

Mr Doolan
3 Craiglea Drive
Edinburgh
EH10 5PB

Decision date: 15 December 2022

TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS
DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013

Change of use from residential to short-term let (in retrospect).
At Flat 11 1B Grassmarket Edinburgh EH1 2HY

Application No: 22/04143/FUL

DECISION NOTICE

With reference to your application for Planning Permission registered on 26 August 2022, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

Reason for Refusal:-

1. The proposal is contrary to Local Development Plan Policy Hou 7 in respect of Inappropriate Uses in Residential Areas, as the use of this dwelling as a short stay let will have a materially detrimental effect on the living conditions and amenity of nearby residents.

Please see the guidance notes on our [decision page](#) for further information, including how to appeal or review your decision.

Drawings 01, 02, represent the determined scheme. Full details of the application can be found on the [Planning and Building Standards Online Services](#)

The reason why the Council made this decision is as follows:

The proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents and therefore it does not comply with LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

This determination does not carry with it any necessary consent or approval for the proposed development under other statutory enactments.

Should you have a specific enquiry regarding this decision please contact James Armstrong directly at james.armstrong@edinburgh.gov.uk.



Chief Planning Officer
PLACE
The City of Edinburgh Council

NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at www.eplanning.scot or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email localreviewbody@edinburgh.gov.uk.

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

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Report of Handling

Application for Planning Permission
Flat 11 1B Grassmarket, Edinburgh, EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Item – Local Delegated Decision
Application Number – 22/04143/FUL
Ward – B11 - City Centre

Recommendation

It is recommended that this application be **Refused** subject to the details below.

Summary

The proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents and therefore it does not comply with LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

SECTION A – Application Background

Site Description

The application site is a studio flat located with its shared street entrance on the south eastern side of grassmarket and external windows facing onto Lady Wynd Lane. The property shares its access to the street with other properties.

Grassmarket is of mixed character, including leisure and entertainment uses, offices, public houses, retail and residential properties. Bus and train links are relatively accessible from the site.

The application site forms part of a category C Listed Building, 1 Grassmarket and 2 King's Stables Road, LB28932, 10/04/1986.

The application site falls within the Old and New Towns World Heritage Site, Old Town Conservation Area and the New Town Gardens and Dean Historic Garden Designed Landscape.

Description Of The Proposal

The application is for a retrospective change of use from Residential to Short Term Let (STL) (sui-generis). No internal or external physical changes are proposed. The applicant has advised that the property has been used as a short term let since 2015.

Supporting Information

- None.

Relevant Site History

No relevant site history.

Other Relevant Site History

No other relevant site history was identified.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 29 August 2022

Date of Advertisement: 2 September 2022

Date of Site Notice: 2 September 2022

Number of Contributors: 9

Section B - Assessment

Determining Issues

Due to the proposals relating to a listed building(s) and being within a conservation area, this report will first consider the proposals in terms of Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the "1997 Heritage Act"):

- a) Is there a strong presumption against granting planning permission due to the proposals:
 - (i) harming the listed building or its setting? or
 - (ii) conflicting with the objective of preserving or enhancing the character or appearance of the conservation area?

- b) If the strong presumption against granting planning permission is engaged, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh it?

This report will then consider the proposed development under Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

If the proposal is in accordance with the development plan the determination should be to grant planning permission unless material considerations indicate otherwise?

If the proposal is not in accordance with the development plan the determination should be refuse planning permission unless material considerations indicate otherwise?

In the assessment of material considerations this report will consider:

- the Scottish Planning Policy presumption in favour of sustainable development, which is a significant material consideration due to the development plan being over 5 years old;
- equalities and human rights;
- public representations; and
- any other identified material considerations.

Assessment

To address these determining issues, it needs to be considered whether:

a) The proposals harm the listed building and its setting?

The following HES guidance is relevant in the determination of this application:

- Managing Change in the Historic Environment: Guidance on the principles of listed buildings
- Managing Change in the Historic Environment: Setting

Managing Change in the Historic Environment: Interim Guidance on the principles of listed building consent sets out the principles for assessing the impact of a development on a listed building.

Managing Change in the Historic Environment: Setting sets out the principles that apply to developments affecting the setting of historic assets or places including listed buildings and conservation areas. It includes factors to be considered in assessing the impact of a change on the setting.

