

Mr Carpenter
29 Cantley Lane
Norwich
NR4 6TA

Decision date: 14 July 2023

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

Change of use to short term let.
At 1 Industrial Road Edinburgh EH6 8AJ

Application No: 23/00341/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 27 January 2023, 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.
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 adverse 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:

The change of use of this property to a Short Term Let (STL) will have an adverse 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 tourist 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.

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 Benny Buckle directly at benny.buckle@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 STL
1 Industrial Road, Edinburgh, EH6 8AJ**

Proposal: Change of use to short term let.

**Item – Local Delegated Decision
Application Number – 23/00341/FULSTL
Ward – B13 - Leith**

Recommendation

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

Summary

The change of use of this property to a Short Term Let (STL) will have an adverse 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 tourist 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.

SECTION A – Application Background

Site Description

The application site relates to a ground and lower ground floor, one bedroom flat at 1 Industrial Road. Situated at the end of a traditional colony style terrace on Industrial Road, between Cochrane Place and Elm Place.

The property is situated immediately below residential use, neighbouring another residential property at ground level. The wider context of the area is entirely residential.

Description of The Proposal

The application is for planning permission for the change of from residential use to short term let.

Supporting Information

- NPF4 Supporting Information
- Planning Statement

Relevant Site History

No relevant site history.

Other Relevant Site History

No further relevant site history.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 31 January 2023

Date of Advertisement: Not Applicable

Date of Site Notice: Not Applicable

Number of Contributors: 6

Section B - Assessment

Determining Issues

This report will 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 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 Productive Places Tourism Policy 30.
- LDP Housing Policy Hou 7.
- LDP Transport Policies Tra 2 and Tra 3.

The non-statutory 'Guidance for Businesses' (updated April 2023) is a material consideration that is relevant when considering change of use applications.

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 (e) specifically relates to STL proposals.

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

The non-statutory Guidance for Businesses (updated April 2023) 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.

Amenity

The property is located within an area that is entirely residential, with two neighbouring properties being situated in immediate proximity. The flat is accessed via a private front door from Industrial Road. The area is characterised by its colony style dwellings, which are high density terraced properties, each formed of two flats with individual accesses from opposing streets.

The use as a short term let would allow visitors to come and go from the premises for inconsistent periods of time on a regular basis throughout the year in a manner dissimilar to that of a permanent resident. A transient visitor may also have less regard

for neighbours' amenity than individuals using the property as a principal home. The use as a short term let is not consistent with the existing neighbouring residential uses or the character of the immediate area.

The proposed use would increase the ambient background noise levels beyond what residents would reasonably expect within the immediate area. The increase in frequency of movement to the flat at unpredictable hours would have a detrimental impact on the amenity of the immediate neighbours and adjacent properties.

The proposal will have an adverse impact 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.

The applicant submitted a planning statement in response to NPF4 that stated a change of use to STL would support the local economy by providing local employment, offering more diverse and affordable accommodation to tourists, and introduces direct spending to local businesses and services.

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.

Having the property within residential use would also contribute to the economy, through the use of a variety of local services and employment opportunities across the City. Long term residents also have the ability to make consistent and long-term contributions to the local community.

The proposal would result in the loss of residential accommodation. As there is a recognised need and demand for housing in Edinburgh, it is therefore important to retain the existing supply where appropriate.

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

Parking Standards

There are no parking requirements for STLs. Cycles could be parked inside the property.

The proposals comply 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 adverse 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 tourist accommodation in this case it does not outweigh the adverse impact on residential amenity. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7.

b) 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.

Independent economic impact assessment

An independent economic impact assessment was commissioned by the Planning Service, and this resulted in a report on the Economic Impact of Residential and Short-Term Let Properties in Edinburgh (the Economic Report). This was reported to Planning Committee on 14 June 2023. The Committee noted that the findings of the report are one source of information that can be considered when assessing the economic impacts of short-term let planning applications and that given the report is considering generalities rather than the specifics of an individual case, it is likely that only limited weight can be attached to it as a material consideration when making planning application decisions. The study considered the economic impact of various types of properties in Edinburgh if used as a residential property as opposed to being used for short-term holiday lettings.

