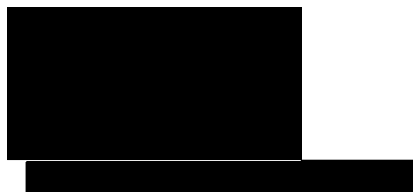


# OLD ABERDEEN COMMUNITY COUNCIL



Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
ABERDEEN  
AB10 1AB



28<sup>th</sup> August 2015

Dear Sir,

**Technical Advice Note: Student Accommodation.**

Old Aberdeen Community Council (OACC) notes the document and endorses many sections, but there are however statements which, whilst addressing the needs of students, do not pay full regard to the needs and expectations of the long-term and full-time resident.

The demographic imbalance caused by the massive loss of family and affordable housing to the HMO market in specific areas of the city is not fully explored and the effects of the very high numbers of places in new purpose built student accommodation complexes currently being created or planned, often in locations which do not adequately address student and transport need, has not been evaluated.

In the following specific points we would wish to see the TAN altered to reflect these aspirations: -

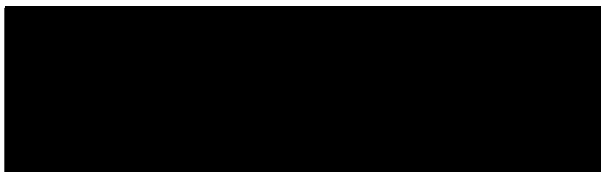
- 1.1 We suggest the following change to the first sentence of this paragraph to clarify the intent: -  
***This Technical Advice Note (TAN) provides advice on new purpose built student accommodation and the change of use of any domestic and other buildings to student accommodation.***
- 1.2 This paragraph should apply to any proposed student accommodation, new build or change of use.  
The last line should be changed to read “further education institutions” in place of too limited “universities”.
- 1.3 As statutory consultees on planning matters, community councils should be included in the list of stakeholders.
- 1.6 HMOs should be specifically referenced in the list.  
It is disputed that the “University of Aberdeen student accommodation is generally focused in and around the Old Aberdeen Campus, Hillhead Student Village and within the city centre”. It would be more accurate to state that it is in “Old Aberdeen and its immediate neighbourhood”.  
It is again disputed that RGU accommodation is “generally focused in and around its Garthdee Campus”. There are significant RGU students resident in both purpose built and HMO accommodation in the Old Aberdeen/King Street/ Spring Garden areas.

NESCOL students are also to be found in the Old Aberdeen/King Street area, adding to the imbalance of accommodation locations towards this area.

- 1.7 In order to combat the loss of family and affordable housing to HMO conversion, change is necessary in students' aspirations as to their accommodation during the whole of their undergraduate experience. It is believed that this should be promoted in this TAN in place of bland acceptance of the status quo as being the correct approach.
- 2.1 The phrasing of this paragraph is related directly to purpose built accommodation blocks and this should be made clear at its start.  
It is not clear to what the author refers when saying "which account for a significant proportion of the available rental accommodation". All but a minute proportion of student accommodation is in the rental market and this statement should be clarified.
- 2.4 The specifics of "all planning applications" should be clarified to ensure the inclusion of HMOs.
- 3 B In order to clarify that a development should be related to a specific campus, thus reduce journey length and time, it is suggested that the sentence be revised to:-  
**"The development should be in a location that is easily accessible to a specific campus by sustainable transport modes, including pedestrian access."**  
It essential that the use of public transport by all residents of Aberdeen is promoted and it must therefore be ensured that high volume blocks and clusters of smaller volume (such as is occurring in St. Peter Street) student accommodation should not adversely impact on public transport to the detriment of year round customers. Such impact can take the form of excessive numbers at rush hours and reduced services outwith term time, seriously affecting the year round public transport user's experience.

**NOTE: -** The TAN numbering system jumps from **3.** to **5.** with Section **4.** missing. It is suggested that the missing section should be developed to give specific guidance on the planning requirements in relation to the conversion of dwelling houses and other buildings to HMO student accommodation.