There are no external or internal alterations proposed. As such, the proposal will not have an adverse impact on or cause harm to the listed building. The setting of the listed building and the setting of neighbouring listed buildings will be unaffected by the proposal.

Conclusion in relation to the listed building

The proposal does not harm the character of the listed building or its setting. It is therefore acceptable with regard to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

b) The proposals harm the character or appearance of the conservation area?

Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states:

"In exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

The Old Town Conservation Area Character appraisal states:

The Old Town Conservation Area Character Appraisal emphasises the survival of the original medieval street pattern; the wealth of important landmark buildings; the survival of an outstanding collection of archaeological remains, medieval buildings, and 17th-century town houses; the consistent and harmonious height and mass of buildings; the importance of stone as a construction material for both buildings and the public realm; the vitality and variety of different uses; and the continuing presence of a residential community.

As stated previously, there are no external changes proposed. Therefore, the impact on the character and appearance of the conservation area is acceptable.

Conclusion in relation to the conservation area

The proposals are acceptable with regard to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

c) The proposals comply with the development plan?

The development plan comprises the Strategic and Local Development Plans. The relevant Edinburgh Local Development Plan 2016 (LDP) policies to be considered are:

- Environment Policies, Env 1, Env 3, and Env 6.
- Housing Policy, Hou 7.
- Delivering the Strategy Policy, Del 2.
- Transport Policies, Tra 2 and Tra 3.

The non-statutory 'Listed Buildings and Conservation Area' guidance is a material consideration that is relevant when considering policies Env 1, Env 3 and Env 6.

The non-statutory guidance for Business is a material consideration when considering LDP Policy Hou 7.

Proposed Use

The application site is situated in the Urban Area and City Centre as defined in the adopted Edinburgh Local Development Plan (LDP).

The main policy that is applicable to the assessment of STLs is LDP Policy Hou 7 (Inappropriate Uses in Residential Areas), which seeks to protect residential amenity.

The non-statutory Guidance for Businesses states that an assessment of a change of use of dwellings to STCVA will have regard to:

- The character of the new use and of the wider area;
- The size of the property;
- The pattern of activity associated with the use including numbers of occupants, the period of use, issues of noise, disturbance and parking demand and

- The nature and character of any services provided.

In connection to short stay commercial leisure apartments it states, "The Council will not normally grant planning permission in respect of flatted properties where the potential adverse impact on residential amenity is greatest".

The application property shares its access to the street with other properties via communal areas and stairs. Grassmarket is of mixed character, with a high degree of activity in the vicinity of the property at any time.

The use of the property as an STL would introduce an increased frequency of movement to the flat and communal areas of the building. The proposed one bedroom STL use would enable visitors to arrive and stay at the premises for a short period of time on a regular basis throughout the year in a manner dissimilar to that of permanent residents. There is no guarantee that guests would not come and go frequently throughout the day and night and transient visitors may have less regard for neighbours' amenity than individuals using the property as a principal home. The additional servicing that operating a property as an STL requires compared to that of a residential use is also likely to result in an increase in disturbances, further impacting on neighbouring amenity.

This would be significantly different from the ambient background noise that neighbouring residents might reasonably expect and will have a significantly detrimental effect on the living conditions and amenity of nearby residents.

Paragraph 220 of the LDP acknowledges that tourism is the biggest source of employment in Edinburgh, providing jobs for over 31,000 people. Whilst there is not a specific LDP policy relating to the jobs created through the required care, maintenance and upkeep of STL properties, the economic benefits are a material planning consideration.

The proposal will provide accommodation for tourists and individuals visiting the city, within an area of mixed use. The proposal will not prejudice or inhibit the activities of any nearby employment use. It will contribute to the vitality of the city centre and its role as a strategic business centre, regional shopping centre and capital city.

The application complies with LDP policy Del 2, however it does not comply with LDP policy Hou 7.

Parking Standards

There is no vehicle parking and no cycle parking. Zero parking is acceptable as there is no parking requirements for STLs. Cycles could be parked inside the property.

The proposals comply with LDP Policies Tra 2 and Tra 3.

World Heritage Site

The proposed change of use to a short stay let does not affect the reasons for the inscription of the World Heritage Site.

The proposal complies with LDP Policy Env 1.

