map 1 shows the location of operational PBSA by year of opening.

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

[2] Edinburgh by Numbers 2024, CEC

Map 1: Location of Operational PBSA



Policy Context

Edinburgh's development plan (City Plan 2030 and NPF4) sets out policies which will apply in the assessment of planning applications for PBSA. The main policies are listed below:

- NPF4 Policy 16c Quality Homes
- LDP Hou 5 Student Accommodation
- LDP Econ 2 Commercial Development

Other policies of particular relevance:

- LDP Env 1 Design Quality and Context
- LDP Env 2 Co-ordinated Development
- LDP Env 3 Development Design-Incorporating and Enhancing Existing and Potential Features
- LDP Env 31 Useable Open Space in New Development
- LDP Env 33 Amenity

In addition to the policies set out above, proposals for student accommodation should meet with the other relevant policies of the development plan as well as relevant planning guidance including the *Edinburgh Design Guidance*.

Overarching Principles

High quality accommodation in the right location is key to providing a positive experience of studying and 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.

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 is important that it is of an appropriate scale within the context of the existing community and avoids negative impact on the amenity of the existing community.

Requirement for Housing on Larger Sites

To maximise the opportunity to provide housing, and in particular affordable housing, LDP Hou 1, supports housing development on sites not allocated for housing. LDP Hou 5 and Econ 2 require sites proposed for student accommodation that are 0.25 Ha or larger to provide at least 50% of the site for housing, where compatible with the site context. In establishing the applicability of this requirement, the site size shall be 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.

Location

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. To achieve this and maximise the opportunity for housing as referenced in LDP Hou 1 and LDP Econ 2, sites should be designed to ensure the most efficient use of land. To provide a balance between housing and PBSA at least 50% of the floorspace developed on the site should be provided as housing.

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 5.7 of this guidance.

The housing proposed should meet with the relevant development plan policies and requirements of the *Edinburgh Design Guidance* 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.

Accessibility to Universities and Colleges

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

Consideration of both active travel and public transport are important as no single method will be suitable for all.

While time and distance are of relevance, there are other factors which must be considered in assessing the accessibility of development. Walking/wheeling and cycling routes should be convenient and safe, providing access at all times of day/evening/night. In well-connected areas which are well served by good public transport, longer journey times may be acceptable.

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

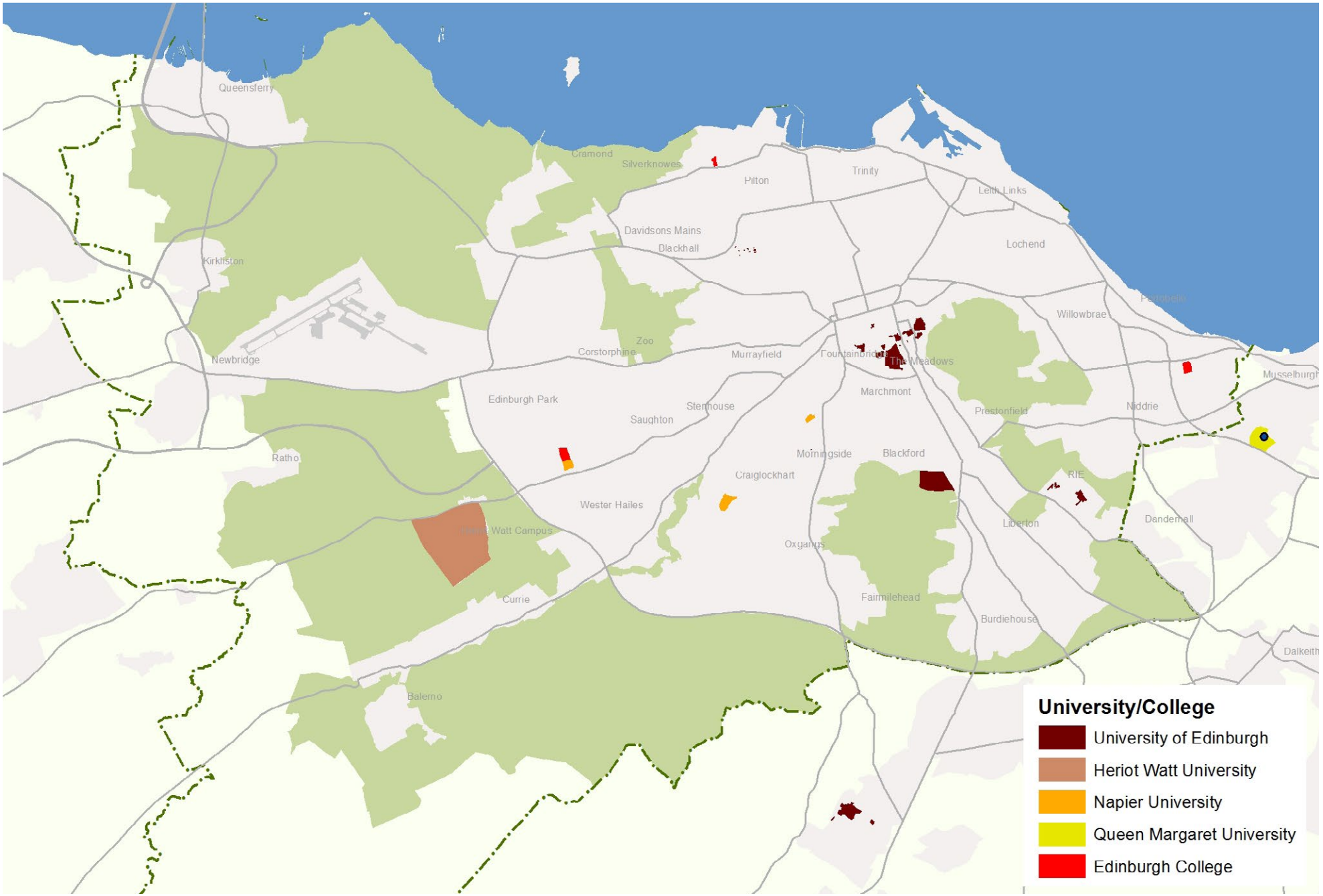
- distance from bus/tram stop
- safety of route to stop
- frequency of service
- total journey time
- if the service is direct
- time of day/night of services