Yours sincerely,



George A. Wood  
Planning Liaison  
For and on behalf of Old Aberdeen Community Council.

GVA James Barr



Report

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# Student Accommodation

Draft Technical Advice Note

Representations on behalf of Unite

Students

August 2015

**UNITE  
STUDENTS**

[gva.co.uk](http://gva.co.uk)

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Prepared By: Caroline Nutsford  
Status: Associate  
Draft Date: August 2015

-

**For and on behalf of GVA Grimley Ltd**

## 1. Introduction

- 1.1 On behalf of our client, Unite Students ("Unite"), we welcome this opportunity to submit representations to Aberdeen City Council's (ACC) Draft Technical Advice Note (TAN) on Student Accommodation.
- 1.2 Unite is the UK's leading manager and developer of student accommodation and provides a home for over 43,000 students in 130 purpose-built and managed properties. Unite has over 1,000 employees and works in partnership with over 50 higher education providers, as well as renting rooms directly to students.
- 1.3 Unite has a strong record of providing and managing student accommodation throughout Scotland where it currently has 4,000 beds. In Aberdeen, Unite currently operates 4 purpose-built properties – Spring Gardens, the Old Fire Station, Mealmarket and Kings Street Exchange. A further scheme at Causewayend is presently under construction.
- 1.4 We respectfully request that these representations are taken into account by ACC in finalising its Student Accommodation Technical Advice Note. On behalf of Unite, we would welcome the opportunity to meet with ACC to discuss these issues in greater detail to inform the process.
- 1.5 Our representations are set out in the subsequent section. For ease, these are structured under the headings of the draft TAN.

## 2. Representations

### Policy Context

- 2.1 As a purpose built student provider, Unite fully supports managed purpose built student accommodation. Unite's properties provide high quality, well located, safe and managed student accommodation that is close to university campuses, transport and local amenities and offer significant advantages to students residing in mainstream residential accommodation. Managed purpose built student accommodation can also help to avoid and/or minimise adverse effects on existing communities associated with students residing in HMO properties.
- 2.2 Paragraph 2.1 should be explicit that it is 'purpose built' student accommodation which contributes to the creation of sustainable communities and helps to relieve pressures on the local housing stock and pressures in HMOs. Given this, the TAN should provide greater support for the development of purpose built student accommodation and recognise that it is preferable for students to live in purpose built managed student housing over students residing in the general housing stock.

### Criteria for purpose built student accommodation

#### **A. The development meets an identified need for the type of accommodation proposed**

- 2.3 This criteria relates to demonstrating a need for purpose-built student housing. There is no national planning guidance which supports this requirement as part of an application submission. Unite therefore questions the inclusion of this objective within the TAN.
- 2.4 Related to this, we consider that the TAN should specifically identify that there is currently a significant need for more purpose built student accommodation in Aberdeen to meet a shortfall in the number of purpose-built bedspaces. Increasing the amount of purpose-built student housing will assist the growth of the universities and the attractiveness of the city as a centre for higher education.

#### **B. The development should be in a location that is easily accessible to the higher education campuses by sustainable transport modes**

- 2.5 Unite welcomes the support for purpose built student accommodation in sustainable locations that will minimise car usage.
- 2.6 From Unite's experience, it is areas closest to university facilities that are the most attractive to students. The Unite Student Experience Survey 2014 which includes over 3,500 responses

confirms that students wish to be within walking distance of campus with 63% of applicants and 64% of undergraduates considering that locations within walking distance to campus are important for student accommodation. The Unite Next Generation 2013 Report on applicant and student expectations further identifies that respondents link the proximity of their accommodation to university to their ability to be successful as a student, to make the best of the academic facilities and not to waste time or money.

- 2.7 However, at present, this encouragement to promote sustainable means of travel and thus minimise car usage as expressed under 3.3 of the TAN is at odds with ACC's current car parking standards for students. Unite supports car free student housing developments in sustainable locations to specifically meet this objective of minimising car use. This is considered further below.

