



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 100637693-001

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.

Type of Application

What is this application for? Please select one of the following: *

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

Description of Proposal

Please describe the proposal including any change of use: * (Max 500 characters)

Use of flat for short-term let use (sui generis) and residential flat

Is this a temporary permission? * Yes No

If a change of use is to be included in the proposal has it already taken place? (Answer 'No' if there is no change of use.) * Yes No

Has the work already been started and/or completed? *

No Yes - Started Yes - Completed

Please state date of completion, or if not completed, the start date (dd/mm/yyyy): *

Please explain why work has taken place in advance of making this application: * (Max 500 characters)

Started before planning permission was required for STLs.

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)

Applicant Agent

Agent Details

Please enter Agent details

Company/Organisation:	Houghton Planning Ltd		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Paul	Building Name:	Alloa Business Centre
Last Name: *	Houghton MRTPI	Building Number:	
Telephone Number: *		Address 1 (Street): *	Whins Road
Extension Number:		Address 2:	Alloa
Mobile Number:		Town/City: *	Clacks
Fax Number:		Country: *	Scotland
		Postcode: *	FK10 3RF
Email Address: *			

Is the applicant an individual or an organisation/corporate entity? *

Individual Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:	Other	You must enter a Building Name or Number, or both: *	
Other Title:	Mr and Mrs	Building Name:	Caim House
First Name: *	Paul and Fiona	Building Number:	
Last Name: *	Lingard	Address 1 (Street): *	Cavendish Road
Company/Organisation		Address 2:	
Telephone Number: *		Town/City: *	Matlock
Extension Number:		Country: *	England
Mobile Number:		Postcode: *	DE4 3GY
Fax Number:			
Email Address: *			

Site Address Details

Planning Authority:

City of Edinburgh Council

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

Address 1:

FLAT 4

Address 2:

5 ALBYN PLACE

Address 3:

NEW TOWN

Address 4:

Address 5:

Town/City/Settlement:

EDINBURGH

Post Code:

EH2 4NG

Please identify/describe the location of the site or sites

Northing

674073

Easting

324772

Pre-Application Discussion

Have you discussed your proposal with the planning authority? *

Yes No

Site Area

Please state the site area:

0.10

Please state the measurement type used:

Hectares (ha) Square Metres (sq.m)

Existing Use

Please describe the current or most recent use: * (Max 500 characters)

Flat

Access and Parking

Are you proposing a new altered vehicle access to or from a public road? *

Yes No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? * ≤ Yes **T** No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site? 0

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? * 0

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? * ≤ Yes **T** No

Do your proposals make provision for sustainable drainage of surface water?? * **T** Yes ≤ No
(e.g. SUDS arrangements) *

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? *

≤ Yes

≤ No, using a private water supply

T No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

Assessment of Flood Risk

Is the site within an area of known risk of flooding? * ≤ Yes **T** No ≤ Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? * ≤ Yes **T** No ≤ Don't Know

Trees

Are there any trees on or adjacent to the application site? * ≤ Yes **T** No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? * **T** Yes ≤ No

If Yes or No, please provide further details: * (Max 500 characters)

Bin storage is available.

Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? *

Yes No

All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? *

Yes No

All Types of Non Housing Development – Proposed New Floorspace Details

For planning permission in principle applications, if you are unaware of the exact proposed floorspace dimensions please provide an estimate where necessary and provide a fuller explanation in the 'Don't Know' text box below.

Please state the use type and proposed floorspace (or number of rooms if you are proposing a hotel or residential institution): *

Not in a Use Class

Gross (proposed) floorspace (In square meters, sq.m) or number of new (additional) Rooms (If class 7, 8 or 8a): *

88

If Class 1, please give details of internal floorspace:

Net trading spaces:

Non-trading space:

Total:

If Class 'Not in a use class' or 'Don't know' is selected, please give more details: (Max 500 characters)

Short term let

Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013) *

Yes No Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? *

Yes No

Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? * Yes No

Is any of the land part of an agricultural holding? * Yes No

Are you able to identify and give appropriate notice to ALL the other owners? * Yes No

If you cannot trace all the other owners, can you give the appropriate notice to one or more owner? * Yes No

Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate C

Certificates

The certificate you have selected requires you to distribute copies of the Notice 1 document below to all of the Owners/Agricultural tenants that you provided previously. Please note that your planning authority may be required to place an advertisement in a local newspaper. You may wish to contact the planning authority for further guidance.

Notice 1 is required

I understand my obligations to provide the above notice before I can complete the certificates. *

Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that – (1) –

I am/The applicant is unable to issue a certificate in accordance with Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and in respect of the accompanying application;

(2) - No person other than myself/the applicant was an owner of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

or –

(3) - I have/the applicant has been unable to serve notice on any person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application relates.

or –

(2) - I have/The applicant has served notice on each of the following persons other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application/appeal was owner [Note 2] of any part of the land to which the application relates.

Name:

Mr Liam Desmond Steele

Address:

Flat 5, 14, Kimmerghame Terrace,, Edinburgh, Scotland, EH4 2GH.

Date of Service of Notice: *

02/08/2023

Name:

Mr and Mrs David and Roselyn Buchan

Address:

98, Mary Elmslie Court,, Aberdeen, Scotland, AB24 5BT

Date of Service of Notice: *

02/08/2023

Name:

Mr Ross Bull

Address:

15 to 17, Canonbury Lane, London, England, N1 2AS.

Date of Service of Notice: *

02/08/2023

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;

or –

(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:

Name:

Address:

Date of Service of Notice: *

(4) – I have/The applicant has taken reasonable steps, as listed below, to ascertain the names and addresses of the other owners or agricultural tenants and *have/has been unable to do so –

Applicants contacted letting agents for the building. Agent did a full ScotLis search.

Signed: Paul Houghton MRTPI

On behalf of: Mr and Mrs Paul and Fiona Lingard

Date: 02/08/2023

Please tick here to certify this Certificate. *

Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? *

Yes No Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? *

Yes No Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? *

Yes No Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? *

Yes No Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? *

Yes No Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? *

Yes No Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

Site Layout Plan or Block plan.

Elevations.

Floor plans.

Cross sections.

Roof plan.

Master Plan/Framework Plan.

Landscape plan.

Photographs and/or photomontages.

Other.

If Other, please specify: * (Max 500 characters)

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. * Yes N/A

A Design Statement or Design and Access Statement. * Yes N/A

A Flood Risk Assessment. * Yes N/A

A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). * Yes N/A

Drainage/SUDS layout. * Yes N/A

A Transport Assessment or Travel Plan Yes N/A

Contaminated Land Assessment. * Yes N/A

Habitat Survey. * Yes N/A

A Processing Agreement. * Yes N/A

Other Statements (please specify). (Max 500 characters)

Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Paul Houghton MRTPI

Declaration Date: 01/08/2023

Payment Details

Online payment: [REDACTED]

Payment date: [REDACTED]

Created: [REDACTED]

Houghton Planning Ltd.
FAO: Paul Houghton MRTPI
Alloa Business Centre
Whins Road
Alloa
Clacks
FK10 3RF

Mr & Mrs Lingard
Caim House
Cavendish Road
Matlock
DE4 3GY

Decision date: 2 October 2023

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

Use of flat for short-term let use (Sui Generis) and residential flat (in retrospect).
At Flat 4 5 Albyn Place Edinburgh EH2 4NG

Application No: 23/03460/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 2 August 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 term 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 term 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.

Report of Handling

**Application for Planning Permission STL
Flat 4 5 Albyn Place, Edinburgh, EH2 4NG**

Proposal: Use of flat for short-term let use (Sui Generis) and residential flat (in retrospect).

**Item – Local Delegated Decision
Application Number – 23/03460/FULSTL
Ward – B11 - City Centre**

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 relates to a two-bedroom, third floor flat at F4 5 Albyn Place. The flat is situated within a three-storey and basement traditional tenement property converted from office back to residential use.

The property is accessed via a shared front door and communal stair. This access is used by three further residential dwellings.

The character of the local area is mixed use, with levels of both commercial and residential uses including a hotel across the road.

The property is within the New Town Conservation Area, is a category A listed building (28234), listed on 14/12/1970 and is within Edinburgh's World Heritage Site.

Description of The Proposal

The application is for a change of use from residential to short-term let use (Sui Generis) and residential flat (in retrospect).

Supporting Information

- Planning Statement
- Economic Impact Study
- Further Supporting Documents

Relevant Site History

No relevant site history.

Other Relevant Site History

No further relevant site history.

Consultation Engagement

Historic Environment Scotland

Publicity and Public Engagement

Date of Neighbour Notification: 2 October 2023

Date of Advertisement: 18 August 2023

Date of Site Notice: 18 August 2023

Number of Contributors: 2

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 and its setting?

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

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

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

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

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

Conclusion in relation to the listed building

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

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

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

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

The New Town Conservation area character appraisal states *"the area is typified by the formal plan layout, spacious stone built terraces, broad streets and an overall classical elegance. The buildings are of a generally consistent three storey and basement scale, with some four storey corner and central pavilions."*

There are no external alterations. The change of use from a residential premises to a short term let will not have any material impact on the character of the conservation area. The change of use would preserve the appearance of the conservation area.

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 Productive Places Tourism Policy 30.
- NPF4 Historic Assets and Places Policy 7.
- Local Development Plan Housing Policy, Hou 7.
- Local Development Plan Transport Policies, Tra 2 and Tra 3

The non-statutory Listed Building and Conservation Area Guidance is a material consideration when considering NPF 4 Policy 7.

The non-statutory Guidance for Business (April 2023) is a material consideration that is relevant when considering LDP Policy Hou 7 and the Edinburgh Design Guidance is a material consideration when considering LDP Policies Tra 2 and Tra 3.

Listed Buildings, Conservation Area and Edinburgh World Heritage Site

Historic Environment Scotland were consulted as the building is category A listed and made no comment on the proposals. The impact on the setting of the listed building

and on the setting of neighbouring listed buildings has been assessed in section a) above which concluded that this would be preserved.

There are no external or internal works proposed and as such there will not be a significant impact on historic assets and 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 (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 (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 proposed property is situated in a mixed-use area with levels of both commercial and residential activity. Access to the dwelling is via a shared front door that is used by three further residential dwellings. The development is within proximity to immediate neighbouring residential properties.

The agent's supporting statement refers to the management guidelines which are in place. However, planning permission is granted to property rather than individuals, which means that property can change hands and be operated in a different way than was intended by the applicant for planning permission. Because of this, when considering the pattern of activity associated with a use, only limited regard is given to how an applicant manages the property.

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. The effect on nearby immediate residential properties is increased by the use of a communal stair.

A change of use would increase the level of ambient background noise beyond what is reasonably expected by neighbouring residents and will have a significant detrimental 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.

The applicant's agent provided a planning statement in response to NPF4. The supporting statement commented that VisitScotland suggests an overseas visitor to Scotland spends £60 per day locally, so based upon a occupancy rate of 90%, and two adult visitors occupying the flat, it will generate a spend of well over £19,000 contributing to the local economy.

The supporting statement also highlighted the importance that the tourist economy provides to Edinburgh citing Frontline Consultants 2021 study which states the industry provided over £91,000,000 in 2020 and supported over 2,500 full-time equivalent jobs within the city.

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 proposed change of use to STL would result in a loss of residential accommodation. As there is a recognised need and demand for housing in Edinburgh, it is critical to retain the existing supply where appropriate.

It is important to recognise that having the property within residential use also contributes to the economy, using local services and fulfilling employment opportunities across the City. Long term residents can also make consistent and long-term 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. As such, the proposal does not comply with NPF 4 30(e) part (ii).

Parking Standards

Zero parking is acceptable as 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 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 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.

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.

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 two objections. A summary of the representations is provided below:

material considerations in objection

- Concern that a change of use would reduce the residential housing stock of Edinburgh's City centre and that this loss is not justified. This has been discussed within section c).
- Concern that a change of use would have a negative effect of the neighbouring residential amenity. This has been discussed within section c).
- Concern that the proposed use would have a detrimental effect on the World Heritage Site. This has been discussed within section b).
- Concern that the proposed use would have a detrimental effect on the Listed Building and setting. This has been discussed within section a) and b).

Conclusion in relation to identified material considerations

Identified material considerations have been assessed above and do not raise issues which outweigh the conclusion in relation to the development plan.

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. The proposal is unacceptable.

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 term 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 term 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: 2 August 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

NAME: Historic Environment Scotland

COMMENT: No comments to make.

DATE: 28 August 2023

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

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: 25 September 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: 28 September 2023

City Plan 2030: Monitoring Statement

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Introduction

The Council is preparing a new local development plan – City Plan 2030. It will form the basis for decision making on planning applications. The first stage in preparing the new plan is the main issues report. Choices for City Plan 2030 is a tool for consulting on options for changing policy and planning development. The Council also has to prepare a monitoring statement alongside publication of the main issues report. Monitoring is essential for determining what the issues are for the main issues report and for justifying why some parts of the existing plan need to change. As such, the Monitoring Statement forms an important part of the evidence base for the main issues report and subsequent local development plan, as well as providing a clearly stated and readily understood baseline for future monitoring in order to serve efficient and high quality plan-making.

The purpose of the Monitoring Statement is:

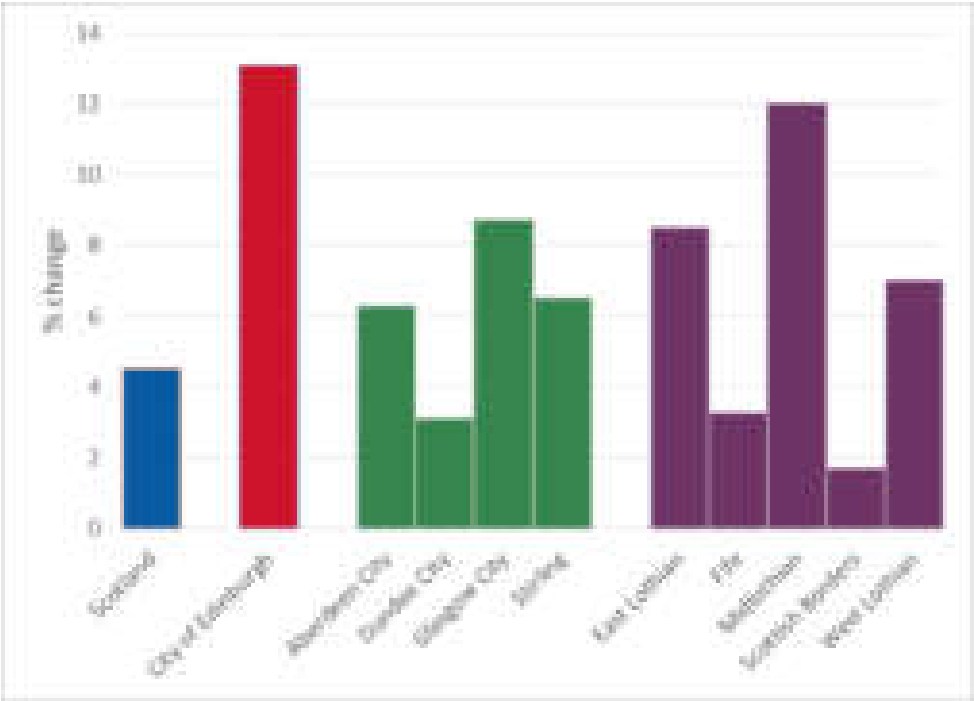
- To identify the key physical, economic, social and environmental changes occurring in Edinburgh since the adoption of the current Edinburgh Local Development Plan in November 2016;
- To assess the effectiveness of current planning policies; and
- To provide an information base to help assess the performance of the new City Plan 2030 in the future.

Context

Population

The latest figures (mid 2018) estimate the population of Edinburgh to be 518,500. Over the last ten years, Edinburgh’s population has grown by 60,000 – an increase of 13%. This growth is higher than all other council area in Scotland both in terms of gross numbers and proportionally. Chart 1 below compares population change in Edinburgh to the other Scottish city authorities and neighbouring council areas.

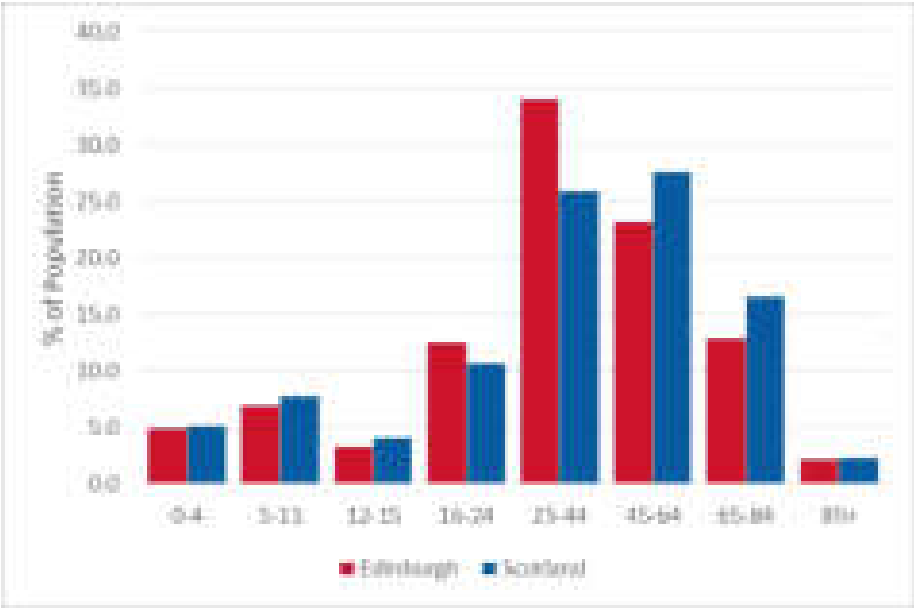
Chart 1. Population Change 2008 to 2018



Source: National Records of Scotland (NRS) mid-year population estimates 2008 to 2018

Edinburgh's population structure differs from Scotland as a whole with more young adults and fewer children and older people. The structure of Edinburgh's population is compared to the Scottish average in chart 2 below.

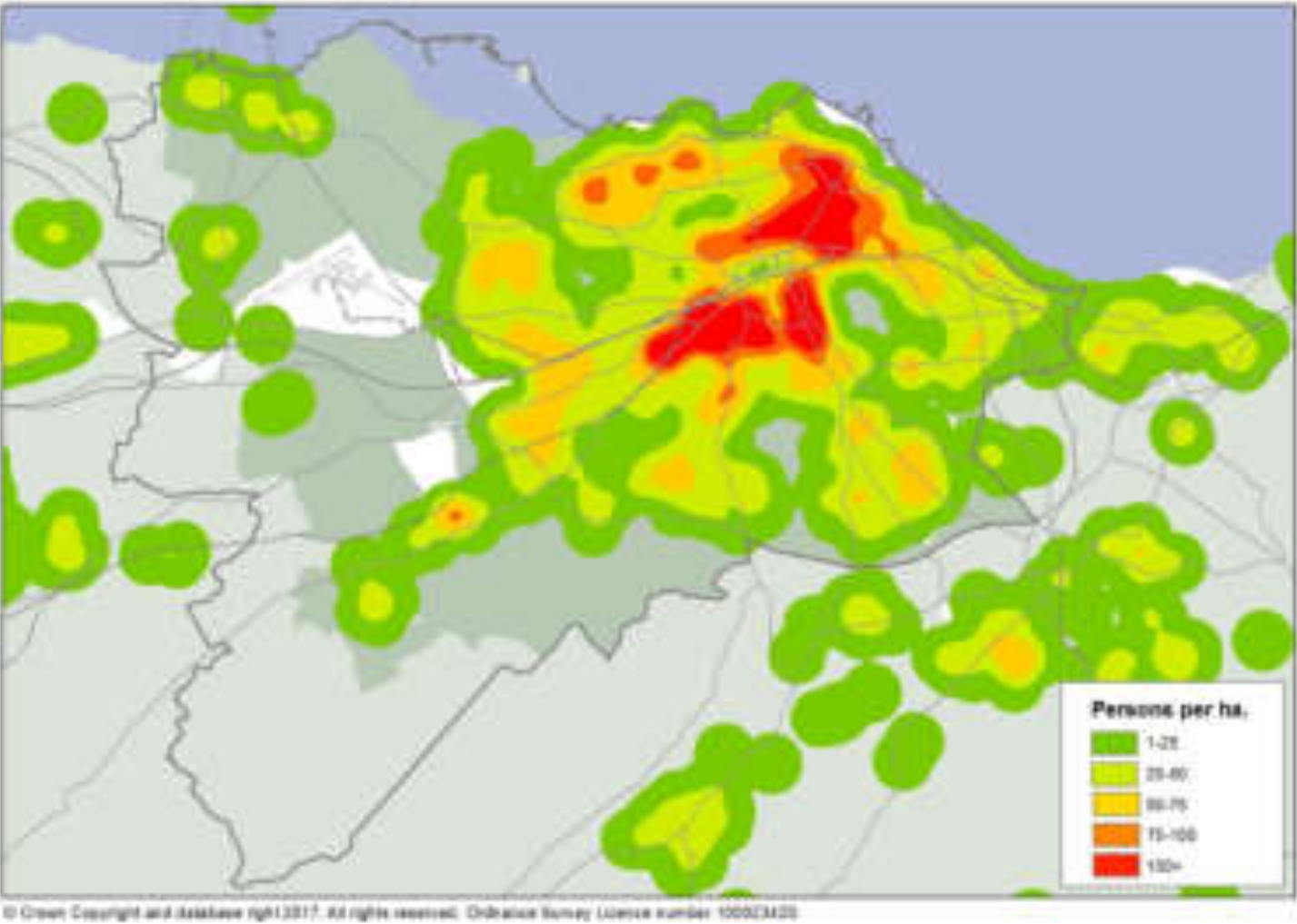
Chart 2: Population Structure 2018



Source: NRS Mid-year population estimates 2018

Map 1 below shows the distribution of population in Edinburgh. The map is shaded according to the number of people resident per hectare of land. A hectare (ha) is an area of land 100m x 100m.

Map 1: Population density 2018

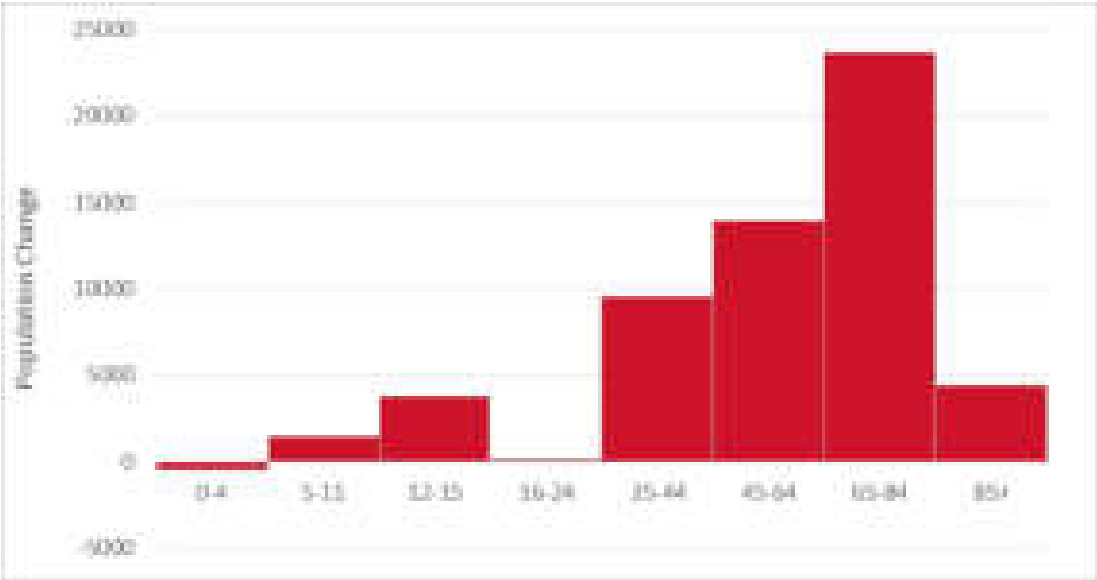


Source: NRS small area population estimates 2018

Future population

According to the National Records of Scotland population projections, Edinburgh’s population will continue to grow at an annual average of around 3,500 per year during the period to 2032 taking the total population of the City to 563,600. The growth is not projected to be uniform across all age groups. Following the national trend, the greatest increase in population is projected for older people with the number of people aged over 65 increasing by 28,000 – accounting for almost half of the overall growth. School age children are projected to experience a moderate increase numerically with a growth of 1,500 primary age children and 3,700 secondary school age. However, when viewed in terms of proportional growth, the results are more significant with the growth in secondary school age children representing more than a 23% increase on the 2016 level. Population change by age group is displayed in chart 3 below.

Chart 3: Population change 2016 – 2032

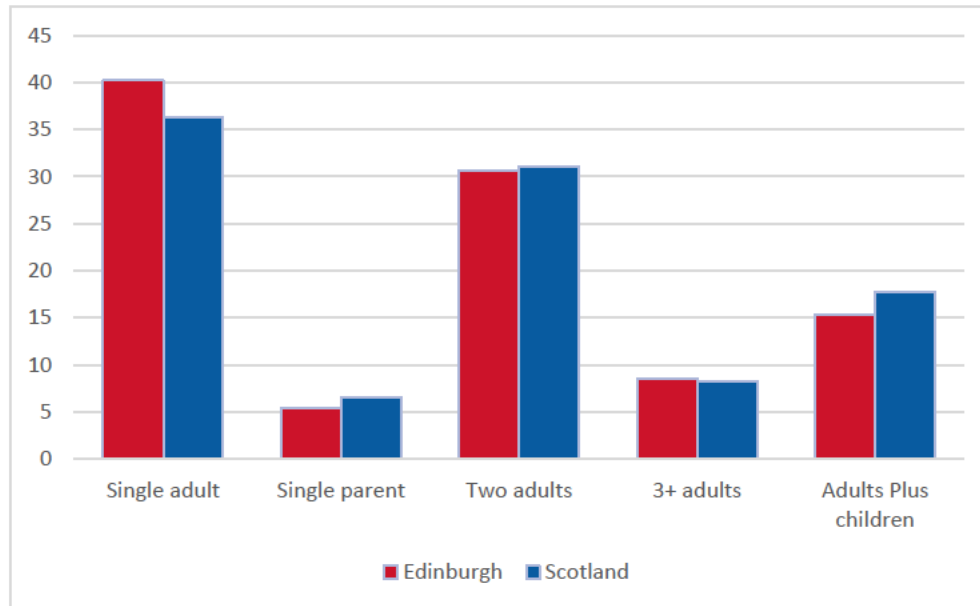


Source: NRS 2016 based population projections

Households

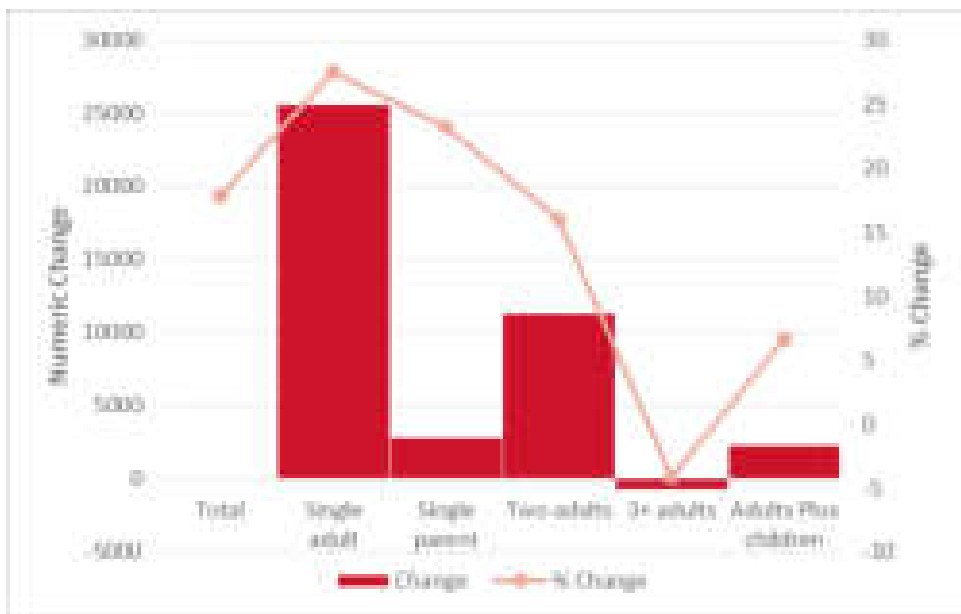
Edinburgh has smaller households than the Scottish average with an average household size of 2.12 people compared to 2.17 for Scotland. Chart 4 below compares the number of households by type in Edinburgh to the Scottish average. The number of single person households is projected to increase more than any other household type causing the average household size in the City to continue to drop. By 2032, the average household size in Edinburgh is projected to fall to 2.0. The decreasing household size in the City means that household growth will be even higher than the population growth. By 2032, the number of households is projected to increase by 18% - a growth of 41,400. Chart 5 below shows the projected numerical and proportional growth of households by type.

Chart 4: Households by Type 2016



Source: NRS 2016 based household projections

Chart 5: Change in households by type 2016 to 2032

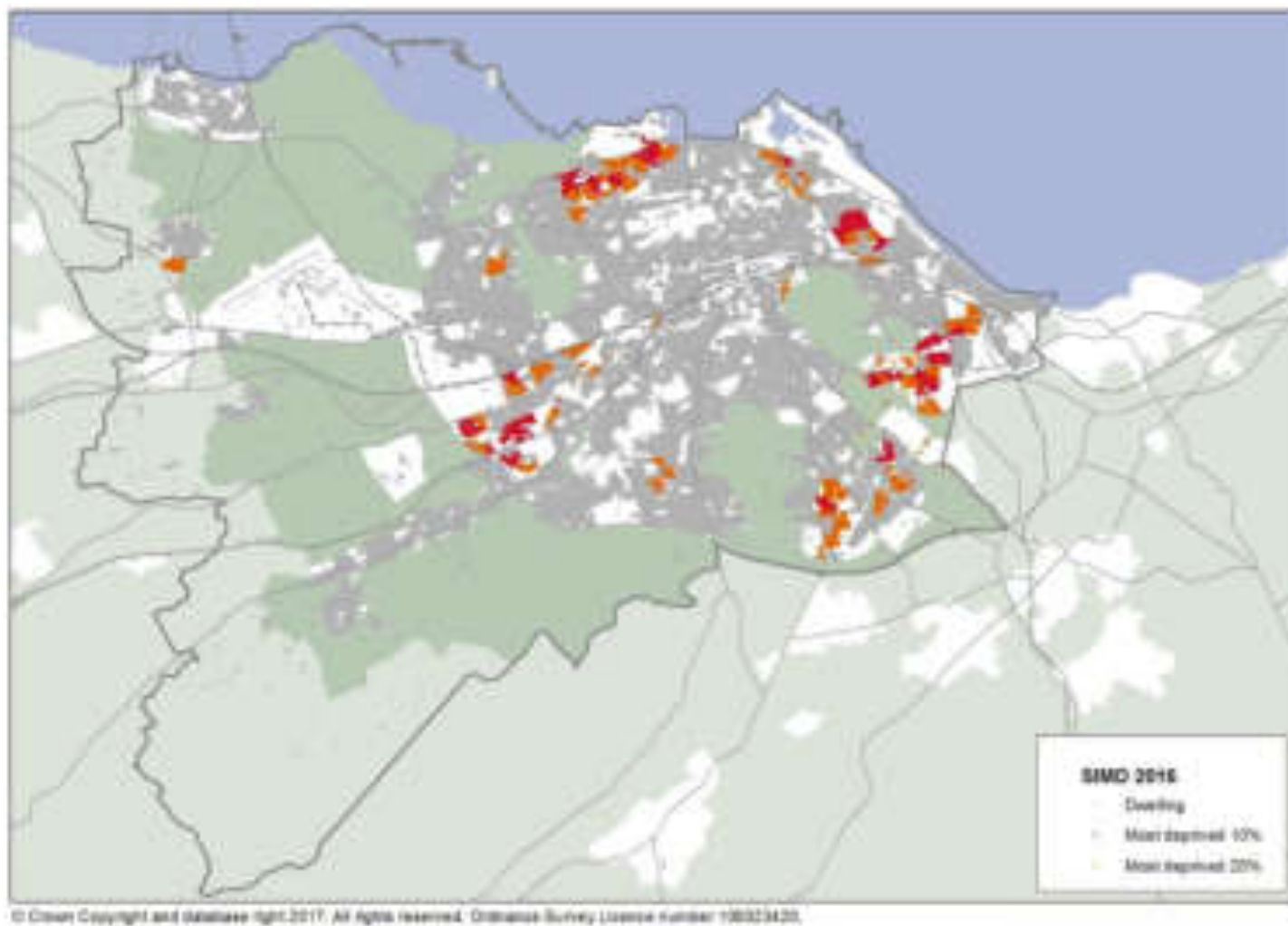


Source: NRS 2016 based household projections

Deprivation

The Scottish Government calculates an index of multiple deprivation for Scotland – the Scottish Index of Multiple Deprivation (SIMD). The purpose is to identify areas of concentration of deprivation across multiple domains – Income, employment, health, education, housing, access and crime. Scotland is divided into 7,000 small areas that statistics can be compiled for called datazones and these datazones are ranked from most deprived to least deprived across the seven domains. Around 29,500 people in Edinburgh live in the most deprived 10% of areas in Scotland. This represents around 5% of Edinburgh total population. Dwellings ranked as being in the most deprived 10% and 20% of areas in Scotland are shown in Map 2 below.

