

# Notice of meeting and agenda

## Planning Committee

**2.00 pm Wednesday, 30th September, 2020**

Virtual Meeting - via Microsoft Teams

This is a public meeting and members of the public are welcome to view the meeting via the webcast.

### Contacts

Email: [veronica.macmillan@edinburgh.gov.uk](mailto:veronica.macmillan@edinburgh.gov.uk)

Tel: 0131 529 4283

## **1. Order of Business**

---

- 1.1 Including any notices of motion and any other items of business submitted as urgent for consideration at the meeting.

## **2. Declaration of interests**

---

- 2.1 Members should declare any financial and non-financial interests they have in the items of business for consideration, identifying the relevant agenda item and the nature of their interest.

## **3. Deputations**

---

- 3.1 If any

## **4. Minutes**

---

- 4.1 Planning Committee of 2 September 2020 - submitted for approval as a correct record 5 - 14

## **5. Business Bulletin**

---

- 5.1 None.

## **6. Development Plan**

---

- 6.1 None.

## **7. Planning Policy**

---

- 7.1 Financial Implications of addressing potential short term lets – Report by the Executive Director of Place 15 - 20

## **8. Planning Process**

---

8.1 None.

## **9. Planning Performance**

---

9.1 None.

## **10. Conservation**

---

10.1 None.

## **11. Motions**

---

11.1 None.

### **Laurence Rockey**

Head of Strategy and Communications

### **Committee Members**

---

Councillors Councillor Neil Gardiner (Convener), Councillor Maureen Child (Vice-Convener), Councillor Chas Booth, Councillor Mary Campbell, Councillor George Gordon, Councillor Joan Griffiths, Councillor Max Mitchell, Councillor Joanna Mowat, Councillor Hal Osler, Councillor Rob Munn and Councillor Cameron Rose

### **Information about the Planning Committee**

---

The Planning Committee consists of 11 Councillors and is appointed by the City of Edinburgh Council.

### **Further information**

---

If you have any questions about the agenda or meeting arrangements, please contact Veronica Macmillan, Committee Services, City of Edinburgh Council, Business Centre

2.1, Waverley Court, 4 East Market Street, Edinburgh EH8 8BG, Tel 0131 529 4283, email [veronica.macmillan@edinburgh.gov.uk](mailto:veronica.macmillan@edinburgh.gov.uk).

The agenda, minutes and public reports for this meeting and all the main Council committees can be viewed online by going to [www.edinburgh.gov.uk/cpol](http://www.edinburgh.gov.uk/cpol).

## **Webcasting of Council meetings**

---

Please note this meeting may be filmed for live and subsequent broadcast via the Council's internet site – at the start of the meeting the Convener will confirm if all or part of the meeting is being filmed.

The Council is a Data Controller under the General Data Protection Regulation and Data Protection Act 2018. We broadcast Council meetings to fulfil our public task obligation to enable members of the public to observe the democratic process. Data collected during this webcast will be retained in accordance with the Council's published policy including, but not limited to, for the purpose of keeping historical records and making those records available via the Council's internet site.

Any information presented by individuals to the Council at a meeting, in a deputation or otherwise, in addition to forming part of a webcast that will be held as a historical record, will also be held and used by the Council in connection with the relevant matter until that matter is decided or otherwise resolved (including any potential appeals and other connected processes). Thereafter, that information will continue to be held as part of the historical record in accordance with the paragraphs above.

If you have any queries regarding this, and, in particular, if you believe that use and/or storage of any particular information would cause, or be likely to cause, substantial damage or distress to any individual, please contact Committee Services ([committee.services@edinburgh.gov.uk](mailto:committee.services@edinburgh.gov.uk)).

## Minutes

### Planning Committee

2.00pm, Wednesday 2 September 2020

#### Present

Councillors Gardiner (Convener), Child (Vice-Convener), Booth, Mary Campbell, Gordon, Griffiths, Mitchell, Mowat, Munn, Osler and Rose.

#### 1. Minutes

---

##### Decision

To approve the minutes of the Planning Committee of 12 August 2020 as a correct record.

#### 2. Leith Walk/Halmyre Street Place Brief

---

Approval was sought for a place brief to provide guidance for a co-ordinated approach to a housing led, mixed use development on the site at Leith Walk/Halmyre Street. It had been prepared by the Council's Planning Service in collaboration with other Council services and had involved extensive engagement with the local community and other stakeholders.