The Economic Report shows that there are positive economic impacts from the use of properties for both residential use and short-term let use. The Report found that in general the gross value added (GVA) effects are greater for residential uses than short-term lets across all property types and all areas. However, given it is considering generalities rather than the specifics of this individual case, only 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

The application received six public representations (six objections) including one from the Leith Links Community Council.

material considerations in objection

- Concern that the proposal conflicts with the residential nature of the area and therefore would have a detrimental impact on neighbouring residential amenity. This has been addressed in section a).
- A change of use would diminish residential housing stock within Edinburgh which is currently experiencing a critical housing shortage. This has been addressed in section a).
- The proposal would have a negative impact on parking provisions within the area. This has been addressed in section a).

non-material considerations in objection

- A change of use would impact the levels of litter in the area.

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 a Short Term Let will have an adverse 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 tourist 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.

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.
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 adverse 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: 27 January 2023

Drawing Numbers/Scheme

01 - 02

Scheme 1

**David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council**

Contact: Benny Buckle, Assistant Planning Officer
E-mail: benny.buckle@edinburgh.gov.uk

Appendix 1

Consultations

No consultations undertaken.

Appendix 2

Application Certification Record

Case Officer

I have assessed the application against the City of Edinburgh Council's Scheme of Delegation (2023) Appendix 6 – Chief Planning Officer and the Statutory Scheme of Delegation (2023) and can confirm the application is suitable to be determined under Local Delegated Decision, decision-making route.

Case Officer: Benny Buckle

Date: 11 July 2023

Authorising Officer

To be completed by an officer as authorised by the Chief Planning Officer to determined applications under delegated powers.

I can confirm that I have checked the Report of Handling and agree the recommendation by the case officer.

Authorising Officer (mRTPI): Damian McAfee

Date: 14 July 2023

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Miss Julie Grant

Address: 16 Fingzies Place Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I'm sorry but I do object. This is a quiet residential with the houses close to each other so existing neighbours are respectful to keeping noise down especially at night time.

If the proposal would be similar to air bnb let then this risks holiday makers

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Miss Julie Grant

Address: 16 Fingzies Place Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I'm sorry but I do object. This is a quiet residential with the houses close to each other so existing neighbours are respectful to keeping noise down especially at night time.

If the proposal would be similar to air bnb let then this risks holiday makers partying and making a disturbance

On several occasions recently we have noticed several instances of unfamiliar people hanging around industrial road, loud revving car noise and unfamiliar cars parked on double yellow lines which is also a risk to people's safety,

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Mr Philip Doyle

Address: 1 Cochrane Place, Edinburgh EH6 8AH

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Hello. I am aware this property existed as a short-term let before the new legislation came into effect last year. As it was in operation before 1st October 2022, the owner must now apply for a license to continue using it for short-term letting purposes.

As such I hope this application is not a simple formality. I can see from their application that they actually reside in Norwich (nearly 400 miles away from Edinburgh) but make "frequent visits" to see family here, during which times they apparently reside in the property.

Is this status being checked somehow? It seems a fairly easy loophole to in fact rarely reside in the Edinburgh property whatsoever during the year, but just declare that this is the case. There is a severe shortage of affordable housing in this city that can be attributed largely to the extreme abundance of short-term lets here and I speak for a great number of people in hoping that the new legislation will actually do something to curb this.

There is a genuine sense of community in this neighbourhood which is rare these days. This property could quite easily contribute to that instead of hosting a revolving door of temporary visitors (any of whom could consider staying in the several guest houses less than one minute's walk around the corner), to line the pockets of someone resident in effectively, a different country.

Thank you for your time and consideration.

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Mr stuart lowe

Address: 17/1 elm place Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am against this as it could be a source of noise and nuisance

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Mr Fraser Crichton

Address: 1 Somerset Place Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My objection to application is based on the application being contrary to at least 3 Scottish Government and Edinburgh City housing and planning principles. Namely:

- 1) The application is contrary to the Scottish Government housing policy on providing more long-term homes - "everyone has a quality home that they can afford and that meets their needs".
- 2) The application is contrary to Scottish Planning Policy on "socially sustainable places" and "supporting delivery of accessible housing".
- 3) The change of use to short-term let would have unacceptable impacts on neighbourhood amenity.