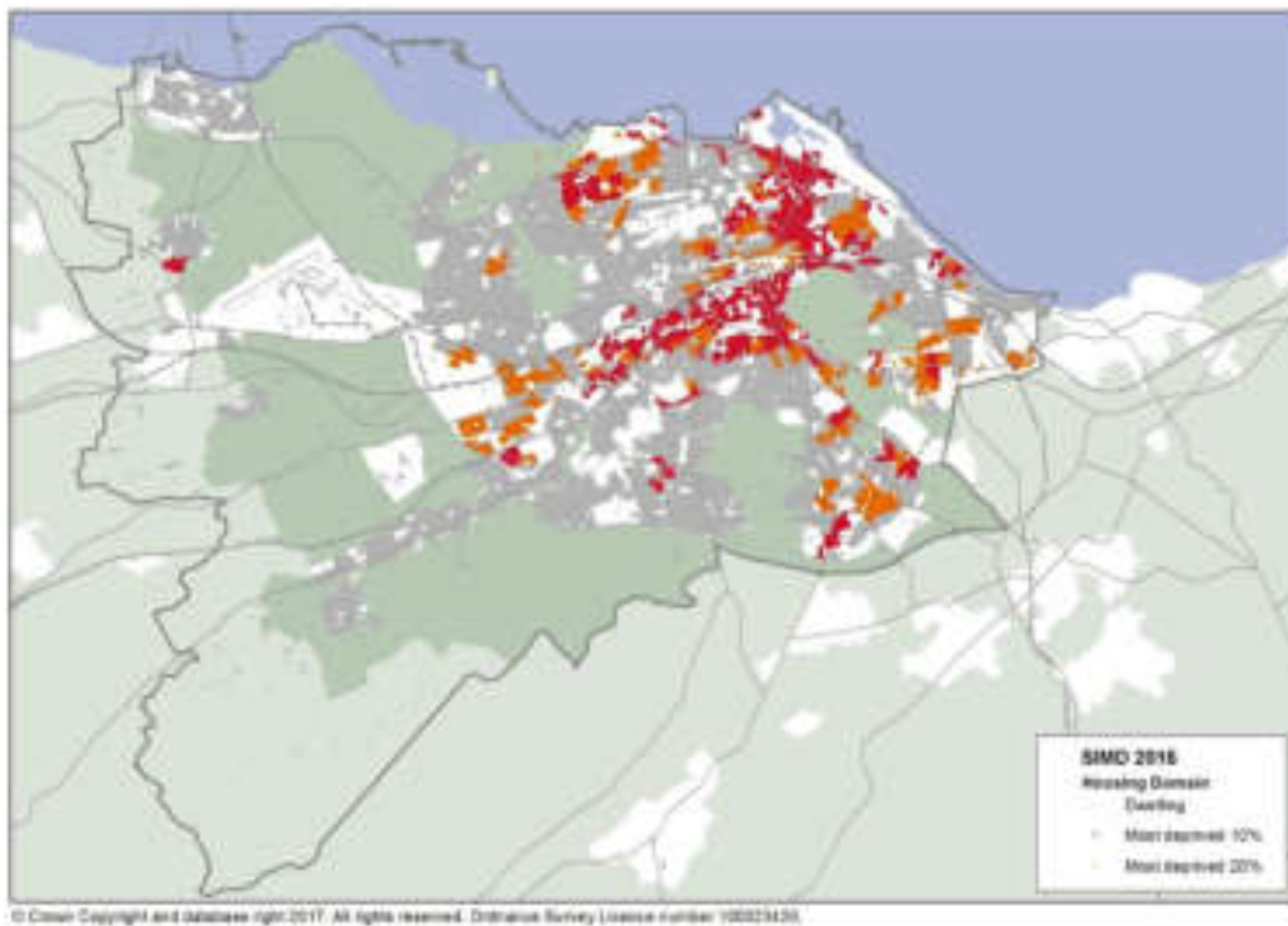
Map 2: SIMD 2016



Source: 2016 Scottish Index of multiple deprivation

At 5%, a relatively low proportion of Edinburgh's population lives within the most deprived areas of Scotland (the population of Edinburgh is nearly 10% of the Scottish total). However, this is not the case across all deprivation domains. The housing domain which is based upon overcrowding and central heating has a different distribution with 28% of Edinburgh population living in the most deprived areas in Scotland. The distribution of the dwellings in the most deprived area when calculated on the housing domain only is shown in Map 3 below.

Map 3: SIMD 2016 Housing Domain



Source: 2016 Scottish Index of multiple deprivation

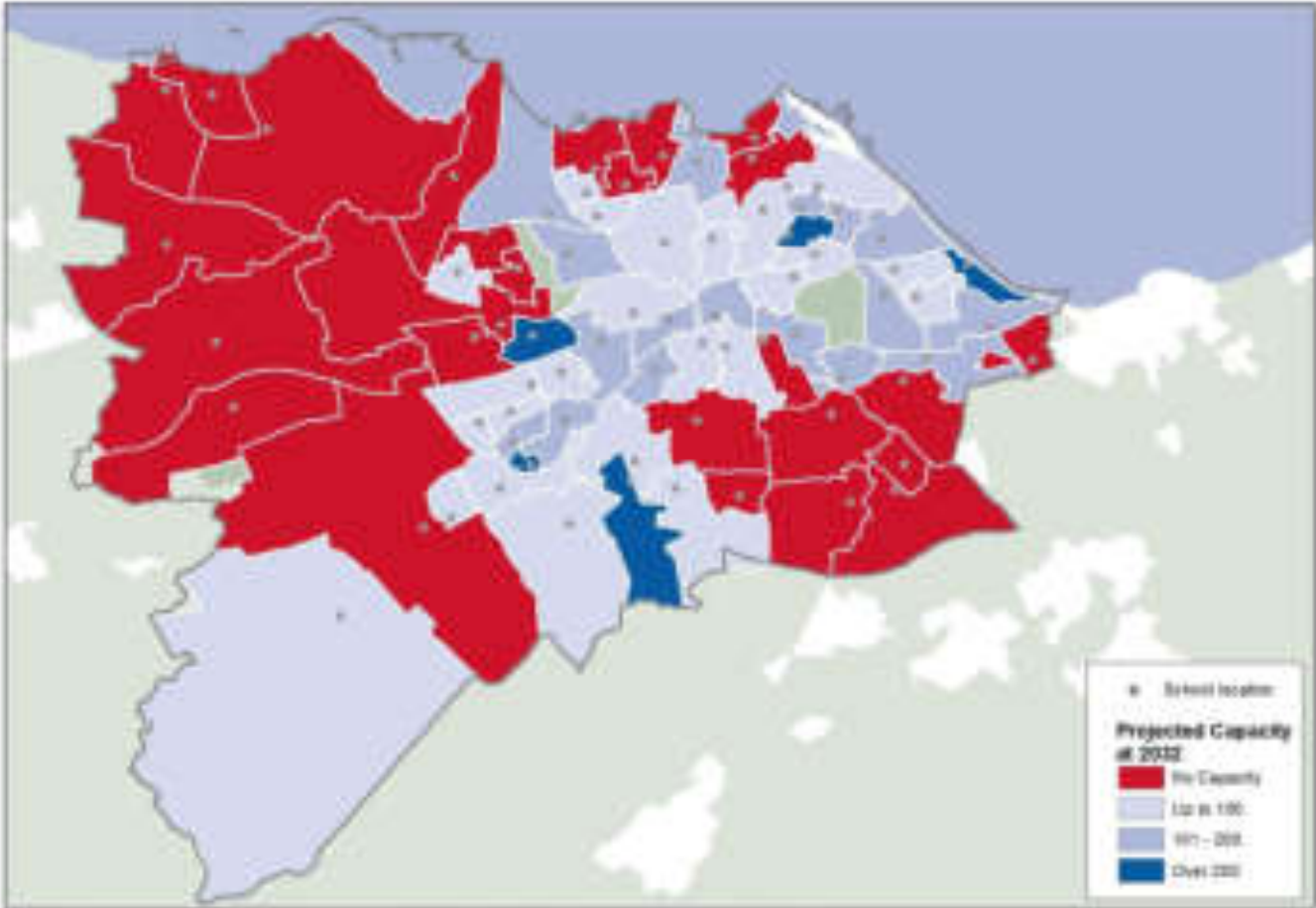
Education

Edinburgh's increasing population is putting pressure on available infrastructure, particularly schools, many of which are already at or close to capacity. In order to efficiently plan for needed new schools and school extensions, projections are made of school roles.

Maps 4 – 7 below show the projected capacities of Edinburgh's schools in 2032. The school role projections are based upon expected population increase due to new house building. The capacity projections do not take account of planned new school provision. The LDP action programme sets out a range of actions to mitigate the impact of expected development.

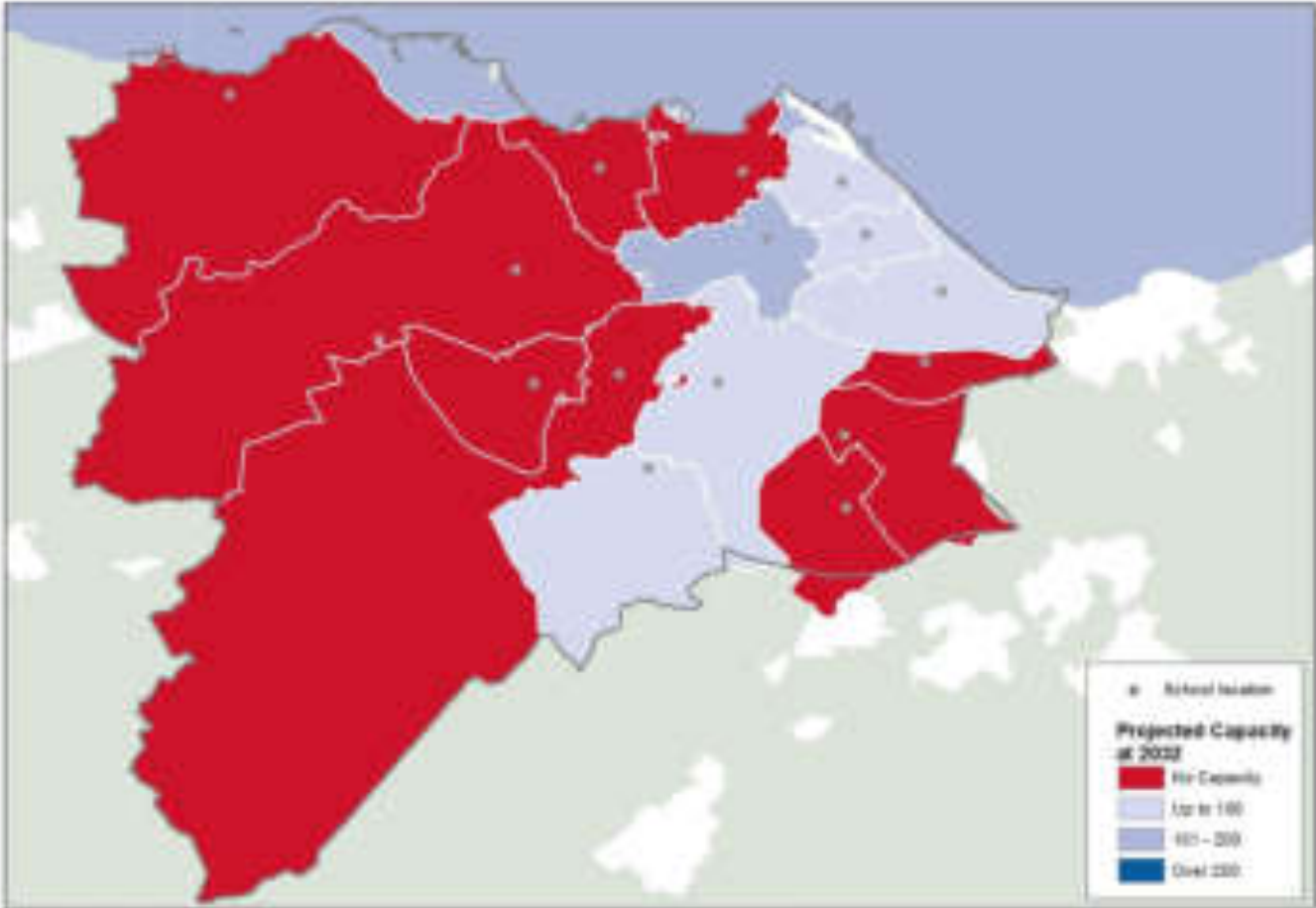
A separate map is shown for non-denominational primary schools, Roman Catholic primary schools, non-denominational secondary schools and Roman Catholic secondary schools.

Map 4: Capacity projection for non-denominational primary schools 2032



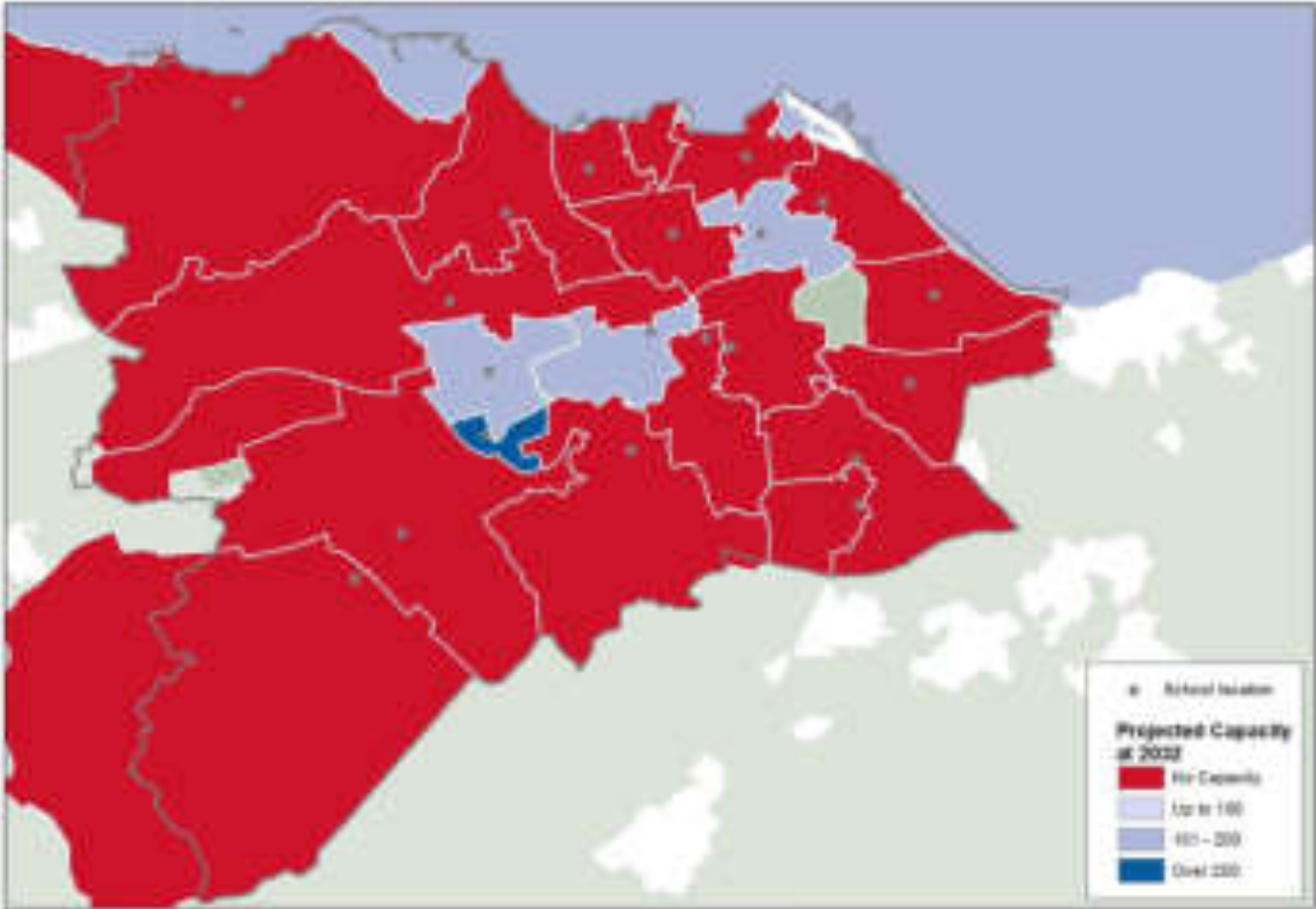
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Map 5: Capacity projection for Roman Catholic primary schools 2032



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Map 6: Capacity projection for non-denominational secondary schools 2032



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Map 7: Capacity projection for Roman Catholic secondary schools 2032



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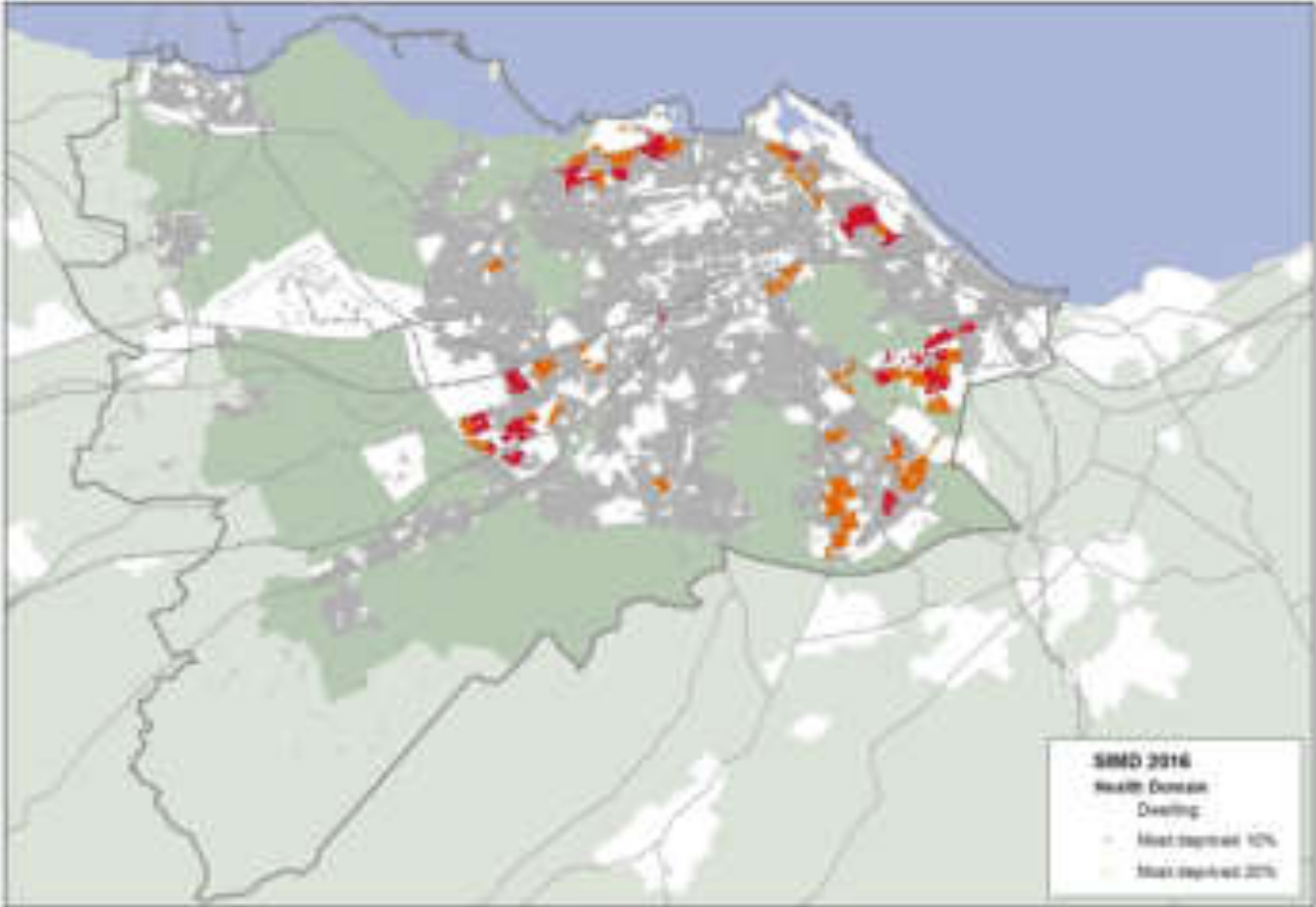
Health

Health Deprivation

Map 8 below shows the households in Edinburgh that are in areas defined as the worst 10% and 20% in Scotland in regards of the Health domain of the Scottish Index of Multiple Deprivation. The health domain of the SIMD is calculated using the following indicators:

- Comparative Illness Factor: standardised ratio
- Hospital stays related to alcohol misuse: standardised ratio
- Hospital stays related to drug misuse: standardised ratio
- Standardised mortality ratio
- Proportion of population being prescribed drugs for anxiety, depression or psychosis
- Proportion of live singleton births of low birth weight
- Emergency stays in hospital: standardised ratio

Map 8: SIMD 2016 Health Domain. Households in worst 20% of Scotland



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Source: 2016 Scottish Index of Multiple Deprivation

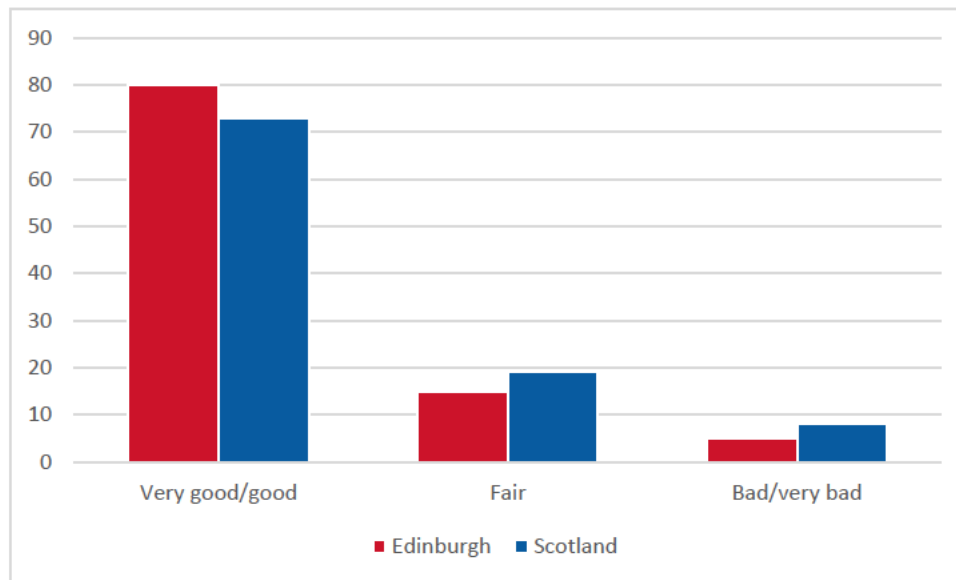
Scottish Health Survey

The general health characteristics of the Scotland's population are captured through the Scottish Health Survey (SHS). The SHS is sample survey carried out annually and is designed to yield a representative sample across Scotland. The survey design also allows for results to be analysed for the City of Edinburgh Council area by combining 4 years of data together. The charts and analysis below are based upon the Scottish health surveys 2015 – 2018.

General Health

All respondents to the SHS were asked to rate their general health as either very good, good, fair, bad or very bad. 80% of Edinburgh residents rated their health as either good or very good. Chart 6 below compares the general health of Edinburgh resident to the whole of Scotland.

Chart 6: Self assessed general health

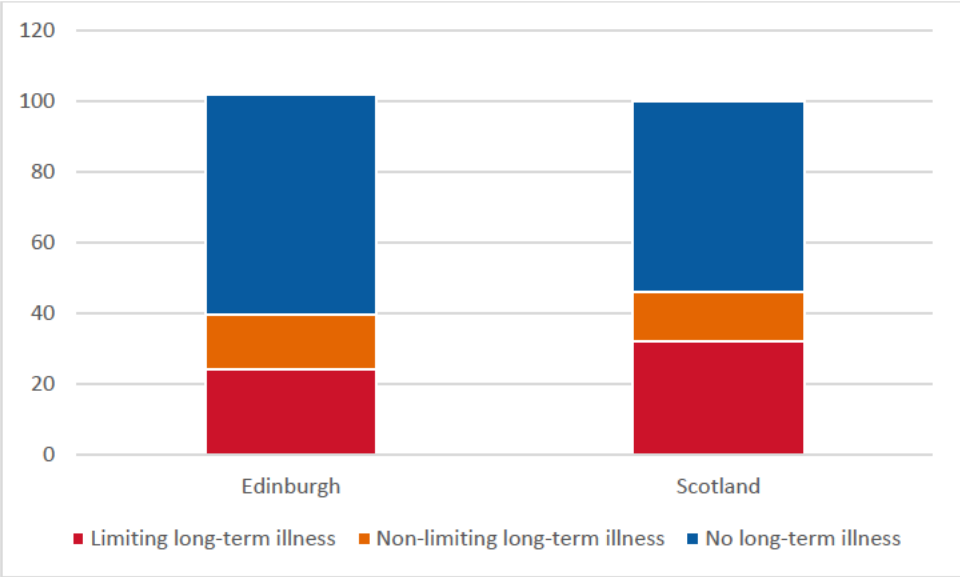


Source: Scottish Health Survey

Long term illness

Participants were asked if they had any physical or mental illness or condition that had lasted or was likely to last for 12 months or more. If the participant said that the condition limited their activities in any way, it was recorded as a limiting long term condition. Chart 7 shows the proportion of participants in Edinburgh and Scotland that were affected by a long term condition. A lower proportion of Edinburgh residents claimed to have a long term illness than the Scottish average.

Chart 7: Long term illness



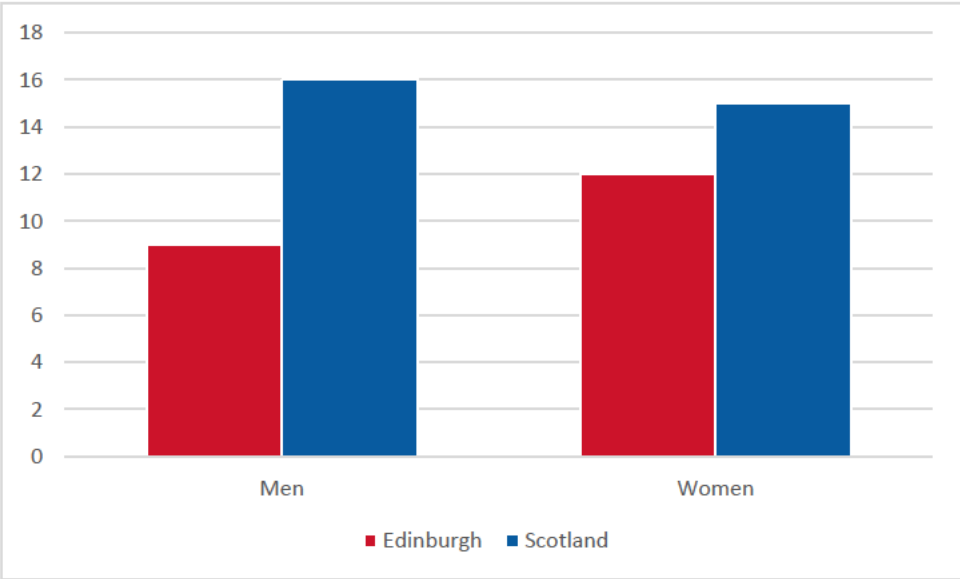
Source: Scottish Health Survey

Cardiovascular disease

Cardiovascular disease (CVD) is a general term that describes any disease of the heart and blood vessels whereby blood flow to the heart, brain or body is restricted. Diseases of the circulatory system are the second most common cause of death in Scotland after cancer.

Chart 8 compares the prevalence of CVD in Edinburgh to residents to the Scottish average. CVDs affect significantly fewer Edinburgh residents that the Scottish average.

Chart 8: Proportion of residents affected by Cardiovascular disease



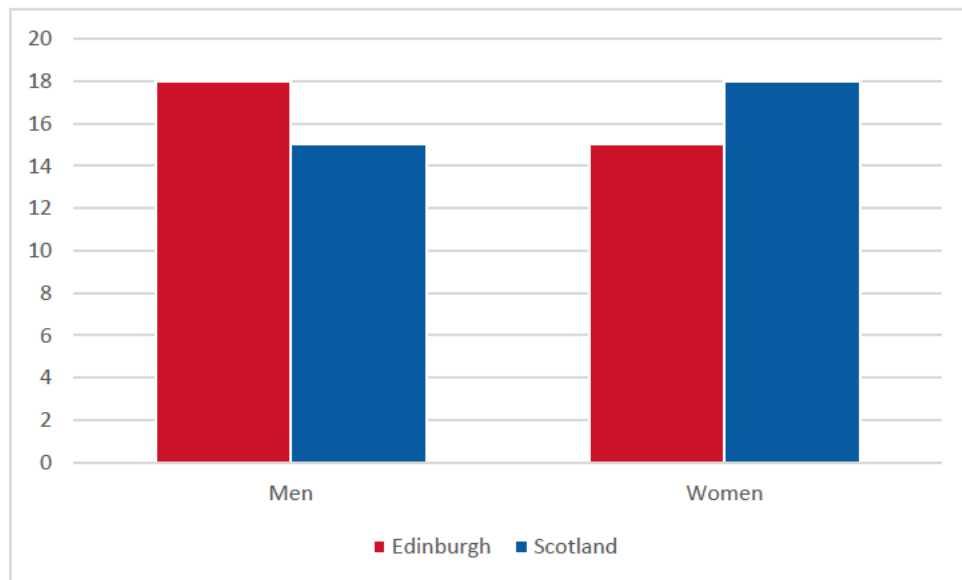
Source: Scottish Health Survey

Mental wellbeing

The General Health Questionnaire (GHQ12) is a scale designed to detect possible psychiatric morbidity in the general population. The questionnaire contains 12 questions about the informant's general level of happiness, depression, anxiety and sleep disturbance over the past four weeks. Responses to these items are scored, with one point given each time a particular feeling or type of behaviour was reported to have been experienced 'more than usual' or 'much more than usual' over the past few weeks. These scores are combined to create an overall score of between zero and twelve. A score of four or more (referred to as a 'high' GHQ12 score) is considered to indicate the presence of a possible psychiatric disorder.

Chart 9 below shows the proportion of informants that scored high on the GHQ12 scale. Edinburgh men had a higher proportion of high scorers compared to the Scottish average whilst Edinburgh women were lower.

Chart 9: % of population scoring 4 or more on GHQ12 scale

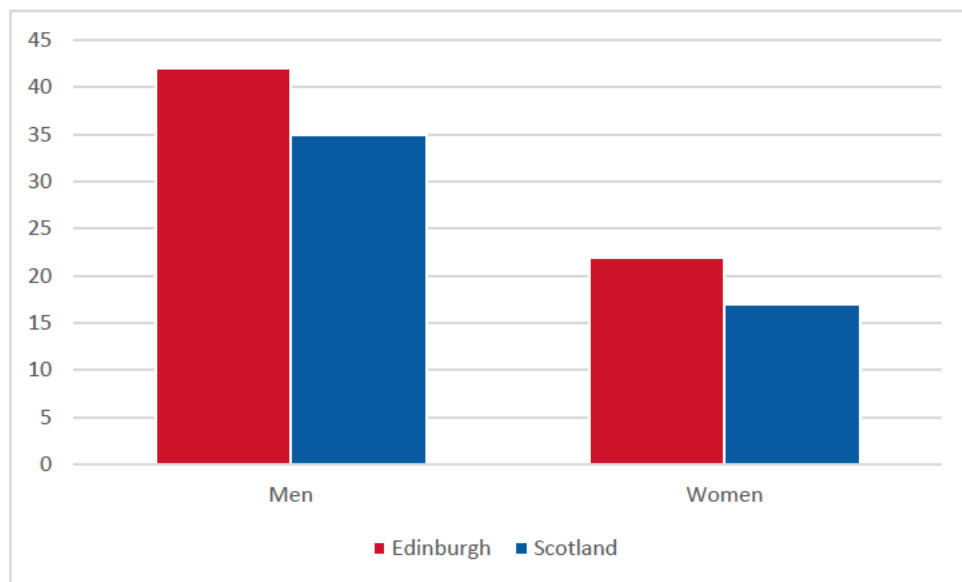


Source: Scottish Health Survey

Alcohol

Problematic alcohol use is recognised as a major public health challenge in Scotland carrying a risk of physical and mental health problems, as well as social and economic losses to individuals and society. The chronic consumption of excessive quantities of alcohol leads to increased risks of high blood pressure, chronic liver disease and cirrhosis, pancreatitis, some cancers, mental ill-health and accidents. Chart 10 compares the proportion of Edinburgh participants that were classified as drinking hazardous levels of alcohol. Over 40% of men in Edinburgh were classified as hazardous drinkers – almost double the proportion of women.