##### Motion

- 1) To approve the Place Brief for the site at Leith Walk/Halmyre Street as non-statutory planning guidance detailed in Appendix 1 to the report.
- 2) To agree that officers would produce a briefing note that provided an update on the bingo hall in terms of the extension of the conservation area and the advice received from built heritage colleagues.
- 3) To agree that the bullet point on the boundary assessment would be reinstated and would say that a building assessment 'may be' required for any future development of the building instead of 'would be'.
- 4) To agree that officers would widen the map to include current cycling links as well as the proposed cycle links, with an emphasis on the southern route.
- 5) To agree that there should be minimal car parking/usage in the new development and that whilst there would be reference to the Council's parking standards, they would be under review and there would be the opportunity to depart from these standards.

- moved by Councillor Gardiner, seconded by Councillor Child

### **Amendment**

- 1) To approve the Place Brief for the site at Leith Walk/Halmyre Street as non-statutory planning guidance detailed in Appendix 1 to the report, subject to the map on page 27 that showed potential cycle connections to be updated to reflect earlier text earlier in page 27, that 'Proposed development should safeguard the opportunity to deliver a pedestrian and cycle route or other public space above the railway arches...'
- 2) To agree that officers would produce a briefing note that provided an update on the bingo hall in terms of the extension of the conservation area and the advice received from built heritage colleagues.
- 3) To agree that the bullet point on the boundary assessment would be reinstated and would say that a building assessment 'may be' required for any future development of the building instead of 'would be'.
- 4) To agree that officers would widen the map to include current cycling links as well as the proposed cycle links, with an emphasis on the southern route.
- 5) To agree that there should be minimal car parking/usage in the new development and that whilst there would be reference to the Council's parking standards, they would be under review and there would be the opportunity to depart from these standards.

- moved by Booth, seconded by Councillor Mary Campbell

In accordance with Standing Order 19(12), the Green Group Amendment was accepted as an addendum to the motion.

### **Decision**

To approve the following adjusted motion by Councillor Gardiner:

- 1) To approve the Place Brief for the site at Leith Walk/Halmyre Street as non-statutory planning guidance detailed in Appendix 1 to the report, subject to the map on page 27 that showed potential cycle connections to be updated to reflect earlier text earlier in page 27, that 'Proposed development should safeguard the opportunity to deliver a pedestrian and cycle route or other public space above the railway arches...'
- 2) To agree that officers would produce a briefing note that provided an update on the bingo hall in terms of the extension of the conservation area and the advice received from built heritage colleagues.

- 3) To agree that the bullet point on the boundary assessment would be reinstated and would say that a building assessment 'may be' required for any future development of the building instead of 'would be'.
- 4) To agree that officers would widen the map to include current cycling links as well as the proposed cycle links, with an emphasis on the southern route.
- 5) To agree that there should be minimal car parking/usage in the new development and that whilst there would be reference to the Council's parking standards, they would be under review and there would be the opportunity to depart from these standards.

(Reference – report by the Executive Director of Place, submitted.)

### 3. Short Term Letting in Edinburgh

---

At its meeting of 28 July 2020, Council agree a motion by Councillor Staniforth, as amended, to ask the Chief Planning Officer to prepare a response to issues contained in a report on commercial short term lets published by Andy Wightman MSP.

Committee considered a report that responded to the report by Andy Wightman MSP.

#### **Motion**

- 1) To note the findings of the survey.
- 2) To support the continued focus on Planning enforcement activity on cases where there was robust evidence of harm to residential amenity.
- 3) To reinforce the use of the Council's reporting facility to capture the information required for Planning enforcement investigations.
- 4) To welcome the fact that the Scottish Government was shortly bringing forward legislation on short term lets.
- 5) To recommend that Council took appropriate measures to implement a licensing regime as soon as the legislation permitted.
- 6) To agree that after the conclusion of the forthcoming Scottish Government Consultation on October 2020, a briefing note would be circulated to members setting out the expected timescales for delivery of the regulations for short term lets that included an outline of how this would be resourced and managed by the Council, based on full cost recovery.

- Moved by Councillor Gardiner, seconded by Councillor Child

### **Amendment**

- 1) To note the findings of the survey.
- 2) To support the continued focus on Planning enforcement activity on cases where there was robust evidence of harm to residential amenity.
- 3) To reinforce the use of the Council's reporting facility to capture the information required for Planning enforcement investigations and agreed to conduct a public awareness campaign of the Council's reporting facility to encourage members of the public to report Short Term Lets that were apparently operating in breach of planning controls and were harming residential amenity.
- 4) To note that paragraph 6 of the current report did not include an estimate of the cost of commencing enforcement action against any of those 380 properties identified in Andy Wightman's report.
- 5) To therefore agree to receive a further report, within one cycle, setting out the likely cost of commencing enforcement action on those properties.