Conclusion in relation to the Development Plan

The change of use of this property to an STL will be of significant detriment to neighbouring amenity. The proposal does not comply with the Development Plan.

d) There are any other material considerations which must be addressed?

The following material planning considerations have been identified:

SPP - Sustainable development

Scottish Planning Policy (SPP) is a significant material consideration due to the LDP being over 5 years old. Paragraph 28 of SPP gives a presumption in favour of development which contributes to sustainable development. Paragraph 29 outlines the thirteen principles which should guide the assessment of sustainable development.

The proposal complies with all thirteen principles outlined within paragraph 29 of the SPP. The proposal will therefore contribute to sustainable development.

Emerging policy context

The Revised Draft National Planning Framework 4 was laid before the Scottish Parliament on 08 November 2022 for approval. As it has not completed its parliamentary process, only limited weight can be attached to it as a material consideration in the determination of this application.

On 30 November 2022 the Planning Committee approved the Schedule 4 summaries and responses to Representations made, to be submitted with the Proposed City Plan 2030 and its supporting documents for Examination in terms of Section 19 of the Town and Country Planning (Scotland) Act 1997. At this time little weight can be attached to it as a material consideration in the determination of this application.

Equalities and human rights

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

Public representations

A summary of the representations is provided below:

8 objections
1 in support
0 neutral

material considerations in objection

- Impact on residential amenity. Addressed in section C.
- Impact on the security of properties. Addressed in Section C.
- Impact on waste and recycling. The properties contain suitable refuse and recycling facilities for their proposed use.
- Mental Health impacts on neighbours. Addressed in Section C.
- Concentration of STLs. The change of use of this flat would not have a significant impact on the local community, nor on the character or sense of place of the area.
- Lack of economic benefit. Addressed in Section C.
- Located within the World heritage Site.
- Impact on housing mix. The change of use of one property will not have a significant impact on a good mix of dwelling types and sizes in the area.
- Impact on traffic congestion Addressed in section C.
- Impact on the maintenance of the listed building. Addressed in Section C.

material considerations in support

- No impact on residential amenity. Addressed in section C.
- Other nearby flats have operated as STLs for over 10 years. No Certificates of Lawful Use regarding STL use have been applied for or granted within the same building as the application site.

non-material considerations

- Impact on house prices and rental prices of neighbouring properties.
- Loss of residential accommodation.
- Loss of tax income.
- Not a material change of use.
- Property requires a licence to operate as an STL.
- Overcrowding.
- STLs result in increased crime and anti-social behaviour. Crime and anti-social behaviour are matters for Police Scotland.

Overall conclusion

The proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents. There are no material considerations that outweigh this conclusion.

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reason for Refusal

1. The proposal is contrary to Local Development Plan Policy Hou 7 in respect of Inappropriate Uses in Residential Areas, as the use of this dwelling as a short stay let will have a materially detrimental effect on the living conditions and amenity of nearby residents.

Background Reading/External References

To view details of the application go to the [Planning Portal](#)

Further Information - [Local Development Plan](#)

Date Registered: 26 August 2022

Drawing Numbers/Scheme

01, 02

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: James Armstrong, Assistant Planning Officer
E-mail: james.armstrong@edinburgh.gov.uk

Appendix 1

Consultations

No consultations undertaken.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Ms OLD TOWN ASSOCIATION

Address: 1 Trunks Close, 55 High Street, Edinburgh EH1 1SR

Comment Details

Commenter Type: Amenity Body

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This application should be refused as the use of a residential house for short-term letting means loss of residential accommodation. Short-term lets in a tenement results in noise and other disturbance for the other inhabitants, especially where there is shared access. Short-term lets as a whole destroy communities and lead to a sense of insecurity amongst remaining residents.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Ms Kirsten Nielsen

Address: 5/1 Portsburgh Square Edinburgh

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Since finding and fining b&bs without planning isn't enforced, there are far too many in the neighbourhood. It is breaking up the sense of community.

While I can see how that makes it harder for the community to object and that that could be handy for the council, it really isn't a good long term sustainable plan.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Mrs Elspeth Wills

Address: 3 Brown's Place Edinburgh

Comment Details

Commenter Type: Residents Association

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Old Town Community Council and GRASS (Grassmarket Residents Association) wish to object to all retrospective applications.