**C. The development should be designed in a way that does not conflict with adjacent properties or the general amenity of the surrounding area.**

- 2.8 Unite supports the development of high density student schemes to meet the need for purpose built student housing. The suggestion (at Paragraph 3.6) that the most suitable location for such developments is in the city centre however should be removed as this contradicts other guidance which recognises that university campuses and along transport corridors are also appropriate locations for student housing. Higher density student accommodation should generally be acceptable where such developments are compatible with the existing built area regardless of whether this is within the city centre or not.

**D. The layout, standards and facilities provided within the development are of high standards**

Open Space Provision

- 2.9 Unite incorporates high quality amenity space within its own developments, however it questions the appropriateness of specifically referring to allotments in the TAN and to the suitability of providing allotments within individual student schemes. Should any students have a desire to utilise allotments, they are able to access allotments facilities within the wider city. Small outdoor sports areas such as table tennis tables, basket ball hoops etc. can be incorporated into student schemes, however it should be recognised that larger outdoor sports areas are unlikely to be compatible with student accommodation scheme and such facilities are likely to be readily available to students as part of university facilities.
- 2.10 The TAN should also recognise that student housing requires significantly less open space provision than family housing. The amount of open space provision within student schemes should reflect the accessibility of the development to existing open spaces in the surrounding area and also take account of internal communal areas (e.g. commons rooms) within student housing developments which also provide important amenity functions.

### Parking

- 2.11 Unite considers the Council's current car parking standards for student housing excessive, although welcomes the confirmation under paragraph 3.10 that these are maximum standards. The current requirement for 1 space per 10 students in the city centre, the inner city and outer city areas does not reflect the accessibility of locations to university facilities, the city centre etc and is at odds with criteria b to promote sustainable means of travel and minimise car usage.
- 2.12 Unite supports measures to eliminate the need for on-site parking and supports car free student developments where student accommodation is well located to university facilities by walking, cycling and public transport. The majority of Unite's recent developments in other UK cities are car free and this is generally encouraged and supported by other Councils.
- 2.13 Unite is willing to enter into agreements with City Car Clubs as a means to eliminate the need for on-site car parking. In addition car free developments also offer further advantages e.g. enhanced amenity provision to students in lieu of car parking.

### Waste disposal facilities

- 2.14 Unite understands the importance of providing adequate waste disposal facilities in student housing developments, however the amount of waste storage bins required on-site should not be excessive. The TAN should provide encouragement for student housing operators to increase the number of waste pick-ups from site to allow a reduction in required bin provision. This will improve the design of developments, reducing the number of bins on-site and in doing so, provide a greater opportunity for increased amenity space.

### Flexibility

- 2.15 Purpose built student housing is a sui generis use and it is therefore not considered necessary to propose restrictive occupancy controls on student accommodation. We do not consider that such a planning condition will meet the tests set out in planning legislation.
- 2.16 Flexibility in tenure to enable purpose built student accommodation to be utilised for other uses outwith term time, should this be considered by operators, can also help to make purpose built accommodation more affordable for students.



**E. The development scheme has appropriate management in place to minimise potential negative impacts from occupants and to create a positive and safe living environment for students.**

- 1.1 Unite supports the requirement for student accommodation schemes to have a management plan to ensure a satisfactory residential environment for existing residential neighbourhoods.
- 1.2 As a matter of course, Unite will submit a Student Management Plan with planning applications for purpose built student housing setting out how its student schemes will be managed. This management approach is tailored to individual circumstances but typically includes 24 hour staff presence on site, provision of safe and secure accommodation, and outlines appropriate complaint procedures should any problems arise, responsibility for community liaison and details the expected behaviour of students which must be adhered to.
- 1.3 Well managed purpose-built accommodation will not have any adverse impacts on residential amenity or the character of the area and therefore a management plan would help the council to assess applications for student accommodation and hopefully aid the positive assessment of well managed proposals.