- Moved by Councillor Booth, seconded by Councillor Mary Campbell

In accordance with Standing Order 19(12), the Green Group Amendment was accepted as an addendum to the motion.

To approve the following adjusted motion by Councillor Gardiner:

- 1) To note the findings of the survey.
- 2) To support the continued focus on Planning enforcement activity on cases where there was robust evidence of harm to residential amenity.
- 3) To reinforce the use of the Council's reporting facility to capture the information required for Planning enforcement investigations agreed to conduct a public awareness campaign of the Council's reporting facility to encourage members of the public to report Short Term Lets that were apparently operating in breach of planning controls and were harming residential amenity.
- 4) To welcome the fact that the Scottish Government was shortly bringing forward legislation on short term lets.



- 5) To recommend that Council took appropriate measures to implement a licensing regime as soon as the legislation permitted.
- 6) To agree that after the conclusion of the forthcoming Scottish Government Consultation on October 2020, a briefing note would be circulated to members setting out the expected timescales for delivery of the regulations for short term lets that included an outline of how this would be resourced and managed by the Council, based on full cost recovery.
- 7) To note that paragraph 6 of the current report did not include an estimate of the cost of commencing enforcement action against any of those 380 properties identified in Andy Wightman's report.
- 8) To therefore agree to receive a further report, within one cycle, setting out the likely cost of commencing enforcement action on those properties.

(Reference – report by the Executive Director of Place, submitted.)

#### **4. The Scottish Planning Policy and Housing – Technical Consultation on Proposed Policy Changes**

---

Approval was sought for a supportive response to the Scottish Government's consultation on proposed interim amendments to Scottish Planning Policy 2014 (SPP) in relation to planning for housing. The consultation proposed removing the existing presumption in favour of 'development that contributed to sustainable development', and by prescribing how the effective five year housing land supply should be calculated. The changes would apply in the interim period ahead of approval of National Planning Framework 4 (NPP4) expected in 2022.

##### **Decision**

- 1) To note the Scottish Government's consultation on proposals for amendment of Scottish Planning Policy in respect of removing the presumption in favour of development that contributed to sustainable development and to set out a consistent method for calculating an effective five year housing land supply to give greater clarity to the decision making process.
- 2) To note that these were interim measures to be replaced on the approval of the National Planning Framework 4 (NPP4) by the Scottish Parliament, and any relevant policies in that document, currently scheduled to be before parliament in draft form in September 2021, with approval to be considered in September 2022.
- 3) To approve the proposed response to the consultation detailed in Appendix 1 of the report that set out the Council's support for the proposed changes as

positive measures which reflected the existing approach taken by the Council and which would simplify these areas of the planning system, which were the subject of significant and unproductive activity.

- 4) To agree that the proposed response was submitted to the Scottish Government by 9 October 2020.

(Reference – report by the Executive Director of Place, submitted.)

## **5. Funding Third Sector Delivery Partners: Edinburgh World Heritage and Edinburgh and Lothians Greenspace Trust**

---

A report was presented to Committee in May 2019 that was approved to enter into three-year service level agreements with Edinburgh and World Heritage (EWH) and Edinburgh and Lothians Greenspace Trust (ELGT) for the financial year 2019/20. It was also agreed that, subject to funds being available, similar levels of funding would be put forward for future years.

Approval was sought for funding for the financial year 2020/21.

### **Decision**

- 1) To approve the sums of £46,000 for Edinburgh World Heritage (EWH) and £25,833 for Edinburgh and Lothians Greenspace Trust (ELGT) for the financial year 2020/21. Services and activities were detailed in Appendices 1 and 2 to the report.
- 2) To agree that an update would be provided in the Business Bulletin on the outcomes of the Service Level Agreements (SLAs) and the outcomes of the smaller organisations, and to agree that officers would include this information in future reports.

(References – Planning Committee, 15 May 2019 (Item 6); report by the Executive Director of Place, submitted.)

### **Declarations of Interest**

Councillors Child and Gardiner declared non-financial interests in the above item as Non-Executive Directors of Edinburgh World Heritage and the Edinburgh and Lothians Greenspace Trust, respectively.

