



THE CITY OF EDINBURGH COUNCIL

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: planning.support@edinburgh.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100634006-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

[X] Applicant [ ] Agent

Applicant Details

Please enter Applicant details

Form fields for Applicant Details including Title (Ms), First Name (Lynda), Last Name (Christie), Building Name, Building Number (35), Address 1 (Regent Place), Town/City (Edinburgh), Country (UK), and Postcode (EH7 5BG).

## Site Address Details

Planning Authority:

City of Edinburgh Council

Full postal address of the site (including postcode where available):

Address 1:

7 BROAD WYND

Address 2:

NORTH LEITH

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

EDINBURGH

Post Code:

EH6 6QZ

Please identify/describe the location of the site or sites

Northing

676476

Easting

327110

## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Change of use from residential property to short term let. It will remain a ground floor, main door, self-contained two-bedroom property with no alterations. A maximum of four guests. Impact on neighbours will be slight as it is main door flat with no communal areas.

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Please refer to the supporting appeal statement and appendices enclosed.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

Appeal Appendices: Appendix 1 - Local Land Use Map, Appendix 2 - External and Internal Photographs. There have been provided to respond to the matters raised by the officer in their report of handling which accompanies the refusal notice.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

For the Appeal: Appendix 1 - Local Land Use Map, Appendix 2 - External and Internal Photographs. From the Previous Application: Appendix 3 - CEC Decision Notice and Handling Report, Location Plan and Floor Plans, Planning Statement

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

22/05796/FULSTL

What date was the application submitted to the planning authority? \*

24/11/2022

What date was the decision issued by the planning authority? \*

05/04/2023

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may select more than one option if you wish the review to be a combination of procedures.

Please select a further procedure \*

By means of inspection of the land to which the review relates

Please explain in detail in your own words why this further procedure is required and the matters set out in your statement of appeal it will deal with? (Max 500 characters)

I would be grateful if Members undertook a site visit to understand the particular characteristics of the site to inform their review.

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Ms Lynda Christie

Declaration Date: 29/06/2023

**22/05796/FULSTL**

**Change of Use (Retrospective) from Residential to Short Term Let**

**7 Broad Wynd, Leith, EH6 6QZ**

**Local Review Body – Appeal Statement**

**July 2023**



This statement is submitted in support of my appeal to the Local Review Body against the decision by the City of Edinburgh Council to refuse my planning application (Reference 22/05796/FULSTL) on 4 April 2023, for the *“Change of use (retrospective) from residential to short-term let. It will remain a ground floor, main door, self-contained two-bedroom property with no alterations. A maximum of four guests. Impact on neighbours will be slight as it is main door flat with no communal areas.”* at 7 Broad Wynd, Leith, EH6 6QZ.

This appeal statement is supported by the following evidence:

- Land use plan of surrounding area (Appendix 1)
- Photographs of flat and surrounding area (Appendix 2)
- Documents from the original application (Appendix 3)
  - CEC Decision Notice and Handling Report
  - Location Plan and Floor Plans
  - Planning Statement

### **Site Location and Proposal**

The property is a two-bedroom flat located on the northern side of Broad Wynd. The property has its own main door access to the street. Of the two bedrooms, one is moderate in size and the other is small and can only accommodate a small double. Typically, occupancy of the property is therefore generally 3 people (22% of bookings), but most stays are typically two guests (44% of bookings). The remainder of bookings tend to be small families (4 people) or solo travellers (1 person).

The ‘Land Use Plan’ at Appendix 1 shows the proximity of neighbouring commercial uses. Notably the building on the corner of Broad Wynd and Water Street, less than 20m from my front door, was recently approved at committee (24 May 2023) for a *“change of use from warehouse to aparthotel”* (Ref [22/06426/FUL](#)). This introduces 45 new apart hotel bedrooms into the local area. My property is the only ground floor residential property which directly faces onto and is accessed via Broad Wynd.

The property is part of a Category A Listed Building, ‘3 Carpet Lane and 42 The Shore’. It is also within the Leith Conservation Area. The HES description references No 7 Broad Wynd specifically, due to its unique multi-pane glazed shopfront. Prior to being converted to residential use in the late 20<sup>th</sup> century, historically, the property was a shop occupied by *“Slimon, E & D, manufacturing and furnishing ironmoners, copper and tin smiths and ship chandlers”*, as evidenced by the writing that is still visible above the door (see cover picture).

### **Appellant’s Personal Statement**

I have spent almost my entire life working for the public sector, principally the NHS. In 2016, after working for NHS Lothian for 25 years, I applied for early retirement. I left a stressful job running an intensive treatment and support service for high-risk opioid users. I felt I had given my all, had developed a chronic, life altering health condition and wanted to pursue a new direction.

I invested my pension lump sum in property and began working as a STL host. First, I had a property on the Canongate which I sold in 2021 in anticipation of the expected changes in STL legislation. I spent 6 months (without an income) looking for a property which was ground floor, main door, not in a shared stair and as self-contained as possible to minimise any impact on neighbours and meet the guidance at that time. When I found 7 Broad Wynd I paid considerably over the asking price to secure the purchase. I did this because I felt confident that this property would be a sound investment of my

pension and would provide an ongoing income as well as a new life opportunity. I spent money refurbishing the property, planning the decor, and sourcing classic furnishings from local sellers.

In October 2021, one year prior to the introduction of the control area, I started as a STL, marketing the property as The Ironmonger's Store - a reference to the history of the building as it was originally a shop supplying hardware to the shipping industry in Leith. I love running the Ironmonger's as a STL and I get a huge amount of pleasure from maintaining the property and sourcing new furniture and fittings. I can use the space to develop my interest in interior design and as a gallery for my own photography which focuses on the industrial landscape of Edinburgh. It's important to me that my guests enjoy their stay and have a wonderful experience in Leith. I am proud of what I have achieved, the business I have built and the pleasure I am able to provide for my guests. I am lucky the Ironmonger's has been invited to join premium holiday letting sites such as Sawday's and the Plum Guide. Both these sites require a vetting procedure to be completed prior to listing and their guests tend to be international travellers who stay in quality accommodation.

Aside from tourists, the property also allows me to provide accommodation for my family, in particular my son who lives in London but frequently visits with his partner. Two of my siblings live in England with their families and stay when making trips back home to see other family members. Being able to support my family in this way brings me a huge amount of personal satisfaction. As with my family, I also accommodate many guests who come to Edinburgh to visit their families for weddings, graduations, important birthdays, and other family milestones. A significant number of guests also come to Edinburgh for work related stays and do not want to be in a hotel with no access to a kitchen or work space. For example, I have had guests working at the universities, hospitals, and other large employers. I often have people who work remotely using the property as a work base combined with a holiday.

There have been no complaints from neighbours in the time that I have been operating and, as I clean the property myself, it is clear to me that guests are respectful of the accommodation. It is always left clean and tidy and there has never been any damage.

The refusal of planning permission for 7 Broad Wynd has had a devastating personal effect on me. I have felt shocked, anxious, and depressed about my future. I feel as though, through absolutely no fault of my own, my livelihood has been taken away from me. After investing a significant amount of money in my future I will now no longer be able to continue trading as a STL, despite meeting the planning requirements at the time of submission in November 2022. The retrospective nature of this legislation feels particularly unfair and punitive.

During COVID I was unable to operate as a STL and did not receive any financial help from HMRC. On purchasing this property, I hoped to be able to get back on my feet financially, so the timing of this legislation post COVID also feels incredibly punitive. On top of the massive financial worry I am now facing, my sense of purpose in life and my personal satisfaction in my work has been removed. I am in effect being made redundant.

I find it incredibly hard to reconcile the decision to refuse planning for 7 Broad Wynd when planning has been subsequently granted to the development of a 45-bed aparthotel on Water Street which is 20m from my building. Considering this decision was supported, there can surely be no debate about the effect of my small property on the local amenity.

This decision feels unfair and biased against small operators like me who are being treated differently and having their livelihoods wiped out. I invested my pension in what I judged to be a sound business venture, based on the available guidance at the time, which would secure me (a single person) an

ongoing income and provide a legacy for my two sons. I also hoped it would provide me with the personal sense of achievement and pride I used to feel when working for the NHS. I cannot emphasise enough how devastating the refusal of planning permission has been for my mental health and my belief in the fairness of local decision making.