Applicants should submit information setting out the accessibility of the development to the main academic buildings (provided in Map 2) it is intended to serve.

Information should include:

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

Map 2: University/College Main Academic Buildings



Living Well Locally

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. NPF4 Policy 15 requires development proposals to contribute to local living.

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 Section 1.5.1 of the *Edinburgh Design Guidance* must be used.

Information should be provided as a walkability ratio as set out in Section 1.5.2 of the Edinburgh Design Guidance. 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.

Character of the Area

LDP Hou 5 d) requires that there is no adverse impact on the established character of the area. Character is a combination of qualities and features that distinguishes one place from another. All elements of a place contribute to character. These elements are not just physical but include wider social aspects and aspects that are subject to perception.

Establishing the character of an area requires a qualitative assessment and the exercise of judgement about which features and characteristics determine the neighbourhood character of an area. Factors which influence the character of an area include but are not limited to:

- The functions of the area
- Mix of uses including the level of transient uses
- The level of activity occurring in the area
- Building form, shape, and scale, materials, architectural style, condition of buildings

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, and this should be considered in assessing the impact of PBSA development in its specific context. 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.

The character and appearance of an area is important to its sense of place. For a proposal to respond positively to its context, it is essential that it is designed with a good understanding of its site and the surrounding area and the wider city.

LDP Env 1 supports proposals that will create or contribute towards a vibrant, successful place. Poor quality or inappropriate design or proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance are not supported.

Proposals should demonstrate that they have been informed by a detailed analysis and understanding of the site. As required by LDP Env 3 proposals should explain how those characteristics and features of the site that are deemed worthy of retention

would be incorporated and/or enhanced. Section 1.1 of the Edinburgh Design Guidance further addresses context.

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.

Opportunities should be taken to improve the character of the area where it may be lacking in quality or cohesiveness. This may be achieved by identifying the positive aspects of character that do exist in the area. This should then be supplemented by looking at areas of positive character nearby or in the wider city. These should be combined to create a stronger sense of place through built forms and new blue green infrastructure.

Developers are encouraged to consider any wider benefits that could be offered to local communities. Incorporating publicly accessible uses such as shops and services, open space, and facilities accessible to the public can help PBSA to integrate with the local community. These uses can add to the amenity offer for

students, provide employment and volunteering opportunities that can also benefit the community. Along with shared amenity spaces for residents of the PSBA, these uses can also help activate ground floors.

Applicants should:

- Undertake consultation with the community.
- Provide an analysis of the current character of the area and identify impacts of the proposed development.
- Demonstrate how the proposal will support integration with the local area, through its design, layout and uses.