Aberdeen Local Development Plan Team  
Planning and Sustainable Development  
Aberdeen City Council  
AB10 1AB



28.8.15

On behalf of Froghall, Powis and Sunnybank Community Council, here are my comments on the Draft Technical Advice Note on Student Accommodation (Dated July 2015), with number references as per the document.

- 1 This Advice Note is welcome, as there has clearly been insufficient planning over the past 10 years between the Aberdeen universities and City Council to accommodate the significant increase in student numbers, which has led to an exponential rise in multiple occupancy lettings in houses with gardens, more suitable for, and better cared by, families and owner occupiers, with associated general degradation of parts of the city.

1-3 Housing and area plans should also aim to design out the risk of potential nuisance, eg by ensuring adequate distance and landscaping between student residences, where nocturnal noise is common, and other populations seeking peace and quiet.

1.5 Do universities and colleges require to give advanced notice to the Council when intending to increase student numbers? And are the details incorporated in the Council's Structure Plans?

1-7 Have the "guarantees" for university accommodation been honoured in recent years? (Some 5 or more years ago, some first time students were being housed in B&Bs in Banchory, such was the shortage of accommodation). The university was slow to address these accommodation shortages.

2-1 Many families have been priced out of housing near the university by buy-to-let purchasers. This has led to notable degradation of once fine streets such as Orchard Street, where many front gardens are now neglected or gravelled over and bins left on pavements, with possible irreversible consequences as inner city schools are closed. Parts of this once renowned garden city are becoming a slum.

2-4. In my opinion 4 or 5 storey buildings are optimum so that no lift is required.

3-4. Agreed. But in practice this does not appear to be carried through. Eg the new (and welcome!) student accommodation currently being constructed on Powis place extends to the extreme limit of the site boundary at the back, flush with the footpath from bridge over the railway. And the new buildings planned for the BT site are currently proposed at the minimum legal distance from the existing houses on Froghall view, causing concern to those residents. Both developments could have less negative impact with a little more thought in the design.

3-6. As above, I think that the optimum building height is 4 or 5 storeys. 5 Storey buildings are suitable for main roads and wide streets, but 4 storeys in smaller streets, so that there is less impact or shade thrown upon neighbouring property. (The new buildings under construction on Justice Mill lane are out of proportion for the street, whereas the new health centre on East North Street is wastefully low rise). I also suggest that better use could be made of the valuable land taken up by single or 2 storey prefabs in many inner city retail parks – ie 3 or 4 floors of student accommodation could be provided above the retail units in Kittybrewster / Berrysden.

3-8 There has been an inexorable rise in bland, sterile car parking spaces in Aberdeen. In France, and other European countries trees are often planted amidst parking spaces, softening the otherwise barren tarmac. Personally I agree with recent developers' plans not to provide student parking with developments – ie students should walk, cycle or take public transport, especially if the buildings are located suitably close to the universities. However, I know that some of my colleagues at FPS Community Council think otherwise, saying that it would be difficult to prevent students from owning cars and simply occupying spaces in neighbouring streets or in the car parks of private housing schemes.

I think that limited parking spaces should be provided for visitors only, BELOW new buildings – ie each building should be provided with a utility basement, allowing the open spaces to be of properly landscaped, with greater space for planting of trees and other natural sound barriers between neighbouring homes. I think there should be a specification to provide a percentage of the land space in new developments for communal gardens.

3.16 With “student only” developments, there is a risk of creating ghettos or dead zones during the summer vacation. The impact on the area for such developments should be considered on a case by case basis.


Regards

Clive Kempe



Chair

FPS Community Council



28 August 2015

Aberdeen Local Development Plan Team

### **Consultation TAN Student Accommodation**

I wish the following comments be considered in the production of the final TAN Student Accommodation. My comments are predicated on living very close to a number of purpose built student accommodation blocks.

1.2 Insert “and also meet the needs of the local community/residents”.

3.7 This is a judgement issue and criteria should be stated.

3.8 A guide on the amount of open space per unit/population should be stated.

3.9 and 3.16 Should the purpose built student accommodation have/undergo a change of use the car parking criteria for any other use could not be achieved.