### **Grounds of Appeal**

The Council's Report states that the reasons for refusal are:

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.
2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of 'Local Amenity' and 'Loss of Residential Accommodation', as the use of this dwelling as a short stay let will result in an unacceptable impact on local amenity and the loss of a residential property has not been justified.

I address each in turn below:

#### **Policy Hou 7 - Impact on Amenity**

The officer describes the site as *"mixed character, featuring residential and commercial uses"*. Yet considers that, the use of the property for STL use would be, *"significantly different from the ambient background noise that neighbouring residents might reasonably expect and will have an unacceptable effect on the living conditions and amenity of nearby residents"*. These statements do not seem to correlate.

Given the property is a main door, with private access, the only interaction of my guests with neighbours that is possible, would be on the street outside the property, from guests entering and leaving the premises.

However, there are no other residential properties at ground floor, or entrances to any other residential properties at upper floors on Broad Wynd. There is therefore no risk of guests disturbing neighbours by walking past their ground floor bedrooms. The only entrance on the street is to the building directly opposite, which is a photography studio and a film studio. There are no properties adjacent to the east of the property, as it forms the gable end. Instead, there is a car park which is well used and has associated disturbance of car engines and people opening and closing doors.

The nearest other residential property is above my property, but their property is accessed via The Shore. There is no entrance for this property on Broad Wynd. They are also already located next to commercial uses, as the property directly adjoined to us on the western boundary is a commercial office (Waterside House), as well as numerous bars / pubs on The Shore, as demonstrated at Appendix 1.

To highlight the inconsistency of approaches taken by the Council, I refer to the recent approval for 45 new apart hotel bedrooms at 23 Water Street (22/06426/FUL), less than 20m from my front door, determined after my application was refused.

In their report for this application, the officer says, *"the proposed use of the building as a Class 7 hotel, without bar or kitchen facilities, is not considered to be a noise generating use"*. They also say, *"due to the mixed nature of the surrounding premises and the existing background traffic noise travelling over cobbles, the proposed use is unlikely to impact upon residential amenity any more than the existing and surrounding premises do at present"*.



I really do struggle to see therefore why my own application should be refused on the grounds of amenity, when it will present far less of an issue than a 45-bed hotel development, which would have considerably greater comings and goings on the same street, given it is the most direct route to the amenities of The Shore. They are in fact proposing a new entrance / fire escape onto Broad Wynd itself at the end of the building, closest to my property.

If it has been concluded that this will have no impact on residential amenity (those same neighbours I am deemed to impact), then surely the same must be said for my own application with only two bedrooms and a maximum occupancy of four people, given all interaction is going to be on the street not within the stairwell itself.

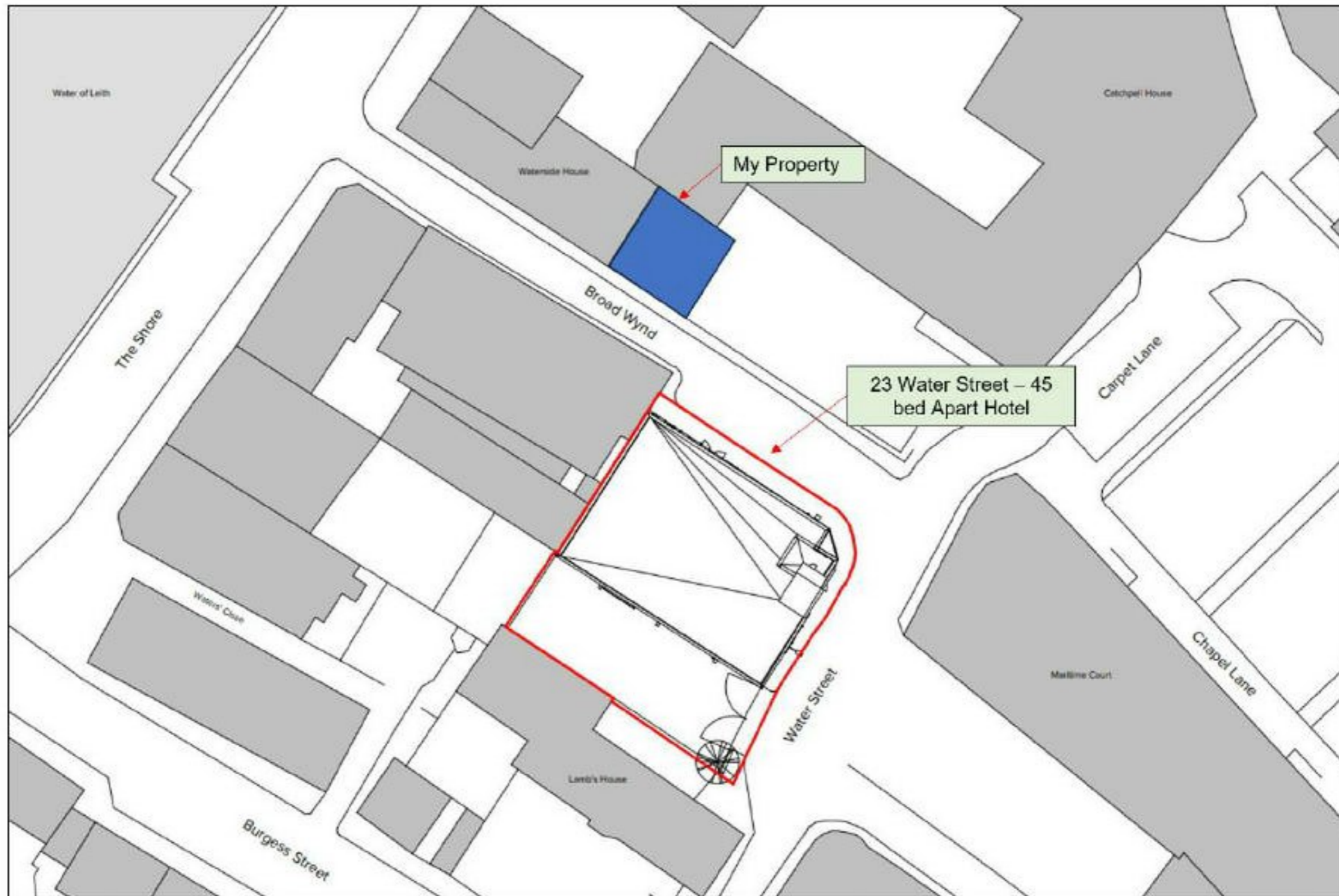


Figure 1: Proximity of 23 Water Street - 45 Bed Apart Hotel to 7 Broad Wynd (Appeal Site)