It has been concluded at numerous DPEA planning appeals that short-term lets have a materially detrimental impact on the living conditions for close neighbours, such as in this case. Significant impacts on neighbours include: increased antisocial behaviour, noise, disruption, intrusion by a frequent turnover of strangers, loss of community, loss of security and impacts on bins and parking. All of these significant impacts have been and will be continue to be felt by local residents should the application be granted.

While the property in question does have its own front door, it lies very close to other residential properties and shares communal walls on at least two sides (above and to the south). Furthermore, the demand for main-door housing in Edinburgh is so great that incentivising any main-door housing for short-term holiday lets is contrary to Scottish Planning Policy on "supporting delivery of accessible housing".

While I am unaware of the wording of the title deeds of the property in question, it is also worth noting that numerous colonies-style properties in the area, including my own, have restrictive

covenants in place preventing their use as any form of "hostelry", which by definition includes short-term accommodation for travellers.

As the council is acutely aware, Edinburgh is suffering from an unprecedented housing crisis hugely exacerbated by the proliferation of short-term rental accommodation and consequent scarcity of secure, long-term rental properties. Independent research for the Scottish Government has found 12.78% of all City Centre dwellings are listed as entire-property short-term lets on Airbnb alone. A search on the company's website returns over 1,000 entire-property listings in Leith - illustrating that the problem is far from being one restricted to the City Centre. Leith's ability to function as a "socially sustainable place" is under threat from such applications, and I urge the council committee to reject it in the interests of the city they have been elected to serve.

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Mr Eric Gallo

Address: 8 East Hermitage Place, Edinburgh EH6 8AA

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would be happy to agree and support a "long term" let license application, but not a short term let. There have been previous issues in this specific area with disturbances connected to STL activity and often neighbours have complained.

Comments for Planning Application 23/00341/FULSTL

Application Summary

Application Number: 23/00341/FULSTL

Address: 1 Industrial Road Edinburgh EH6 8AJ

Proposal: Change of use to short term let.

Case Officer: Improvement Team

Customer Details

Name: Ms Sally Millar

Address: 22 Claremont Road Edinburgh

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:23/00341/FULSTL OBJECT

On behalf of local residents, the Leith Links Community Council is writing to object to the application 23/00341/FULSTL applying for a change of use of 1 Industrial Road into a Short Term Let.

We have not heard of complaints from neighbours about this particular property but we have heard of complaints from local residents about other STLs in the Leith Links colonies. There is really not enough information provided about this property in terms of possible number of visitors, or the typical number of lets per year for us to estimate the estimated frequency or scale of the nuisance to neighbours, however we support the Council's existing policy to deny change of use and licencing of STLs, in residential areas, and where properties share facilities such as stairs, gardens etc. On that basis, we object as a matter of principle.

We believe that allowing a change of use of this property to STL would be in contravention of key Scottish Government policies and also Edinburgh City Council policies.

The development is contrary to the Scottish Government's new Planning Framework 4 which states: "Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:

- I. An unacceptable impact on local amenity or the character of a neighbourhood or area, or
- II. The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits."

Our objection is based on these important principles

1. The development would have unacceptable impacts on neighbourhood amenity and character. Loss of amenity would affect both immediate neighbours and residents in both this and surrounding streets, in general, as the whole colonies enclave is built in the same very distinctive style.

a. Colonies style architecture. This has two main features.

Firstly, history and architectural heritage. This is an area with distinct character. Built in the 19th Century, it is an area with much 'heritage' even though it has not been designated a Conservation Area (though arguably it should be, as other colonies in Edinburgh have been). It was built expressly as a residential area (for workers), and should stay as a residential area. The area is a coherent whole, built in the same particular style, not just a collection of random adjoining streets. Allowing one short term let licence within this could be a dangerous precedent and open the door to many others, which could threaten the character of the whole area.