#### Car Parking

The current allocation 1 space per 10 residents is too little. The private student accommodation providers charge students to park within the premises. Therefore the vast majority of students choose park their cars in the surrounding streets. The Council should look to a contribution from the developer to set up a CPZ to protect the local permanent residents who already have to compete with city centre workers who park their cars in the locality and walk to the city centre.

#### Energy Efficiency

Whilst this is laudable, the technology is at too early a stage to ensure that such things as ground source heat pumps do not make noise. It is particularly noticeable during the night as “thumping” occurs in relatively recent development. A condition should be imposed that the operation after completion is assessed for impact on the local community.

#### Developer Contributions

A recent development of 125 student flats only required a contribution to ACC of just over £1000.00 towards the footpath. Surely there should be a bigger contribution required e.g. towards street lighting, etc. This should also take cognisance the student do not pay Council tax and so are not contributing to the “running of Aberdeen City”.

Yours sincerely

Jacinta Birchley



## OLD ABERDEEN HERITAGE SOCIETY

Aberdeen Local Development Plan Team,  
Planning Dept,  
Aberdeen City Council



30<sup>th</sup> August 2015

Dear Sirs,

### **Draft Technical Advice Note: Student Accommodation**

Thank you for the opportunity to comment on this proposed advice on the consideration of planning applications for purpose-built student accommodation. Having examined the draft, the Society wishes to submit the following observations on this important document:-

- 1) It should be noted at the outset that although this TAN has, as stated in the Introduction, been prepared by Aberdeen City Council, it seems, in fact, largely to be based on a similar draft guidance document issued by Leicester City Council. In fact, significant sections of the Aberdeen document are identical to the Leicester guidance.

This in itself, of course, is not necessarily a problem, as the Leicester Council advice is clearly deemed best practice, being both comprehensive and effective, and therefore to be emulated. We are, however, concerned that in fact, some of the best and most important parts of the Leicester document have been watered down or omitted from the proposed TAN for Aberdeen City Council, for no apparent reason. The consequence of this is that the effectiveness of the advice is seriously diminished.

- 2) We shall address the various issues in turn, but first we wish to draw attention to a **serious omission in this TAN**:-

Whereas the 'best-practice' document being followed has six criteria for consideration in the determination of planning applications, the draft TAN has only five, and the one which has been omitted is one of the most important. It states:-

**“When considered with existing student housing provision, the development should not have an unacceptable cumulative impact upon surrounding residential neighbourhoods.”**

It continues:

**“When assessing applications for new purpose built student accommodation schemes, the Council will take into consideration the number of students**

**already in the area and the cumulative impact the proposal would have on nearby existing residential neighbourhoods”.**

This criterion is based on the observation that:

“high concentrations of students in a particular area potentially has negative impacts which can substantially change the nature of a neighbourhood and can increase the demand and pressure on some services (e.g parking), and potentially create late night noise and environmental nuisance”.

This observation is supported by the findings of the recent in-depth report by the St. Andrews Town Commission on Housing (Dec. 2013) which (page 49) draws attention to the phenomenon of “Studentification” - “the process by which specific neighbourhoods become dominated by student residential occupation.”

This phenomenon, has, as it says, been **widely recognised by universities and government, both local and national.** In particular, “**Universities UK**” **report (2006)** on “Studentification”, outlines the major problems associated with this creation of unbalanced communities and registers studentification as a matter of serious and widespread concern, which must be addressed.

The negative impact of high concentrations of student housing in any one particular area has, of course, also been recognised specifically in Scottish Government Guidance, and it is accepted by them that this is an important consideration in planning terms.

Furthermore, this negative impact has been specifically recognised in Aberdeen’s Local Development Plan, in its Supplementary Guidance, the “Householder’s Development Guide”, which, in recognition of the problems associated with high concentrations of student accommodation in a particular area, gives guidance which allows the Council to refuse an application on these grounds. This guidance applies not only to HMOs in shared housing, but to all HMOs, including those which are purpose built student accommodation. The general principle, of course, can be extrapolated to high concentrations of all kinds of student accommodation.