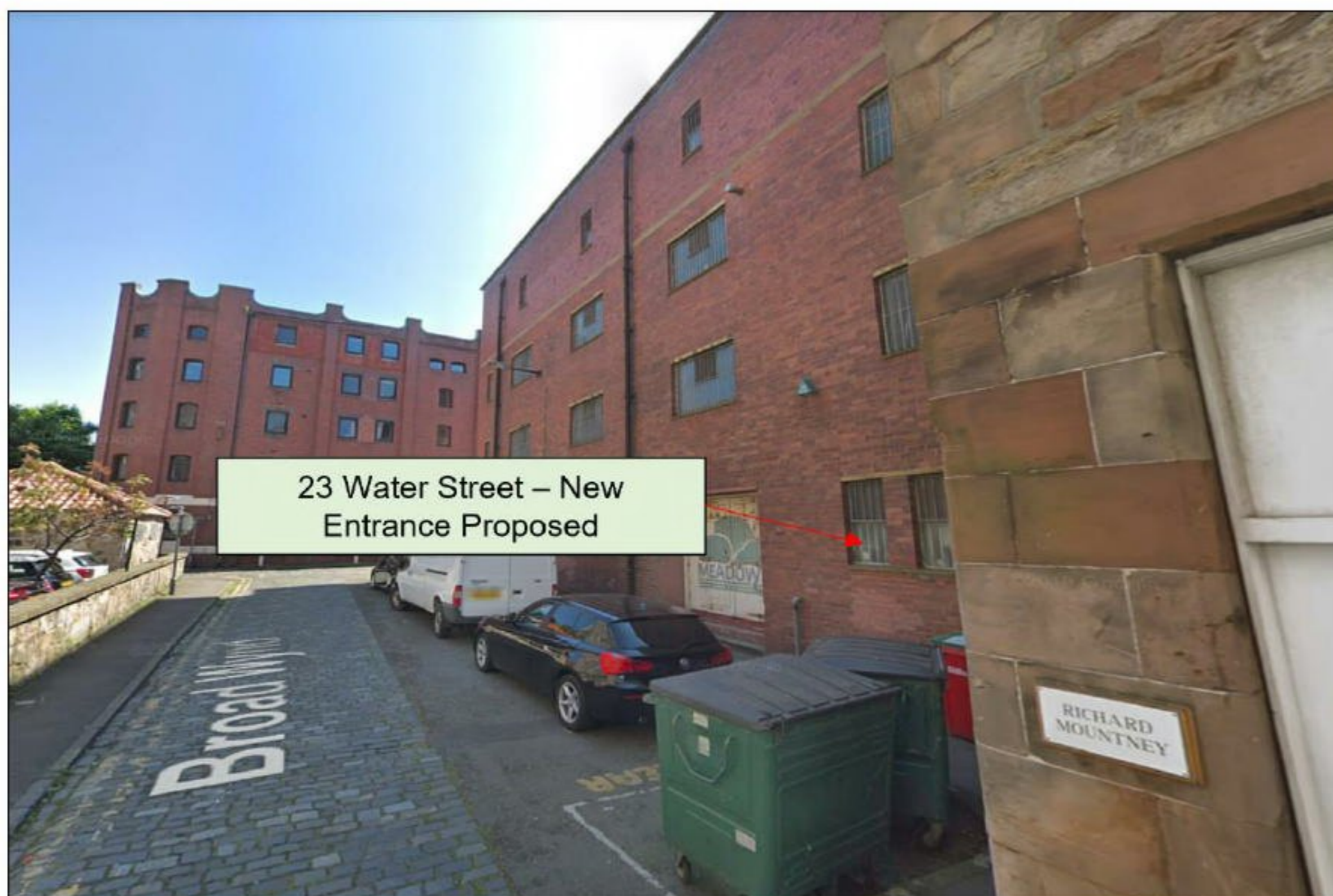


Figure 2: View of 23 Water Street from outside my property. New entrance is proposed approximately at location behind the green bins.

Members must also consider that a licensing scheme has been introduced, and that a key function of this is to investigate and manage noise disturbances or anti-social behaviour associated with STL use. One of the stated purposes of the STL licensing scheme, as taken from the Scottish Government's guidance document for hosts and operators (March 2022) is: *"to assist with handling complaints and address issues faced by neighbours effectively"*.

The City Council's own short term let licensing policy states that where complaints are received in relation to the operation of a licensed short-term let accommodation, the Council will seek to resolve it through engagement with the host or operator in the first instance. Where this is not possible, the Council can also consider:

- a) Additional licence conditions applied on determination of an application or through variation of an existing license.
- b) Compliance notices.
- c) Variation, suspension, or revocation of licence; or
- d) Report to the Procurator Fiscal of any alleged offences under the 1982 Act.

To my mind, the above measures provide adequate safeguarding for any neighbouring properties to protect their amenity in the future long-term.

#### **NPF4 Policy 30(e) - Loss of Amenity and Loss of Residential Accommodation**

I have addressed Policy 30 (e) part (i) above in relation to the loss of amenity and do not believe there is any unacceptable impact.

NPF4 policy 30 (e) part (ii) requires that where there is a loss of residential accommodation, this will only be supported where the loss is outweighed by demonstrable local economic benefits.

I accept that there is a need for housing in the city and understand the rationale for this policy. However, I consider in this case, that loss is outweighed by demonstrable local economic benefits as follows:

- It allows travellers to 'live like locals'. Guests are looking for a more authentic tourist experience and want to soak up the local atmosphere of the neighbourhood, choosing to spend their time and money locally.
- To promote the amazing range of local businesses and give guests an authentic experience of Leith, I provide a list of local recommendations. Guests use this information as in reviews of my property, 65% of reviews mention the local hospitality venues. For example:
  - MaryAnn said, 'We were provided with recommendations for food & drink nearby and she was spot on' (November 2022).
  - Another reviewer said of the area 'It's full of the best restaurants - the two we booked were 3 min walk from the apartment'.
  - Bella had also eaten locally saying 'So many lovely restaurants/coffee shops to choose from - all of them listed by Lynda'.
  - Often guests will book to stay specifically because they have a reservation at one of the Michelin starred restaurants (The Kitchen and Martin Wishart) as both are close to the property.

I also provide a guest book to encourage guests to share their own local recommendation. The following examples provide evidence that my guests are choosing to eat and drink locally and are therefore benefiting the local economy.

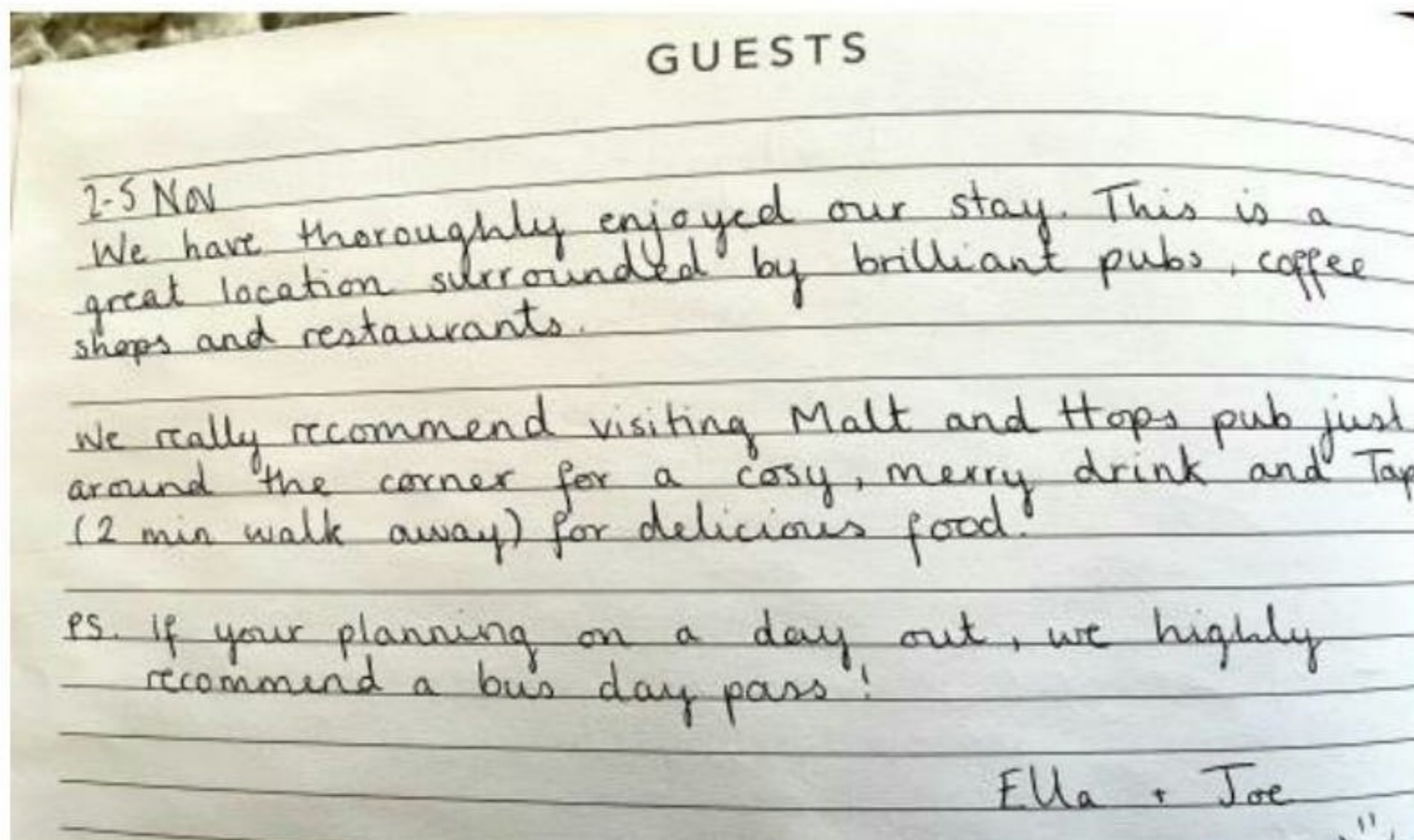


Figure 3: Example Guest Review 1

20th March 2022

## GUESTS

We had a lovely return visit to Leith and staying at Broad Wynd which was an excellent place to explore further from as well as being beautifully presented and extremely comfortable.