Our grounds of objection are as follows:

Shortage of housing to buy or rent is a real issue throughout Edinburgh as acknowledged by both by the current and 2030 national planning guidelines. This is particularly true of the Old Town where the voters' roll has fallen to its lowest level ever and one in three properties is now a STL. The proliferation of STLs has damaging effects not only on neighbours (Hou 7) and on building maintenance but on whole communities. Judging by the neighbour notification list there are still a few residents surviving in the area.

STLs bring few benefits to the local economy or community as most visitors stay for only 2-3 nights to have fun in the city centre.

Many properties are at the heart of the World Heritage site.

Loss of income to the Council who maintains essential services such as rubbish collection free of charge. Housing should be seen as a place for people to live in not as an investment.

We urge that this and all STL applications are turned down.

Yours sincerely

Elspeth Wills

Planning - OTCC and GRASS

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Lord Cockburn Association

Address: 1 Trunks Close, 55 High Street, Edinburgh EH1 1SR

Comment Details

Commenter Type: Amenity Body

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The information provided in this application is limited which makes its assessment difficult. However, this application appears to be related to a shared residential stair.

It is our view that in this residential shared stair context the proposed change of use is not in accordance with Policy Housing 7 'Inappropriate Uses in Residential Areas' as it would have a materially detrimental effect on the living conditions of other residents of the main door accessed residential stair, and so should not be permitted.

It is our view that the proposed change of use from residential to short term visitor accommodation is not consistent with Policy Hou 2 'Housing Mix' as it would detract from the provision of a mix of local house types and sizes able to meet a range of local housing needs, including those of families, older people and people with special needs, and it does not have regard to the character of the surrounding area.

The proposed change of use is not supportive of either Scottish Government Housing policy on more homes - "everyone has a quality home that they can afford and that meets their needs" or Scottish Planning Policy on "socially sustainable places" and "supporting delivery of accessible housing".

For these reasons we object to the conversion of this property from long-term residential to short-term commercial use.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Dr The Architectural Heritage Society of Scotland

Address: 15 Rutland Square, Edinburgh EH1 2BE

Comment Details

Commenter Type: Amenity Body

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The AHSS Forth & Borders Cases Panel has examined the proposals for the change of use to short-term let in a tenement within the Old Town Conservation Area and World Heritage Site, and objects.

- 1) The proposals only relate to one property within the tenement, which is accessed from a shared stair. This would have a detrimental impact on the residential amenity of neighbouring properties, and limits the future of the flats not included within the application.
- 2) The change of use would contribute to the unsustainable growth of the short term let (STL) sector in Edinburgh. The economic benefits of tourism for Edinburgh are clear, and we celebrate the role that our architectural heritage plays in this sector. However, the current rising rate of STLs threatens the sense of place and community which are part of the city's attraction, and this is especially acute in the World Heritage Site.
- 3) Scottish Government Research has highlighted the links between STLs and the negative impacts of reduced availability of affordable housing, congestion and reduced quality of life through noise and disturbance (People, Communities and Places, October 2019, pp. iv-v)
- 4) With particular reference to architectural heritage the responsibility for the care and maintenance of communal areas and aspects of joint responsibility in listed buildings and conservation areas is diminished by the increase of short-term occupants.

The change of use does not respect the building's location in the World Heritage Site, and would increase the negative impacts caused by the growth of STLs in Edinburgh.

The proposals contradict Edinburgh Council's Local Development Plan policies DES1 (Sense of place), DES5 (amenity of neighbours/refuse and recycling facilities), and HOU7 (Materially detrimental effect on the living conditions of nearby residents). We therefore object to the

application.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Mrs Alison Russell

Address: 6/2 King's Stables Road Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I am aware of the heated controversy surrounding the growth in the number of Edinburgh's short-term lets but, as a nearby neighbour, I support this application.

We are surrounded by a mixture of occupancy types: shops, restaurants, pubs, cafés, offices, an apartment hotel, hotels, fast-food outlets, student accommodation and apartments (residential and short term let). Aside from the impact of the residents, guests and clients, each of these activities has to be serviced with supplies, waste disposal, cleaners. Every one of them has an impact on my property.

From a planning perspective, in this locality, I see no material impact on the enjoyment of my own property of granting the applicant the right use his property as a short term let and would support the application.