On a wider overview, it is vital to note that the Aberdeen City and Shire Structure Plan sets out as one of the key objectives of its strategy to “**create sustainable communities**”.

Aberdeen City Council’s Local Development Plan endorses this aim in its main chapter, entitled “Delivering Sustainable Communities”. Its stated objective, in terms of infrastructure, is the creation of “**balanced accessible and sustainable communities**” (page 17 3:2) and in terms of housing and community needs, the general requirement “to create sustainable communities”.

These overarching, key objectives of both the Strategic Structure Plan and Local Development Plan are central to the local authority’s stated vision for Aberdeen.

It should be noted that the Scottish Government’s Planning Circular no.3/2012 (paragraph 2) (Annex A) gives these further weight where it sets out the results of a legal judgement on the approach to deciding planning applications in general:-

This judgement required local authorities to “interpret carefully” the provisions of the Local Development Plan which are relevant to the decision, “**looking at the aims and objectives of the Plan as well as detailed wording of policies.**”

The “aims and objectives” of the Local Plan are crystal clear:-

**“to created balanced, sustainable communities”**

\* \* \* \* \*

It is evident from all the foregoing that Aberdeen City Council has committed itself to this aim, and that the draft TAN under consideration in this report must reflect this.

Consequently, it must include amongst the criteria for assessing planning applications for purpose-built student accommodation, a criterion which requires new development not to have an unacceptable cumulative impact upon surrounding residential neighbourhoods, when considered with existing housing provision.

The criterion as stated in the Leicester guidance would fulfil this need, and would complement the other sections of that document which have been proposed for use in the Aberdeen TAN advice.

To sum up on this crucial point, the inclusion of this criterion is essential if this TAN is fully to convey the City Council’s policy position, and fully to reflect the key objectives of the Local Plans. In particular, without this criterion, this TAN will fail to address the problems which are known to arise from high concentrations of student accommodation, and so also fail to meet the Council’s objectives to create mixed, sustainable and **balanced** communities.

- 3) Comments on the rest of the proposed TAN:, on a page-by-page basis:-

### **Pages 3-4 - Introduction**

Although this TAN details the findings of the Aberdeen City and Shire Housing Need and Demand Assessment, in terms of the needs of students, it fails to balance this with the HNDA which expounds the housing needs of the general public. This imbalance in the proposed document is of huge significance, because in each and every community there is a finite amount of land and/or housing, and if recognition is automatically given only to the needs of students, when assessing applications for such accommodation, then the urgent need for general housing will clearly be neglected, in violation of Council Policy.

The Aberdeen Local Development Plan (page 30) states that the Housing Need and Demand Assessment for the City has identified what it describes as a “**chronic need**” for **general housing** in Aberdeen. This concern is repeated in the 2015 Proposed Local Plan. The Council has made clear its commitment to addressing this chronic need, and in particular to promoting affordable housing.

If this TAN remains as proposed, then all possible sites for general housing, which are the subject of a planning application for student accommodation, are likely to be lost to general

housing, **as that chronic unmet need** is not balanced in the TAN against any need for student accommodation. The result will be that preference for all vacant sites will be given to student housing over all other kinds of housing, without weighing up the relative degrees of need in a particular area.

This is surely contrary to the main aims and vision of the City Council. This TAN should include a requirement to assess general housing need in the area to which the application relates, and to consider how the approval of an application for student accommodation might deprive an area of the chance to gain much needed general or family housing, in which case it would be contrary to Council policy.

### **Page 5 (Policy Context) - 2.1**

It is stated in the TAN that:

“student accommodation is essential in contributing to the creation of sustainable communities in Aberdeen as they offer choice to students in the City.”

The logic of this claim is not at all clear. How does “offering choice to students” as to where to live, contribute to sustainable communities? This does not follow.