Would recommend Ostara on Coburg Street for brunch as well as Razzo pizza and Orinoco Latin Food if "posh" takeaways are more your thing!

Leith is quickly becoming one of our favourite spots in Scotland and with the lovely weather we had would highly recommend the Water of Leith walk.

Thank you for a great stay Lynda and who knows, we maybe back again soon!

Chris and Debbie

Figure 4: Example Guest Review 2

## GUESTS

1st of June 23

We stayed here for Marathon weekend and couldn't have asked for a better place to stay. Thank you so much! Some of our highlights from Leith include Kesban (Turkish Restaurant) was fantastic - order the falafel Super hungry and really reasonable, Ice cream just up the road and brunch at boat.

Would definitely recommend staying here to friends. Great place, fab host and perfect location!

Thanks 😊 Ella, Alex, Sophie & Kat.

Figure 5: Example Guest Review 3

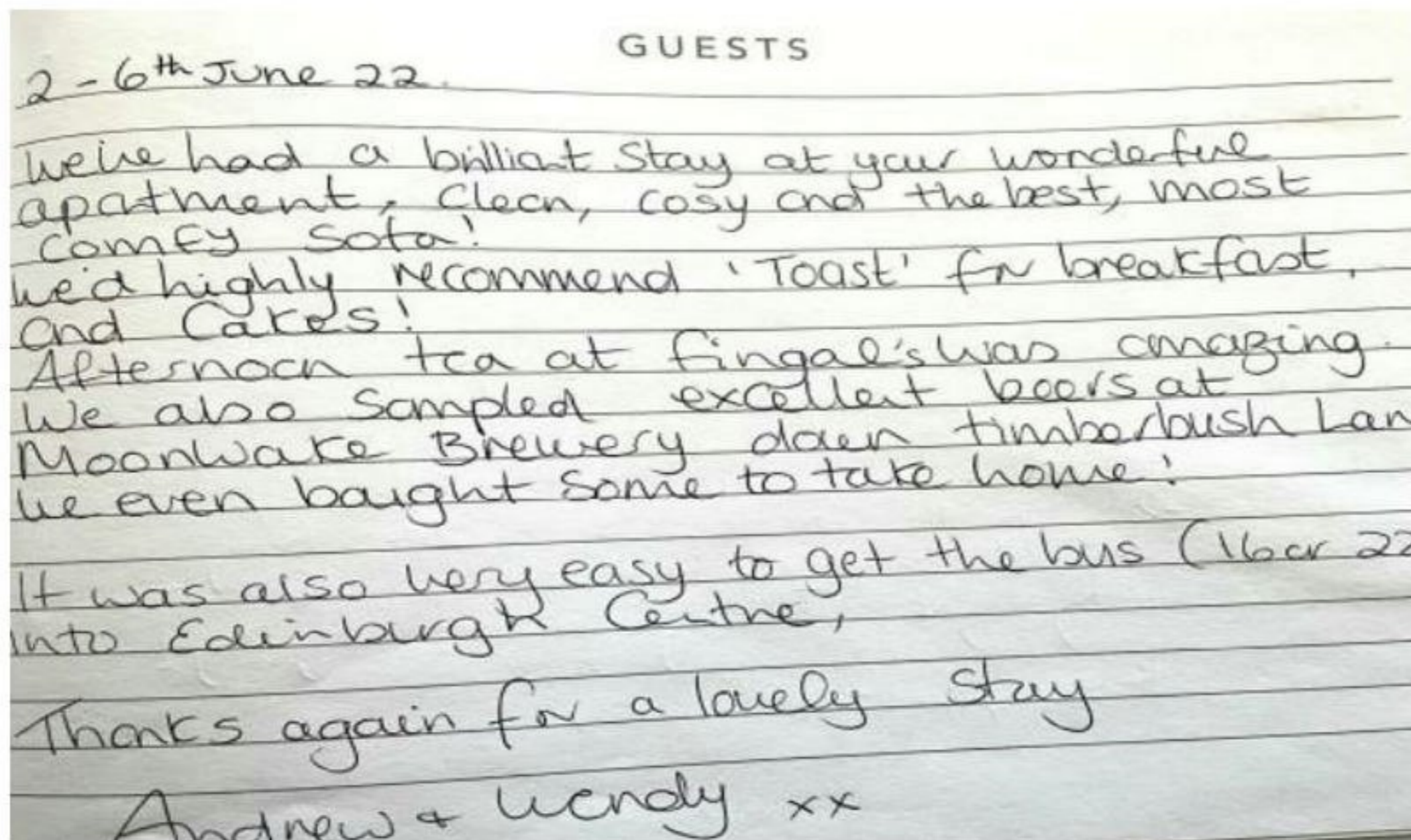


Figure 6: Example Guest Review 4

In addition to the above, I spoke to managers from five local venues about the economic impact of tourism in the area. All agreed that tourism from STLs contributed to their economic prosperity. For example:

- Kevin, the manager at Malt and Hops, told me that tourists 'provide a massive uplift in trade' especially during the summer months and at Hogmanay. Anecdotal evidence supports this as my guests at Hogmanay told me they spent the entire evening in the Malt and Hops. Kevin also said that as a venue they were very supportive of having STL in the area.
- Danny at the Shore Bar and Restaurant was similarly positive and said that trade from tourists contributed to 50% and perhaps even 60% of trade at peak season. He said that people often say they are staying in a STL locally and that it has a positive impact on their business.
- Ian, the manager at The Kings Wark, reported that trade had still not bounced back to pre-pandemic levels but in 2019 tourists accounted for 50% of their business.

I'm aware that the Council have recently published a report entitled 'Economic Impact of Residential and Short Term Let Properties' looking at the benefits of STL vs Residential Use which concludes that the GVA effects are greater for residential uses than STLs, although it is noted that the employment effects are greater for STLs in most cases.

There are several flaws, in my opinion with this report:

- Transport costs appear to be included for residents but excluded for STL guests – surely this should be included as it all goes back into the local economy (taxis / lothian buses)
- It assumes a 71% occupancy rates for a 2-bed property in Leith. My occupancy rate is typically 83% over the year, but in the summer, can reach 100% a month, thus far exceeding that.
- It does not appear to take account of the fact that hosts salaries / livelihoods are provided for / supplemented by their STL, like in my case, as explained in my personal statement.
- It does not reflect that as an STL host, I also contribute to the local economy. I shop in the local Aldi supermarket for all cleaning and hospitality supplies, and I employ local trades people from Leith such as plumbers and electricians who use local wholesalers for materials, and again derive a valuable income from regular work on STL properties like mine.

It is interesting to note that the report assumes that those spending more on accommodation are likely to spend less during their stay. If this is true, it surely only supports greater consideration being given to supporting local STL providers like me. If all STLs are wiped out by the current policy position or considerably reduced in number, it will inevitably reduce the availability of accommodation, forcing people into hotels/commercial tourist accommodation, and push prices up significantly. The outcome will only be that the local economy in areas like Leith, where there is a more limited choice of alternative accommodation, suffers detrimentally as a result and will have an adverse impact on all those local businesses I refer to above.

The policy also does not allow for instances where a complete 'loss' of residential accommodation is not taking place. As I have described above, I use the property, as do my family and friends. Under the definition of STLs, this type of use is not included. I also let the property to people working away from home in the city, or here on business, and this could not be described as 'short term holiday letting'. This policy is too blunt a tool for the multiple ways in which my property is used and provides such a narrow view of what benefits and types of accommodation STLs provide in the city.

I would also like to note that if the case officer had determined the application by the target determination deadline of 23 January 2023, I understand that NPF4 Policy 30 would not have been a consideration, having only come into force on 13 February 2023. Instead, a decision was not issued until 5 April 2023, over 4 months after I submitted the application, over which I had no control.

The Council have recently allowed permission for a STL at 29C Blair Street, despite the loss of residential accommodation, because it is in a busy city centre location, with no impact on residential amenity. I have demonstrated above why there will not be an amenity impact, and the nature of surrounding uses, which include pubs/bars, which make my case similar in many respects.

If I am forced to return this property to long term residential use (letting), this will become the only residential address at ground floor on this street. The predominant footfall on the street will be associated with those visiting the commercial uses and the apart hotel once operational. Given that both bedrooms face directly onto the street, it is inevitable that there will be disturbance from passers-by, and this is why this particular property suits holiday makers looking to stay in the heart of the city so well, and why I purchased it in the first instance. During the time that building work is going on to complete the apart hotel opposite, any long-term tenants would also be subject to constant noise, dirt, traffic, and disruption from the construction process, which for any long-term resident looking to work from home would prove to be a nightmare.