I would make four additional points:-

1) The impact on others, particularly direct neighbours, will be mitigated, if not entirely eliminated, by the mandatory conditions and extensive additional conditions in the licence which will soon be required for every Short Term Let (the result of Edinburgh City Council's consultation is expected imminently). These conditions have been extensively consulted upon by the Scottish Government, Scottish Parliament and, subsequently, Edinburgh City Council precisely to ensure that they address the perceived impact on neighbours of a Short Term Let. If they do not, then the extensive and lengthy consultation process and resulting measures will not have achieved their desired effect. So long as these conditions are robustly enforced (as they should be) then the adverse impact on immediate neighbours will be addressed promptly and effectively;

2) The change of use would appear to be minimal especially given the long period during which this has operated as a short term let without, according to the applicant, complaint. It is likely that some of the apartments within the tenement will have operated for over 10 years, meaning planning permission can no longer be required, and so the tenement automatically comprises - and may always comprise - mixed residential and short term let use. The incremental impact (if there is any) of this studio continuing to operate as a short term let under licence is unlikely to be material.

3) If permission is granted for short term let use (as I believe it should), it is my understanding from consultation documents relating to the creation of short term let planning control areas that permission would automatically be granted in the event that the property returned to residential use. This appears to be a strong indication that the types of use are very similar (otherwise permission should be required for the return to residential use) and that will be even more the case if and when the proposed additional licence conditions are included within short term let licences. Those licence conditions will have the effect of making the use of the property almost identical to residential use, albeit occupied by guests rather than an owner or tenant;

4) If a licence condition is breached, the licence will be revoked and, from a licensing perspective, could no longer be operated as a short term let. This would then oblige the property to be returned to residential use. This means that compliance with the licence conditions will be of paramount importance for anyone seeking to operate a short term let. That will provide a very important safeguard for neighbours.

In summary, the effect of the extensive short-term let licensing conditions is a very relevant consideration for assessing the planning permission request. That effect will be to render use as a Short Term Let almost identical to that of residential use. Accordingly, I would support the application.

Comments for Planning Application 22/04143/FUL

Application Summary

Application Number: 22/04143/FUL

Address: Flat 11 1B Grassmarket Edinburgh EH1 2HY

Proposal: Change of use from residential to short-term let (in retrospect).

Case Officer: Local1 Team

Customer Details

Name: Dr Moritz Linkmann

Address: 1b/28 Grassmarket Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The application concerns a property in a building that comprises 32 flats, all of which are accessible through a common stair. I estimate about half of these to be currently let on short-term basis.

Apart from general issues caused by short-term lets such as noise, disturbance, parking demand, and a shortage of long-term renting opportunities, there are specific concerns to be raised in connection with this building.

1) Damage and littering.

The walls of the common stair get easily damaged by suitcases carried up and down, leading to costs that eventually must be shared between all property owners in the building. Litter is regularly left behind in the common stairwell and has been deposited in the cupboards housing the water supply for fire brigade, to the extent of blocking the connections altogether.

2) Noise and disruption.

As short-term tenants are mostly holiday-makers choosing to stay in a busy part of the city, in my experience they tend to be active late at night, resulting in noise in the common stairwell, when entering or leaving the property or by lingering in front of it. The latter two points are specifically relevant as access to the property is through the common stair and subsequently via access balconies facing an internal courtyard. The majority of properties in the building and in the neighbouring buildings have windows into this courtyard, and will thus be adversely affected by noise resulting from tenants accessing the property or spending time outside on the access balcony at night. Tenants tend to do this often as smoking is usually not permitted in short-term lets.

3) Security and Community.

Due a frequent turnover of strangers in the stair, and a lack of long-term tenants, it is virtually impossible to build up a community of neighbours in the stair. This also results in loss of security as it is often unclear whether someone who is trying to access the stair is entitled to do so. Unauthorised access is a problem. For instance, the basement has been broken into three times over in the last 1.5 years, parcels and mail disappears and letterboxes have been forced open.

4) A short-term let would most likely house a greater number of people at a given time that can be expected to live long term within a one-bedroom flat. This level of occupation would intensify the level of activity compared to if it were occupied by a single household, and thus intensify the adverse aspects listed in points 1)-2).