Secondly, high density housing. As part of a block built in the 'colony' style, this property is 'attached' to its neighbours both back to back, and underneath as a ground / lower floor - in other words, as closely (or even more so!) than terraced houses are. In the recent consultation on STLs, there was no mention of colony housing, which is an important omission. Colony housing should definitely be on City of Edinburgh Council's list of types of housing that is completely unsuitable for STL licence, alongside tenement buildings, blocks with a common entrance and stair, and terraced houses.

'Communality' is very much built in to the actual design of this style of housing.

Also, colony houses for workers were built to be inexpensive and therefore - also partly due to their age - there was a minimum of insulation and sound proofing put in, which means that 'neighbours' in adjoining flats are particularly susceptible to noise nuisance. Narrow streets also mean that outside noise can echo across between the houses.

We know from bitter experience all over Edinburgh, that properties used as short term lets can cause noise (people pulling wheelie cases, loud talk and sometimes shouting in the street as people arrive/ leave at all hours of the day and night), or sometimes noise from parties. Another known problem is AirBNB guests disturbing local residents by ringing the bell or knocking at the wrong house when they cannot find their rental address. Colonies streets are prime sites for this sort of confusion, due to the back to back configuration, which can lead to strangers wandering about at all hours, causing concern about safety and security.

The Community Council therefore takes the view that no colony property should ever be licenced for short term letting, as it has an unacceptable impact on local amenity simply because of its heritage, unique architecture / design, and exceptional closeness to neighbours.

b. Traffic & Parking

This little colonies enclave is a very tightly-packed network of extremely narrow streets. There is absolutely no room for any additional vehicle traffic. Taxis bringing in AirBnB guests, or visitors in their own cars would be adding to an already chaotic and over-congested traffic / parking situation. At any given time of day, you are already very likely to find vehicles parked on the pavement, blocking access for pedestrians. Industrial Street is far too narrow for two cars to pass in opposite directions, so vehicles often have to stop and mount the pavement to allow another to pass through. Elm Place, that this property in question is also partly in, (in spite of its address and front

door being Industrial Road), is also too narrow for two-way traffic (it is essentially a cul de sac - though there is an exit lane at the top, this is too narrow for motor vehicles), and therefore anything like double parking or vehicles doing three point turns, or reversing out of narrow streets, causes a major blockage for both other vehicles and also, potentially, for pedestrians. Local residents sort of know from long experience what can and can't be done/got away with, in terms of irresponsible parking, but short term let visitors would not know this, and - just as they commonly dispose of rubbish carelessly or inappropriately - might be likely to make very bad parking choices, that would greatly inconvenience neighbours.

2. Change of use would lead to loss of residential housing. This is a residential area, originally designed for permanent /long term housing of local workers and even today still very much exactly that. As everyone knows, Edinburgh desperately needs housing of all types, but especially, perhaps, housing that is accessible and affordable for lower income families (whether for purchase or for rent). Leith Walk, Leith and Leith Links are popular and densely populous housing areas, and this colonies enclave is very much part of that. There is a shortage of affordable housing around here and residential housing must not be lost to transient short term renters.

Allowing short term rental would be at odds with Scottish Government housing policy on More Homes - "everyone has a quality home that they can afford and that meets their needs"

<https://www.gov.scot/policies/more-homes/>

Because of the closely packed nature of the colony housing design (see above), neighbours are closer in contact with each other than in many areas. It is therefore also very much a local 'community' not just a 'street'. Such a community could be destroyed if it is 'hollowed out' by allowing STLs in these properties (as has already happened in similar closes and courtyards and tenements eg in the Old Town). Allowing short term rental in the Leith Links colonies would be at odds with Scottish Government Planning Policy on prioritising "socially sustainable places" (i.e. as well as environmental and economic sustainability)

In conclusion, we believe that allowing a change of use of this property to STL would be detrimental to the area and to local residents, as well as being in contravention of key Scottish Government and Edinburgh City Council policies.

Please refuse the applicant's application.

Sally Millar

Secretary, Leith Links Community Council