Given the unique location of my property, the nature of surrounding uses (and increasing footfall from an apart hotel), the direct local economic benefits that I have outlined specific to me and my use of the property, I hope that Members can take a fair view of my case and I can continue providing a valuable and much needed service to visitors to our beautiful City.

### **Summary**

In summary, I hope that the LRB committee can allow this proposal, as I have clearly demonstrated that there will be no detrimental impact on neighbouring amenity, given the existing ambient background noise provided by neighbouring uses. I have also highlighted the inconsistency in the officer's reporting, given the recent approval of a 45-bed apart hotel opposite my property, where it was considered there would be no adverse impact on amenity in direct contrast to the comments made on my own application. Given the numerous 'local economic benefits' I have described, I believe these far outweigh any partial loss of residential accommodation in this case, both to me personally, and the wider local economy.

Ms Christie  
35 Regent Place  
Edinburgh  
EH7 5BG

**Decision date: 5 April 2023**

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

Change of use from residential property to short term let. It will remain a ground floor, main door, self-contained two-bedroom property with no alterations. A maximum of four guests. Impact on neighbours will be slight as it is main door flat with no communal areas.

At 7 Broad Wynd Edinburgh EH6 6QZ

**Application No: 22/05796/FULSTL**

**DECISION NOTICE**

With reference to your application for Planning Permission STL registered on 24 November 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;

**Conditions:-**

1. No conditions are attached to this consent.

**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.

2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this dwelling as a short stay let will result in an unacceptable impact on local amenity and the loss of a residential property has not been justified.

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:

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](mailto: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](http://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](mailto: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.

;;

# Report of Handling

**Application for Planning Permission STL  
7 Broad Wynd, Edinburgh, EH6 6QZ**

**Proposal: Change of use from residential property to short term let. It will remain a ground floor, main door, self-contained two-bedroom property with no alterations. A maximum of four guests. Impact on neighbours will be slight as it is main door flat with no communal areas.**

**Item – Local Delegated Decision  
Application Number – 22/05796/FULSTL  
Ward – B13 - Leith**

## **Recommendation**

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

## **Summary**

The proposal is acceptable with regard to Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will not harm the listed building or its setting and it will preserve or enhance the character or appearance of the conservation area.

The change of use of this property to a short term let will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the adverse impact on residential amenity or the loss of residential accommodation.

The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and 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 two bedroom flat located on the northern side of Broad Wynd. The property has its own main door access to the street.

Broad Wynd is of mixed character, featuring residential and commercial uses. Public Transport links are relatively accessible from the site.

### **Description Of The Proposal**

The application is for a change of use from Residential to Short Term Let (STL) (sui-generis).

The application property is part of a category A listed building, 3 Carpet Lane and 42 The Shore (Donaldson's Warehouse), LB27078, 12/12/1974.

The application site is in the Leith Conservation Area.

### **Supporting Information**

- Planning Statement.

### **Relevant Site History**

No relevant site history.

### **Other Relevant Site History**

No other relevant site history was identified.

### **Consultation Engagement**

Historic Environment Scotland

### **Publicity and Public Engagement**

**Date of Neighbour Notification:** 5 April 2023

**Date of Advertisement:** 9 December 2022

**Date of Site Notice:** 9 December 2022

**Number of Contributors:** 3

## **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 24, 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Having regard to the legal requirement of Section 24(3), in the event of any policy incompatibility between National Planning Framework 4 (NPF4) & Edinburgh Local Development Plan 2016 (LDP) the newer policy shall prevail.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling material considerations for not approving them?

If the proposals do not comply with the development plan, are there any compelling material considerations for approving them?

In the assessment of material considerations this report will consider:

- equalities and human rights;
- public representations; and
- any other identified material considerations.

## **Assessment**

### **a) The proposals harm the listed building or its setting?**

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

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

- o Managing Change in the Historic Environment: Guidance on the principles of listed buildings
- o 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, its setting, or the setting of neighbouring listed buildings. 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 Leith Conservation Area Character Appraisal emphasises the area's unique and complex architectural character, the concentration of buildings of significant historic and architectural quality, the unifying effect of traditional materials, the multiplicity of land use activities, and the importance of the Water of Leith and Leith Links for their natural heritage, open space and recreational value.

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 comply with Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

**c) The proposals comply with the development plan?**

National Planning Framework 4 (NPF4) was adopted by the Scottish Ministers on 13 February 2023 and forms part of the Council's Development Plan. NPF4 policies supports the planning and delivery of Sustainable Places, Liveable Places and Productive Places and are the key policies against which proposals for development are assessed. Several policies in the Edinburgh Local Development Plan (LDP) are superseded by equivalent and alternative policies within NPF4.

The relevant NPF4 and LDP 2016 policies to be considered are:

- NPF4 Sustainable Places Tackling the climate and nature crises Policy 1.
- NPF4 Sustainable Places Historic assets and places Policy 7.
- NPF4 Productive Places Tourism Policy 30.
- LDP Housing Policy Hou 7.
- LDP 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 historic assets.

The non-statutory 'Guidance for Businesses' is a material consideration that is relevant when considering change of use applications.

Listed Buildings, Conservation Area and World Heritage Site

There are no external or internal works proposed and as such there will not be a significant impact on historic assets or places. The proposal complies with NPF 4 Policy 7.

### Proposed Use

With regards to NPF 4 Policy 1, the proposed change of use does not involve operational development resulting in physical changes to the property. The proposals will have a negligible impact on the global climate and nature crisis.

NPF 4 Policy 30 seeks to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with our net zero and nature commitments, and inspires people to visit Scotland. Criterion 30 (b) and (e) specifically relate to STL proposals.

LDP Policy Hou 7 (Inappropriate Uses in Residential Areas), seeks to protect residential amenity.

The non-statutory Guidance for Businesses states that an assessment of a change of use of dwellings to a short term let 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 term lets 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".

### *Amenity*

The application property has its own main door access and is located within an area of mixed character. There is a low to moderate degree of activity in the immediate vicinity of the property at any time.

The use of the property as an STL would introduce an increased frequency of movement to the property. The proposed two 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. However, this would be of lesser impact as it is likely that servicing would be conducted during the daytime.

This would be significantly different from the ambient background noise that neighbouring residents might reasonably expect and will have an unacceptable effect on the living conditions and amenity of nearby residents. The proposal does not comply with NPF 4 policy 30(e) part (i) and LDP policy Hou 7.

#### *Loss of residential accommodation*

NPF 4 policy 30 (e) part (ii) requires that where there is a loss of residential accommodation, this will only be supported where the loss is outweighed by demonstrable local economic benefits.

Paragraph 220 of the LDP acknowledges that tourism is the biggest source of employment in Edinburgh, providing jobs for over 31,000 people. The use of the property by guests and the required maintenance and upkeep of STL properties are likely to result in a level of job creation and spend within the economy which can be classed as having an economic benefit.

The applicant has provided a planning statement outlining the location of the property as popular with tourists, as being of benefit to local shops, hospitality venues, and the local economy.

However, the use of the property as an STL would result in the loss of residential accommodation, which given the recognised need and demand for housing in Edinburgh it is important to retain, where appropriate.

Furthermore, residential occupation of the property also contributes to the economy, in terms of providing a home and the spend in relation to the use of the property as a home, including the use of local services and resultant employment, as well as by making contributions to the local community.

In this instance it has not been sufficiently demonstrated that the loss of the residential accommodation is outweighed by demonstrable local economic benefits arising from the STL use. As such, the proposal does not comply with NPF 4 30(e) part (ii).

#### Parking Standards

There is no motor vehicle or cycle parking. This is acceptable as there are no parking requirements for STLs.

The proposal complies with LDP Policies Tra 2 and Tra 3.

#### **Conclusion in relation to the Development Plan**

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the impact on residential amenity or loss of residential accommodation. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7.

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

The following material planning considerations have been identified:

#### Emerging policy context

City Plan 2030 represents the settled will of the Council, and it has been submitted to Scottish Ministers for examination. As such, limited 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:

3 objections

#### *material considerations in objection*

- Loss of residential accommodation. Addressed in section C.
- Impact on residential amenity. Addressed in section C.
- Impact on the local community. The change of use of one property to STL use will not have a significant impact on the local community.