It is, to the contrary, often the case that where students, as a whole, succeed in acquiring their ideal place to live, which is usually very close to the University they attend, then the demographics of that local residential neighbourhood are hugely altered, and an imbalance is created in the community, leading to completely unsustainable communities. This is seen especially in areas of proliferation of HMOs, but proliferation of blocks of purpose-built student flats in one small area can have many of the same negative effects

We suggest that under paragraph 2.1 on page 5 of the draft TAN, the first sentence is omitted, and replaced with:-

*“Student accommodation is an essential component of the housing mix in Aberdeen, and offers choice to students in the City”.*

### **Page 5 - 2.3**

This section of the report should also include **Policy D5 (Built Heritage)**. This must be included to highlight the specific requirements of the Local Plan with regard to proposals for student accommodation which fall within or adjacent to Conservation Areas. This should be updated on the approval of the 2015 Local Plan to include **Policy D5 (Historic Environment)**.

### **Page 5 - 2.4**

**The Supplementary Guidance “Householder Development Guide”** must also be included, in recognition of the policy it states on high concentrations of HMOs (including those blocks of purpose-built student accommodation which are, legally, HMOs by virtue of the shared facilities within them).



It is important also that the importance of extra sensitivity in Conservation Areas is recognised, by the inclusion in this list of the Conservation Character Appraisals and Management Plan, which will be relevant to applications in those areas.

### **Pages 6-7 - Criteria for Purpose Built Student Accommodation**

As we stated earlier, we are concerned that the terms of the Leicester model guidance, (which seems to be being followed generally), have been watered down considerably in this TAN. We wish therefore, in order to restore its effectiveness, to suggest the following amendment to the criteria set out in this draft:-

#### **CRITERION "A"**

**3.2** - Instead of "should give adequate consideration to addressing an identified need"... there should be substituted, as in the model:-

All proposals for purpose built student accommodation

**"will be required to provide clear evidence to demonstrate, to the satisfaction of the City Council, that the development would meet an identified need at the time it is submitted."**

Instead of "Developers should consider"... it should read:

**"The Council will require that this evidence includes details of the following"**

We also suggest that after the requirement to state:-

"what specific need the proposal is aimed at and why this need is currently unmet".

there should be added:

**"taking into account other student accommodation proposals already approved, and underway, but not yet completed"**

#### **CRITERION "C"**

Instead of "the general amenity of the surrounding area", this should read

**"the general residential environment of the surrounding area"**.

This change is important, in order to emphasise the need for due consideration to the existing residential community.

**3.4** - It is important specifically to recognise adverse impacts on the surroundings of purpose built student accommodation, other than "overlooking, overshadowing, or overdomination of buildings".

The question of noise nuisance, is one which must be considered, when considering what locations might or might not be suitable.

Also, as explained earlier, the question of over-high concentrations in the area should be addressed here. Their location must not add to an already difficult situation for the local residential neighbourhood, by allowing a disproportionate provision of student accommodation in one area.

We therefore suggest that an extra sentence is added at the end of paragraph 3.4:-

**“Impacts such as noise disturbance should also be considered, and the question should also be asked as to whether approval of a particular application would result in too high a concentration of student accommodation in one area, and so the loss of balance in that community.”**

**3.5** - The Council’s policy on Historic Environment (D4 or D5) should be added to this list, in order to highlight the importance of protecting the character of Conservation Areas. This is especially important, because many of the proposals for student accommodation are for areas within or adjacent to Conservation Area no.1.

**3.6** - Here, again, the ‘model’ guidance on which this TAN seems to have been based has been watered down.

We would strongly suggest that the wording of this first sentence is revised to read:-

**“Taller, higher density student accommodation will not normally be appropriate within or adjoining existing residential neighbourhoods”.**

This is how the model advice reads, and it our view that this sentence is essential, in order to spell out what is not acceptable.

### **CRITERION “E”**

For clarity, we suggest that the TAN should here once again follow the model, and add, after “potential negative impacts from occupants”, the wording:-

**“or the development, on surrounding properties and neighbourhoods”**

This should make it clear that it is as much the impact of the development itself as that of its occupants which can have a negative impact on surrounding areas.