Chart 10: proportion of participants classified as hazardous drinkers

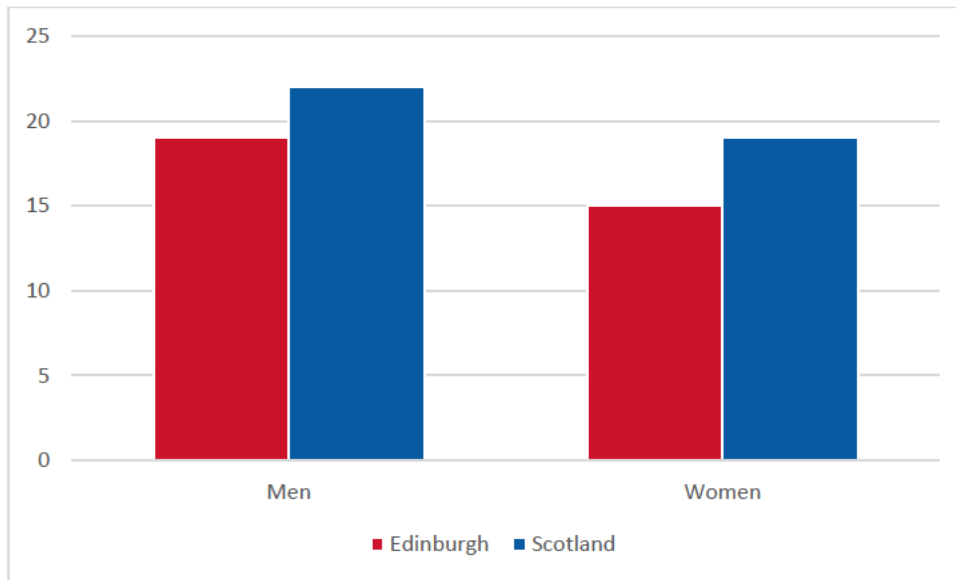


Source: Scottish Health Survey

Smoking

Tobacco use is the leading cause of premature mortality and preventable poor health. Tobacco use is associated with stillbirths and infant deaths, childhood respiratory diseases, and communicable as well as non-communicable diseases in adulthood. Chart 11 shows the proportion of Edinburgh respondents who said they were regular smokers. Edinburgh has fewer regular smokers than the Scottish average.

Chart 11: Proportion of participants that are regular smokers

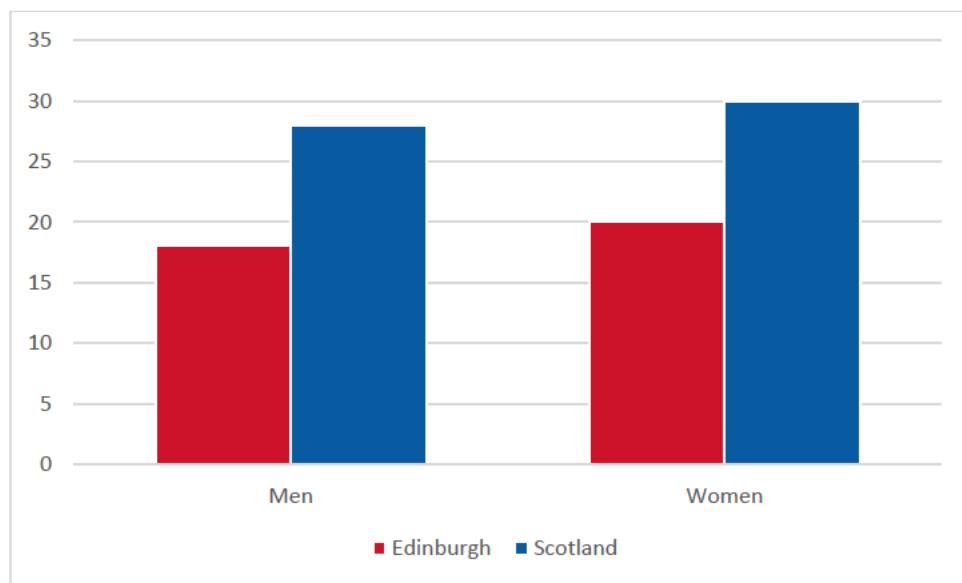


Source: Scottish Health Survey

Obesity

The impact of being overweight and/or obese upon quality of life and health is felt across the life course. Childhood obesity is associated with a higher chance of adult obesity as well as premature death, disability, diabetes, cardiovascular disease, osteoarthritis and some cancers. Scotland has one of the worst obesity records among OECD countries. Almost 1 in 5 men and women in Edinburgh are classified as obese, though this is significantly lower than for Scotland as a whole. Chart 12 shows how Edinburgh compares to the Scottish average.

Chart 12: Proportion of participants classified as obese



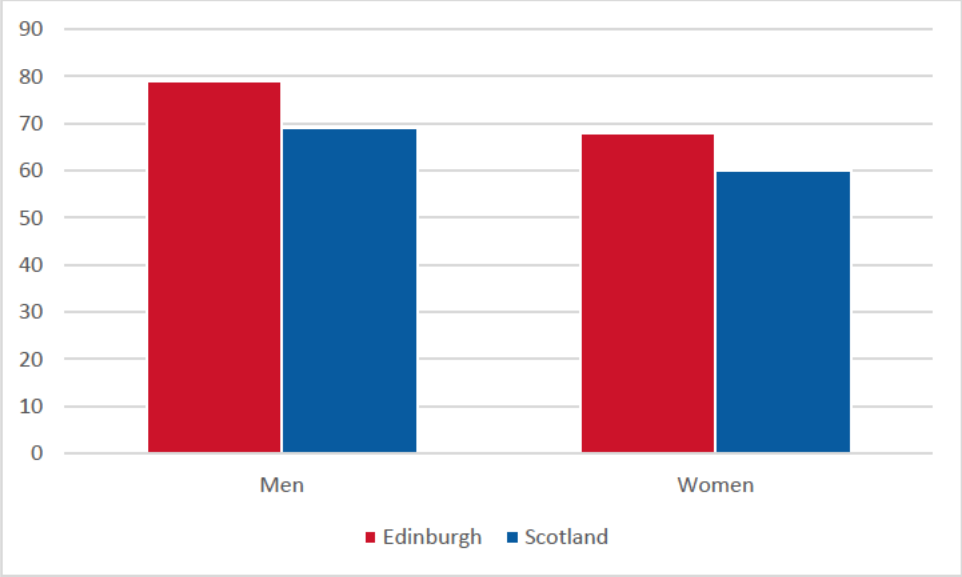
Source: Scottish Health Survey

Physical activity

There is widespread consensus around the evidence base for the health, economic and social benefits of physical activity with strong scientific evidence that sufficient, regular physical activity is beneficial for the health of body and mind. Physical activity improves the health of the heart; skeletal muscles; bones; blood; immune system and nervous system. Physical activity also improves psychological wellbeing; self-perception and self-esteem; and mood and sleep quality.

The UK Chief Medical Officers' guidelines on recommended amounts of physical activity for adults were issued in 2011. Chart 13 shows the proportion of Edinburgh respondents who meet the guidelines on physical activity. 79% of men from Edinburgh were meeting the guidelines compared to 66% for women. A greater proportion of both men and women from Edinburgh meet the guidelines than the Scottish average.

Chart 13: Proportion of respondents meeting the guidelines for physical activity



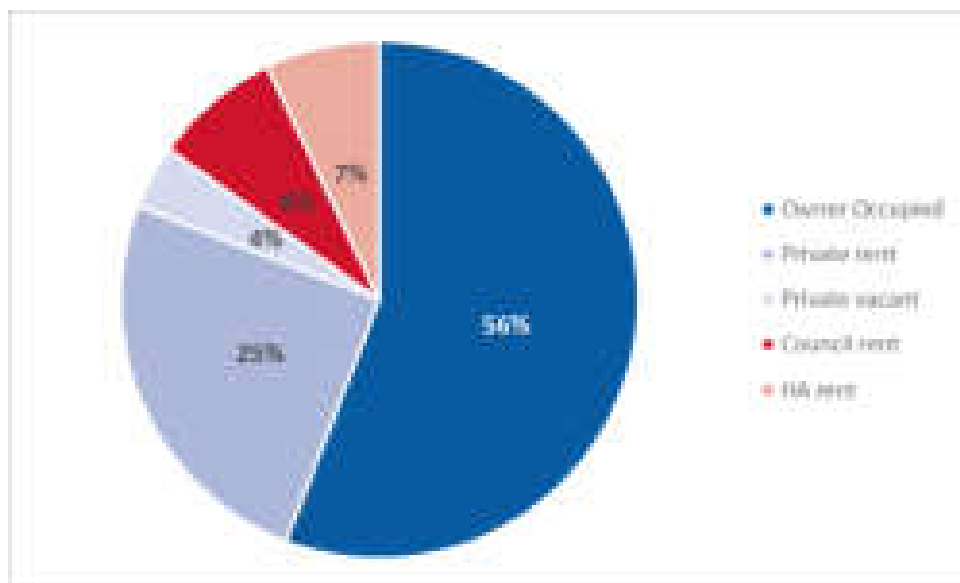
Source: Scottish Health Survey

Housing

Housing Stock

There was an estimated total stock of 248,300 dwellings in Edinburgh in 2018. Of these, 56% are owner occupied, 25% are private rented and 15% are social rented, either from the council or from other registered social landlords. The breakdown of housing stock by tenure is shown in chart 14 below

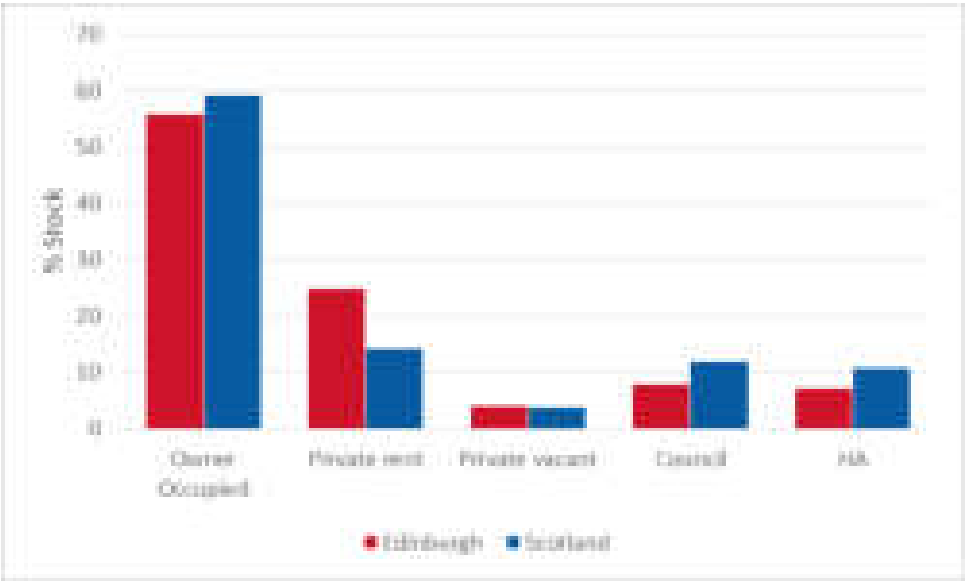
Chart 14. Housing stock by tenure



Source: Scottish Government housing statistics

Edinburgh has a lower proportion of its housing stock in owner occupation than the Scottish average and lower levels of social rented housing. The private rented sector in Edinburgh, however, is almost double the level of the Scottish average. At 25% of all dwellings, Edinburgh has the highest level of private rented dwellings than any other Scottish local authority. Chart 15 compares the makeup of Edinburgh's housing stock compared to the Scottish average.

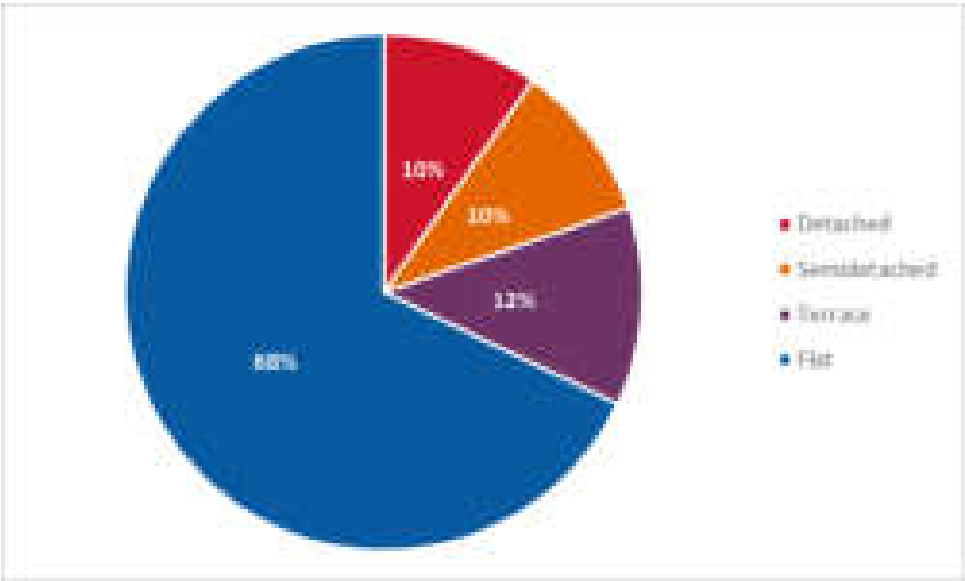
Chart 15: Housing Stock 2018



Source: Scottish Government housing statistics

Over two thirds of Edinburgh’s housing stock are flats. The remaining housing stock is evenly distributed between detached, semidetached and terraced houses. Chart 16 shows Edinburgh’s housing stock by built form.

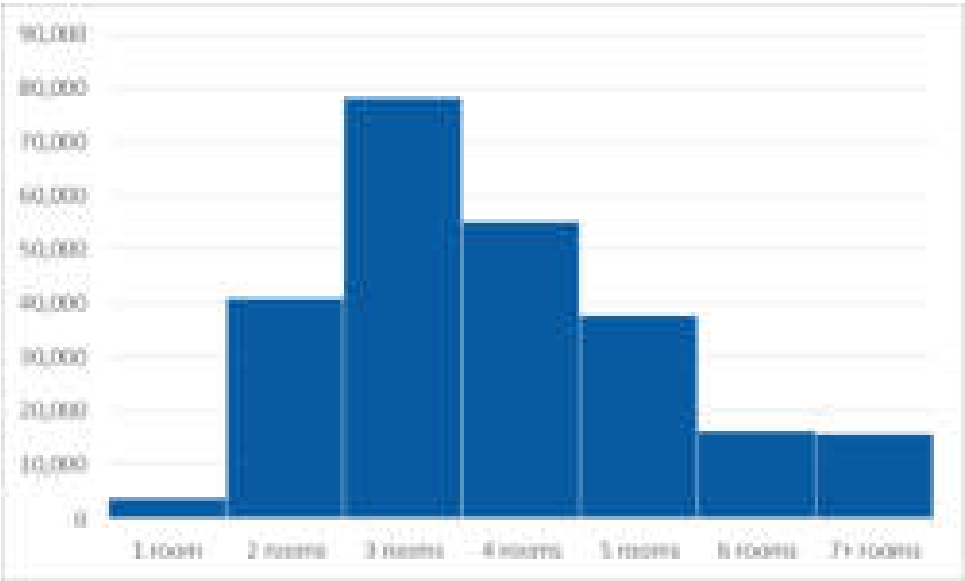
Chart 16. Housing stock by built form



Source: Scottish Government housing statistics

As such a high proportion of dwellings in Edinburgh are flats, the distribution of dwellings by number of rooms is skewed towards smaller units. This distribution is shown in chart 17.

Chart 17. Housing stock by number of rooms

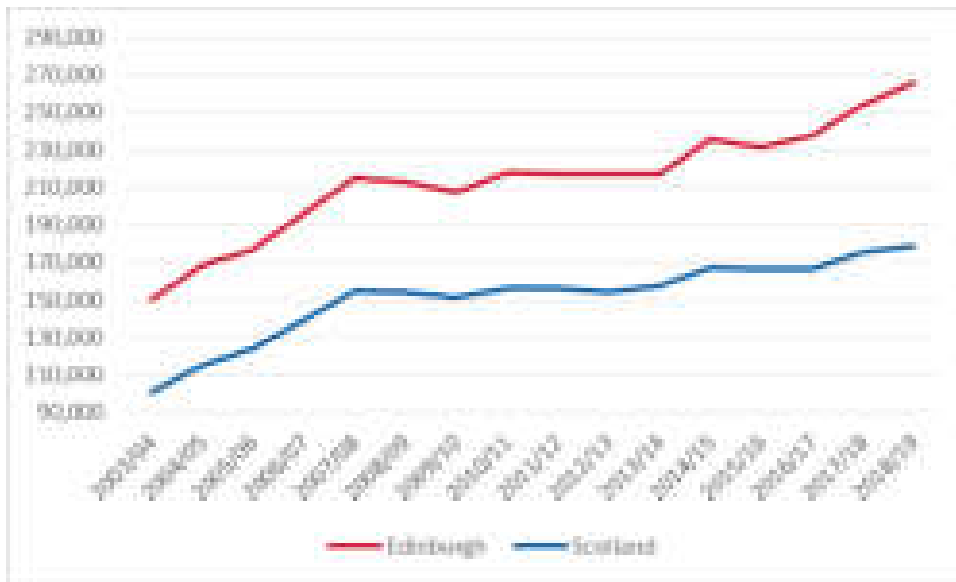


Source: Scottish Government housing statistics

House Prices

Over the financial year 2018/19, the average house price in Edinburgh was £265,900. This is almost 50% higher than the Scottish average price of £178,900. House prices in the City were rising steeply in the early 2000s but following the credit crunch in 2008, prices fell. Since 2014, prices have been rising again with the current average price being 5% higher than the previous year. Chart 18 below shows house prices in Edinburgh compared to the Scottish average.

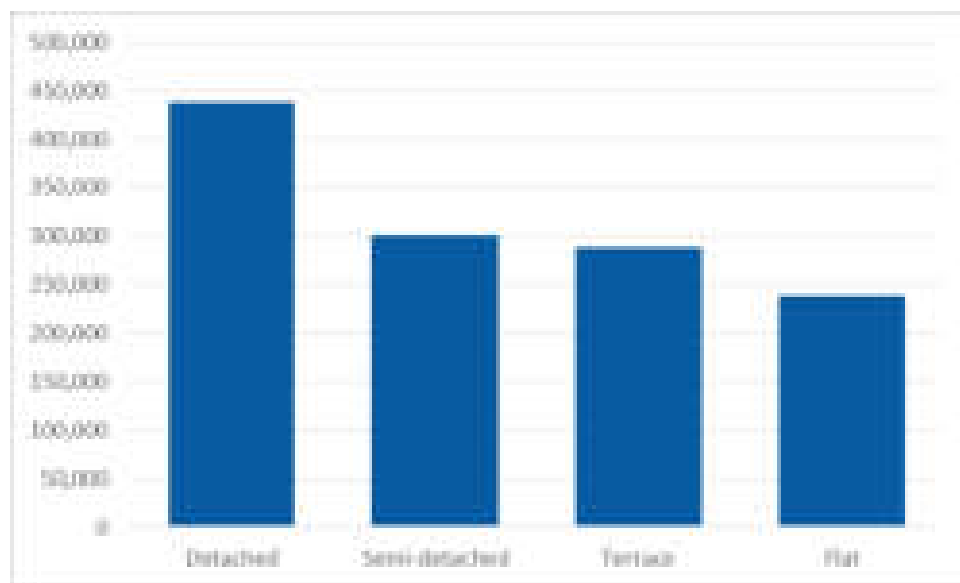
Chart 18. Average house prices 2003 to 2019



Source: Registers of Scotland

Detached properties have the highest average selling price of £438,100 in 2018/19. The average selling price for a flat in the same period was £238,300. Chart 19 shows the average selling price for dwellings in 2018/19 according to the property type.

Chart 19: Average price by dwelling type 2018/19

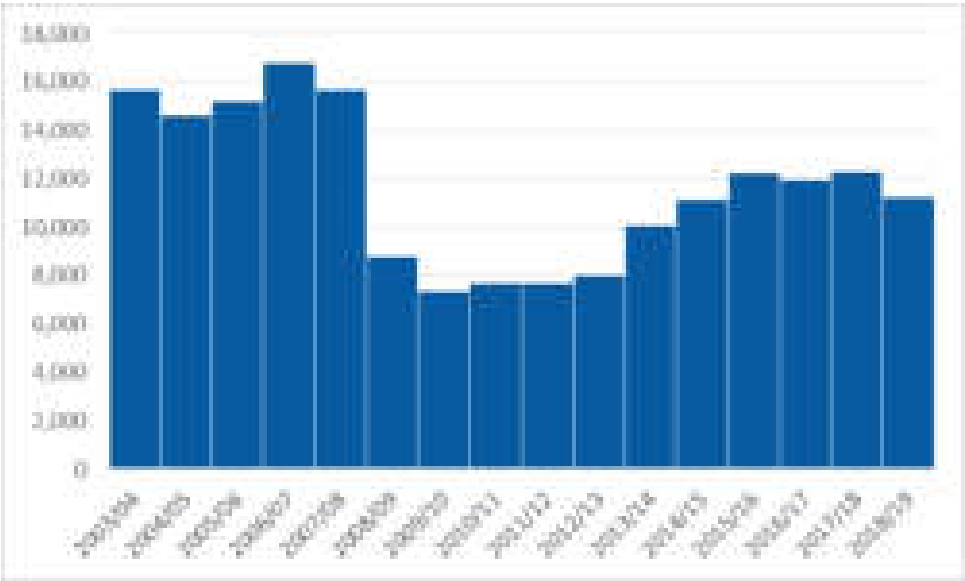


Source: Registers of Scotland

Prior to the credit crunch, the average number of house sales per year Edinburgh was 15,600. In 2009/10 the number of sales had fallen to half that level. The recovery from recession has seen an increase in house sales, but sales have not yet risen to pre-credit crunch levels. Volume of house sales is shown in chart 20.

In terms of the types of properties sold over the last three years, the distribution closely matches the stock of housing in the city with 70% of sales being flats, 8% detached, 7% semidetached and 15% terraced.

Chart 20: Volume of house sales in Edinburgh 2003 – 2019

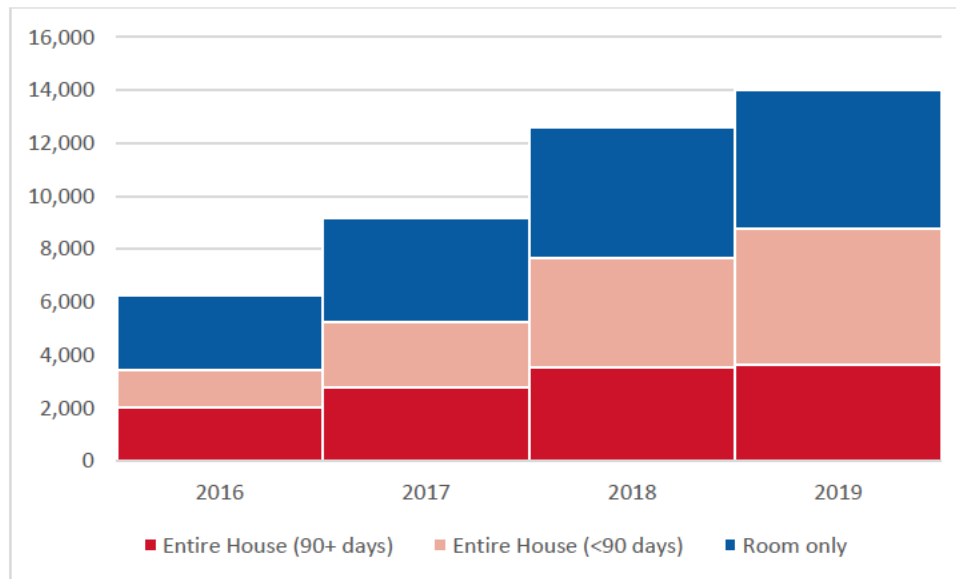


Source: Registers of Scotland

Short Stay Commercial Visitor Accommodation

Edinburgh has experienced a steep rise in the number of properties being used as short term visitor accommodation. In 2016 there were 6,300 properties with Airbnb. This number has risen to 14,000 in 2019. Of the 14,000 properties registered, 8,740 are for the entire house or apartment and 5,280 are for a room within the house. Of the 8,740 entire properties registered, 3,620 are available for 90 days or more, indicating that these properties may no longer be being used for residential purpose. The increase in Airbnb registrations has been greatest for properties available for less than 90 days. Chart 21 shows the changes in properties registered with Airbnb over the last four years. The analysis is based upon all properties registered with Airbnb. A recent Scottish Government report gives a lower total figure for Edinburgh. The Scottish Government analysis removed properties for which the owner had not updated the calendar availability for over six months, assuming that they are no longer actively being used for visitor accommodation.

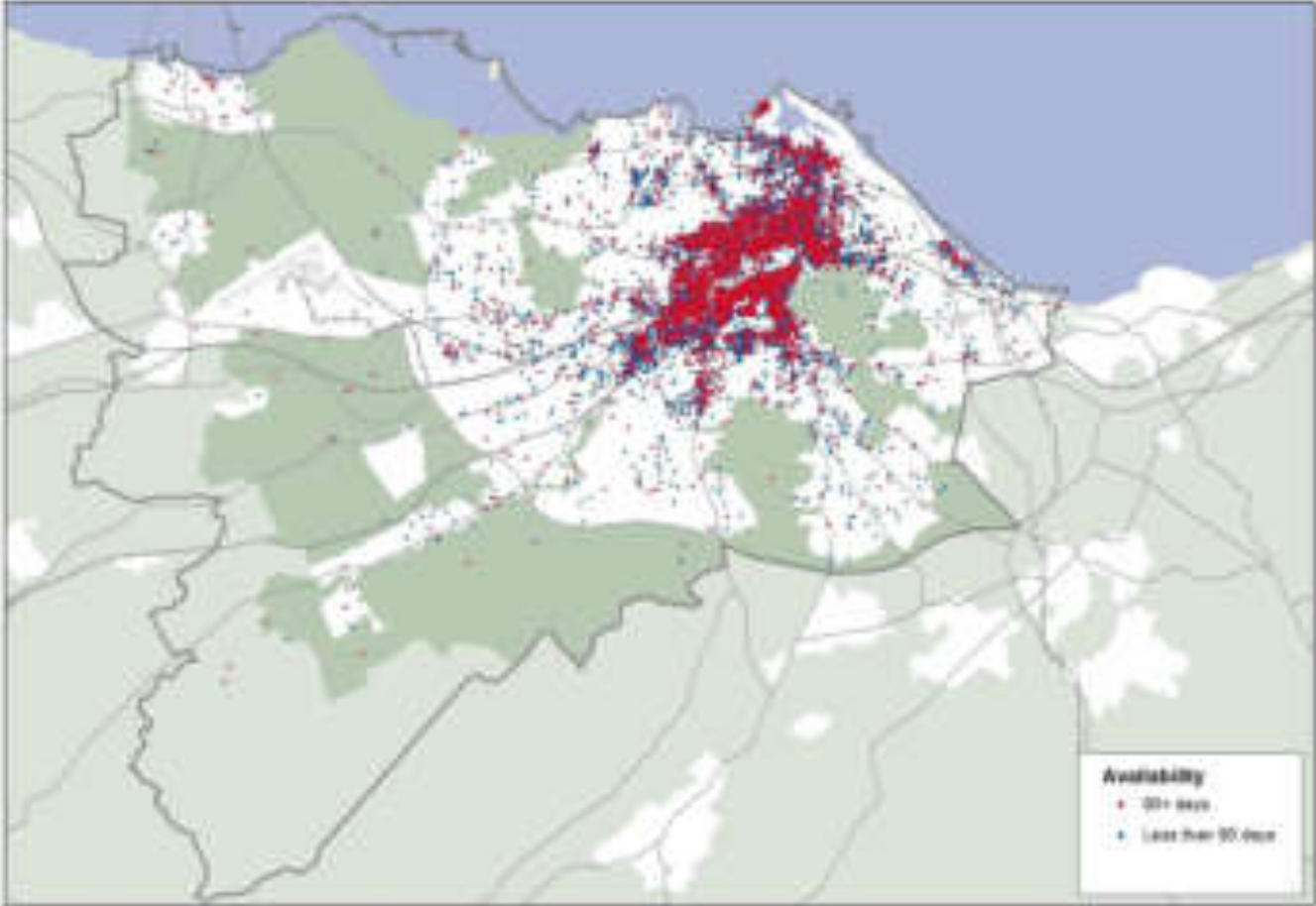
Chart 21: Properties registered with Airbnb



Source: Inside Airbnb

Properties registered with Airbnb are concentrated mainly close to the City Centre and Leith. The distribution of entire dwellings registered with Airbnb is shown on map 9.

Map 9: Entire properties registered with Airbnb



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Housing Supply Targets

The South East Scotland Strategic Development Plan sets targets for the number of new homes to be delivered in Edinburgh for the periods 2009 to 2019 and 2019 to 2024. The local development plan which covers a ten year period, increased the target to encompass the period to 2026. These targets are summarised in table 1 below.

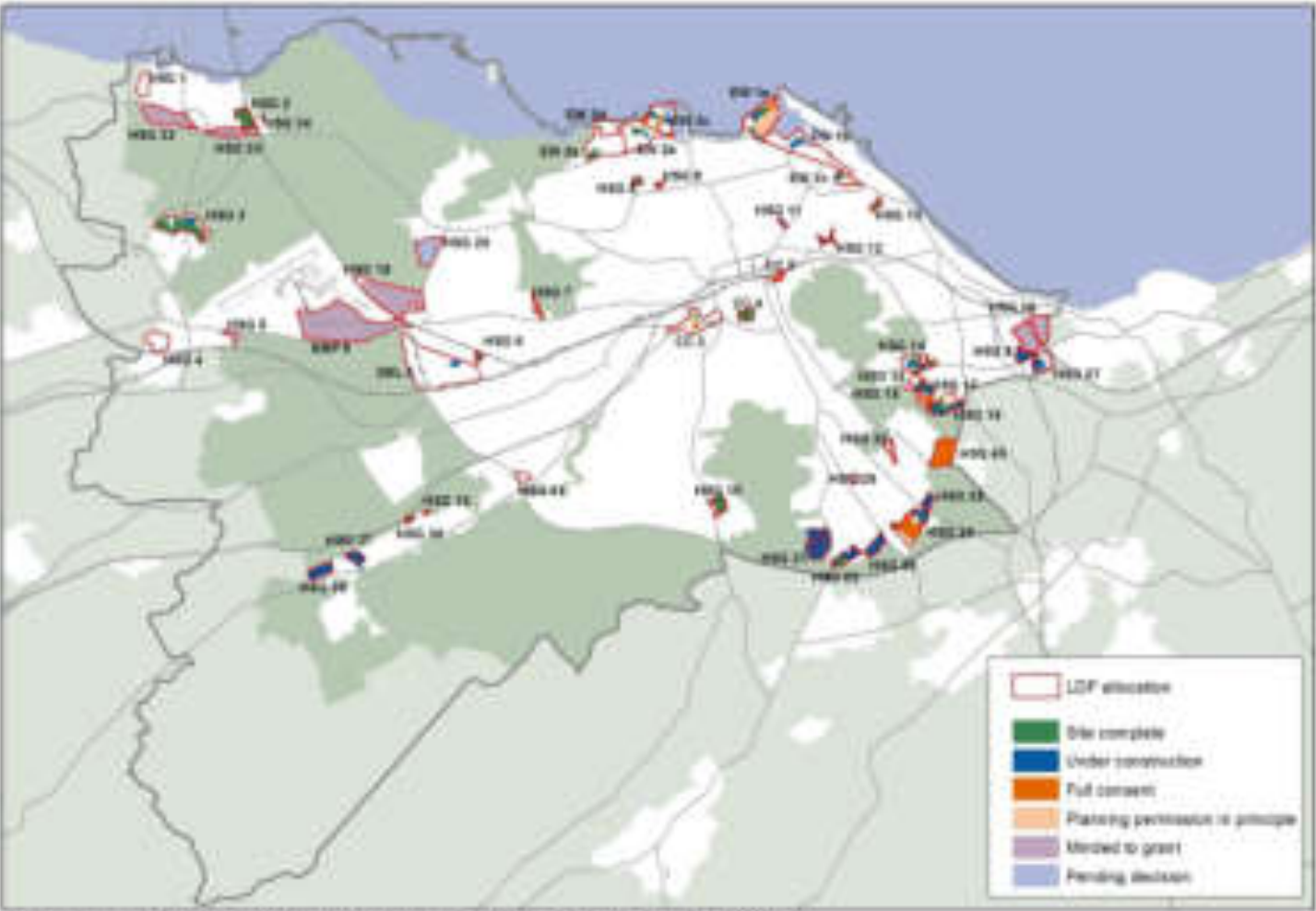
Table 1. Housing Supply Targets

	2009 - 2019	2019-2024	2024-2026	2009 - 2026
Housing Supply Target (dwellings)	22,300	7,210	2,884	32,394
Annual Average (dwellings per year)	2,230	1,442	1,442	1,906

Housing Allocations

The local development plan allocated more than sufficient housing land to meet the housing land requirement on a range of sites in both brownfield and greenfield locations. These sites were detailed in table 4 of the local development plan. Many of these sites are already under construction, some completed. The status of the allocated sites is shown in map 10 and table 2 below.