#### *non-material considerations*

- None

#### **Conclusion in relation to other material considerations**

The proposals do not raise any issues in relation to other material considerations identified.

#### **Overall conclusion**

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the the adverse impact on neighbouring amenity or loss of residential accommodation. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

### **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following;



## Conditions

1. No conditions are attached to this consent.

## Reasons

### 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.
2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this dwelling as a short stay let will result in an unacceptable impact on local amenity and the loss of a residential property has not been justified.

## Background Reading/External References

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

**Further Information - [Local Development Plan](#)**

**Date Registered: 24 November 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](mailto:james.armstrong@edinburgh.gov.uk)

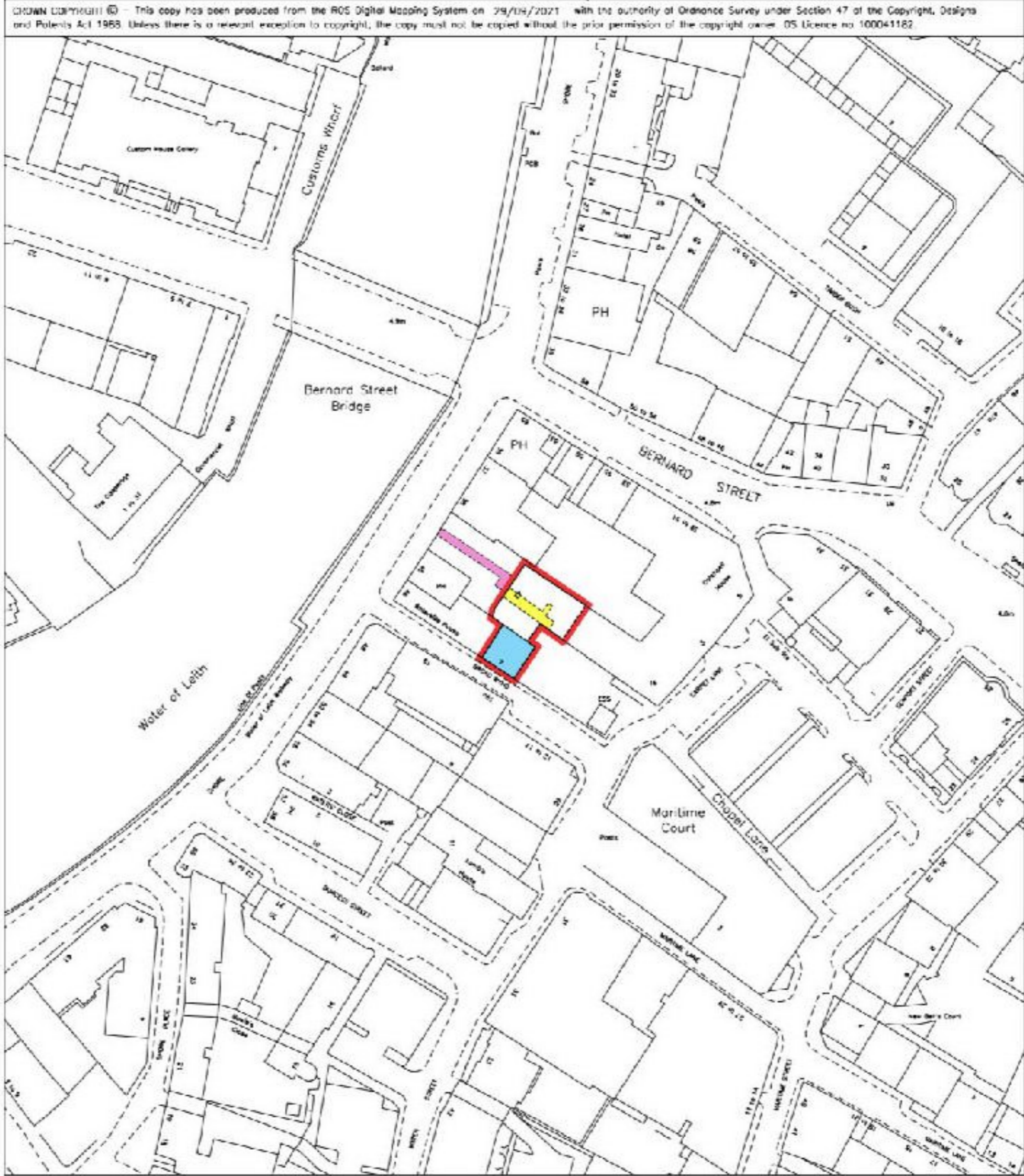
## Appendix 1

### **Consultations**

NAME: Historic Environment Scotland  
COMMENT: No comments or objections.  
DATE: 10 February 2023

The full consultation response can be viewed on the Planning & Building Standards Portal.

 <b>LAND REGISTER OF SCOTLAND</b>	Officer's ID / Date	TITLE NUMBER
	6707 4/11/2016	<b>MID125099</b>
	ORDNANCE SURVEY NATIONAL GRID REFERENCE	70m
	NT2676SE NT2776SW NT2676NE NT2776NW	Survey Scale 1/1250



**LAND REGISTER OF SCOTLAND**



TITLE NUMBER MID125099

A 1

A. PROPERTY SECTION

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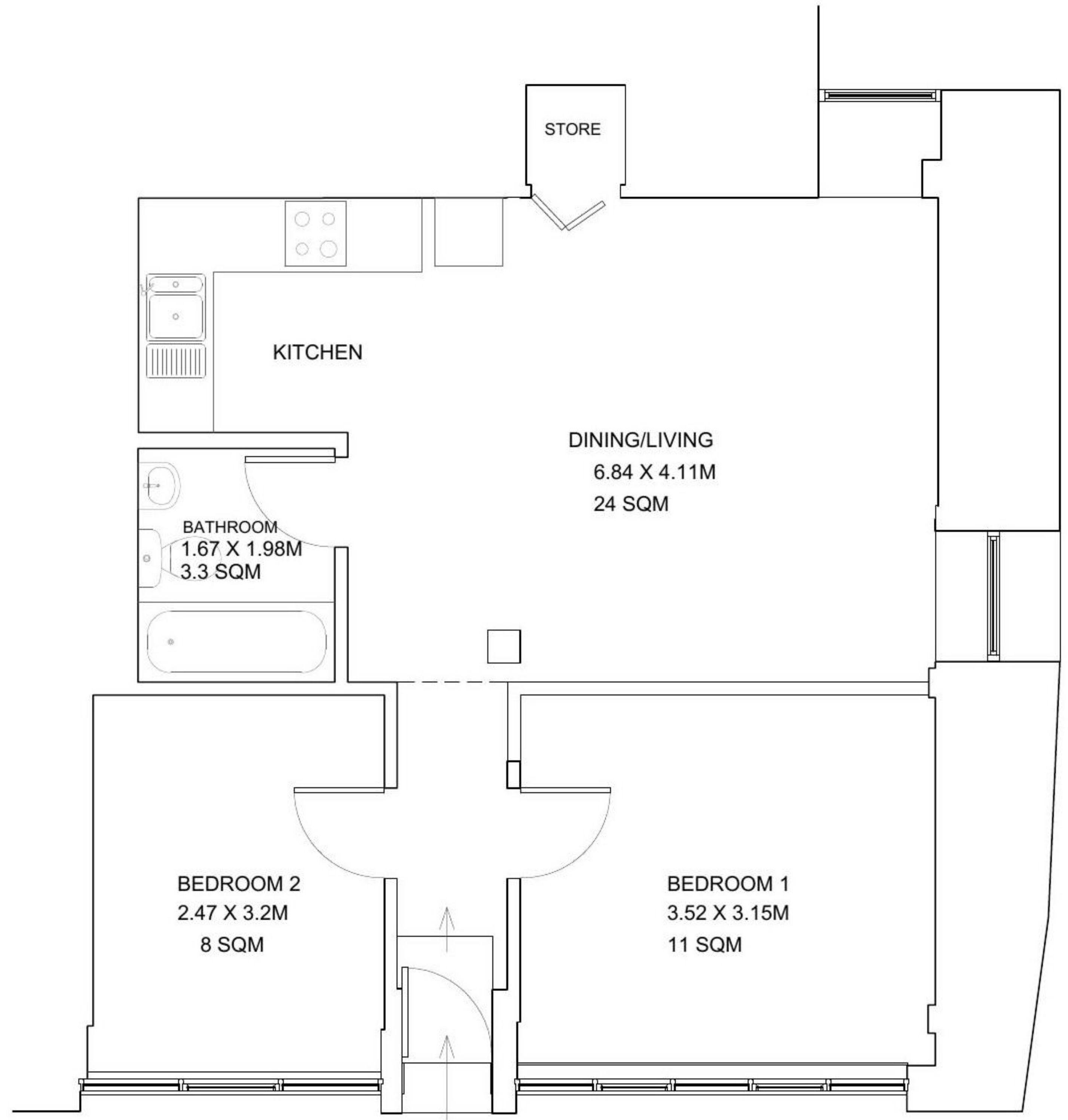
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Sheet Notes