\* \* \* \* \*

Lastly, in relation to the suggested Criteria, we would say that we **cannot over-emphasise the need for a additional criterion**, presumably to become “**CRITERION ‘F’**”, as detailed at the beginning of this letter, which will assess the existing nearby student housing provision, and ensure that no application is approved which would, by virtue of a significant provision already in the area, have an unacceptable cumulative impact on surrounding residential neighbourhoods.

An additional, and important, matter to be looked at in this regard is in relation to the “**Equality and Human Rights Impact Assessment**” appended to the proposed TAN before the Planning Committee.

On page 8 of that document, under Article 8 - “the right to respect for family life”, it is stated by the report’s author that:-

“The TAN advocates for student accommodation to respect the residential amenities of surrounding areas.”

We assume that it is not “residential amenities” but “residential amenity” which is meant, which is somewhat different in meaning, but this is a minor point.

The important point here is that this TAN does **not fully advocate** “respect for the residential amenity of surrounding areas” **unless it includes a criterion** which would **prevent an unacceptable cumulative impact** of student accommodation on the neighbourhood.

As is stands, this TAN does not meet the requirements of the Equality and Human Rights Assessment with regard to the right to respect for family life, and it should, in our view, be altered to include the extra criterion as suggested.

\* \* \* \* \*

In conclusion, we would like to say that we have examined the draft TAN in detail because there has up to now been no specific planning advice on this subject drawn together in one document, and for this reason, this TAN will no doubt be turned to for information before other considerations. It is likely, therefore, to carry more weight in day-to-day practice than might be expected of a TAN as opposed to Supplementary Guidance.

For this reason, we should be grateful if the Planning Committee would give full consideration to our comments as laid out in this letter, as they are the product of significant research, and considered thought.

The alterations we have asked for are, we believe, important, **in order to ensure** that any proposals for new purpose built student accommodation are **needed, appropriate in size and scale,** directed **towards suitable locations within the City,** and **do not have an unacceptable cumulative effect on residential neighbourhoods.**

We hope that Members will support us in our request for alterations to the TAN to attain these objectives.

Yours sincerely,



(Mrs). B. McPetrie Planning Secretary

**From:** [Bruce Ritchie](#)  
**To:** [LDP](#)  
**Subject:** REPRESENTATION ON DRAFT TECHNICAL ADVICE NOTE FOR STUDENT HOUSING  
**Date:** 21 July 2015 12:48:24  
**Attachments:** [image001.png](#)  
[image002.png](#)

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To whom it may concern,

We have review the draft technical advice note and would comment as follows:

-We welcome a specific guidance document on Student Accommodation  
-Item 3.9 cites Building Standards Regulations: Technical Handbook – Domestic as a point of reference. We would note that there has been a shift in Aberdeen City Building Control approach in recent years and new Student Housing developments are being assessed under the Technical Handbook – Non Domestic. It would be good to have a consensus between Planning and Building Control in this regard.

Kind Regards

Bruce Ritchie

**Acanthus Architects df**

[Redacted signature block]



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**From:** [REDACTED]  
**To:** [LDP](#)  
**Subject:** TAN Student Accommodation  
**Date:** 28 August 2015 19:29:52

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To Whom it may concern:

I welcome the advice notes as a way to improve and stimulate suitable PBSA provision. May I make the following suggestions

Need for the University of Aberdeen to identify and possibly free land for development near to the campus. Edinburgh has identified the need for students NOT to have to travel to work. Neither does the TAN spell out the desirability for accommodation to be convenient and within easy walking distance (this is the most sustainable solution)

Nor does it identify the cumulative effect of repeated approvals within a particular area. I suggest that with every application by the developer there be a detailed assessment of provision and establish the need in that locality, hopefully to overcome the over concentration of students, which can destabilise a community.

3.10 existing "maximum" should read "minimum" otherwise the accommodation will be too inflexible to change its use. Providing only parking for residential staff seems to be a charter for part time management as it benefits those who do not provide full time management

Overall there is a lack of detail in the TAN, maybe the detail will come in time!