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. Hou 5 b) requires that PBSA proposals provide suitable amenity for students and LDP Env 33 and Section 2.3.5 and 2.3.6 of the *Edinburgh Design Guidance* set requirements to protect the amenity of both future occupiers and neighbouring developments. PBSA must meet with these requirements which include:

- daylight
- sunlight
- privacy and outlook
- noise

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 student halls provided by universities and family accommodation.

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.

Cluster Flats

Cluster flat arrangements allow the opportunity for students to interact and contribute to wellbeing. 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.

Studios

Studio flats can lead to social isolation and in high concentration do not foster healthy student communities. LDP Hou 5 c) requires that no more than 10% studio flats are provided. This policy encourages the provision of other forms of accommodation such as cluster flats while allowing a choice of accommodation for students who may have a need or preference for private space. 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. The percentage will be calculated based on the number of bedspaces provided by the proposal.

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 additional amenity. Nevertheless, it is still important that accommodation provides a high quality, 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.

Accessible Bedrooms/Studios

As set out at 6.2 PBSA developments should seek to incorporate a high level of accessibility and inclusive design and are required to comply with the Equality Act 2010 requirements. Accessible bedrooms for wheelchair users should be provided within PBSA developments at a rate of one wheelchair accessible bedroom for every 20 bedrooms, or part thereof, in accordance with *Scottish Building Standards, Standard 4.2*.

Consideration should be given to storage space and charging for wheelchairs or other mobility aids.

Shared Amenity Space

Social interaction between occupiers in PBSA 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.

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, Sustainable Drainage Systems (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, preserve reasonable privacy and are designed to minimise risk of suicide. 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. Section 2.3.5, Daylight, Sunlight, Shelter, Privacy and Outlook of the Edinburgh Design Guidance 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.

Proposals should meet with the relevant development plan policies and requirements of the Edinburgh Design Guidance.

Safety

Development of PBSA should incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime. Development should:

- Position the principal entrance to take direct access from the street.
- Minimise ground level recesses to deter anti-social behaviour; where these occur ensure they are well-lit.
- Provide an active frontage, where the ground floor promotes visual contact and pedestrian movement between inside and out. This should be well lit at night.
- Locate uses such as plant rooms and cycle storage away from the street edge to avoid blank walls.
- Ensure paths leading to and through the development are well-overlooked and have good sight lines that are not obscured.
- Ensure storage areas (e.g. for bins, cycles) are well-lit with good natural surveillance.
- Integrate external lighting into the design from the outset.

Guidance on street frontage, movement routes and lighting is provided in Section 2.3.1 of the Edinburgh Design Guidance.

Accessibility

Design of PBSA should provide for the needs of people with a range of disabilities and impairments, not just those requiring wheelchair access. Other mobility, sensory, dexterity and learning difficulties, as well as needs arising from particular mental health conditions should also be considered. This includes not only within individual study bedrooms and studios (see 5.5) but also within the accommodation as a whole and

along key access routes to and from the site. 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. This may be provided in a Design and Access Statement.

Adaptability

PBSA should be designed so that it can be adapted and reconfigured internally and externally to meet the needs of mainstream housing use. Guidance on adaptability of buildings is provided in Section 1.2.2 of the Edinburgh Design Guidance A sustainability statement should be provided in line with LDP Env 7 Sustainable Developments.

Parking

Standards for car and cycle parking are set out in Section 1.5.4 of the Edinburgh Design Guidance. 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.

Development proposals should consider the quality, accessibility, location, convenience, security and personal safety of cycle parking provision. Requirements for the design of cycle parking are set out in Section 1.5.4 of the Edinburgh Design Guidance.

Waste Management

It is important that the integration of waste management facilities is considered at the outset of the design process. Developers must engage with the Council's Waste and Cleansing Service to agree a waste management strategy. This must occur as early as possible to ensure that requirements can be satisfactorily incorporated within the design. Further guidance on the provision for waste management is set out in Section 2.3.7 of the Edinburgh Design Guidance.

Provision of Infrastructure

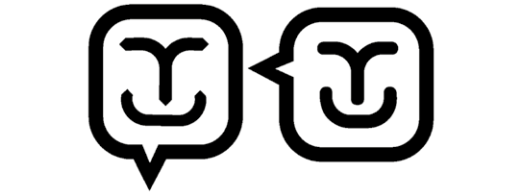
New development often generates additional demands upon existing services, facilities, infrastructure and the environment. In line with LDP Inf 3, proposals will be required to deliver or contribute to the following infrastructure provision:

- transport proposals and safeguards
- primary healthcare infrastructure capacity
- green/blue network actions

Guidance on Infrastructure Delivery and Developer Contributions provides detail of contributions.

Student Accommodation Guidance

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