1 GENERAL ARRANGEMENT  
1:50


Client / Project Name

Ms. Lynda Christie  
7 Broad Wynd EH6 6QZ

Sheet Name

General Arrangement Floor Plan

Project No.	Sheet No.	
Date Issued	Rev Date	Reason
23/11/2022		
Scale	Drawn By	Checked
A3	1:50@A3	TT

# **Change of Use Planning Application**

7 Broad Wynd, Edinburgh  
EH6 6QZ

**Reference Number:22/05796/FULSTL**

## **Introduction**

This report will firstly illustrate the benefits that supporting a change of use planning application for 7 Broad Wynd will bring to the local economy in Leith.

Secondly, It will also provide information on the impact on local amenities and the character of the area.

## **1. Research on economic benefits from STL**

It is widely accepted that short term lets (STL) provide economic benefits both locally and nationally.

The Scottish Government acknowledges that STL bring benefits to hosts, visitors and the Scottish economy. (1)

The report by BiGGAR Economics in 2020 estimated that spending by Airbnb guests and hosts supported in the region of £0.7 billion gross value added and 33,500 jobs in the tourism sector and wider Scottish economy.(2)

In 2018 the Edinburgh Chamber of Commerce reported that 'Airbnb hosts and guests in Edinburgh contribute approximately £238.7m to the local economy.' (3)

According to Airbnb data, 85% of STL guests want a local experience and 44% of their spending stays in the local neighbourhood.(4)

From this research it is clear that changing the use of 7 Broad Wynd into a STL will have a positive impact on the wider Edinburgh and Scottish economies and in particular on the local economy of Leith.

## **1.2 Economic benefits from 7 Broad Wynd as STL**

As a resident of Leith as well as a STL host it is important to me that guests enjoy staying in Leith and support the many local cafes, pubs, restaurants and shops in my neighbourhood.

One of the most appealing aspects of STL is that it allows travellers to 'live like locals'. Guests are looking for a more authentic tourist experience and want to soak up the local atmosphere of the neighbourhood, choosing to spend their time and money locally.

Over the past few years Leith has been actively promoted to travellers as a destination to visit and was voted the fourth coolest neighbourhood in the world in Time Out's rankings in 2021. Hospitality is a major factor in this increase in awareness and according to Time Out 'innovative new food and drink businesses have increasingly made it a must-visit on any trip to the city'.

As a way to promote the amazing range of local businesses and give guests an authentic experience of Leith, I provide a list of local recommendations.

It is clear that guests use this information as in reviews of my property on the Airbnb platform, 65% of reviews also mention the local hospitality venues.

For example, in November 2022 MaryAnn said 'We were provided with recommendations for food & drink nearby and she was spot on'.

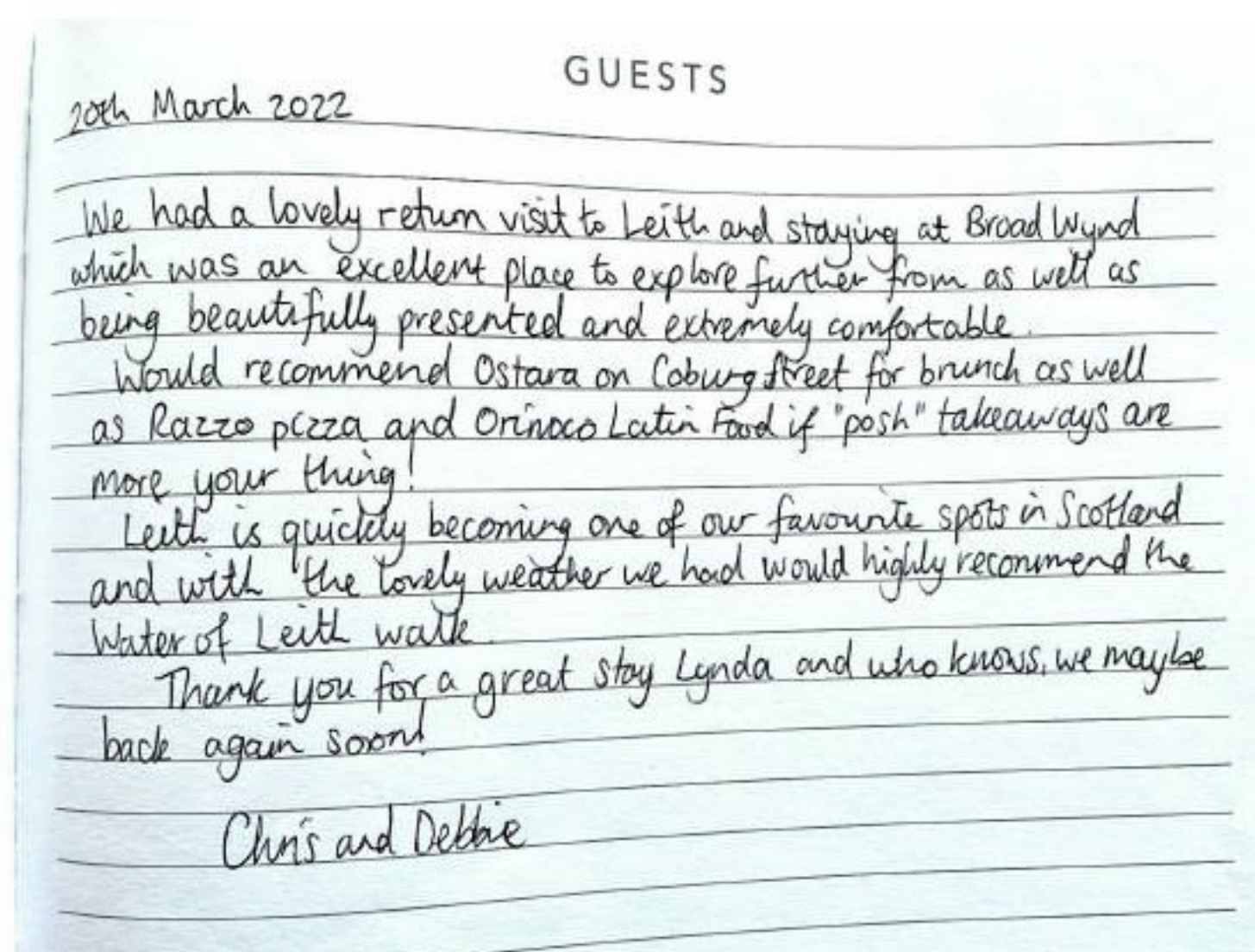
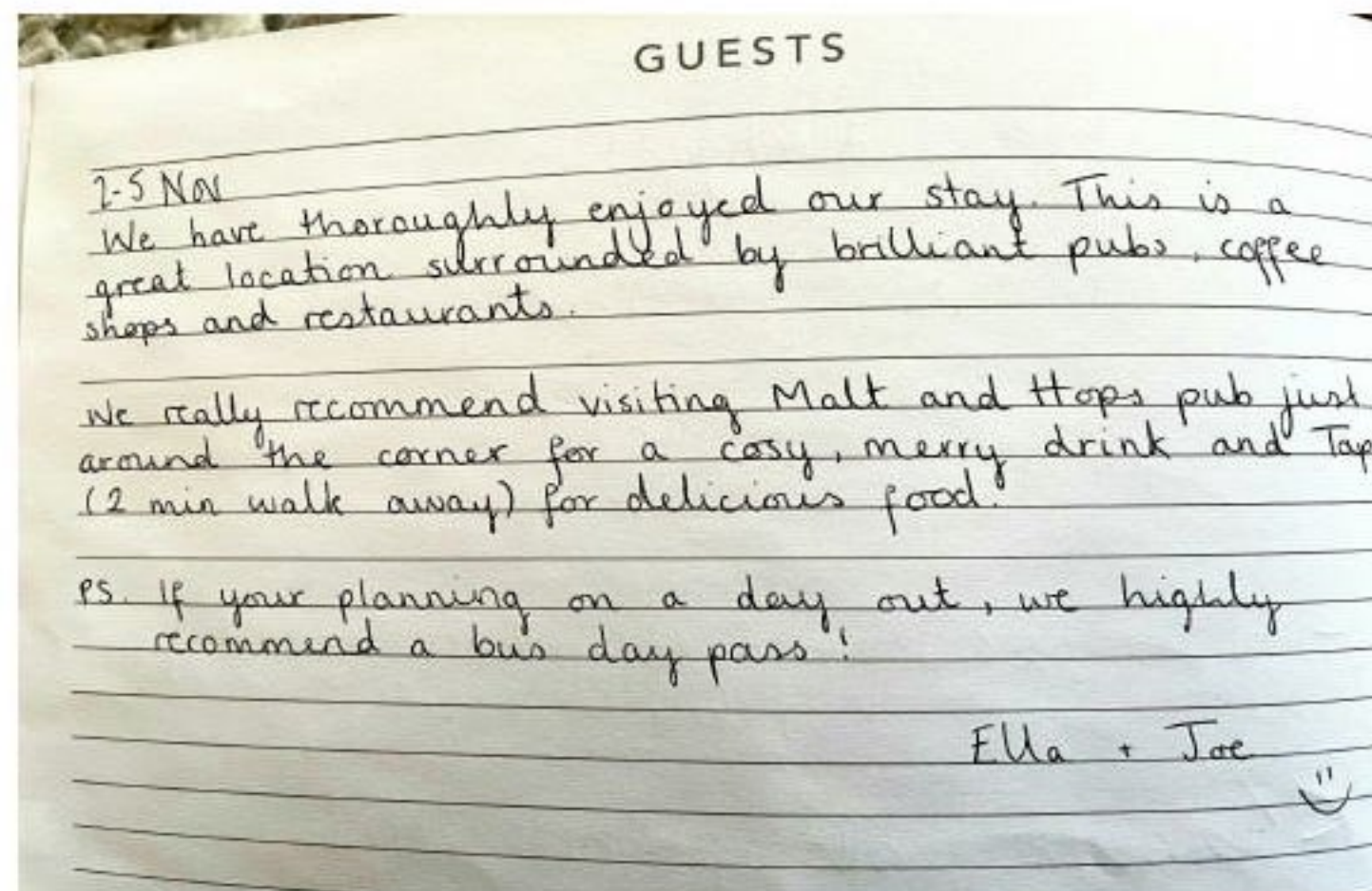
Another reviewer said of the area 'It's full of the best restaurants - the two we booked were 3 min walk from the apartment'.