Map 10: Housing sites allocated in the LDP



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Table 2: Progress on allocated housing sites

		Status	Estimated Capacity	Units Consented	Units Completed	Units Remaining
HSG 1	Springfield, Queensferry	-	150			150
HSG 2	Agilent, South Queensferry	Under construction	450	450	450	0
HSG 3	North Kirkliston	Under construction	680	712	670	10
HSG 4	West Newbridge	-	500			500
HSG 5	Hillwood Road, Ratho	Pending Decision	50-100			
HSG 6	South Gyle Wynd	Complete	204	203	203	0
HSG 7	Edinburgh Zoo	-	80			80
HSG 8	Telford College (North Campus)	Complete	330	329	329	0
HSG 9	City Park	Complete	200	203	203	0
HSG 10	Fairmilehead Water Treatment Works	Complete	275	280	280	0
HSG 11	Shrub Place	Under construction	410	376	64	312
HSG 12	Lochend Butterfly	Under construction	590	597	491	106
HSG 13	Eastern General Hospital	Complete	295	295	295	0
HSG 14	Niddrie Mains	Under construction	814	819	512	307
HSG 15	Greendykes Road	-	145			
HSG 16	Thistle Foundation	Under construction	256	256	107	149
HSG 17	Greendykes	Under construction	990	693	234	459
HSG 18	New Greendykes	Under construction	878	1,025	503	522

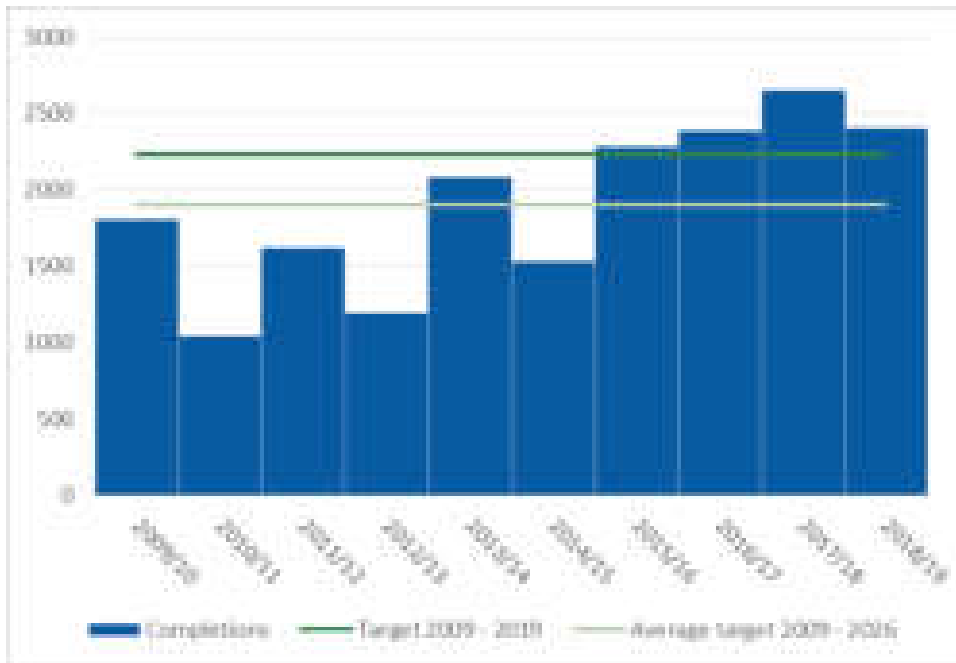
		Status	Estimated Capacity	Units Consented	Units Completed	Units Remaining
CC2	New Street	Full Consent	250	207	40	167
CC3	Fountainbridge	Under construction	1,200	1,076	380	696
CC4	Quartermile	Complete	1,110	983	983	0
EW 1a	Leith Waterfront (Western Harbour)	Under construction	3,000	3,008	1,331	1,669
EW 1b	Central Leith Waterfront	Part Under construction	2,600	445	0	2,600
EW 1c	Leith Waterfront (Salamander Place)	Under construction	1,500	774	205	1,295
EW 2a	Forth Quarter	Under construction	1,800	1,800	759	1,041
EW 2b	Central Development Area	Under construction	2,000	573	317	1,683
EW 2c	Granton Harbour	Under construction	1,980	1,466	344	1,636
EW 2d	North Shore	-	850			
HSG 19	Maybury	Part minded to grant	1700-2000			
HSG 20	Cammo	Application pending	500-700			
Emp 6	International Business Gateway	Application pending	n/a			
Del 4	Edinburgh Park / South Gyle	Part Under construction	450-700	200	150	50
HSG 21	Broomhills	Under construction	425-595	633	0	633
Del 4	Edinburgh Park / South Gyle	Part Under construction	450-700	200	192	8
HSG 21	Broomhills	Under construction	425-595	549	57	492
HSG 22	Burdiehouse	Under construction	250-350	332	268	64
HSG 23	Gilmerton Dykes Road	Complete	50-70	61	61	0

		Status	Estimated Capacity	Units Consented	Units Completed	Units Remaining
HSG 24	Gilmerton Station Road	Under construction	600-650	807	33	774
HSG 25	The Drum	Under construction	125-175	149		149
HSG 26	Newcraighall North	Under construction	220	220	179	41
HSG 27	Newcraighall East	Under construction	275-385	176	59	270
HSG 28	Ellen's Glen Road	-	220-260			
HSG 29	Brunstane	Minded to grant	950-1330			
HSG 30	Mordenvale Road	-	188			
HSG 31	Curriemuirend	-	150-180			
HSG 32	Builyeon Road	Minded to grant	700-980			
HSG 33	South Scotstoun, Queensferry	Minded to grant	312-437			
HSG 34	Dalmeny	Under construction	12-18	15	6	9
HSG 35	Riccarton Mains Road, Currie	Complete	25-35	17	17	0
HSG 36	Curriehill Road, Currie	Complete	50-70	54	54	0
HSG 37	Newmills Road, Balerno	Under construction	175-245	206	58	148
HSG 38	Ravelrig Road, Balerno	Under construction	120	140	32	108
HSG 39	North of Lang Loan	Under construction	220	260	9	251
HSG 40	South East Wedge South: Edmonstone	Full consent	170-370	696		696
HSG 41	South East Wedge North: The Wisp	Under construction	71	80	48	32

Housing Completions

During the early part of the plan period, following the credit crunch, the number of homes completed was significantly below the level required to meet the target. Development activity has since increased and, should current development levels continue, the overall target will be met. Chart 22 below shows completions since 2009 against the annual average target set by the SDP.

Chart 22: Annual Housing Completions 2009 – 2019



Source: Annual Housing Land Audit and Completions Programme

Location of Housing Completions

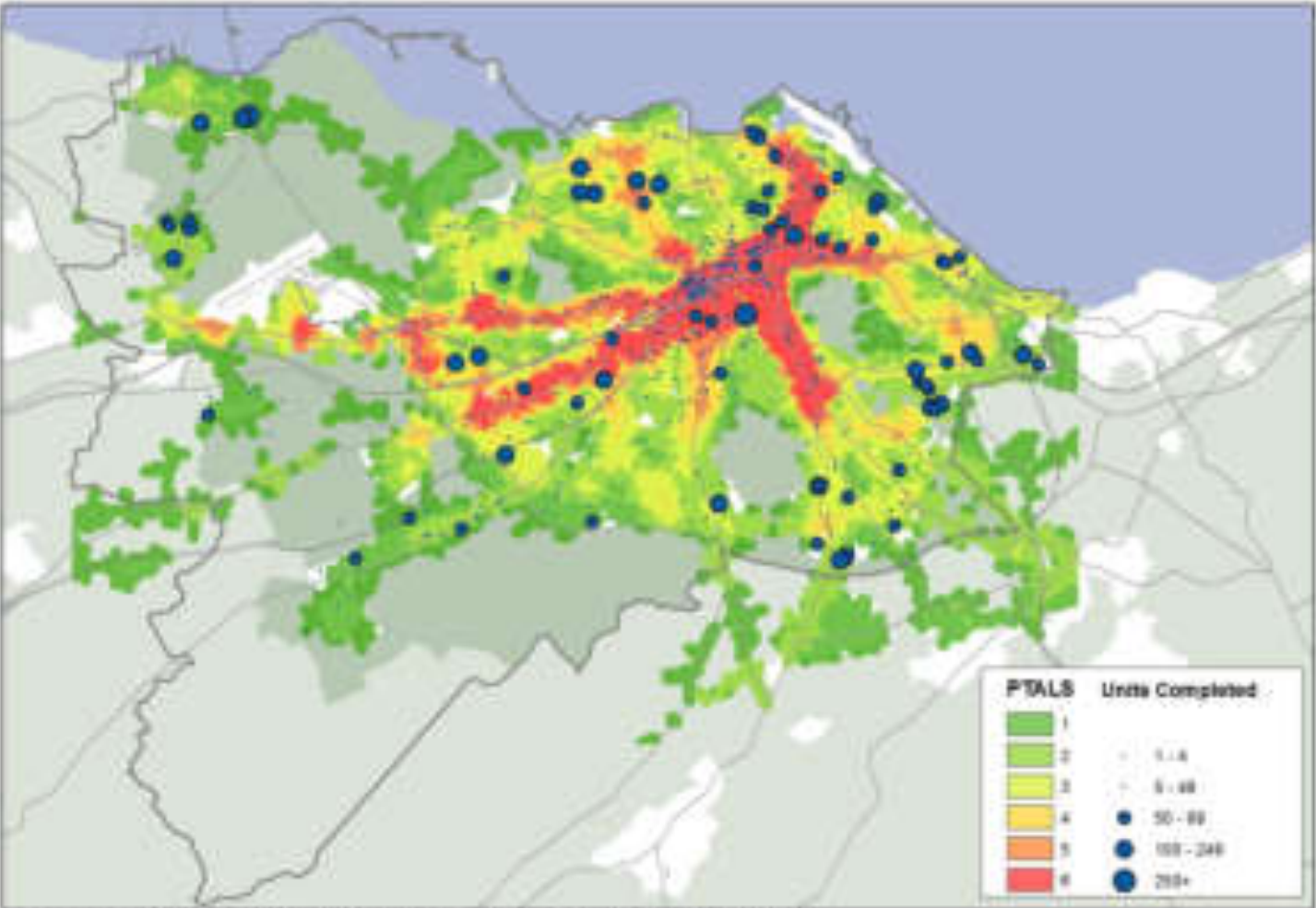
Map 11 below shows the locations of recent housing completions in terms of the public transport accessibility levels. The numbers of completed houses within the different accessibility bands is shown in table 3. Public transport accessibility is measured according to PTAL scores. The PTAL score is a relative measure of accessibility based upon the number and frequency of different public transport services that can be reached from any given point. A PTAL score of 1 is the lowest level of accessibility and a PTAL score of 6 is the highest. Whilst a lot of small developments have occurred in highly accessible locations, most of the major

developments have occurred in less accessible locations. It should be noted that the PTAL measure is calculated using existing public transport stops and many of the larger developments have been green field developments which, by their nature, tend to be located in areas away from existing bus stops.

Table 3: Completions by Public Transport Accessibility 2014 - 2019

PTAL	Local Development (Less than 50)	% total	Major Development (50+units)	% total	All Development	% total
1	198	8	1,512	18	1,710	15
2	315	12	3,362	39	3,677	33
3	459	18	1,664	19	2,123	19
4	485	19	701	8	1,186	11
5	301	12	635	7	936	8
6	849	33	747	9	1,596	14
Total	2,607		8,621		11,228	

Map 11: Completions 2014 - 2019 by Public Transport Accessibility Level



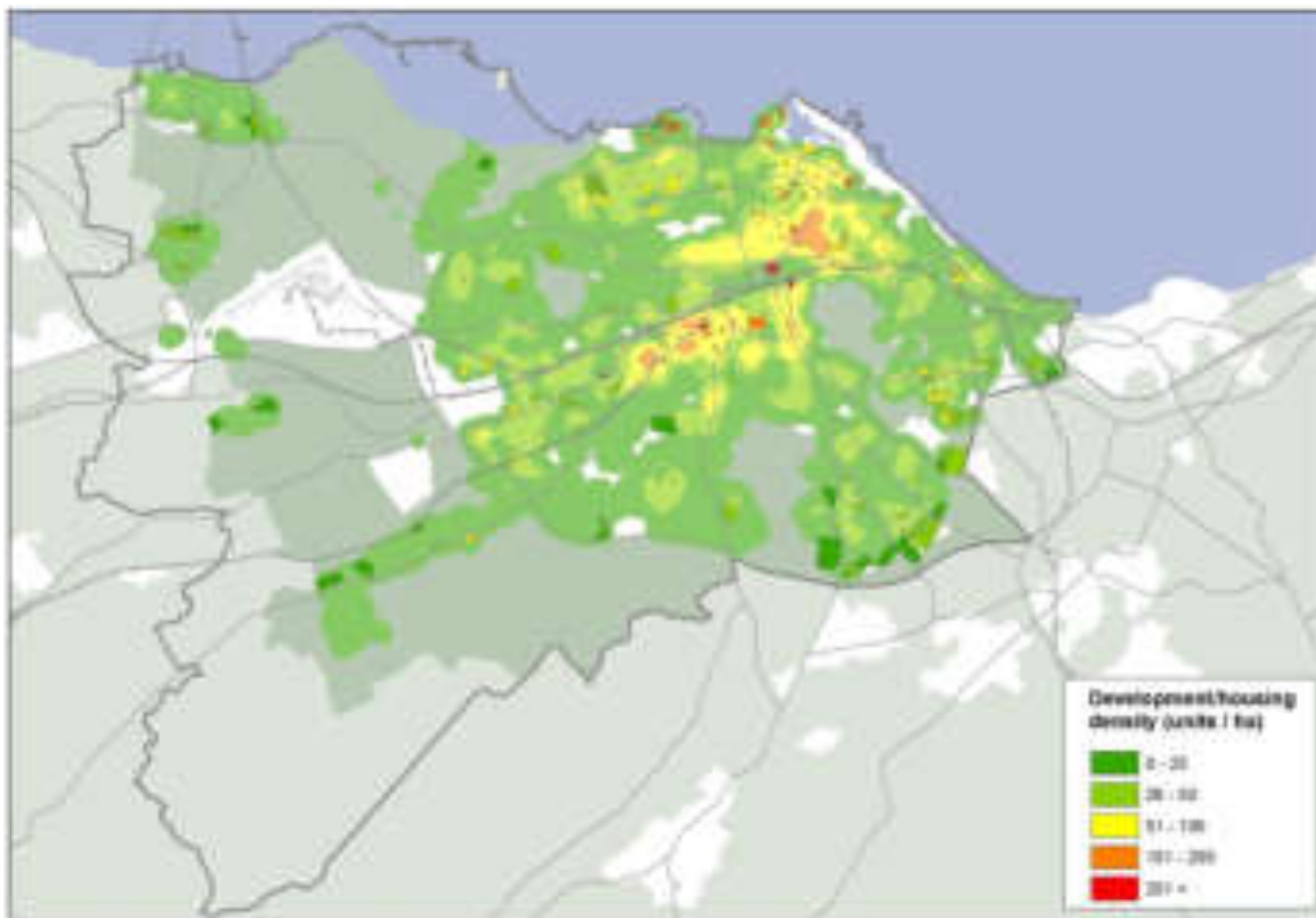
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Source: Annual Housing Land Audit and Completions Programme

Housing density

Hou 4 seeks to ensure an appropriate density of development on each site. Map 12 shows the existing housing density in Edinburgh overlaid with recently completed and current housing sites.

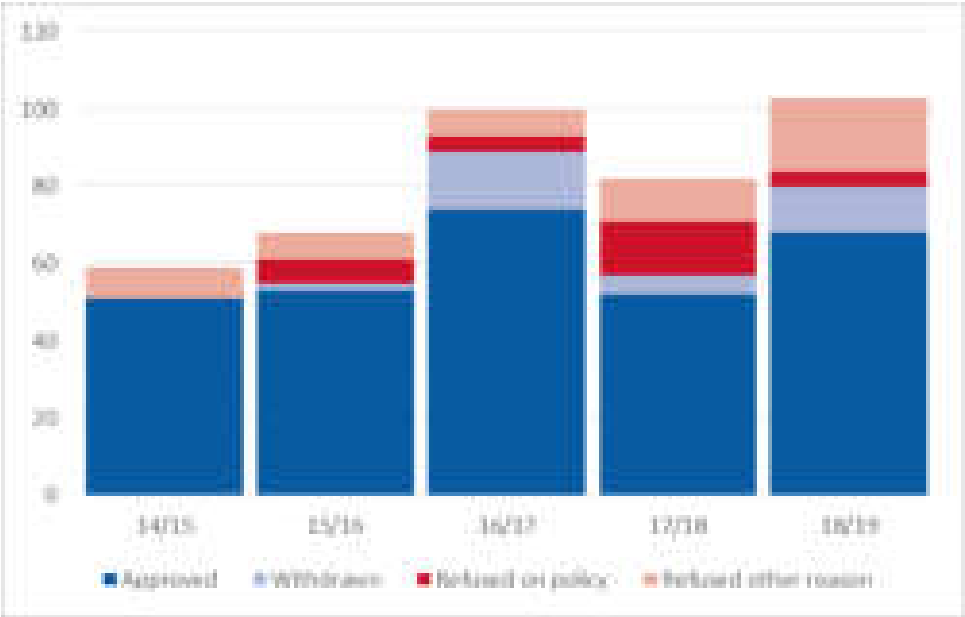
Map 12: Density of Housing development (recent completions and current sites)



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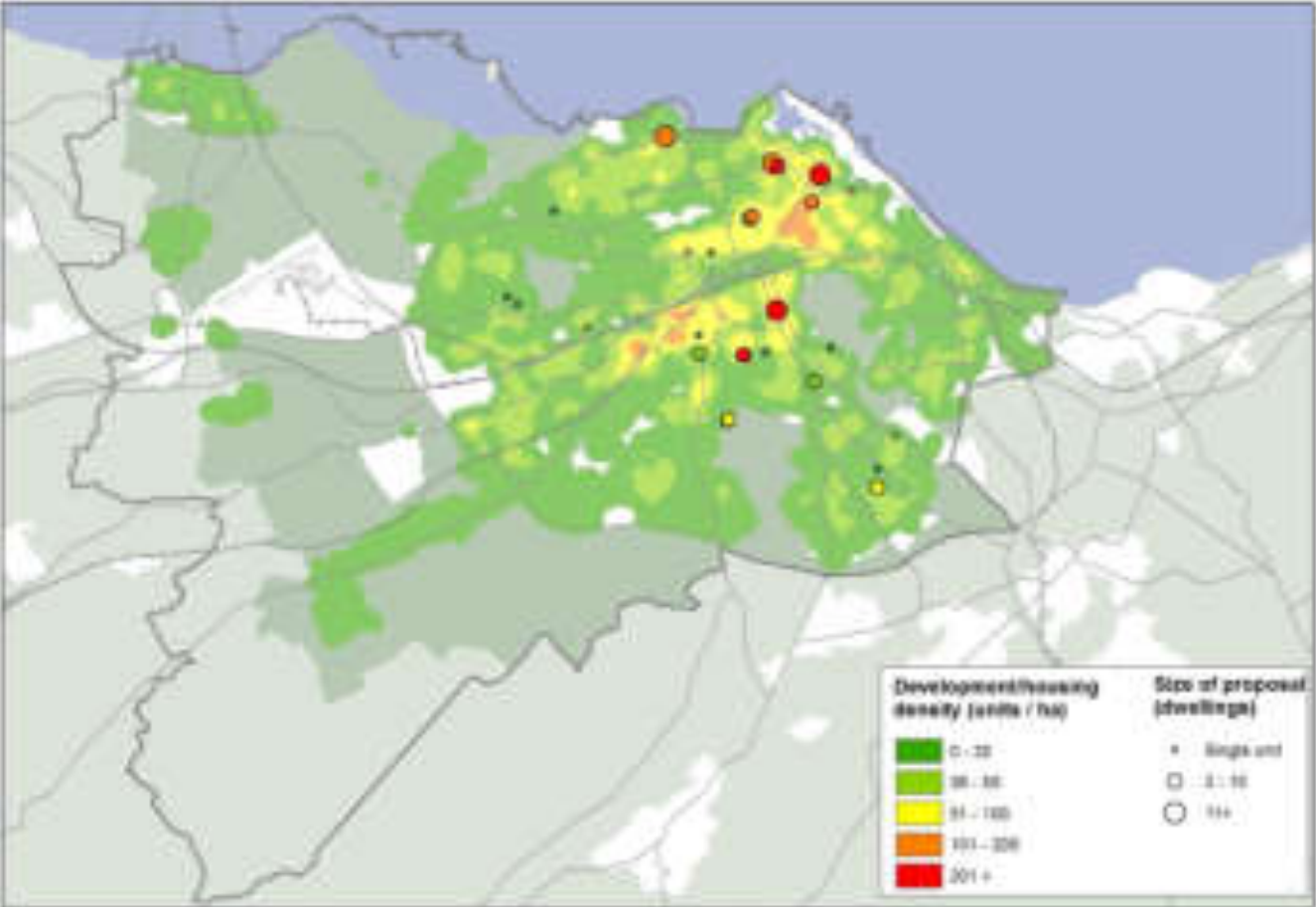
Chart 22 shows the number of times that Hou 4 has been specifically applied in determining planning applications for new housing, broken down by the eventual decision.

Chart 22: Application of Policy Hou 4



Planning applications that have been refused on the grounds of inappropriate development density are shown on Map 13 below.

Map 13: Planning applications refused on the grounds of Hou 4



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Change of use to housing

LDP policy Hou 5 relates to the conversion of non-residential buildings to housing. It states:

Planning permission will be granted for the change of use of existing buildings in non-residential use to housing, provided:

- a satisfactory residential environment can be achieved
- housing would be compatible with nearby uses
- appropriate open space, amenity and car and cycle parking standards are met
- the change of use is acceptable having regard to other policies in this plan including those that seek to safeguard or provide for important or vulnerable uses.

Chart 23 shows the number of planning applications determined over the last five years involving the conversion of non-residential to housing.

Chart 23: Planning applications determined for change of use to residential

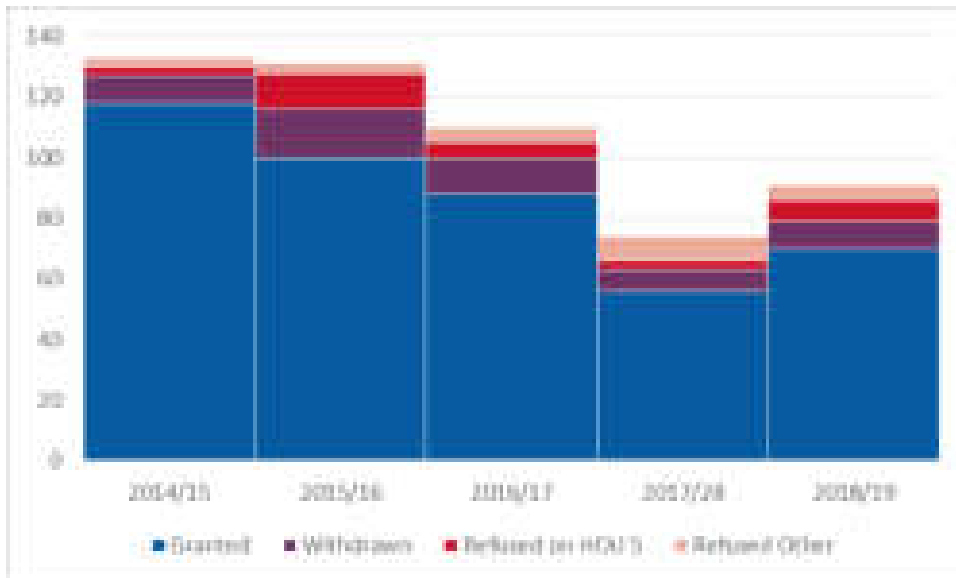
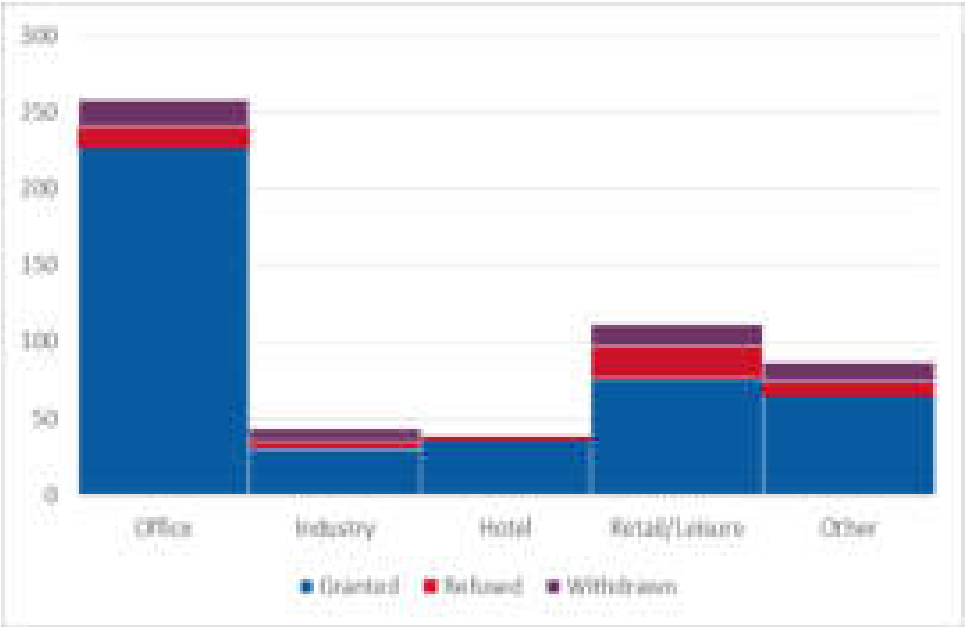


Chart 24 shows planning applications determined for conversion to housing based upon the existing use of the building.

Chart 24: Planning applications determined 2014 – 2019 for change of use to residential



Change of use from Housing

LDP Policy Hou 7 is intended to prevent inappropriate uses in residential areas. Chart 25 shows the number of planning applications determined over the last 5 years for changes of use from residential to some other use. Chart 26 breaks down planning applications for change of use from residential according to the type of development proposed.

Chart 25: Planning applications determined for change of use from residential

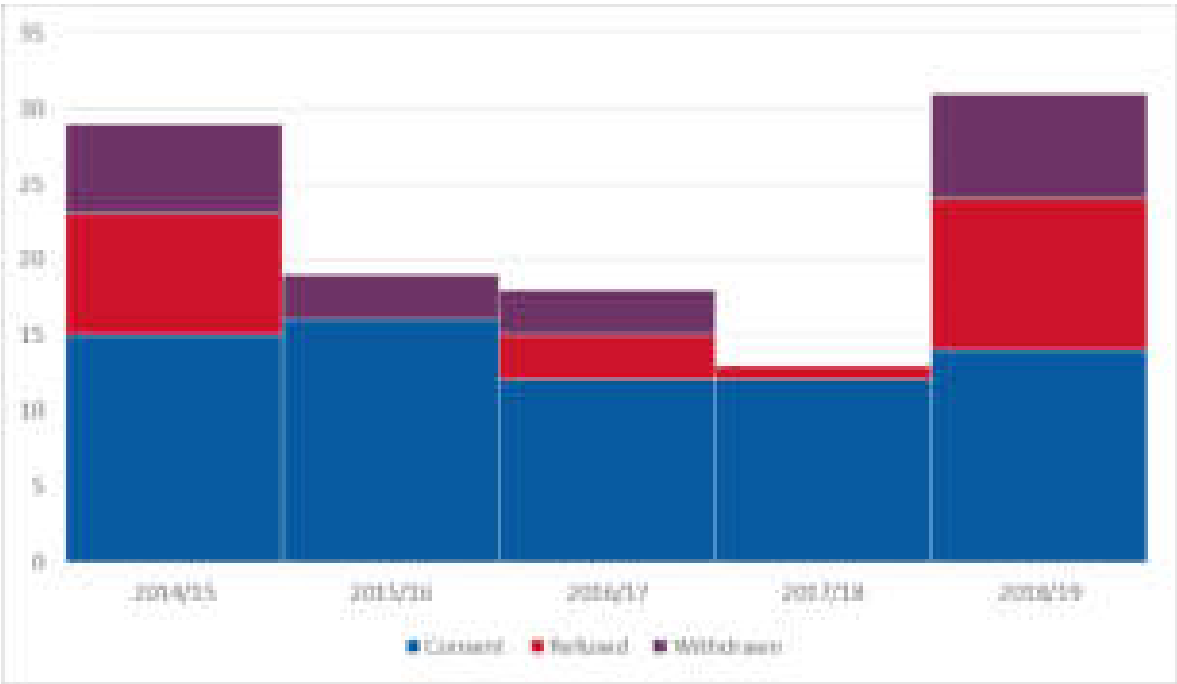
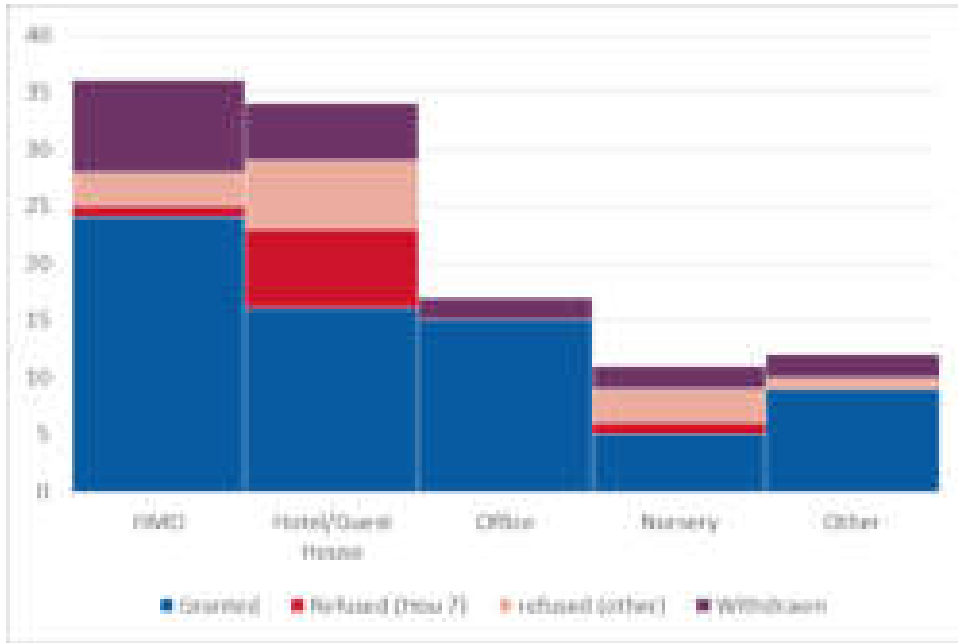


Chart 26: Planning applications determined 2014 – 2019 for change of use from residential



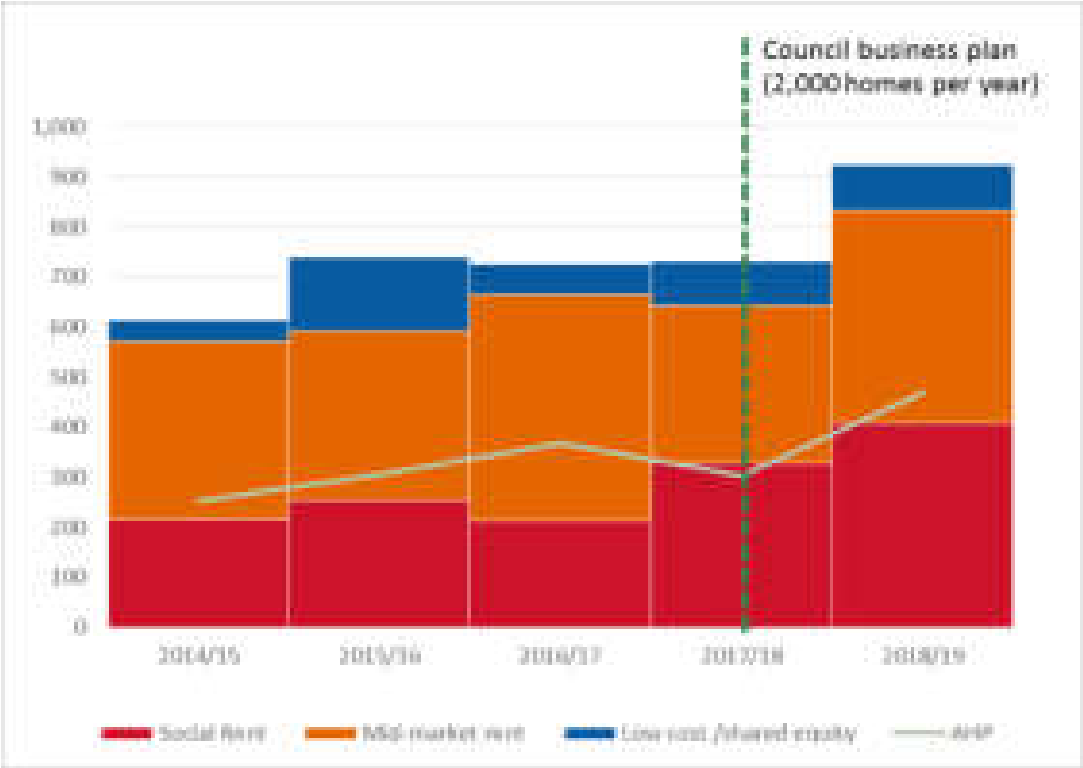
Affordable Housing

Policy Hou 6 of the Local Development Plan states that planning permission for residential development of 12 or more units should include provision for affordable housing amounting to 25% of the total number of units proposed. For proposals of 20 units or more, the provision should normally be on-site.

Chart 27 shows the annual number of affordable homes completed since 2014, broken down by affordable tenure. The chart also shows the number of affordable homes delivered through the affordable housing policy separately from affordable homes delivered through other means. In many cases, more than the required 25% of the total is delivered as affordable housing. In these cases, the 25% required through the policy is regarded as Affordable Housing Policy (AHP) delivery and the remainder is regarded as other affordable housing. The chart shows that the affordable housing policy was responsible for around half of affordable homes built over the last 5 years.

In 2017, the council business plan included a commitment to deliver a programme to build at least 10,000 social and affordable homes over the next 5 years, with a plan to build 20,000 by 2027. Whilst the number of affordable homes has been increasing, it is still significantly below the level necessary for the council to meet its objective of delivering 20,000 homes by 2027.