## 6. Changes to Publication Arrangements for Applications during the Coronavirus Emergency

---

As a result of the Coronavirus emergency it was necessary to make changes to how planning and related applications were publicised and progressed. The Coronavirus (Scotland) Act 2020 allowed the Councils to take decisions not to physically publish or publicise documents or make documents available for physical inspection where they considered that doing so might give rise to a significant risk of transmission of coronavirus.

### Decision

- 1) To note the decision of the Chief Planning Officer, which was made in consultation with the Planning Committee Convener and Vice-Convener, under extended delegated authority during the Coronavirus Emergency Measures period to:
  - cease, for the duration of the coronavirus emergency, the publication of applications via the weekly list at Council libraries and offices and cease the ability to for members of the public to view these applications at libraries and offices whilst these buildings were closed to the public.
  - amend neighbour notification letters and advertisements to reflect the changes described above.
  - Suspend the physical posting of site notices for the duration of the coronavirus emergency.
  - Amend working practices to conform with any subsequent regulations or guidance issued by the Scottish Government with respect to the carrying out of Development Management functions for the duration of the coronavirus emergency.
- 2) To agree that given the ongoing restrictions on access to buildings, the arrangements in relation to not publicising weekly lists and not facilitating computer access at libraries and offices remained in place until 31 December 2020. If the Chief Planning Officer considered that these measures needed to continue beyond that date, he would take a decision to do so following consultation with the Convener and Vice Convener of the Planning Committee and would report to Committee on that decision thereafter.
- 3) To agree that, given the lower risk of contracting coronavirus during external activities, the posting of site notices was resumed from 6 October 2020, subject to the Chief Planning Officer being provided with the authority not to post these, if he considered that there was an increased risk to officers or to the objectives of community health protection.

(Reference – report by the Executive Director of Place, submitted.)

## 7. Legal Review of Council Planning Processes

---

An independent review of certain Council Planning decisions had been undertaken by Fraser Mitchell, a specialist Planning Partner at legal firm Shoosmiths LLP. The purpose of the review was to understand the Council's approach to these planning matters and to make any appropriate recommendations which would facilitate general improvements.

A full confidential report had been prepared by Shoosmiths under legal privilege, in order to protect the Council's legal position in relation to matters under review. The report was made available to elected members for inspection.

### **Motion**

To note the findings and recommendations of the independent legal report into planning processes undertaken by Shoosmiths LLP.

- Moved by Councillor Gardiner, seconded by Councillor Child

### **Amendment**

- 1) To note the findings and recommendations into planning processes undertaken by Shoosmiths LLP.
- 2) To call for a further report on how the recommendations of the Shoosmiths report were to be addressed and implemented or rejected in two cycles; the report should set out resources implications of implementation and cross reference to any actions that had already been taken under the Planning Improvement Plan and changes to the management of Development Management Sub-Committee should be discussed with Councillors at a workshop.

- moved by Councillor Mowat, seconded by Councillor Mitchell

In accordance with Standing Order 19(12), the Conservative Group Amendment was accepted as an addendum to the motion.

### **Decision**

To approve the following adjusted motion by Councillor Gardiner:

- 1) To note the findings and recommendations into planning processes undertaken by Shoosmiths LLP.
- 2) To call for a further report on how the recommendations of the Shoosmiths report were to be addressed and implemented or rejected in two cycles; the report should set out resources implications of implementation and cross reference to any actions that had already been taken under the Planning Improvement Plan and changes to the management of Development Management Sub-Committee should be discussed with Councillors at a workshop.

(Reference – report by the Chief Executive, submitted.)

## **8. Planning Improvement Plan – Progress Update**

---

An update was provided on the progress made on the Council's Planning Improvement Plan (PIP) 2018/21 and on the recommendations of an internal audit in developer contributions. The report also identified how the service's programme of change and improvement had been accommodating and learning from the Covid-19 period.

### **Decision**

To note the progress which had been made on the implementation of the Planning service's Improvement Plan and progress against the internal audit actions on developer contributions.

(References – Planning Committee, 29 January 2020 (Item 8); report by the Executive Director of Place, submitted.)

## **9. Colinton Conservation Area Character Appraisal Review**

---

Committee considered a report that presented the revised Colinton Conservation Area Character Appraisal (CACA). The revised appraisal had been the subject of consultation.

### **Decision**

To approve the revised Colinton Conservation Area Character Appraisal.

(Reference – report by the Executive Director of Place, submitted.)