Bella had also eaten locally saying 'So many lovely restaurants/coffee shops to choose from - all of them listed by Lynda'.

Often guests will book to stay specifically because they have a reservation at one of the Michelin starred restaurants as both are close to the property.

I also provide a guest comments book to encourage guests to share their own local recommendations.

The following examples provide evidence that my guests are choosing to eat and drink locally and are therefore benefiting the local economy.



## GUESTS

1st of June 23

We stayed here for Marathon weekend and couldn't have asked for a better place to stay. Thank you so much! Some of our highlights from Leith include Keyban (Turkish Restaurant) was fantastic - order the falafel super tasty and really reasonable, Ice cream just up the road and brunch at boat.

Would definitely recommend staying here to friends. Great place, fab host and perfect location.

Thanks 😊 Ella, Alex, Sophie & Kat.

## GUESTS

2-6th June 22.

We've had a brilliant stay at your wonderful apartment, clean, cosy and the best, most comfy sofa!

We'd highly recommend 'Toast' for breakfast, and Cakes!

Afternoon tea at Fingal's was amazing.

We also sampled excellent beers at Moonwake Brewery down timberbush lane we even bought some to take home!

It was also very easy to get the bus (16 or 22) into Edinburgh Centre,

Thanks again for a lovely stay

Andrew + Wendy xx

It is clear that my STL guests are contributing economically to a wide variety of local hospitality venues - cafes, restaurants, pubs, pizza takeaways and local breweries.

For this report I spoke to managers from five local venues about the economic impact of tourism in the area. All were in agreement that tourism from STL contributed to their economic prosperity.

For example Kevin, the manager at Malt and Hops, told me that tourists 'provide a massive uplift in trade' especially during the summer months and at Hogmanay.



Anecdotal evidence supports this as my guests at Hogmanay told me they spent the entire evening in the Malt and Hops.

Kevin also said that as a venue they were very supportive of having STL in the area.

Danny at the Shore Bar and Restaurant was similarly positive and said that trade from tourists contributed to 50% and perhaps even 60% of trade at peak season. He said that people often say they are staying in a STL locally and that it has a positive impact on their business.

Ian, the manager at The Kings Wark, reported that trade had still not bounced back to pre pandemic levels but in 2019 tourists accounted for 50% of their business.

As the research mentions, STL hosts also contribute to the local economy. I shop in the local Aldi supermarket for all cleaning and hospitality supplies and I employ local trades people from Leith such as plumbers and electricians who use local wholesalers for materials.

It is important to note that there are very few hotels in the local area and hospitality is still recovering from the impact of COVID.

If Leith and the local economy are to continue to thrive, then responsible, safe, well managed STL needs to be supported.

In summary, both the research and qualitative evidence I have presented above make it clear that granting planning permission for 7 Broad Wynd will have 'demonstrable local economic benefits'. (5)

## **2. Local Amenities and Character**

Having worked for NHS Lothian most of my career, working within a health inequalities framework and developing services to meet community needs, I am completely supportive of the Scottish Government's intention to ensure that the interests of the community are not only important but need to be acknowledged alongside the wider economic interests.(6)

I am also supportive of the aim of providing safe, sustainable travel that benefits everyone but am aware that communities can often have a negative experience of tourism.(7)

As a responsible STL owner, I looked for a year to find a property which I judged would have the least impact on neighbours and the community.

7 Broad Wynd is a main door, end of terrace, ground floor property in a small side street of mainly commercial properties. On one side of the property there is a commercial premises and above there is a residential property. There are no adjoining properties on the other two sides - it is the end of a row. There are only commercial properties on the other side of the street, no residential properties.

It is well evidenced that communal stairs and shared areas can cause issues with STL properties. (7)

As 7 Broad Wynd has its own front door, there is no stair and no shared areas with neighbours, I expect impact on the immediate community to be negligible. The property was carefully chosen for this specific reason.

Broad Wynd has two bedrooms - one is moderate in size, the other is small and can accommodate only a single bed as well as storage. As a dwelling house it provides accommodation for two people only.

Analysis of my bookings for 2022 shows that 44% of bookings were for two guests only and 22% were for three guests.

These figures indicate that my STL does not significantly increase the population in the community or the subsequent issues such as noise, disruption or daily congestion which can concern local residents.

As evidenced in reviews, even if guests arrived by car they will typically use public transport to explore Edinburgh. This means that these guests are not adding to traffic congestion or having a detrimental impact on the environment. Most guests arrive by train or aeroplane so the tram extension will be a further benefit to encourage guests to book in Leith.

As a responsible host, I do not allow guests to arrive late in the evening, do not allow extra guests (other than those booked) to stay and do not allow parties on the premises or smoking indoors. I am careful who can book and do not allow last minute reservations which can give rise to anti-social or problematic behaviours. I want to host guests that will treat the property and the surrounding area as they would their own home.

I market my property on four platforms, two of which are by invitation only and the accommodation is inspected before being open to guests. These platforms tend to cater for a different demographic, more discerning, often older people looking for a quieter, longer trip.

I am very proud of my property, clean it myself and maintain it to a high standard. The fittings and furnishings are of a premium standard and it is booked by guests who are looking for quality accommodation.

I very much hope you will support this planning application and am happy to provide any further information should you require it.

## **References**

1. Research into the impact of short-term lets on communities across Scotland, Scottish Government, 2019
2. Scottish Local Authorities Economic Analysis, Biggar Economics Report, 2022
3. Edinburgh Chamber of Commerce <https://www.edinburghchamber.co.uk/2018>
4. Airbnb Economic Impact Study, 2023
5. Revised Draft National Planning Framework 4, Scottish Government, 2023
6. Short-term lets: business and regulatory impact assessment, Scottish Government, 2021

7. Research into the impact of short-term lets on communities across Scotland, Scottish Government, 2019