Chart 27: Affordable housing completions 2014 - 2019



Source: Annual Housing Land Audit and Completions Programme

Student Housing

Policy Hou 8 of the local development plan covers the development of student accommodation and says -

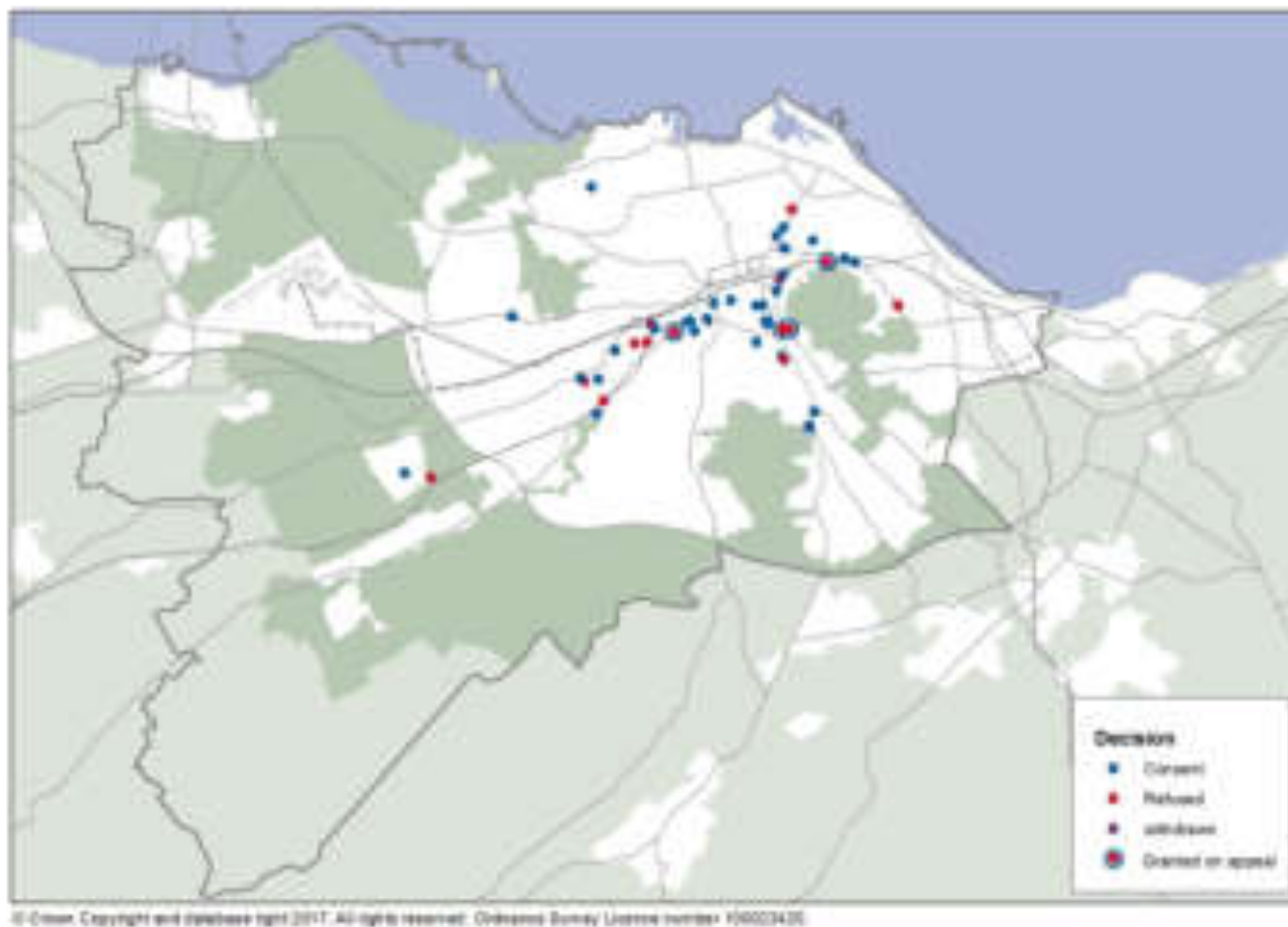
Planning permission will be granted for purpose-built student accommodation where:

- a) The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport
- b) The proposal will not result in an excessive concentration of student accommodation (including that in private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or the established character and residential amenity of the locality.

Over the last five years, 5 applications have been refused as being contrary to Hou 8. Of those 5 refusals, three were subsequently granted planning permission through successful appeals.

Map 14 below shows the locations of applications for new purpose built student accommodation decided over the period 1 April 2014 to 31 March 2019.

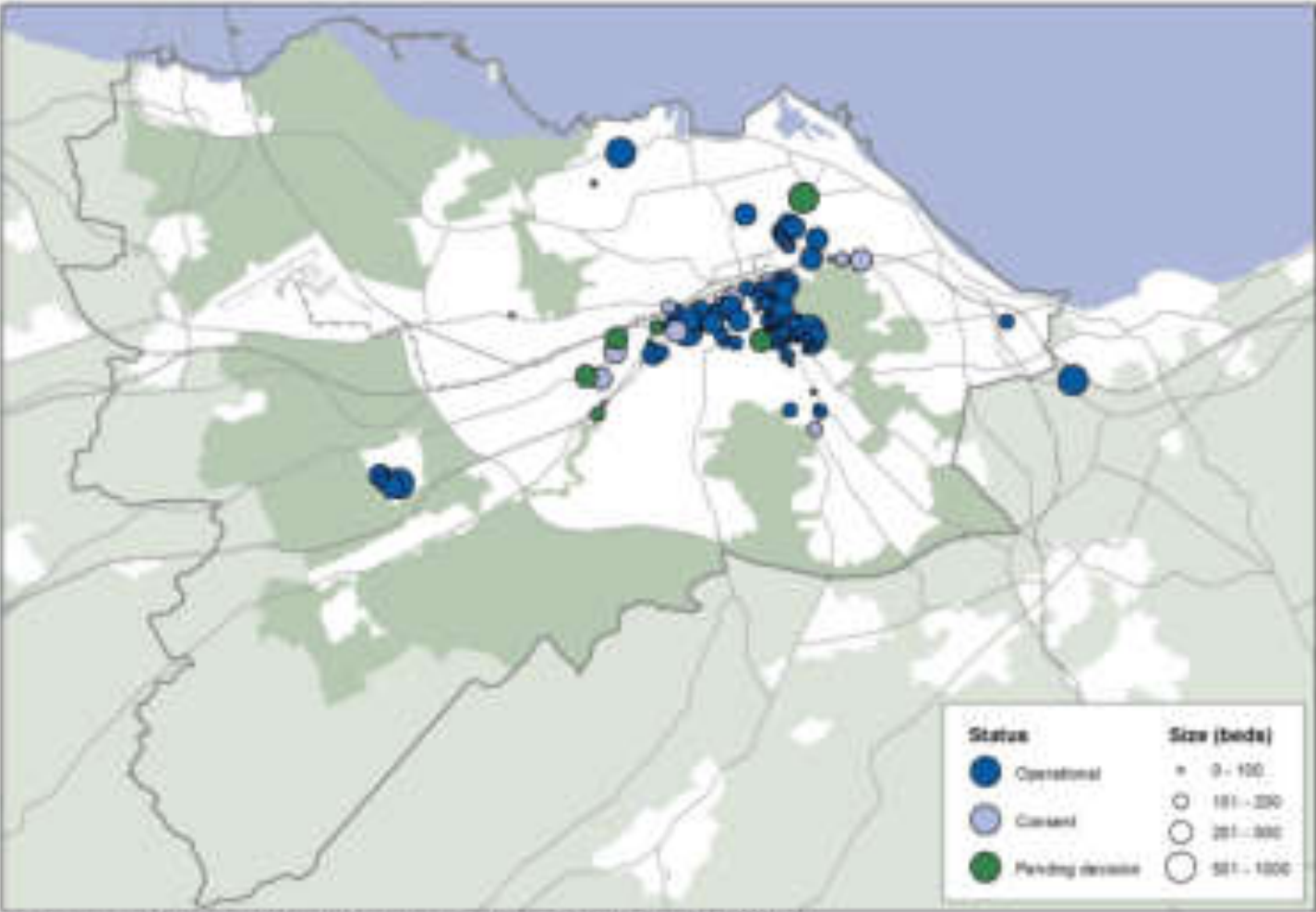
Map 14: Applications for student accommodation 2014 to 2019



In February 2016, non-statutory student housing guidance was adopted by the council which was to help ensure that development does not result in an excessive concentration of students in a single locality. Since adoption, two planning applications have been refused on the grounds of non-conformity with the guidance.

Map 15 below shows the locations of current student accommodation alongside sites with consent and applications awaiting determination.

Map 15: Location of student accommodation September 2019



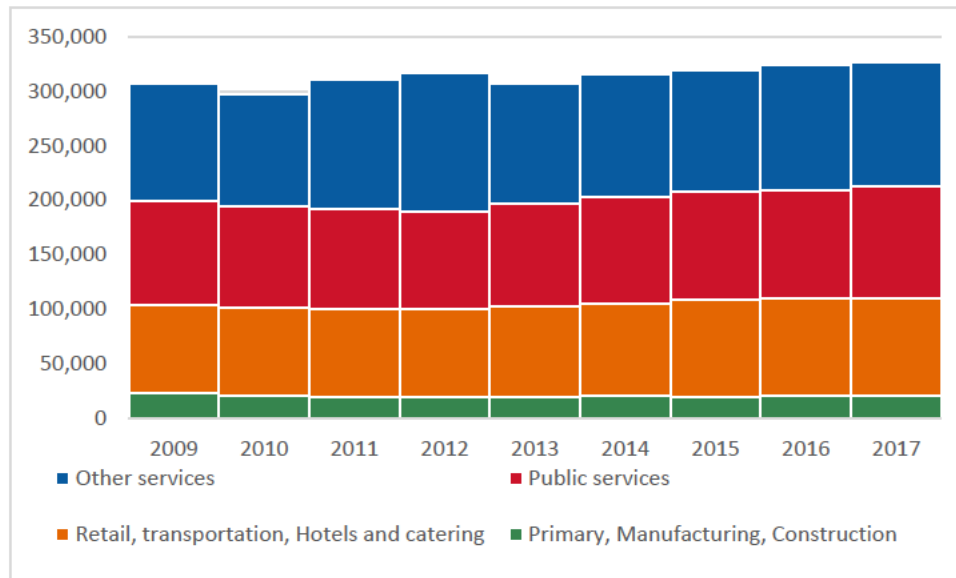
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Economic Development

Employment

There are around 330,000 people employed in the City, the majority being employed within the service sector. The recession in the late 2000s saw the number of jobs in Edinburgh fall from 309,000 in 2007 to a low of 297,000 in 2010. Employment has been rising since and at 2017, stood at 326,500. The recovery in employment has been very much service led with the number of people employed in manufacturing and construction and building trades still below the pre-recession level. The trend in employee jobs is shown in chart 28

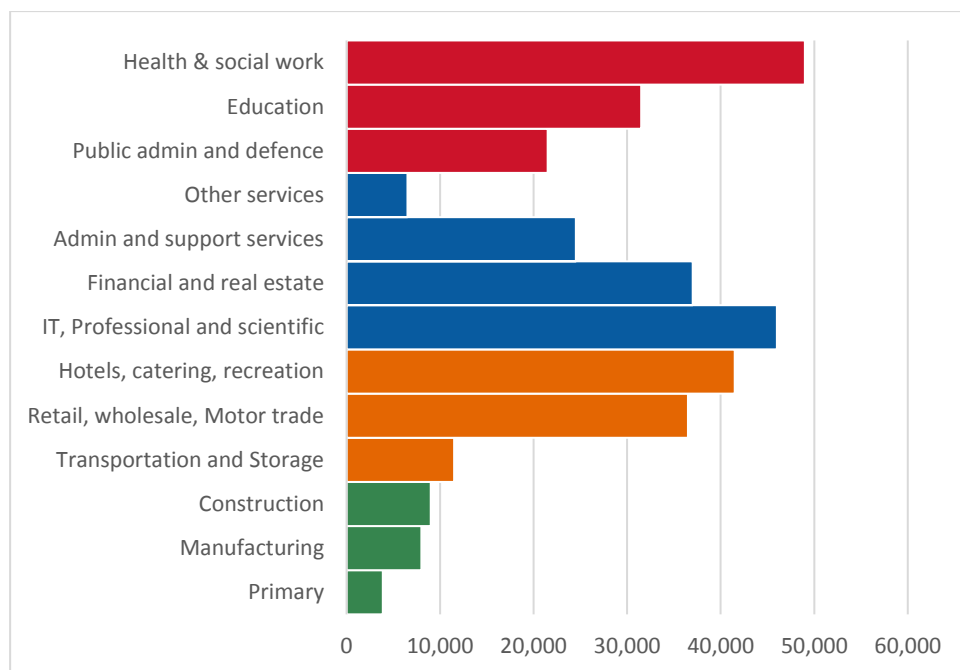
Chart 28: Employee jobs in City of Edinburgh



Source: NOMIS. Business Register and Employment Survey

Chart 28 shows that employment in Edinburgh is heavily centred on service sector industries, accounting for two thirds of all jobs. Chart 29 gives a more detailed breakdown of jobs within the city.

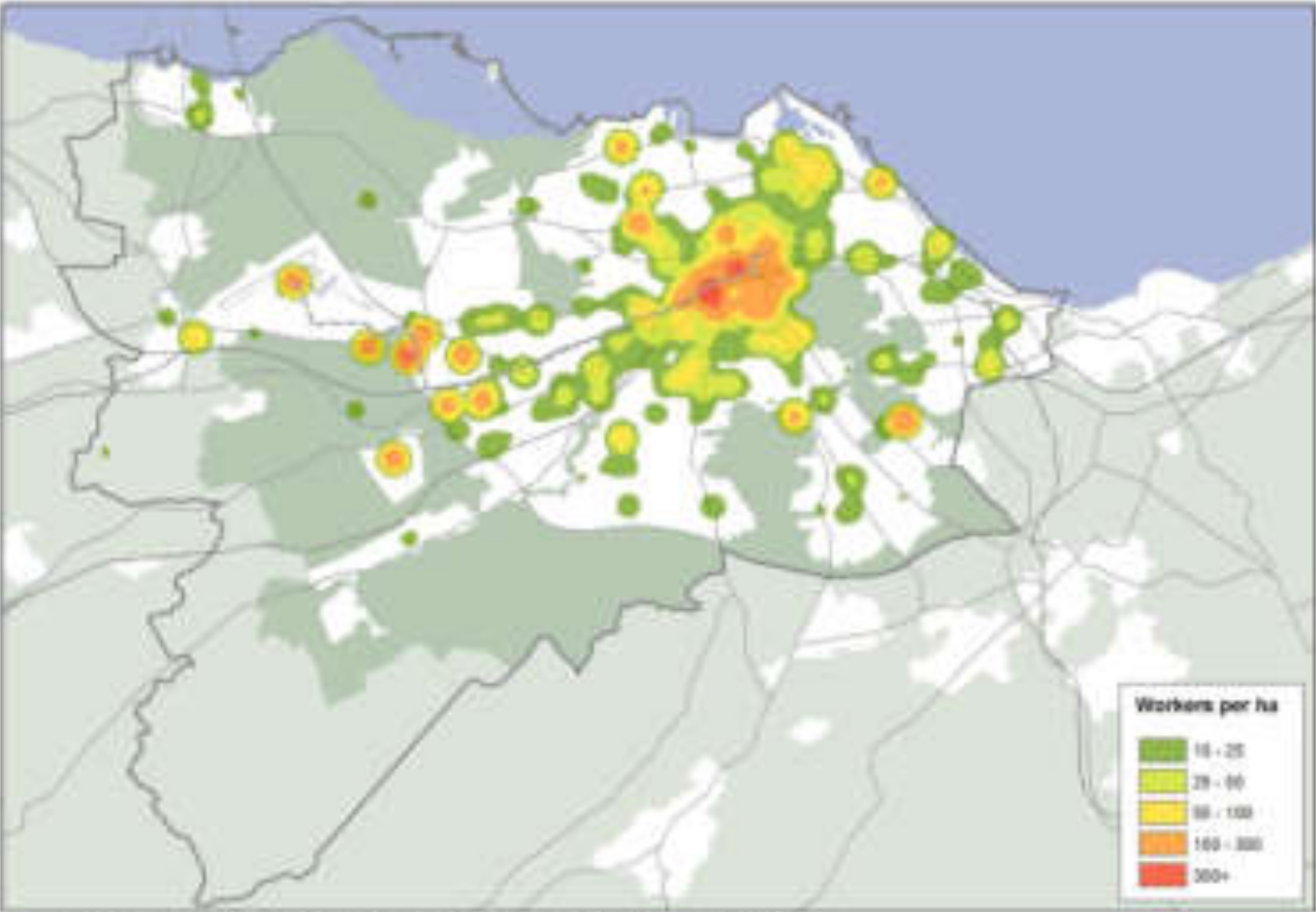
Chart 29: Employee jobs by sector



Source: NOMIS. Business Register and Employment Survey

Employment density (number of workers per ha) is shown in map 17 below. The greatest concentration of workers is in Edinburgh city centre with other hotspots located at Sighthill Industrial Estate, Edinburgh Park, Herriot Watt, Gogarburn, Leith, Edinburgh BioQuarter, Crewe Toll and Cameron Toll.

Map 17: Employment Density (number of workers per ha)



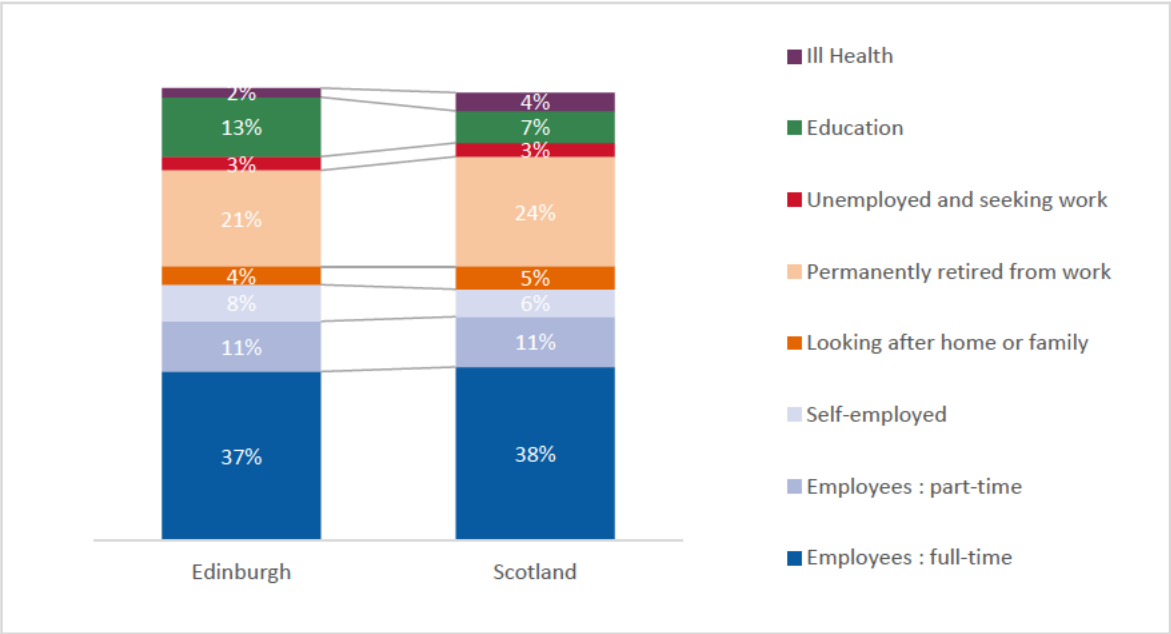
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Source: 2011 Census

Adults in Employment

Nearly two thirds of Edinburgh’s adult population are in employment – either as employees or self-employed. This is higher than the Scottish average where just over half are working. Edinburgh also has a higher proportion of its adult population in education at 11% compared to the Scottish average of 8%. As Edinburgh has a younger age structure than Scotland as a whole, there are fewer adults permanently retired. Chart 30 compares the economic status of Edinburgh’s population to the Scottish average.

Chart 30: Economic status of adult population: 2017

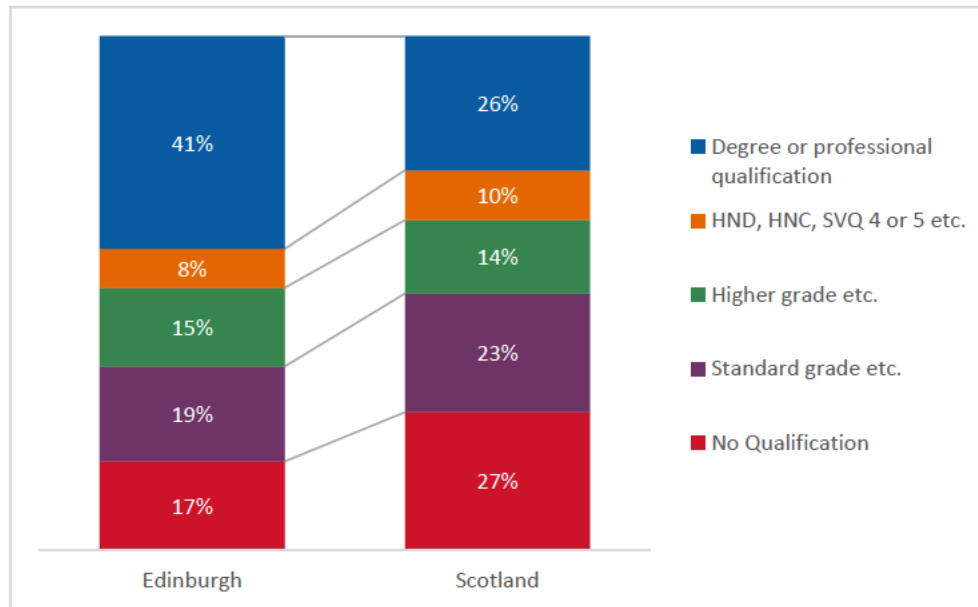


Source: Scottish Household Survey

Qualifications

Edinburgh has a highly qualified workforce. 41% of adults aged 16-64 in Edinburgh are educated to degree level compared to the Scottish average of 26%. At the other end of the scale, only 17% of Edinburgh adults have no qualification compared to the Scottish average of 27%. The highest level of qualification of Edinburgh's adult population is shown in chart 31 below.

Chart 31: Highest level qualification attained

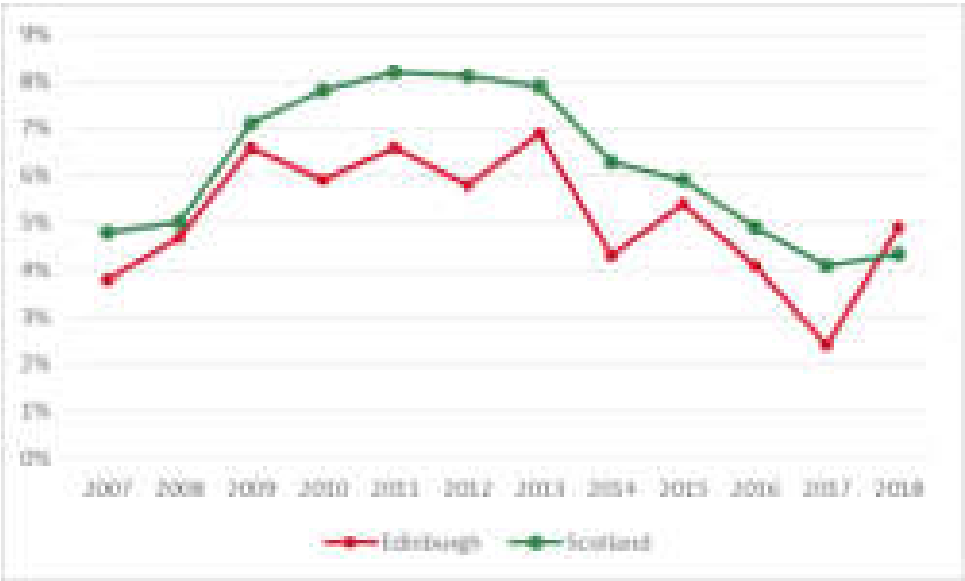


Source: 2011 Census

Unemployment

Unemployment in Edinburgh (number of claimants as a percentage of economically active adults) has been below the Scottish average since the 1990s. The claimant rate increased sharply following the recession in the 2000s but has been declining since. In 2018, the unemployment rate in Edinburgh increased to a higher rate than the Scottish average. This is shown in chart 32.

Chart 32: Unemployment claimant rate



Source: Annual population survey

Offices

Policy Emp 1 supports office development in the city centre and strategic business centres at Edinburgh Park/South Gyle, IBG and Leith, and town and local centres and, where such sites are unavailable, at other accessible locations. Policy Del 2 requires where practicable that within the city centre major mixed use developments should provide offices. Policy Del 4 applies to Edinburgh Park/South Gyle and requires development for office as part of mixed use proposals. Table 4 shows the development activity within these areas in the last 5 years. The majority of activity has taken place in the city centre and strategic business centres.

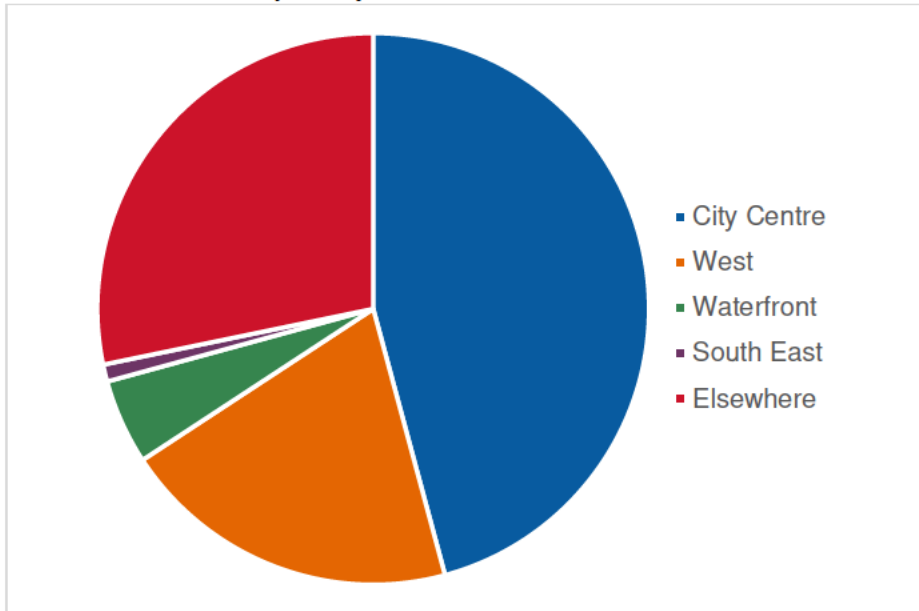
Table 4: Office activity 2014 – 2019

Location	Completed 2014 - 2019	Under Construction	With Consent	Applications Refused
City Centre	37,541	86,689	47,519	1,191
Edinburgh Park / South Gyle	0	0	212,329	0
IBG	0	0	0	0
Leith	0	0	0	139
Total Emp 1	37,541	86,689	259,848	1,330
Outwith Emp 1 areas	24,357	0	262,440	0
Total Edinburgh	61,898	86,689	522,288	1,330

Office Stock

Edinburgh's office stock at June 2018 is estimated at 1.85 million sq.m. (net lettable area) chart 33 below provides a breakdown of floorspace by area. Although the city centre is prominent there is significant office stock within west Edinburgh and other locations.

Chart 33: Office floorspace by location



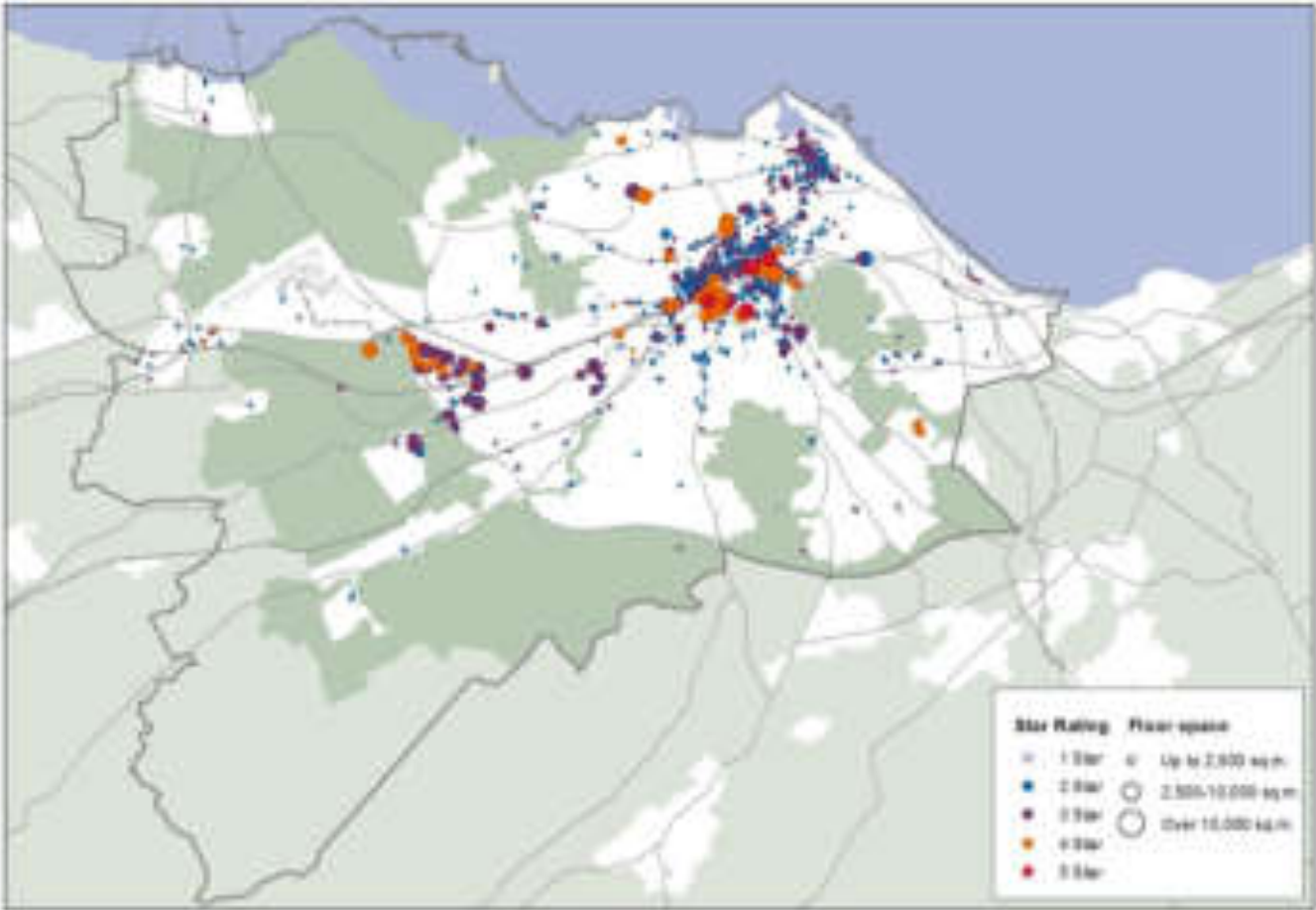
Source: Ryden

The mean size of office building is 1,310 sq. m. Chart 34 shows the average size by location.

The stock analysis identifies individual office buildings. The total number in the city is 1,413 and the mean size is 1,310 sq. m. (14,100 sq. ft.). Many buildings are multi-occupied, meaning that the total number of occupiers is higher. A 2018 estimate suggests that Edinburgh has around 7,000 office occupiers. The 'average' occupier may therefore use around 260 sq. m. of office space, accommodating say 20-25 employees. The 'average' building based upon this data would thus have 5 occupiers.

Map 18 below shows the location of office by quality and size. Map 19 provides a detailed view of offices within the city centre.