This page is intentionally left blank

## Planning Committee

10.00am, Wednesday, 30 September 2020

### Financial implications of addressing potential short term lets

Executive/routine	
Wards	All
Council Commitments	

#### 1. Recommendations

---

- 1.1 It is recommended that Committee notes:
  - 1.1.1 the financial implications of three scenarios scenario set out in paragraphs 4.7 – 4.16; and
  - 1.1.2 that any individual report of a short-term let to the Council's 'Report a Possible Breach of Planning Controls Form' webpage will be fully investigated.

#### Paul Lawrence

Executive Director of Place

Contact: David Givan, Planning and Building Standards Service Manager

E-mail: [david.givan@edinburgh.gov.uk](mailto:david.givan@edinburgh.gov.uk) | Tel: 0131 529 3679

## Financial implications of addressing potential short term lets

### 2. Executive Summary

---

- 2.1 A report was provided to Planning Committee on [2 September 2020](#) on Short Term Letting in Edinburgh. This report was prepared in response to Council agreeing a motion by Councillor Staniforth on [28 July 2020](#), as amended, to ask the Chief Planning Officer to prepare a response to issues contained in a report on commercial short term lets published by Andy Wightman MSP.
- 2.2 On 2 September 2020, Committee noted that paragraph 6 of that current report did not include an estimate of the cost of commencing enforcement action against any of those 380 properties identified in Andy Wightman MSP's report. It therefore agreed to receive a further report, within one cycle, setting out the likely cost of commencing enforcement action on those 380 properties.

### 3. Background

---

- 3.1 Andy Wightman MSP published a report in July 2020 of findings from a survey he conducted to identify the location of commercial short term let properties in Edinburgh. The survey identified 477 properties which were considered to be operated on a commercial basis, with no permanent resident, in the period January to June 2020.
- 3.2 From the full survey data, he identified 444 properties where there appeared to be use of a communal entrance or access. He supplied a list of addresses of such properties to the Chief Planning Officer. Using Planning Enforcement information available on the Council's Portal, the survey identified that 380 of these properties appeared not to have been reported to the Council previously.
- 3.3 Of the 477 commercial short term let addresses identified in the report, the survey could only identify that one had sought and obtained planning permission for such a use.



## 4. Main report

---

- 4.1 The 2 September 2020 report recommended that Committee:
- 4.1.1 notes the findings of the survey;
  - 4.1.2 supports the continued focus of Planning enforcement activity on cases where there is robust evidence of harm to residential amenity; and
  - 4.1.3 reinforces the use of the Council's reporting facility to capture the information required for Planning enforcement investigations.
- 4.2 Carrying out enforcement in relation to potential breaches of planning control in relation to short term lets is a complex process. It takes considerable time to gather details about properties, their ownership and to establish whether there has been a breach of planning control. Where there have been breaches of planning control it is then necessary to decide whether these are relatively minor in nature or are of a more significant nature that requires action to be take. Enforcement action can be conducted informally or formally through the serving of notices and ultimately through recourse to the courts.
- 4.3 In cases where enforcement action in relation to short term lets are appealed by those subject to enforcement notices to the Scottish Government's Department of Planning and Environmental Appeals (DPEA), the DPEA has dismissed these appeals where it has clearly been established the change of use from dwelling to short term let is causing harm to neighbouring residential amenity.
- 4.4 In conducting successful enforcement action therefore, it is necessary to understand whether the extent of harm being caused would warrant formal enforcement action.
- 4.5 The list that has been provided is only a list of property addresses that may be being used as short term lets. It is understood that the list was prepared between January and June of this year. Between 26 March 2020 and 15 July 2020, the Health Protection (Coronavirus) (Restrictions) (Scotland) Regulations 2020 prevented holiday let business from being carried out. It is therefore probable that some of these properties are no longer in use as short term lets.
- 4.6 At Committee on 2 September 2020, officers outlined that if Committee wishes action to be taken in relation to the list there are three possible scenarios:
- Scenario 1**
- 4.7 A letter could be sent to each of the 380 properties identified. It would be addressed to the owner of the property and not a named individual. It would highlight that it had been drawn the Council's attention that the property may be being used as a short term let and that there are no records of planning permission being in place. The letter would advise the owner that where there has been a change of use from domestic to commercial property in this way, that planning permission is required and should be applied for but only where it would be in accordance with the Council's Guidance for Businesses.