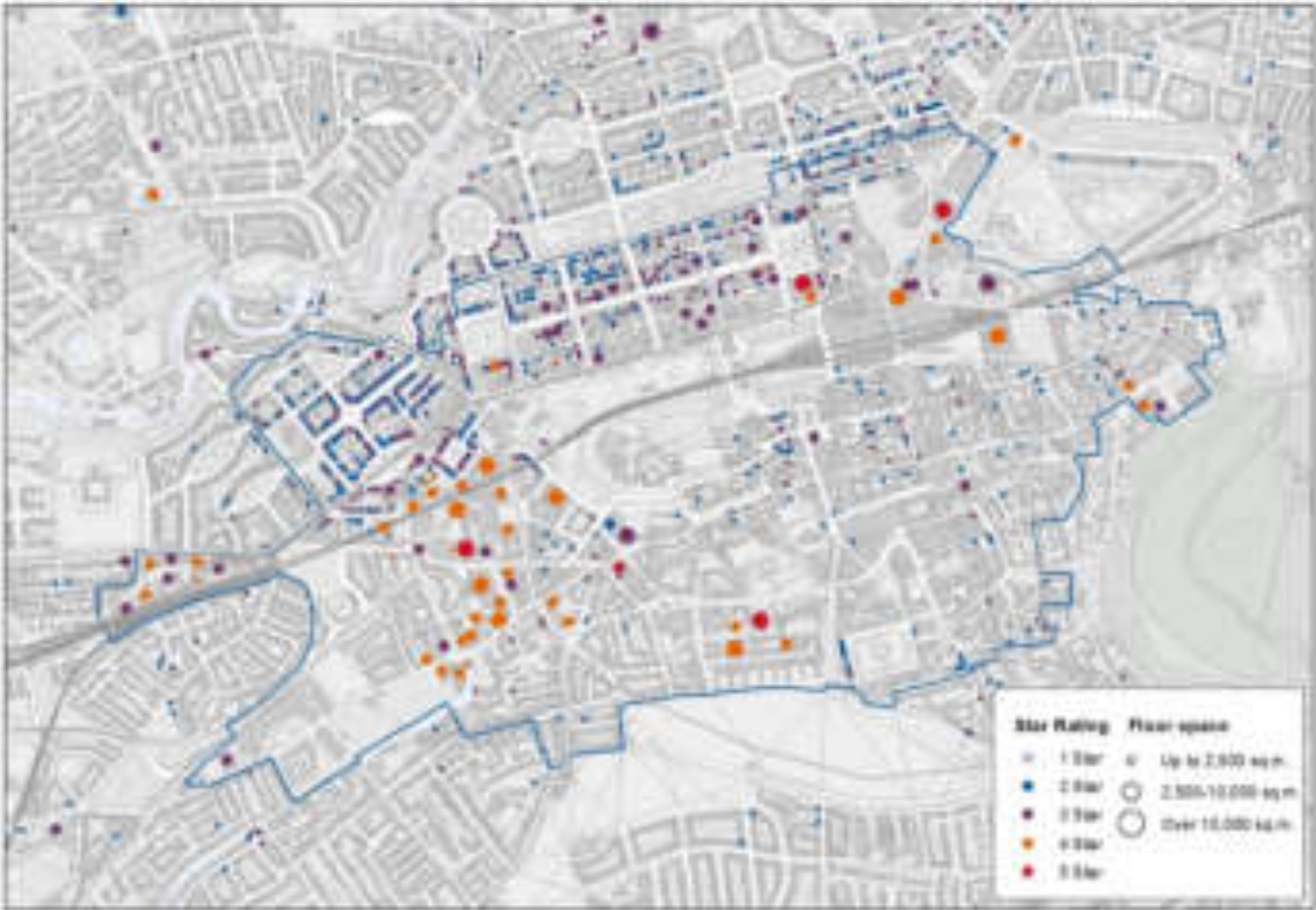
Map 18: Location of office stock by quality



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Source: Ryden/CoStar

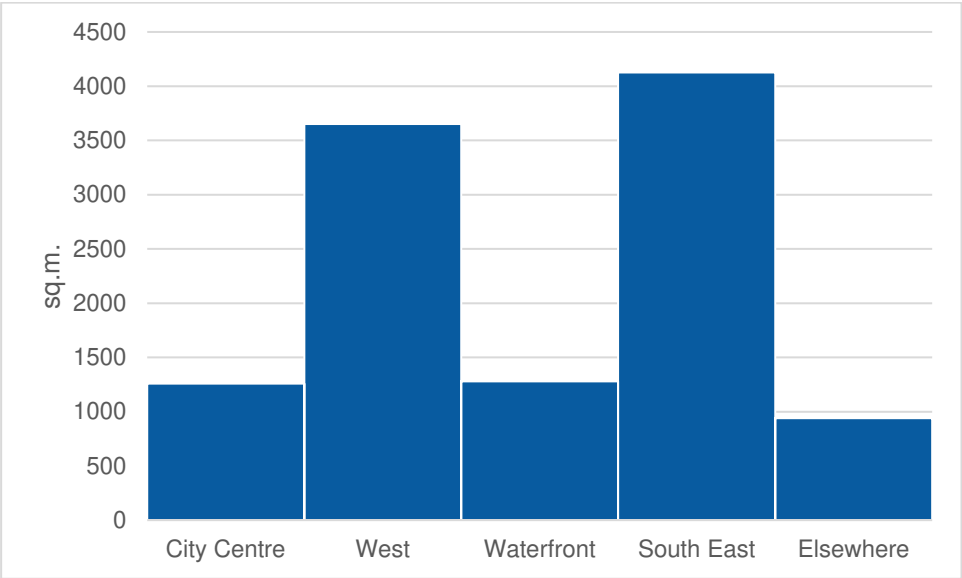
Map 19: Location of office stock by quality: City Centre



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Source: Ryden/CoStar

Chart 34: Average building size by location

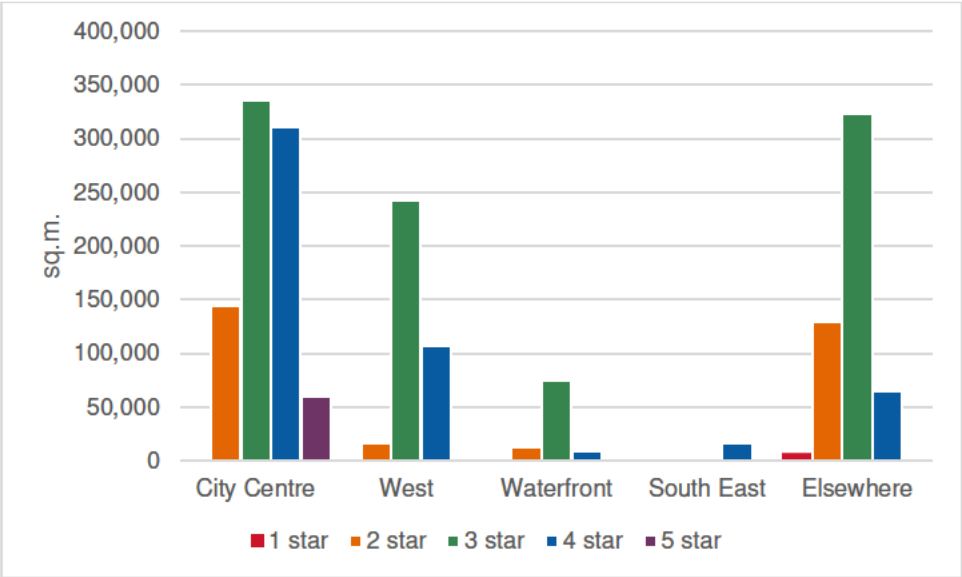


Source: Ryden/CoStar

The quality of office stock is diverse. Costar allocates star ratings to office buildings to reflect their quality. The results are shown on chart 35. Office building ratings range from 5-star (“exemplary, state-of the art”) down to 1-star (“practically uncompetitive, possibly functionally obsolete”).

Very little (1%) of the city’s stock is 5-star, and all of that is located in the city centre. The large majority of stock across all locations is 4-star (12%, mostly in the city centre), 3-star (61%) or 2-star (26%). The dominant 3-star rating reflects office buildings with “less flexible floor plates, likely older and renovated” and “some standard amenities, modest landscaping and likely small or no exterior spaces”.

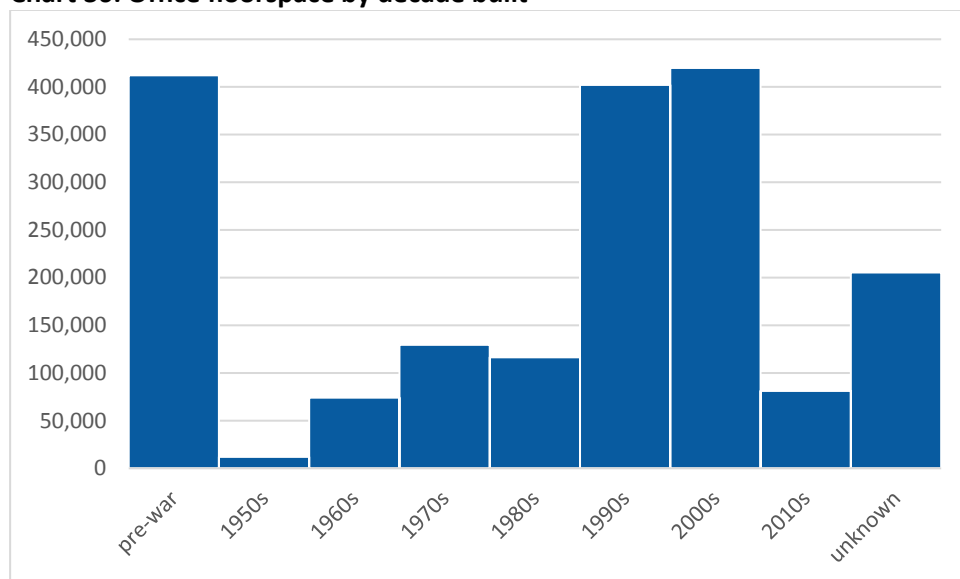
Chart 35: Office floorspace by star rating and location



Source: Ryden/CoStar

Chart 36 below indicates the decades in which office floorspace was built. The two clear peak eras are the pre-WW2 period when the city’s tenements and townhouses were built, then the 1990s and 2000s. The post-crash slump entering the 2010s is also apparent.

Chart 36: Office floorspace by decade built



Source: Ryden/CoStar

The majority of the city's office market is 'mid-market' in terms of location, size and price (rent) point. Edinburgh's 'average' office is:-

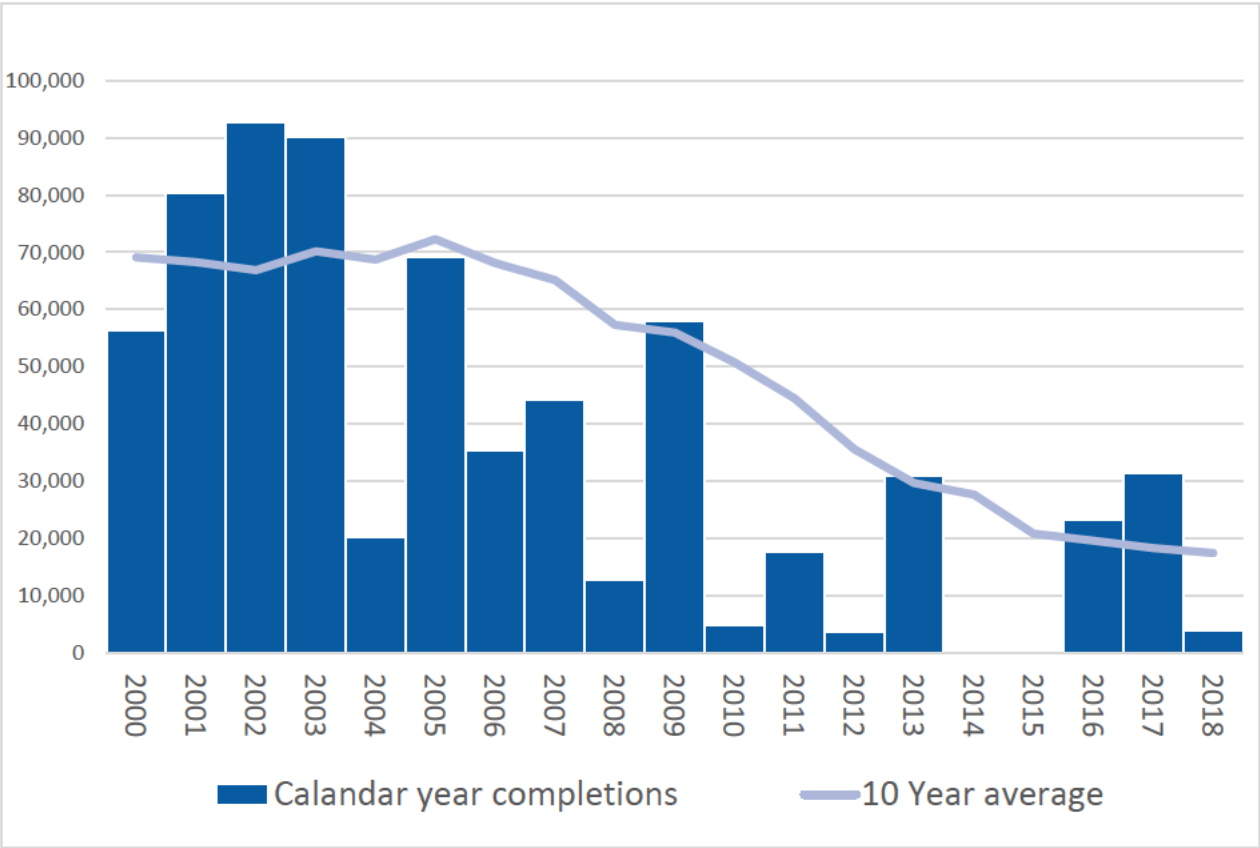
- 1,300 sq. m. (14,000 sq. ft.)
- multi-occupied
- built in the 1990s
- accommodating around 100 – 125 employees
- graded 3-star on a 5-star scale
- renting for around £180 per sq. m. (c.£17 per sq. ft.), and
- in an inner urban location close to the city centre.

The 'average' office in the city is therefore around 20 years old, mid-urban, comparatively affordable, and is let to a mix of SMEs.

Office development

The development rate had gradually declined from an early 2000s peak. Following a year of no office completions in 2014, annual floorspace completions have risen showing some recovery, though the floorspace completed during 2018 is lower than the previous two years.

Chart 37: Office completion trends



In the period 2014-2019 a total of 61,898 sq. m. gross office floorspace has been completed across Edinburgh. Of the 15 developments completed in this time, 10 were greater than 1,000 sq. m. gross and 6 were greater than 5,000 sq. m. gross. 60% of office floorspace developed in the period 2014-2019 was within the city centre.

At December 2018, a further 86,700 sq. m. of offices was recorded as under construction at four city centres sites. However, the largest of these - 43,900 sq. m. at The Haymarket - only completed site works before the project was sold on in 2018 without any office buildings having been started.

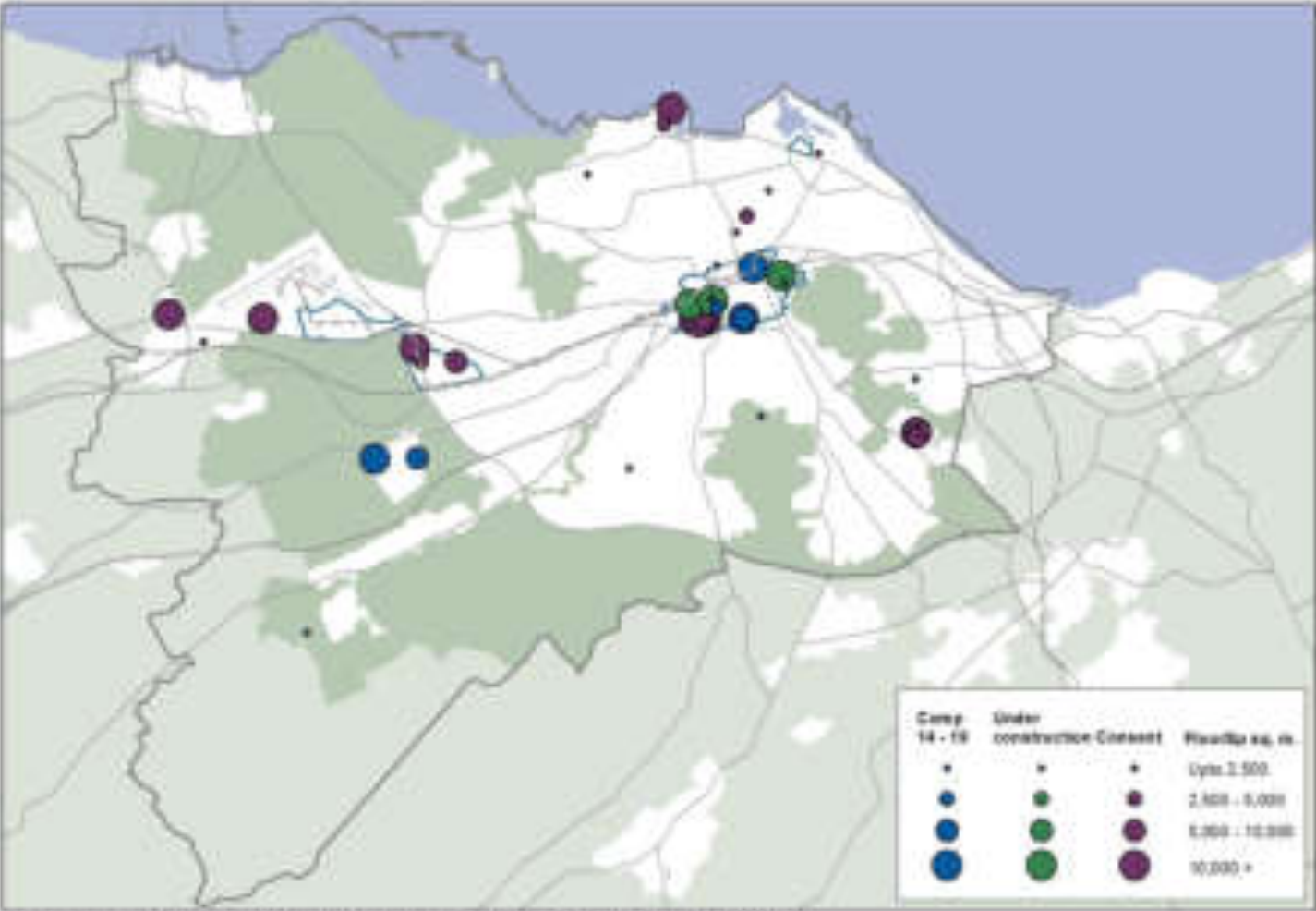
Occupier activity within the development pipeline is reducing supply. During 2017 and 2018 six developments have pre-let during construction. This letting activity leaves only two-and-a-half of eight very recent new city centre office developments still available.

522,300 sq. m. office floorpace has planning consent. Of this:

- 62% is in West Edinburgh (41% at Edinburgh Park)
- 23% is in the South East (at Edmonstone Campus)
- 3% is elsewhere outwith these strategic office locations
- notably, only 9% (47,500 sq. m.) is in the city centre

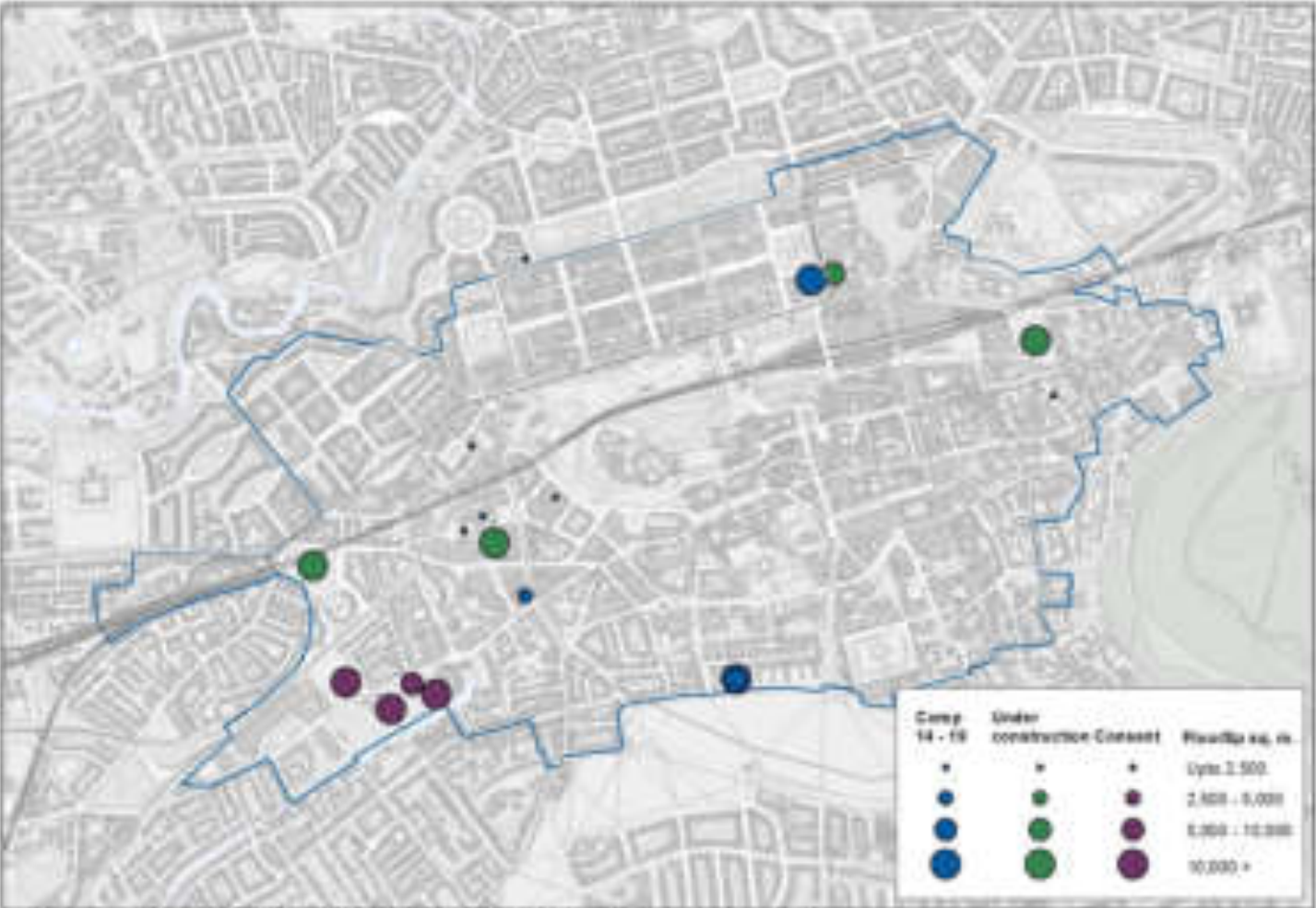
A further 127,600 sq. m. of office development proposals was awaiting determination at December 2018. Of this, 95% is in West Edinburgh; more than half of that is at the proposed International Business Gateway, which still requires land assembly and infrastructure. Within the city centre only 4,500 sq.m of office floorspace within a hotel-led development was awaiting determination. Map 20 shows the location, size and status of office floorspace in the period 2014-2019. Map 21 show this within the city centre.

Map 20: Offices development activity 2014 - 2019



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Map 21: Office development activity in the city centre 2014 – 2019



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Table 5: Office pipeline

Development Area	Under construction (Dec 2018)	Consent (Dec 2018)	Total Pipeline (UC or Consent)	Awaiting determination
City Centre	86,689	35,897	122,586	4,465
West Edinburgh	0	118,485	118,485	0
Waterfront	0	28,486	28,486	0
South East	0	322,227	322,227	122,158
Elsewhere	0	17,192	17,192	1,000
TOTAL	86,689	522,287	608,976	127,623

Office market trends

Continued growth of the service sector has driven the expansion and evolution of office working. Over the past 25 years, technological, sociological and environmental changes have reconfigured traditional understandings of office space. The focus has shifted from offices being purely about physical property, towards how the workplace can enhance employee well-being and productivity.

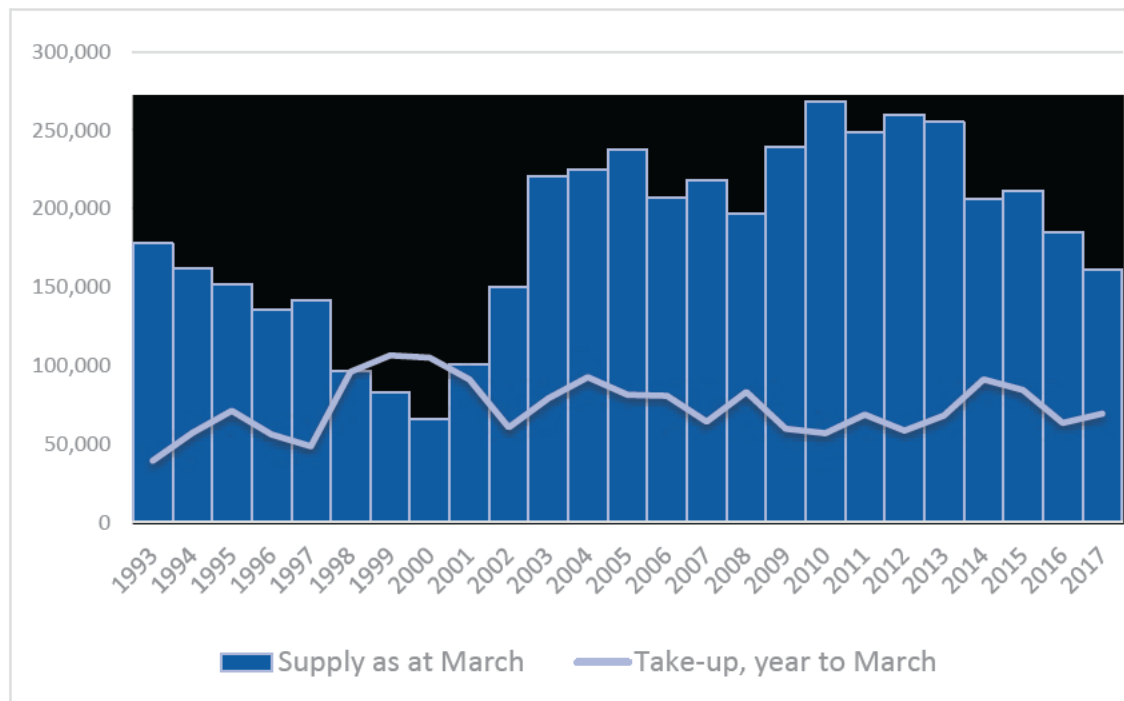
Offices can house more jobs and economic activity than in the past. However, that office space must be higher quality in terms of providing open-plan floorplates, capacity for flat screen information and communications technologies and desking systems, and comfort-cooling systems. Agile working with less than one desk per employee can also increase occupational densities. The overall trend is towards smaller, better, more intensively used offices. Agile working practices will mean the future office will be characterised by wide, open floor plates and communal areas to enable flexible ways of working. Co-working spaces provide a place to work and meet for individuals not employed by the same organisation. This is part of a wider trend towards greater use of less formal, shorter tenures in serviced offices.

The traditional headquarter is beginning to lose its monopoly as the prime physical infrastructure for an organisation. This flattening of the corporate hierarchy has led to some firms, to move certain aspects of their business to regions with lower rents and lower cost residential options for their employees. Urban locations in generally have seen a resurgence. Occupiers have rediscovered the central business district and there is a growing interest among employees to work in locations accessible by public transport in close proximity to a range of accommodation, services, amenities and entertainment. Despite this preference for central locations, there will still be occupier space requirements outside of city centres and demand for lower cost accommodation for administrative functions.

Office supply take-up

The average supply of offices in Edinburgh since 1980 is 147,000 sq. m. Office supply rose strongly with the opening-up of the Exchange and Edinburgh Park during the 1990s, and again with the largely city centre-led development phase of the 2000s. In West Edinburgh, the last new building at Edinburgh Park and RBS Gogarburn completed in 2005. The development lag caused office supply to peak two years after the market crash of 2008. Since full economic recovery in 2013, office supply in Edinburgh has tracked steadily downwards.

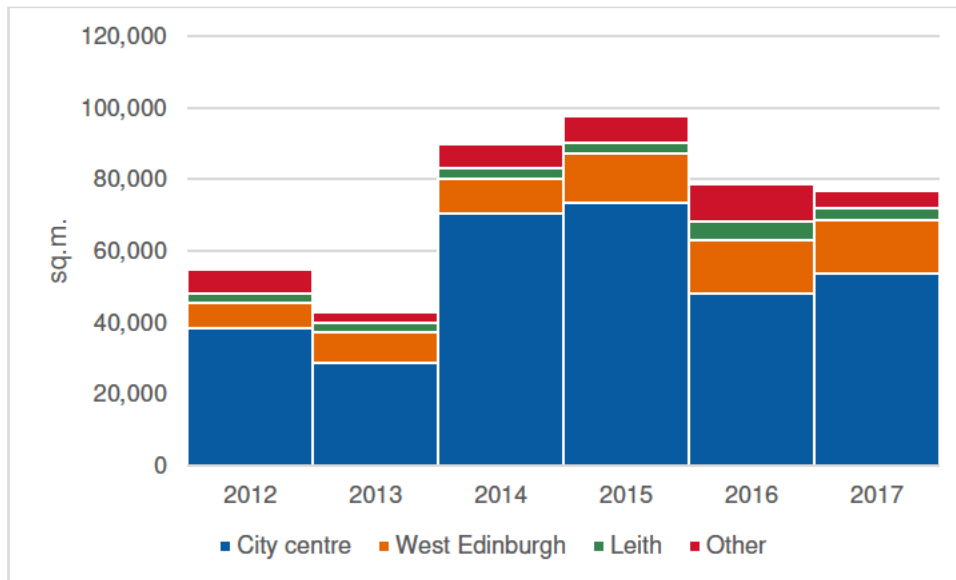
Chart 38: Take up of Office floorspace



Source: Ryden

The city centre's share of office market demand has jumped to 77% during the 2010s to date. This may reflect development in new city centre locations (such as Quatermile) and also a market preference (including investors) for major urban centres. The city centre has accounted for 71% of recent Edinburgh office market take-up. West Edinburgh accounts for 16%, Leith 5% and other locations 9%. Chart 39 shows take up by location for each of the last six years.

Chart 39: Office take up by location



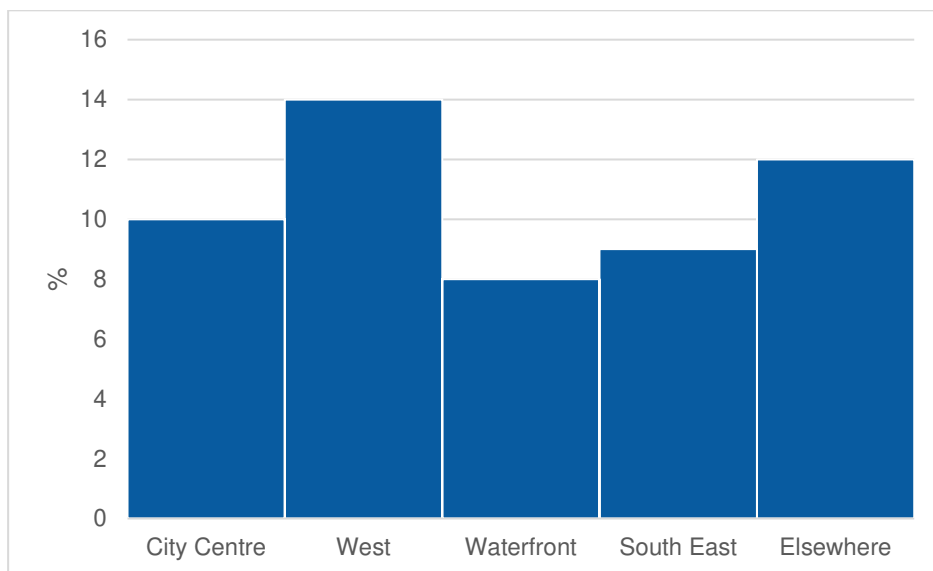
Source: Ryden Commercial Needs Study

The city wide vacancy rate is 11%. Within this rate there will be some obsolete stock therefore the effective availability rate for occupiers seeking modern office space is much lower than this. In tandem with low levels of new development and the loss of office stock to other uses, the city's office vacancy rate has reduced. Compared with other regional cities the vacancy rate is low. Chart 40 below shows vacancy rates by area.

- 40% of available office space is in the City Centre (10% vacancy rate).
- 24% is in West Edinburgh (14% vacancy rate)
- 4% is at the Waterfront (8% vacancy rate)

- 1% in the South East (9% vacancy rate); and
- 31% is elsewhere (12% vacancy rate)

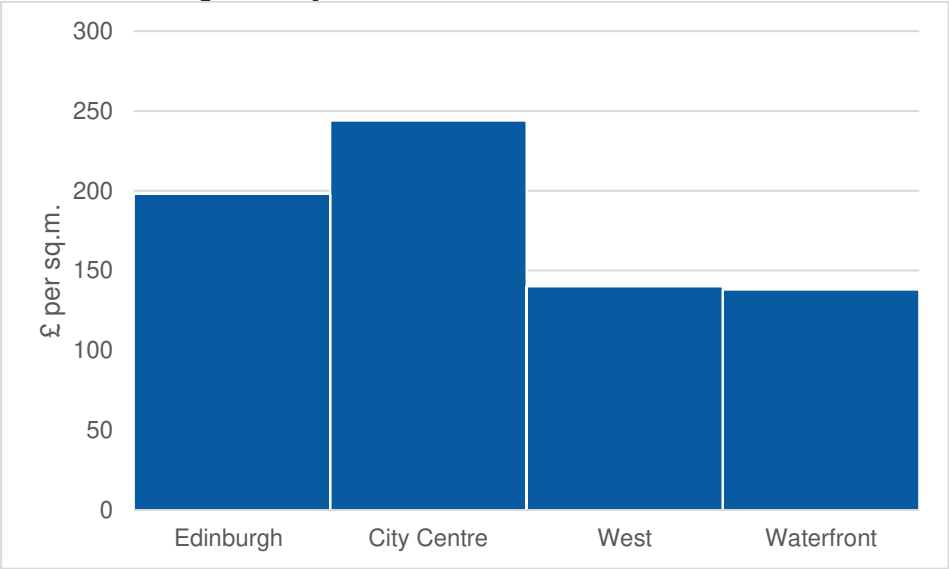
Chart 40: Vacancy rate by area



Source: Ryden/CoStar

Rents for office premises vary significantly by sub-market area and quality of building. Growth in rents has been concentrated in the city centre. Average rents by area are shown on chart 41.

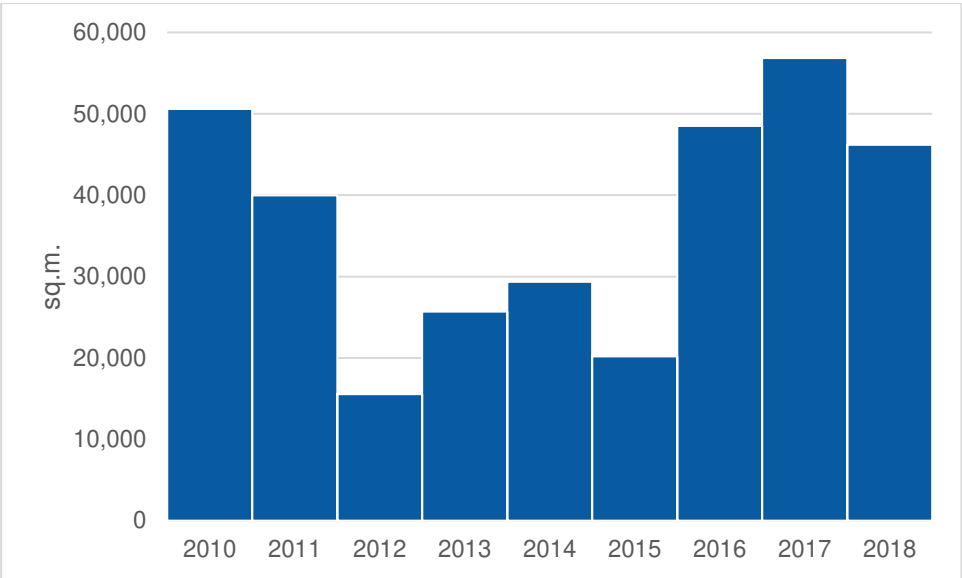
Chart 41: Average rent by area



Source: Ryden/CoStar

Occupier requirements for offices larger than 929 sq. m. (10,000 sq. ft.) since 2010 are shown on Chart 42. Current demand of 46,000 sq. m. is the fourth highest of the 9 years shown and is reasonably close to the decade’s peak years.

Chart 42: Edinburgh Occupier Demand (> 929 sq. m. (10,000sq.ft.))



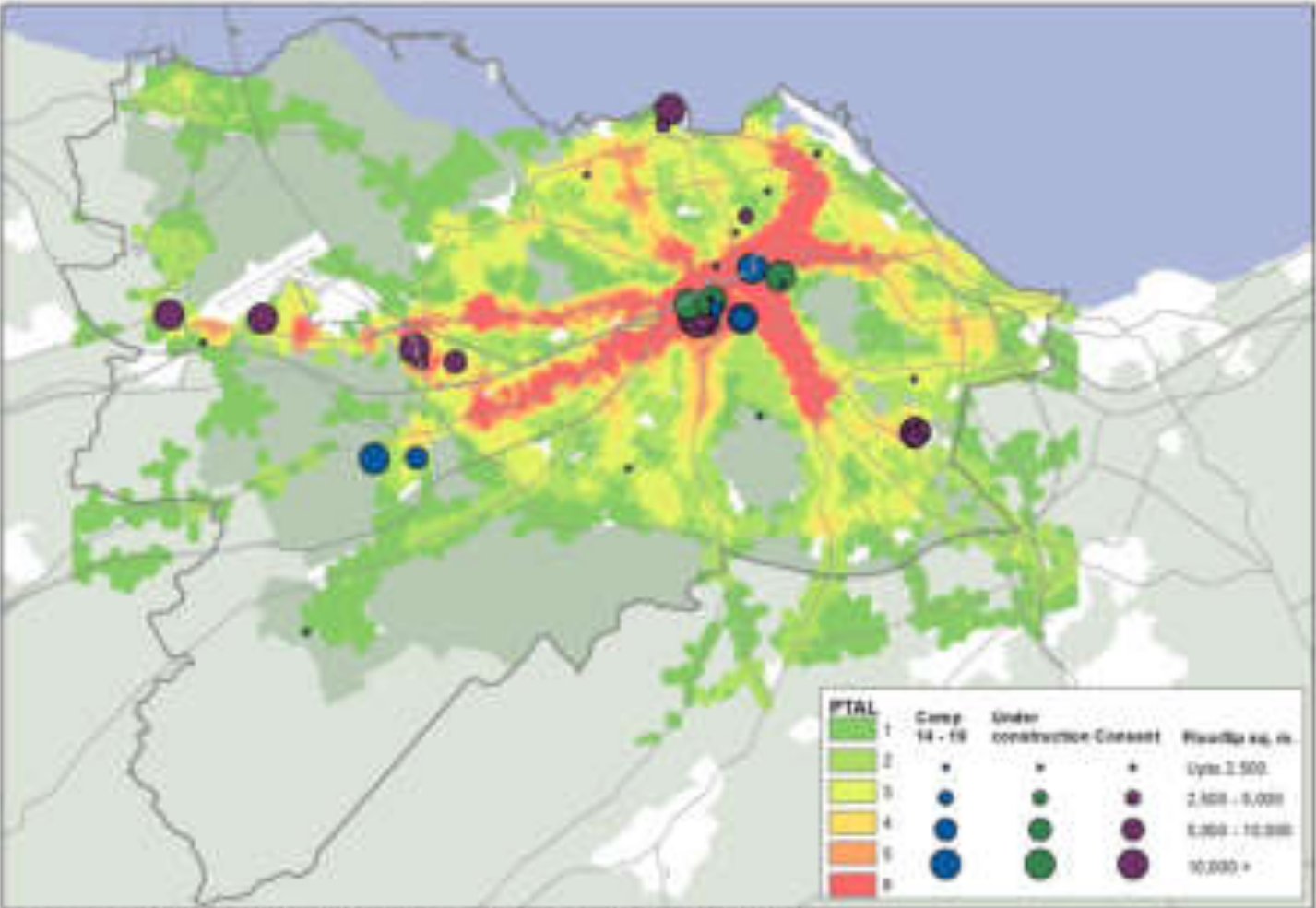
Source: Ryden

In addition to high profile headquarters the city has a deep pool of businesses across the size ranges. There is a skew towards smaller organisations which implies that more than 90% of occupiers would require a 1-person suite up to a floor or a very small building (Ryden – Office Market Report).

Accessibility of new office developments

Policy TRA 1 seeks to ensure that new development takes place in locations with good accessibility by modes other than private car. Map 22 shows the locations of recently completed office development, those under construction and planning consents against public transport accessibility levels (PTALs).

Map 22: Office development by PTAL



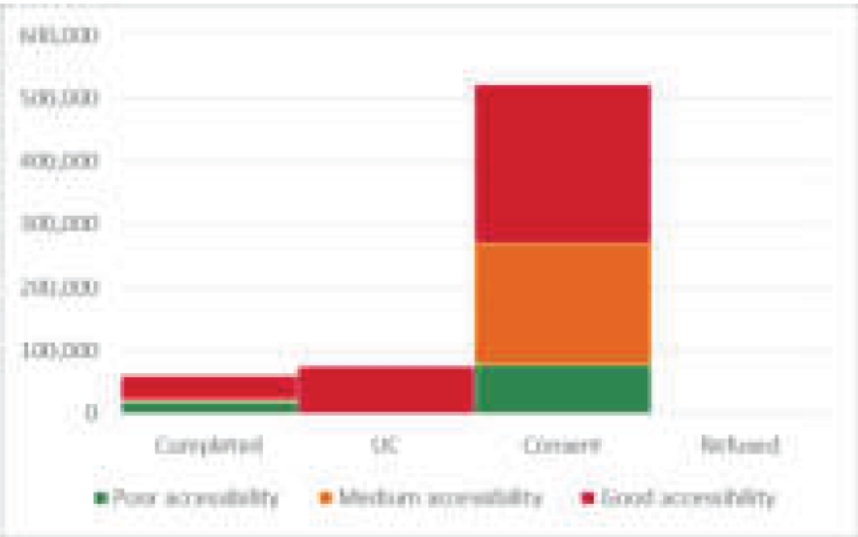
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Details of the amount of floor space completed, under construction, consented and refused by accessibility level is detailed in table 6 and displayed graphically in chart 43. All of the office space in areas covered by Emp 1 are classified as good accessibility.

Table 6: Office development by Public Transport Accessibility Level

PTAL	Accessibility Level	Completed 2013 - 2018	Under Construction	With Consent	Applications Refused
1-2	Poor accessibility	18,438	0	78,640	0
3-4	Medium accessibility	5,507	0	191,232	139
5-6	Good accessibility	37,953	86,689	252,416	1,191
Total		61,898	86,689	522,288	1,330

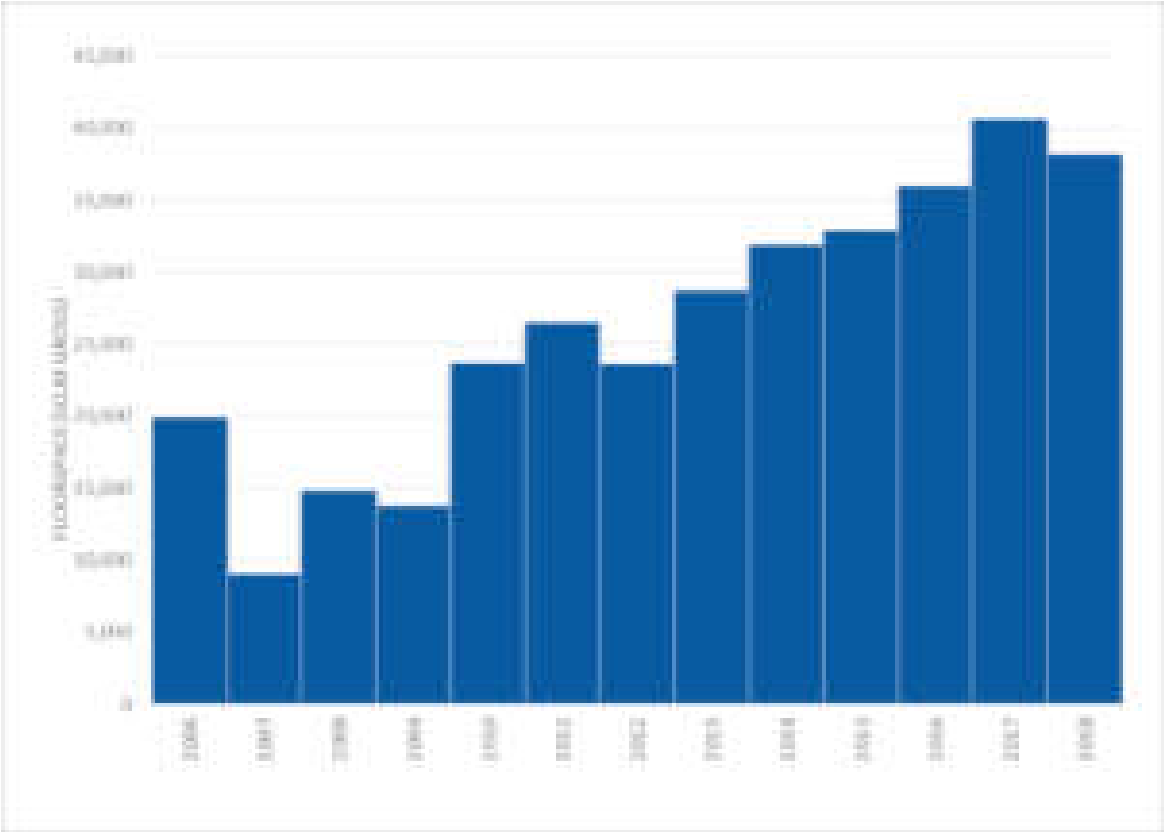
Chart 43: Office development by Public Transport Accessibility Level



Loss of Office Space

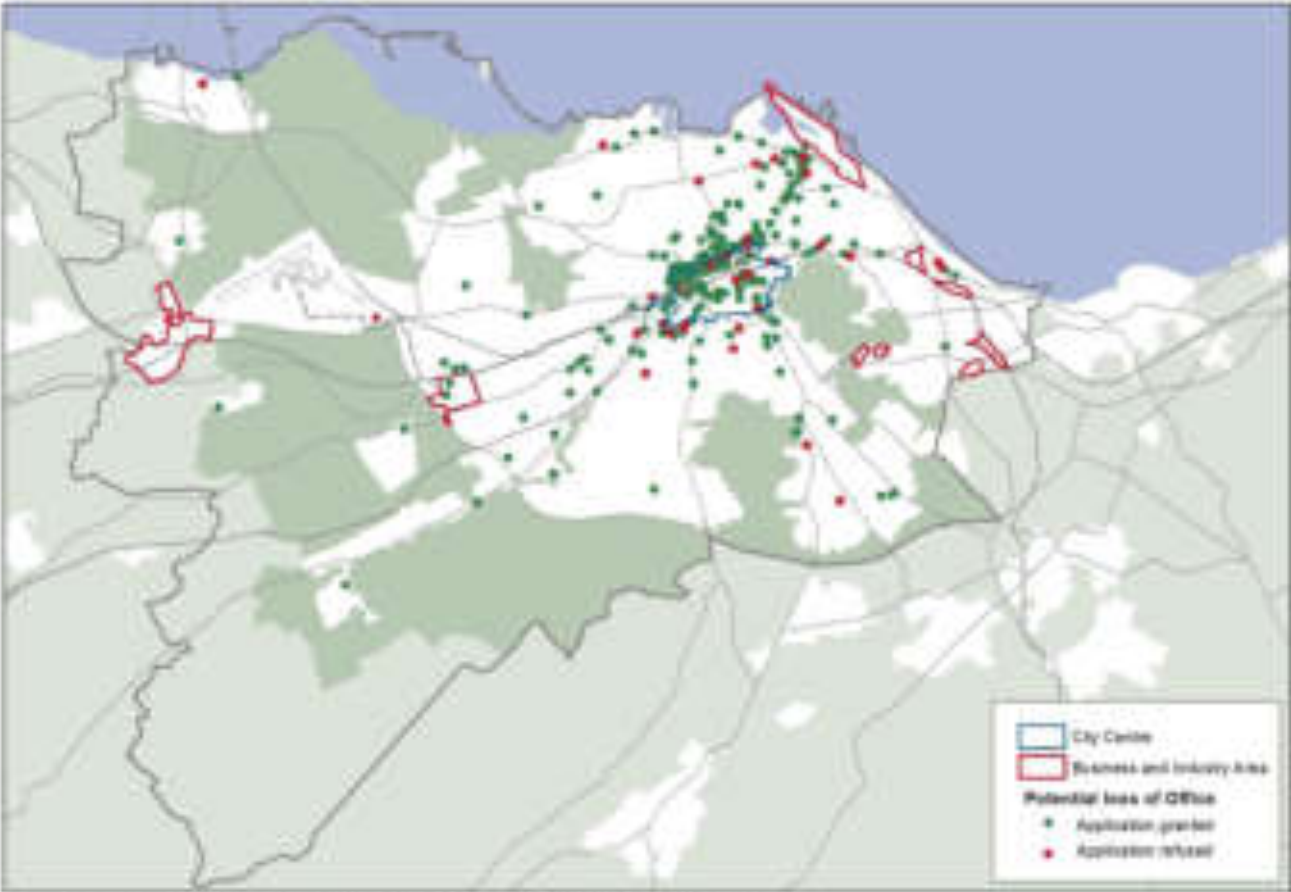
The number of planning applications consented involving the loss of office space has been steadily increasing over recent years. This is displayed in chart 44.

Chart 44: Planning consents involving loss of office space



The locations of planning applications with the potential loss of office space is shown in map 23.

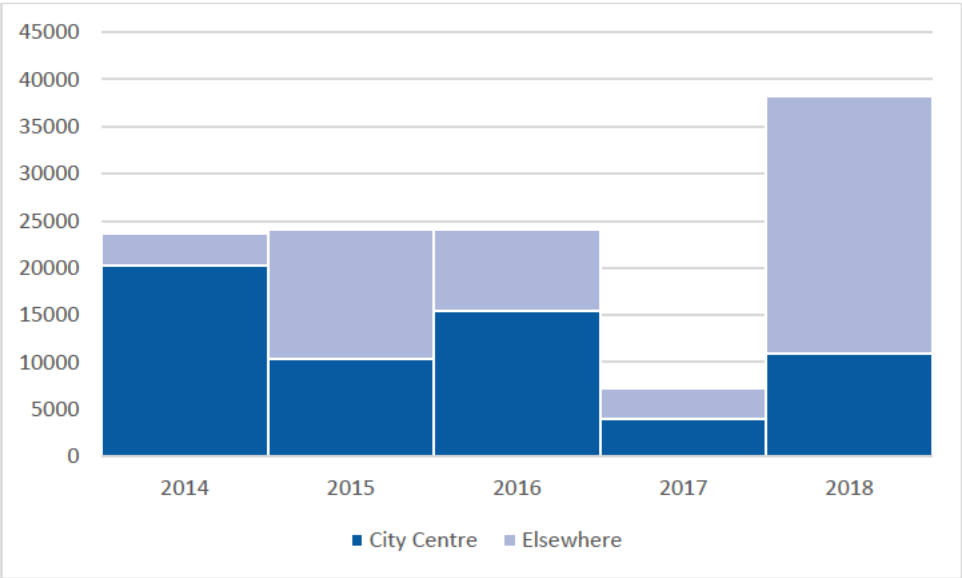
Map 23: Potential loss of office space



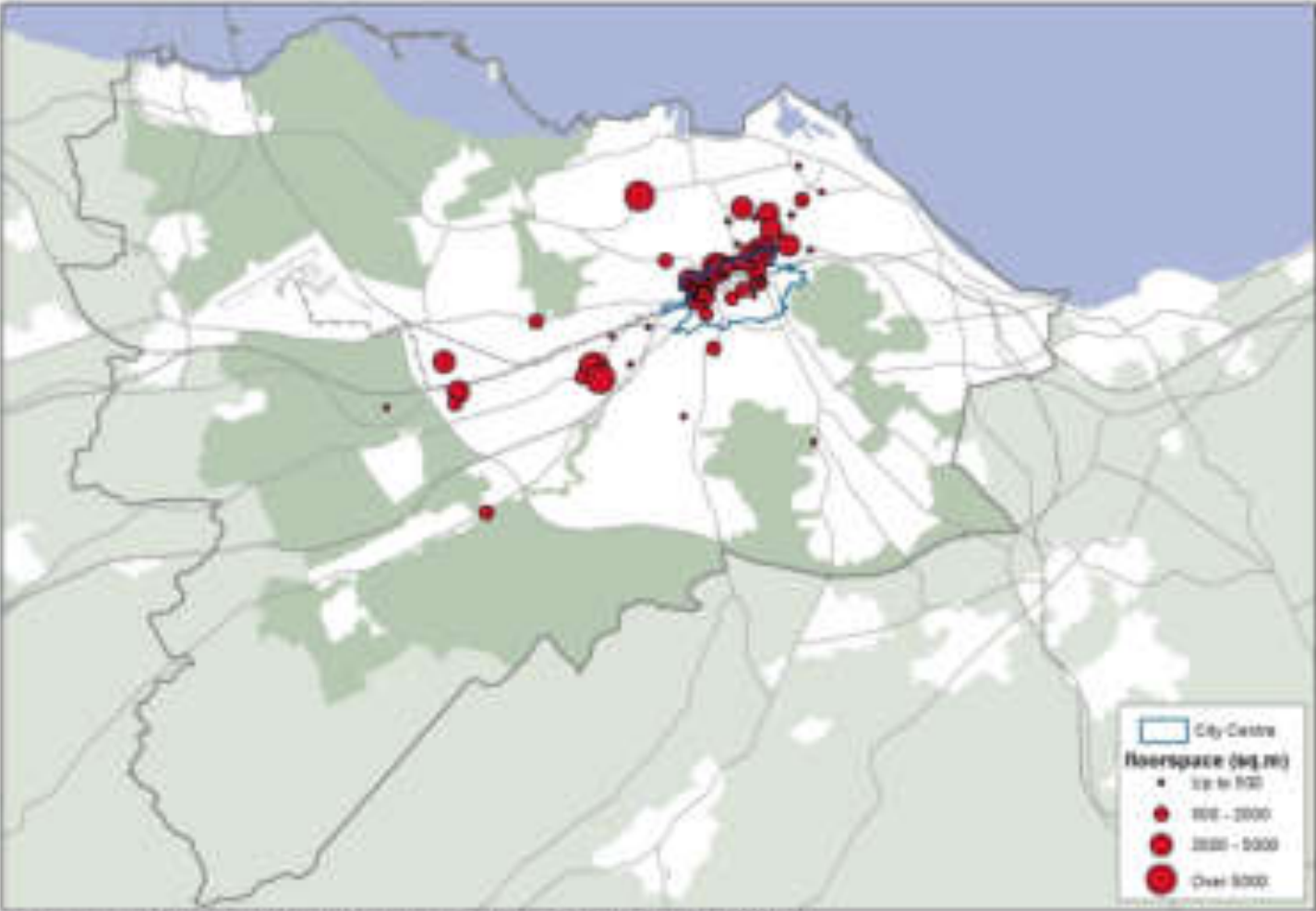
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Over the last 5 years a total 117,060 sq. m. of office floorspace has been lost to other uses city wide. Chart 45 shows the losses per year. The location of these losses is shown on Maps 24 and 25.

Chart 45: Actual loss of office space 2014 - 2019



Map 24: Actual loss of office floor space 2014 - 2019



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Over half of office floorspace lost to other uses has occurred in the city centre where 60,900 sq. m. was lost during the period 2014-2019.

Map 25: Location of loss of office space in the city centre

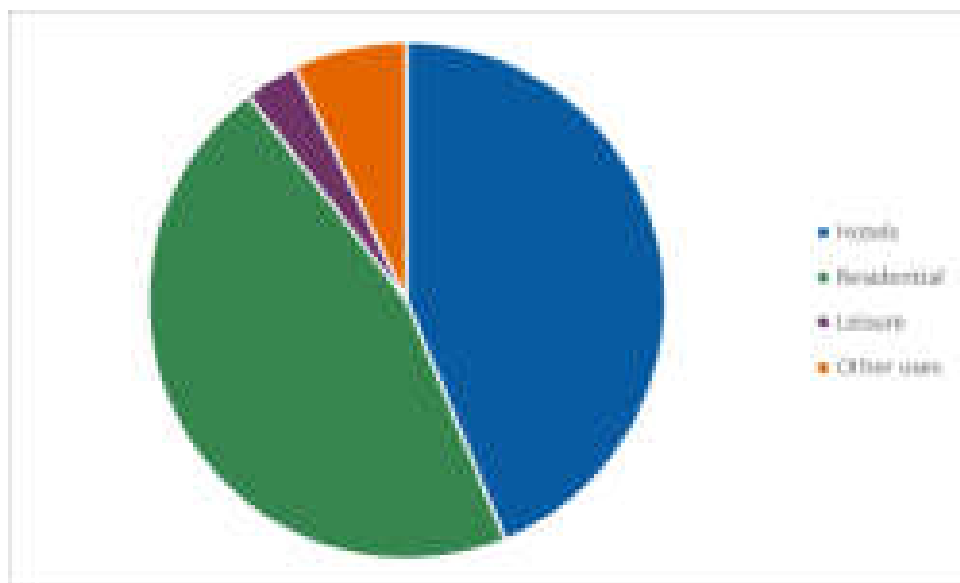


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Chart 46 shows the breakdown of new uses in the city centre in this period. Within the city centre the majority of office space lost in the last 5 years has been replaced by residential use and hotels.

Of the 61 individual losses, 14 resulted in losses of more than 1,000 sq. m. each and 7 of these were in excess of 2,000 sq. m. each.

Chart 46: Loss of office space in the city centre by new use



Comparing the loss of office floorspace over the last 5 years with new-build office development, over the same period, the net effect is that the city has lost office floorspace overall. In qualitative terms though, the city's office stock has improved as new, purpose-built offices replace obsolete older buildings.

Location Quotients

Location quotients (LQ) indicate the 'concentration' of a particular measurement within an area. For example, if the city-wide office vacancy rate is 10% and the sub-market area's is 5%, then the LQ is 0.5. The city-wide LQ for all market indicators is thus 1.0. Although only indicative LQs can help to confirm areas of market pressures and weakness. Table 6 below shows the location quotients for the main development areas. This shows:

- city centre office market is attracting 71% of take-up with only 45% of stock; and the reverse position where 'elsewhere' urban locations have 29% of stock but are attracting only 9% of take-up. This implies an office market concentrating into the city centre rather than other urban employment centres.
- city centre is the highest-rented location with the fastest growth, re-confirming the demand pressure in central Edinburgh.

- The city centre attracts 78% of investment activity meaning that the remainder of the city attracts comparatively low levels of capital.
- The average quality rating by area indicates that Waterfront offices and the substantial 'elsewhere' urban office stock both fall below a middling star rating of 3.
- The future office development pipeline is heavily skewed towards the West and South-East. The city centre and 'elsewhere' urban areas have proportionately very little.

Table 6: Location quotients for development areas

Location	Stock (sq.m.)	Vacancy rate	Take-up (share v stock)	Rents (£/sq.m.) (% 2.5 years)	Investment share	* rating and age	Stock loss	Planning consent pipeline
Edinburgh	1,850,000 (100%)	1.00 (11.2%)	1.00 (100%)	1.00 (£198) 9%	1.00 (100%)	3.2 stars	1.00 (100%)	1.00 (100%)
City Centre	829,000 (45%)	0.90 (10.1%)	1.58 (71%)	1.23 (£244) +12%	1.73 (78%)	3.4 stars	1.51 (68%)	0.18 (8%)
West Edinburgh	365,000 (20%)	1.24 (13.9%)	0.8 (18%)	0.71 (£140) -2%	0.65 (13%)	3.2 stars	0.58 (32%)	3.00 (60%)
Waterfront	96,000 (5%)	0.76 (8.5%)	1.00 (5%)	0.70 (£138) +0%	0.43 (15%)	2.9 stars		1.00 (5%)
South East	16,000 (1%)	0.84 (9.4%)	n/a	n/a		4.0 stars		24.00
Elsewhere	546,000 (29%)	1.04 (11.7%)	0.32 (9%)	n/a		2.8 stars		0.10 (3%)

Source: Ryden

Office Market Projections

Potential future demand for additional office accommodation in the city has been assessed (Ryden Commercial Needs Study). The range of projected office development required in Edinburgh is 17,000 sq. m. to 30,000 sq. m. (gross floorspace) per annum until 2030. Replacement rather than net additional offices account for 56-65% of this requirement.

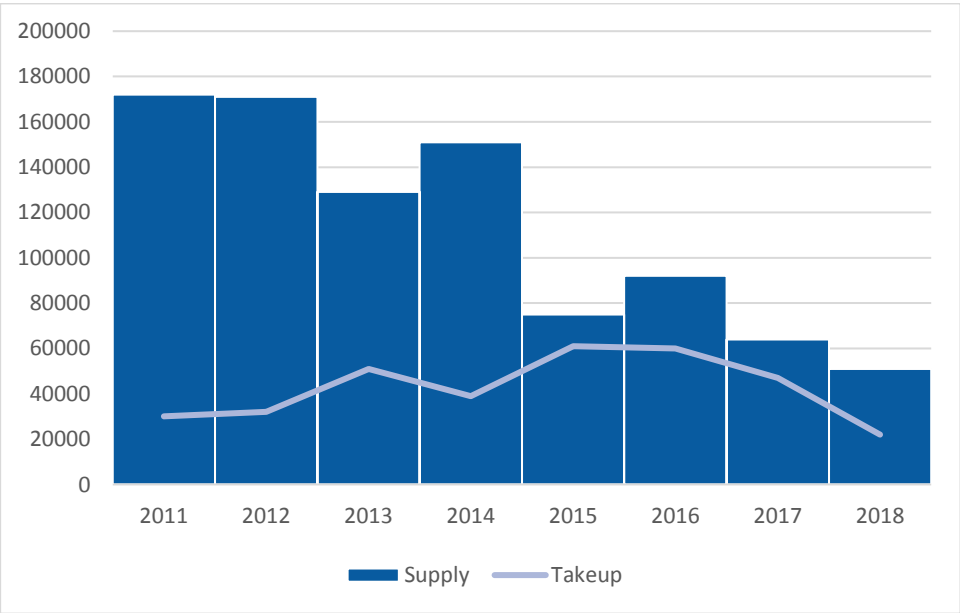
Only at the lowest level of projected office development requirements would it be possible to meet Edinburgh's office market needs to 2030 from existing identified sites and other windfall opportunities.

Industry

Key findings from the Industrial Land Supply and Demand Report

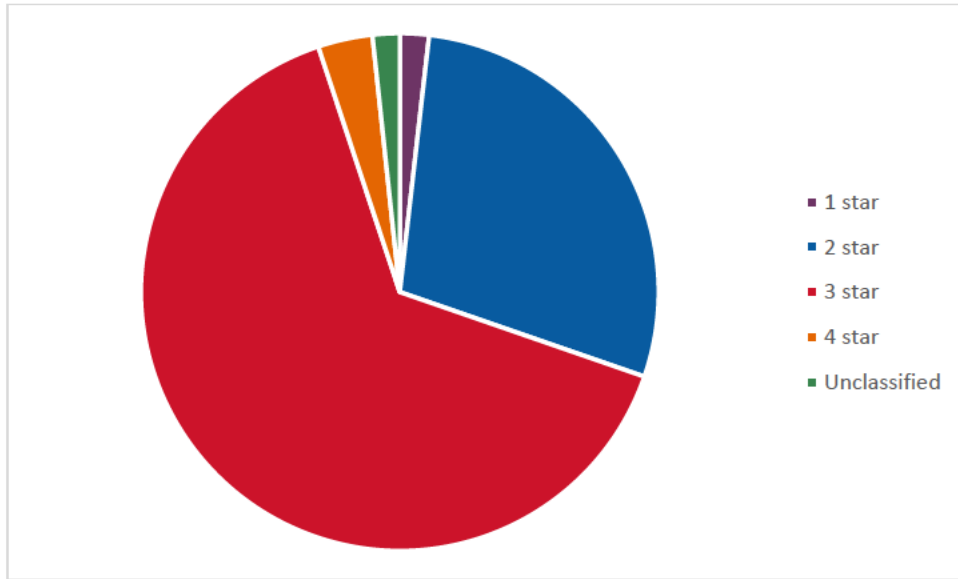
- Aging stock – over half of stock is 30 years or more.
- 1,006 units taken-up since 2000; falling supply may be constraining demand. Low vacancy rate – at Sept 2018 it stood at 4.9%
- Edinburgh’s volume represents only 9% of Scottish floorspace and 4.5% value. Much of the stock continues in same landlord’s ownership.
- Mean size 655 sq. m.
- Most common size sub-463 sq. m. (65%)
- Average grade 3-star

Chart 47: Industrial supply and take up



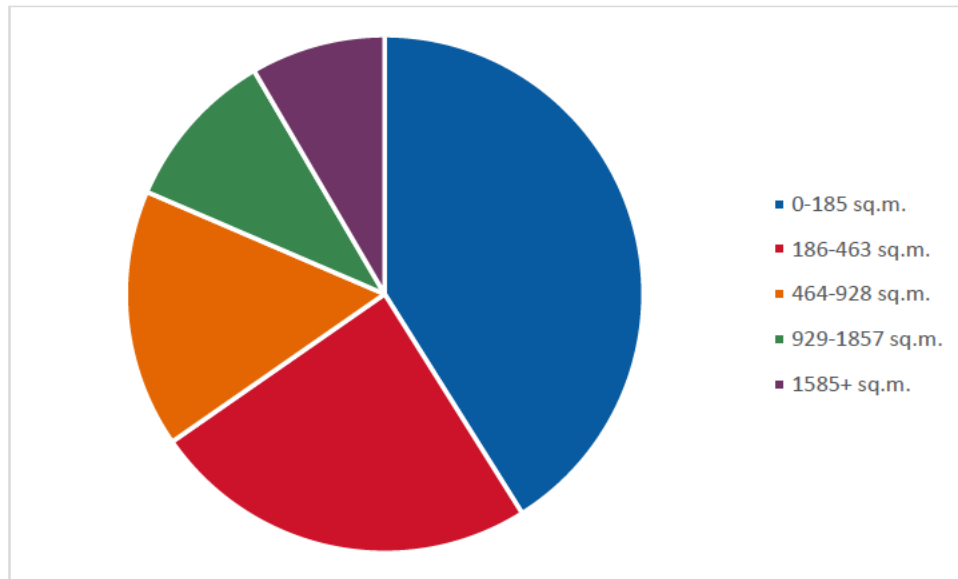
Source: Ryden/CoStar

Chart 48: Industrial stock by star rating



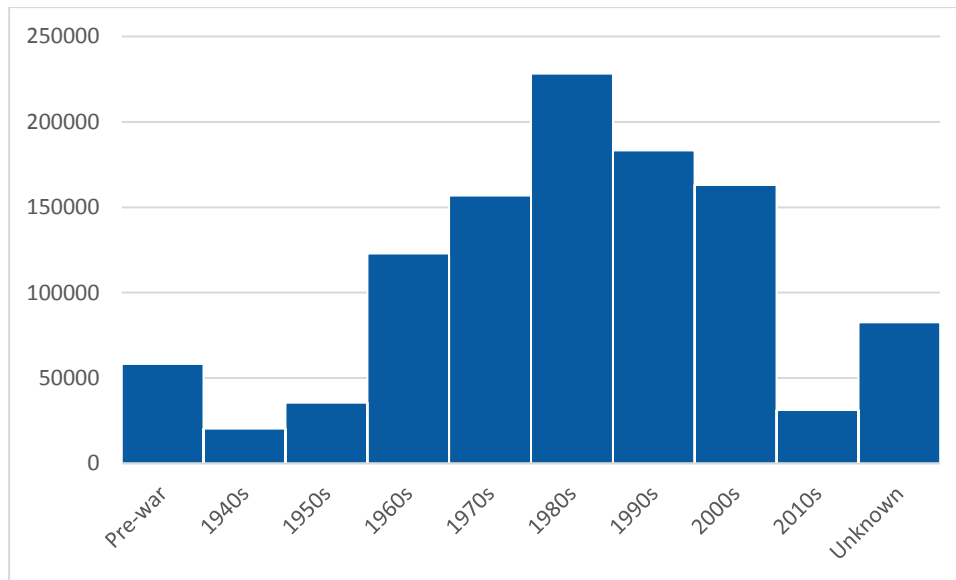
Source: Ryden/CoStar

Chart 49: Units taken up since 2000 by size band



Source: Ryden/CoStar

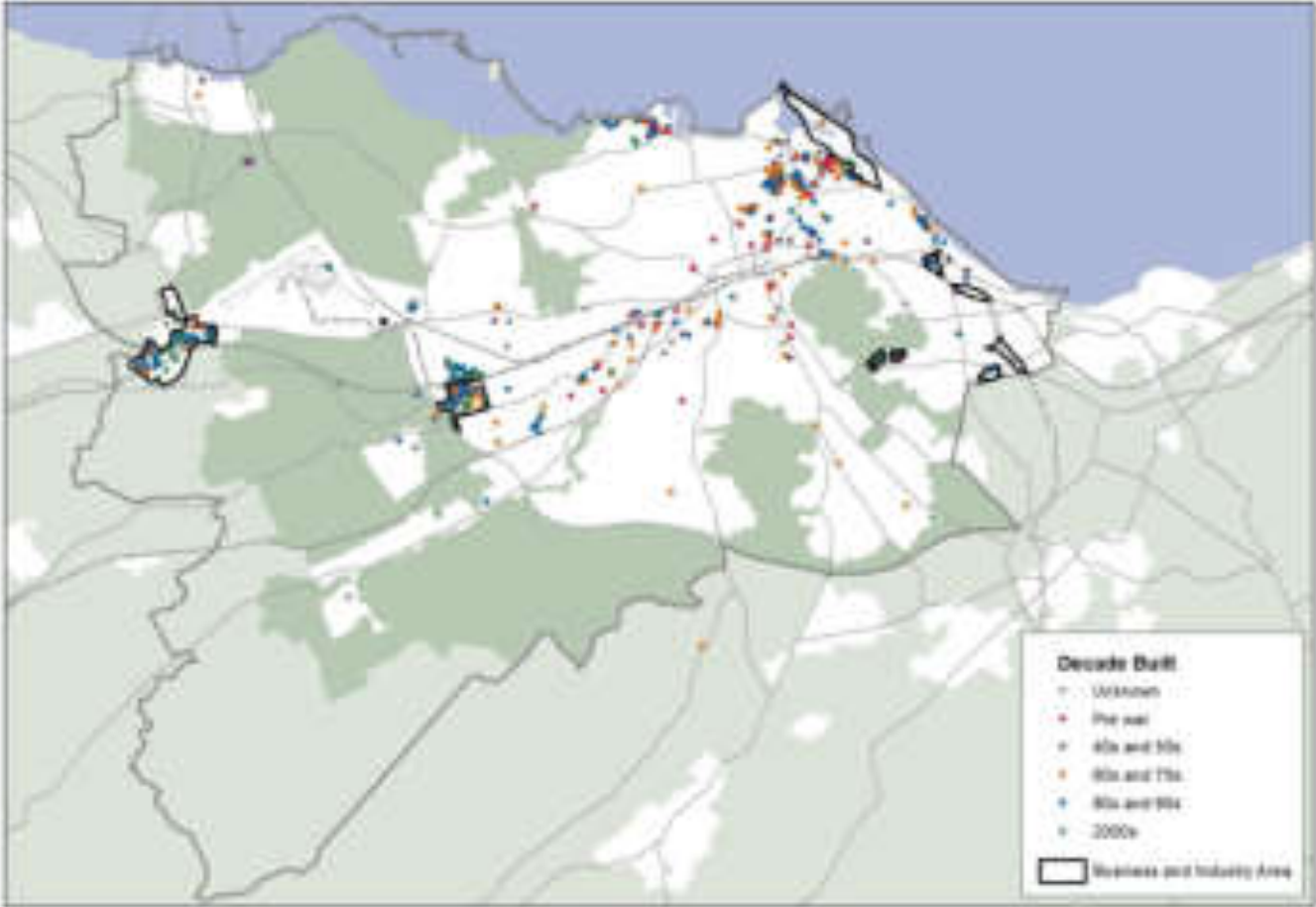
Chart 50: Industrial stock by decade built



Source: Ryden/CoStar

Map 26 shows Industrial stock by age of unit – industrial units follow Edinburgh’s internal transport network.