- 4.8 Without owners' names, it is likely that many of the letters will not be read by owners and could be treated as junk mail. Many of the owners will not be at the properties regularly so even if they do read the letter, it may not be until some-time after it is sent. To ensure it accurately reflects the Council's knowledge, the letter would not be able to state that the Council thinks there has been a breach of planning control. It is likely that this approach would be of limited benefit.
- 4.9 Costs for doing this would be £402 for the cost of printing and posting and between £500 and £1,000 for officer time in preparing the letter, verifying postal addresses and checking whether planning permission is in place. The overall cost for this is therefore between £900 and £1,400.

### **Scenario 2**

- 4.10 To determine ownership, research would have to be done on each of the 380 properties. Assuming that this could be done on average in around one hour for each property and taking account of associated costs in retrieving information from the land registry, it is estimated that this would cost around £10,000 to £12,000 in officer time.
- 4.11 This would enable any letter to be sent to be directed to the owner. Without further investigation however, it is likely that the sending of such letters would be of limited benefit.

### **Scenario 3**

- 4.12 To fully investigate whether there has been a breach of planning control, it would be necessary to conduct further desktop research, serve planning contravention notices (which allows owners/operators to make representations about how the property is used and provide details of other parties who have an interest in the property) and carry out site visits including separate meetings with operators and affected parties. If a breach was established, it would then be necessary to take a view on what the impact of that was upon neighbours. If it was considered that the breach was harmful, consideration would be given to serving a planning enforcement notice which requires the unauthorised use to cease.
- 4.13 In many cases, where notices have been served, there will be planning appeals to the DPEA. Officer time has to be spent on these appeals defending the Council's position.
- 4.14 It is estimated that there would be an initial period of three months involving the full time equivalent of six to ten officers working on the cases. After that period, it is estimated that there would be a period of nine months involving two to three officers. The costs of this would range between £135,000 and £220,000.
- 4.15 However, it is very important to note that it would not be possible to bring in planning officers with experience of enforcement over the time period indicated above. In practical terms, to undertake the investigations, planning officers would require to be diverted from current tasks with the enforcement team and within the wider service, which would have potential impacts on application processing timescales or the ability to bring forward new policy and guidance.

- 4.16 The planning enforcement team considers all potential breaches of planning control. If its time is reprioritised for these cases, its ability to consider these other cases would be diminished and there could be a consequential drop in confidence in the planning system if the wide range of enforcement investigations are narrowed in scope.
- 4.17 It is therefore not proposed that these cases are investigated on the basis of this list.
- 4.18 This does not preclude the investigation of any of these properties if individuals report them on the Council's 'Report a Possible Breach of Planning Controls Form' web page. If these cases are reported in this way it will allow the enforcement team to obtain information about the impacts the alleged use of these properties are having on neighbours. It will allow the service to prioritise its investigations upon those breaches of planning control that are having the greatest harm.

## **5. Next Steps**

---

- 5.1 As required by Committee on 2 September, the service will conduct an awareness raising programme of planning enforcement and the need to have planning permission for short term lets, where there has been a change of use.
- 5.2 The service will continue to investigate any reports received through the planning enforcement webpage.
- 5.3 Proposals will be brought forward for the designation of a short-term let control area for the city once planning legislation to enable this comes into force in the spring of 2021. In parallel, legislation is being brought forward for the licensing of short-term lets which the Council will be able to implement.

## **6. Financial impact**

---

- 6.1 The financial implications of the scenarios outlined in section four are set out in that section.
- 6.2 In relation to scenario 1, the administrative cost of £900 to £1,400 could be contained within existing budget.
- 6.3 In relation to scenario 2, the cost of £10,000 to £20,000 is substantively the cost of officer time. It would be spread across Planning and other service areas that support the investigation of property ownership. This could be contained within existing budget, however, there would be an opportunity cost of other enforcement activity requiring to be reprioritised because of time being spent on investigating these cases.
- 6.4 There is no current budget for additional enforcement work. Therefore, in relation to scenario 3, the cost of between £135,000 and £220,000 would be an opportunity cost of diverting staff from current activities and depending on what they are

currently working there could be impacts on other enforcement activity, application processing timescales or the ability to bring forward new policy or guidance.

## **7. Stakeholder/Community Impact**

---

- 7.1 There will be stakeholder/community impact if the survey data is used and resources are diverted from other enforcement cases where specific harm to residential amenity has been reported.

## **8. Background reading/external references**

---

- 8.1 Report to Planning Committee of 2 September: [Short Term Letting in Edinburgh](#)

## **9. Appendices**

---

- 9.1 None.