Map 26: Industrial stock by age



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Source: Ryden/CoStar

Most of the industrial land and premises in Edinburgh are distributed in small estates across the urban area. Some are identified in the development plan as sites that are protected against redevelopment. However, outwith designated areas the redevelopment and resultant loss of business and industrial floorspace is managed through LDP Policy Emp 9 Employment Sites and Premises and criteria c) requires on sites larger than one hectare, the proposal includes floorspace designed to provide for a range of business users. However, looking at the use of Policy Emp 9 shows that where development has resulted in a loss of business and industrial floorspace, in most cases the relevant policy Emp 9 which seeks some replacement of flexible business floorspaces for a range of business users, has not been applicable as most sites are under the 1ha threshold.

Of those development proposals over 1 ha the following floorspace has been provided:

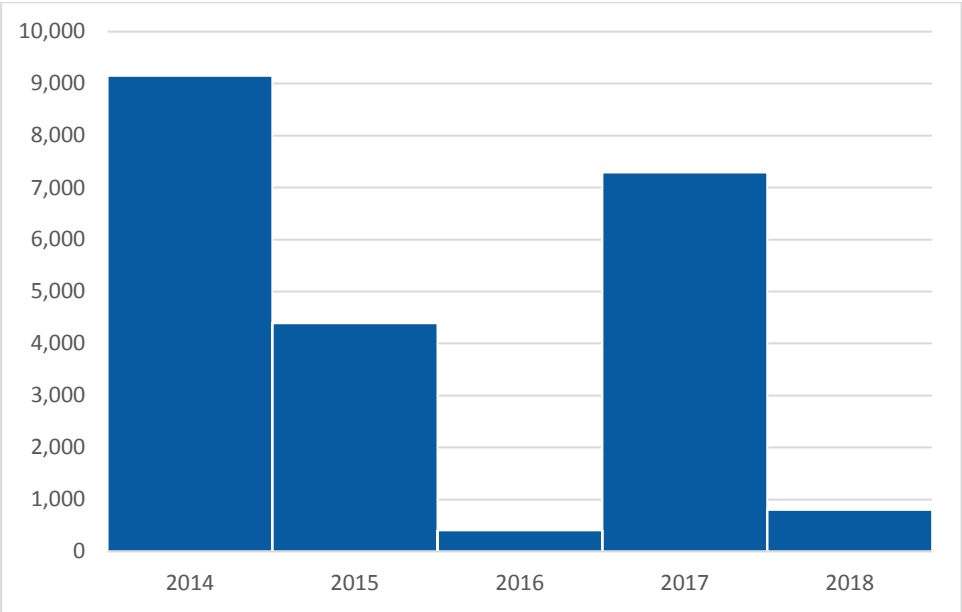
- 14 Bonnington Road Lane – PPP minded to grant subject to legal agreement is the subject to a condition for the re-provision of 600 sq. m. Class 4 use
- 17 Fishwives Causeway – 960 sq. m. commercial floorspace (Class 2 or 4 including healthcare, office, community space) – but not flexible business floorspace
- 9-21 Salamander Place - 2 commercial units secured, total of 367 sq. m. but in Class 1, 2 or 4.

There are few examples where new industrial floorspace is consented, such as the change of use from car sales to light industrial along with erection of 3 units at 23 Roseburn Street (also under 1ha) or new units developed by the Council at Cultins Road, Sighthill.

New Industrial floor space

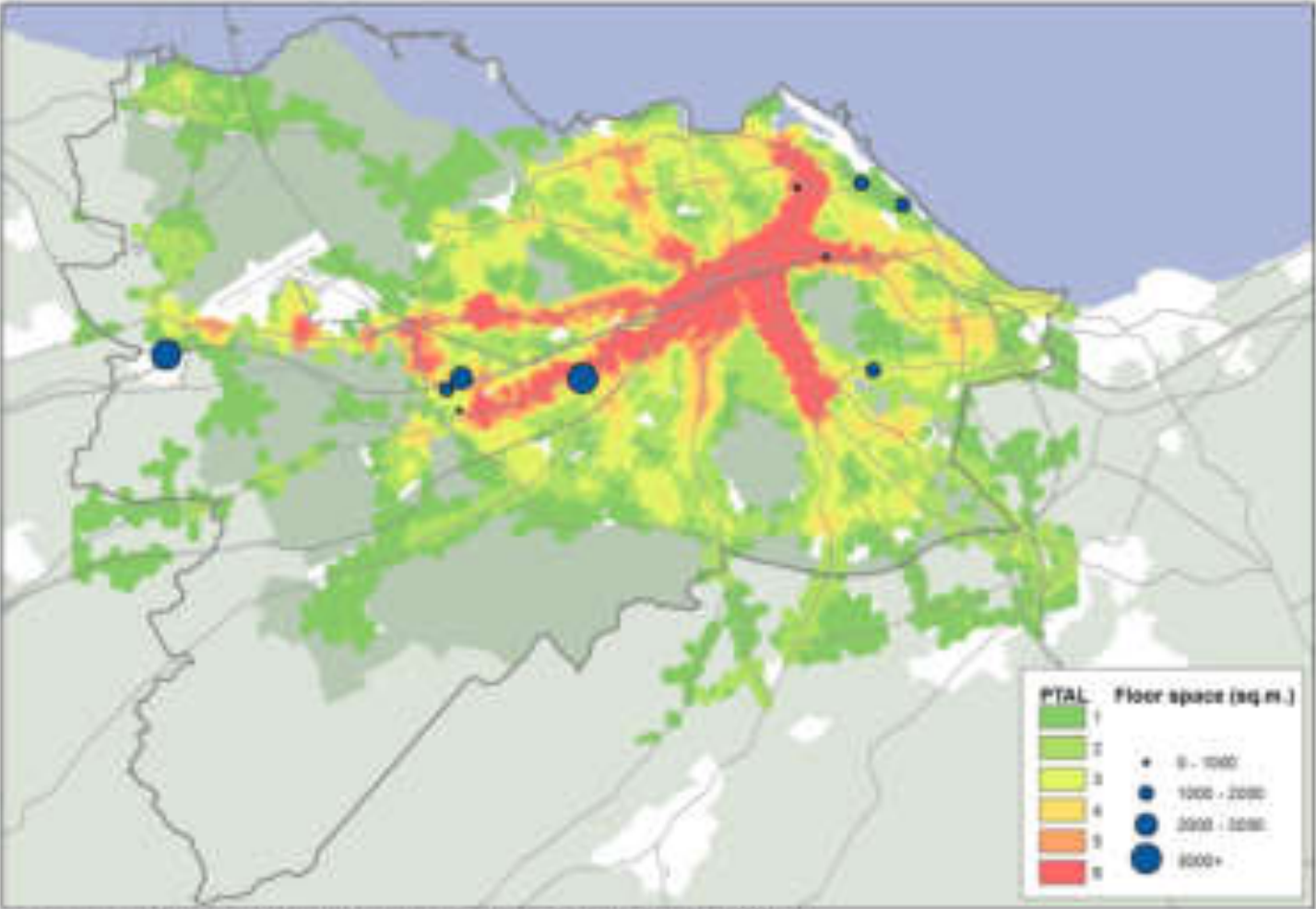
Chart 51 shows the amount of new industrial floor space developed over the last five years. The locations of the sites are shown on map 27 along with the accessibility of the sites via public transport.

Chart 51: Amount of new industrial floorspace developed



Source: City of Edinburgh Council development activity schedules

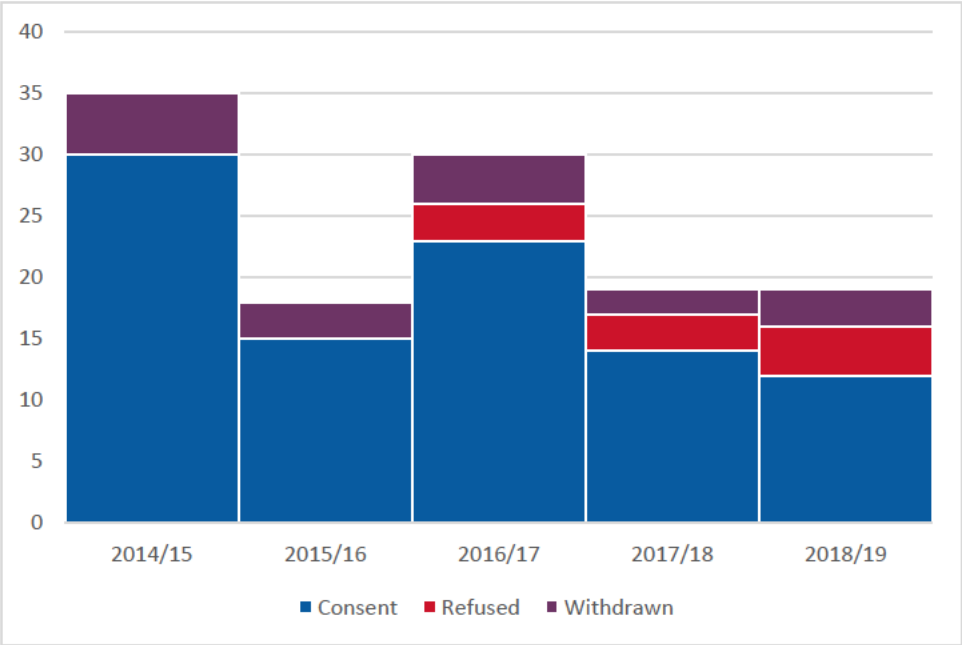
Map 27: New Industrial units by public transport accessibility level



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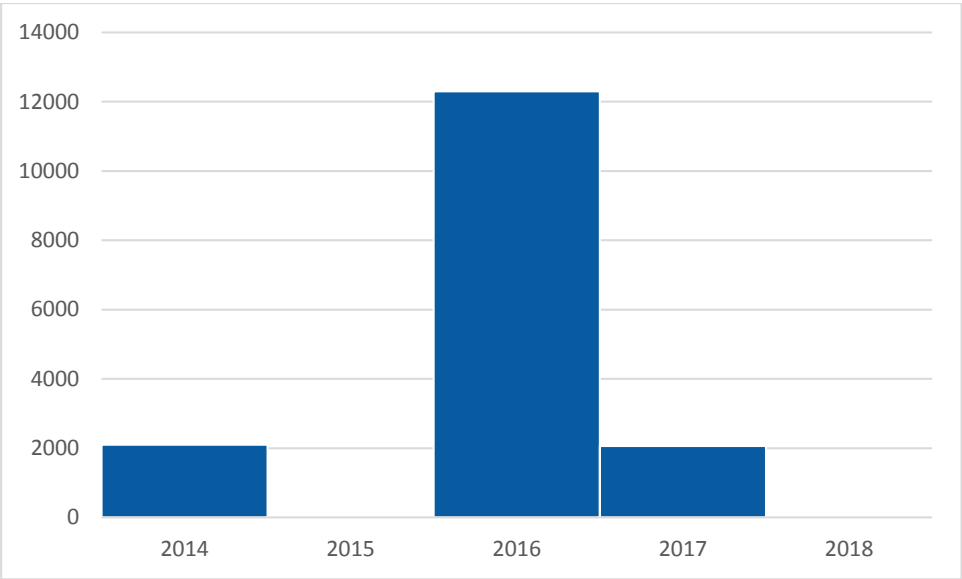
Chart 52 shows the number of planning applications decided for developments that would result in the loss of industrial floorspace. Few applications were refused. Not all applications are implemented. The actual loss of industrial floorspace that has occurred is shown on chart 53.

Chart 52: Potential loss of industrial floorspace



Source: City of Edinburgh Council planning service

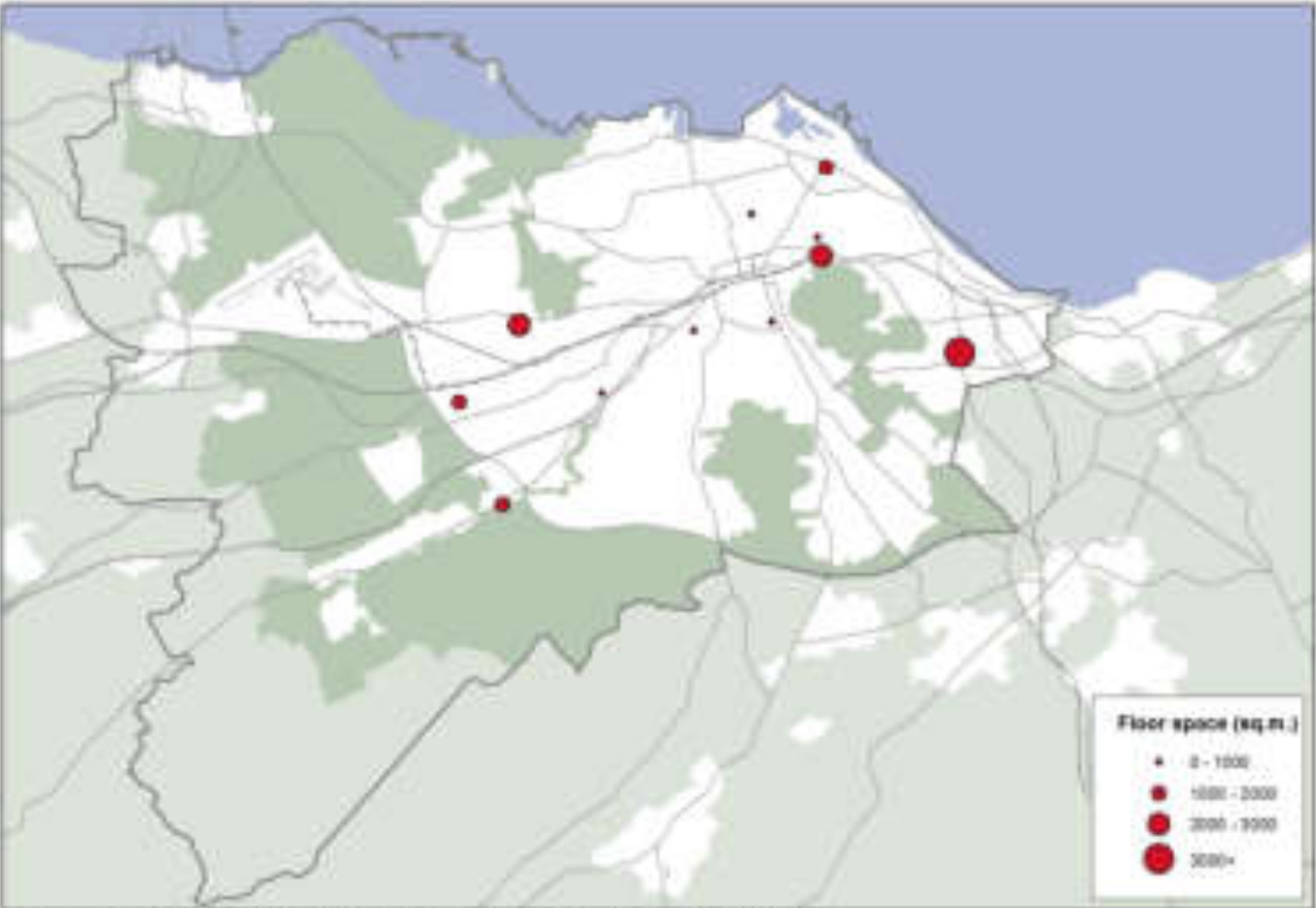
Chart 53: Actual loss of industrial floorspace



Source: City of Edinburgh Council planning service

The locations of the industrial units lost are shown on map 28 below.

Map 28: Loss of industrial units 2014 - 2019



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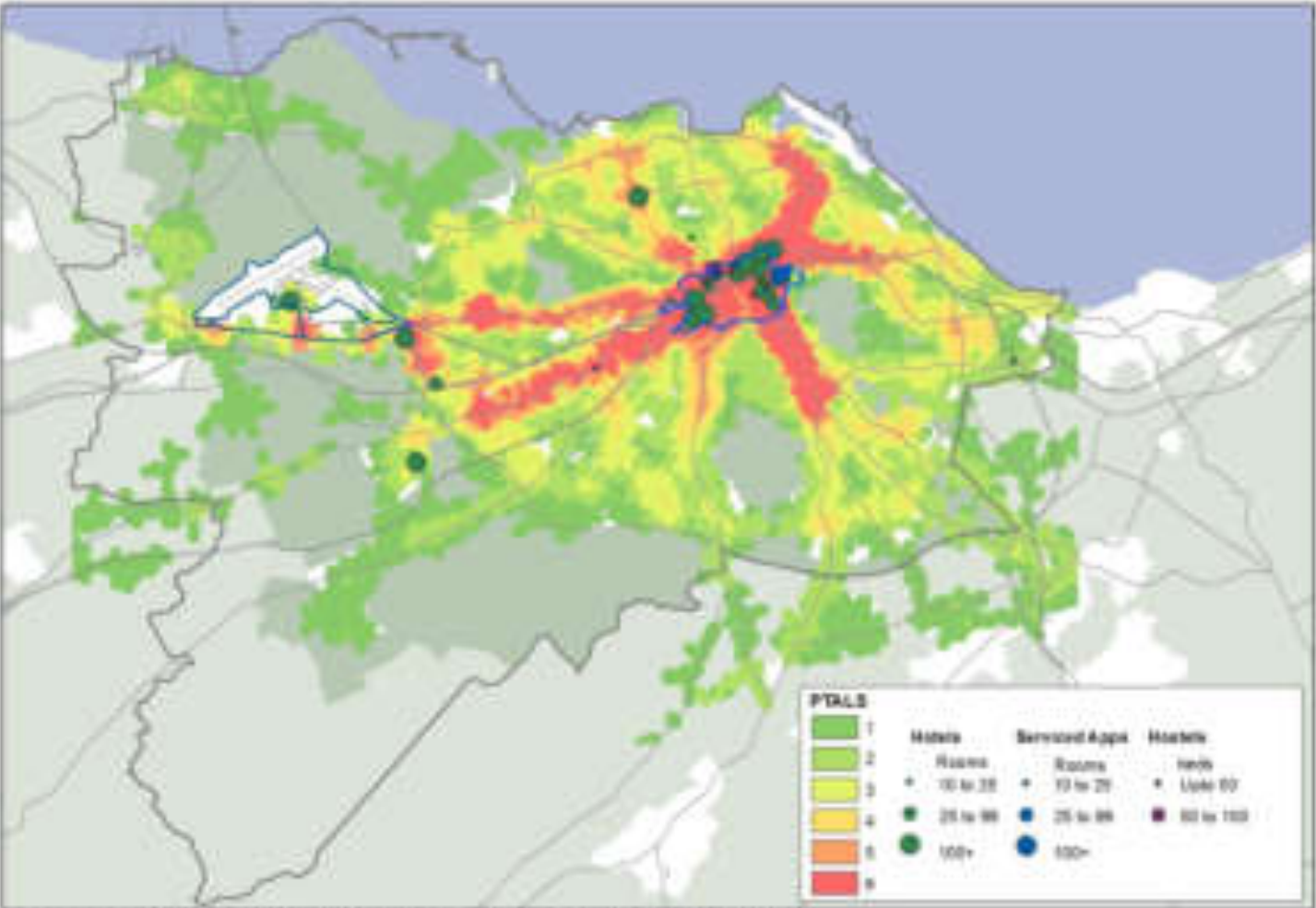
Hotels

Policy Emp 10 states that hotel development will be permitted

- In the City Centre where developments may be required to form part of mixed use schemes, if necessary to maintain city centre diversity and vitality, especially retail vitality on important shopping frontages
- within the boundaries of Edinburgh Airport, the Royal Highland Centre and the International Business Gateway
- In locations within the urban area with good public transport access to the city centre.

Map 29 shows the locations of new hotel development that has taken place since 2013 against public transport accessibility levels.

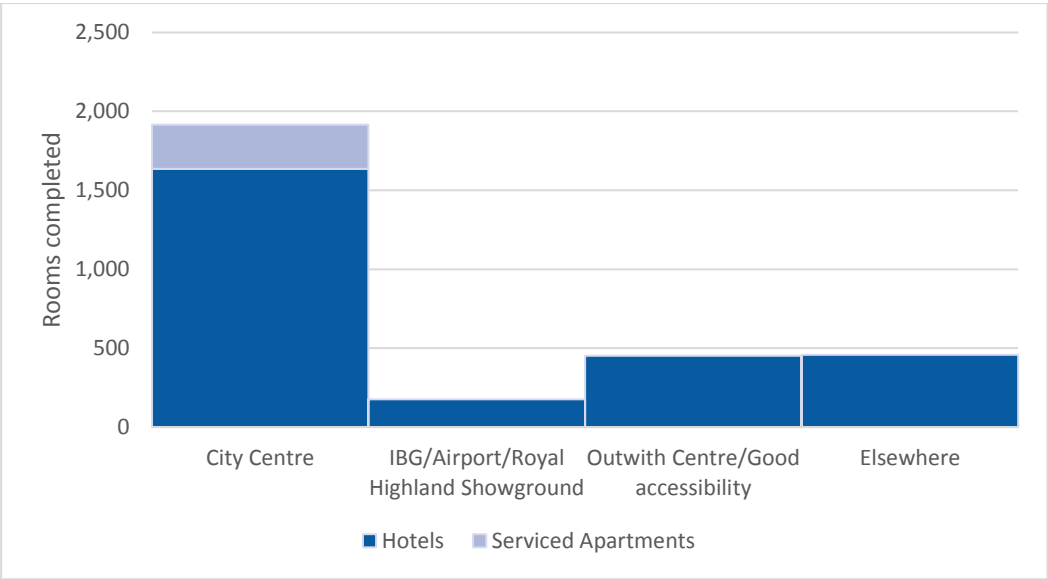
Map 29: Hotel development 2014 – 2019



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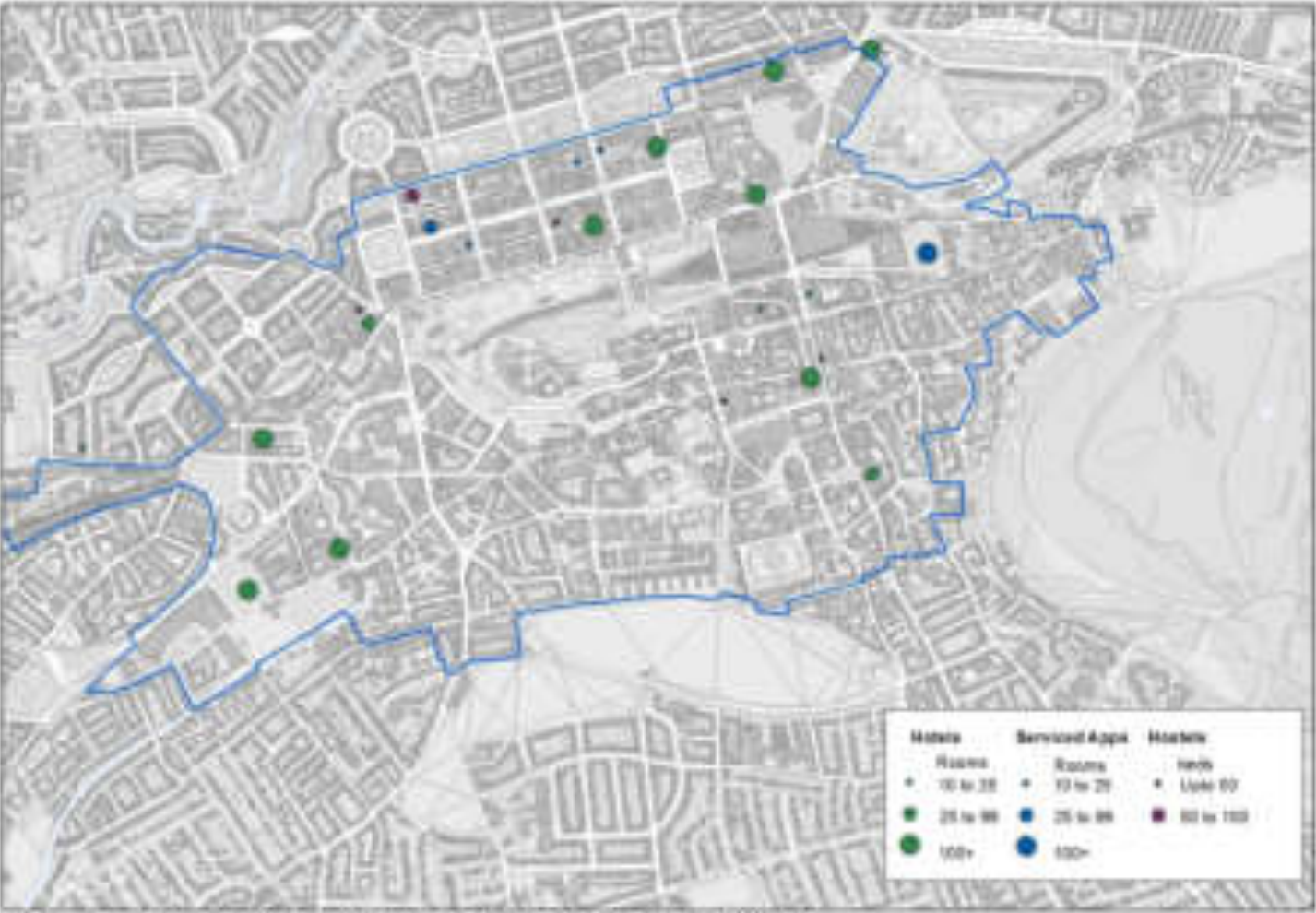
A locational analysis of rooms completed since 2014 is given in chart 54 below.

Chart 54: Hotel rooms completed 2014 - 2019



A detailed view of newly completed hotel development in the city centre is given in map 30.

Map 30: Hotel development 2014 – 2019 in the City Centre

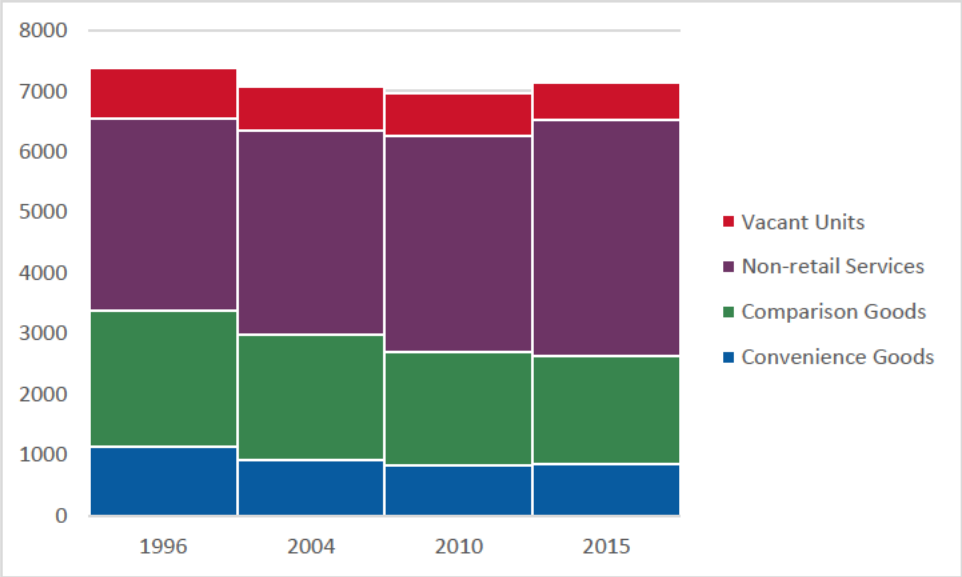


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Retail

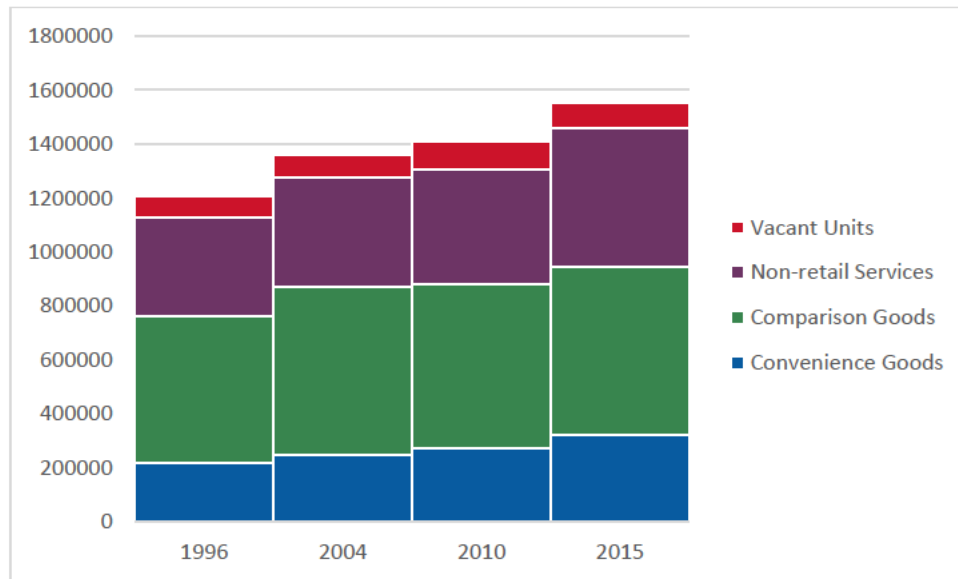
Charts 55 and 56 below shows how the stock of retail units in Edinburgh has changed over the last 20 years. Chart 55 shows change in the number of retail outlets whilst chart 56 shows change in the amount of retail floorspace.

Chart 55: Numbers of retail outlets in Edinburgh 1996 to 2015



Source: CEC retail survey

Chart 56 Retail floorspace in Edinburgh 1996 to 2015

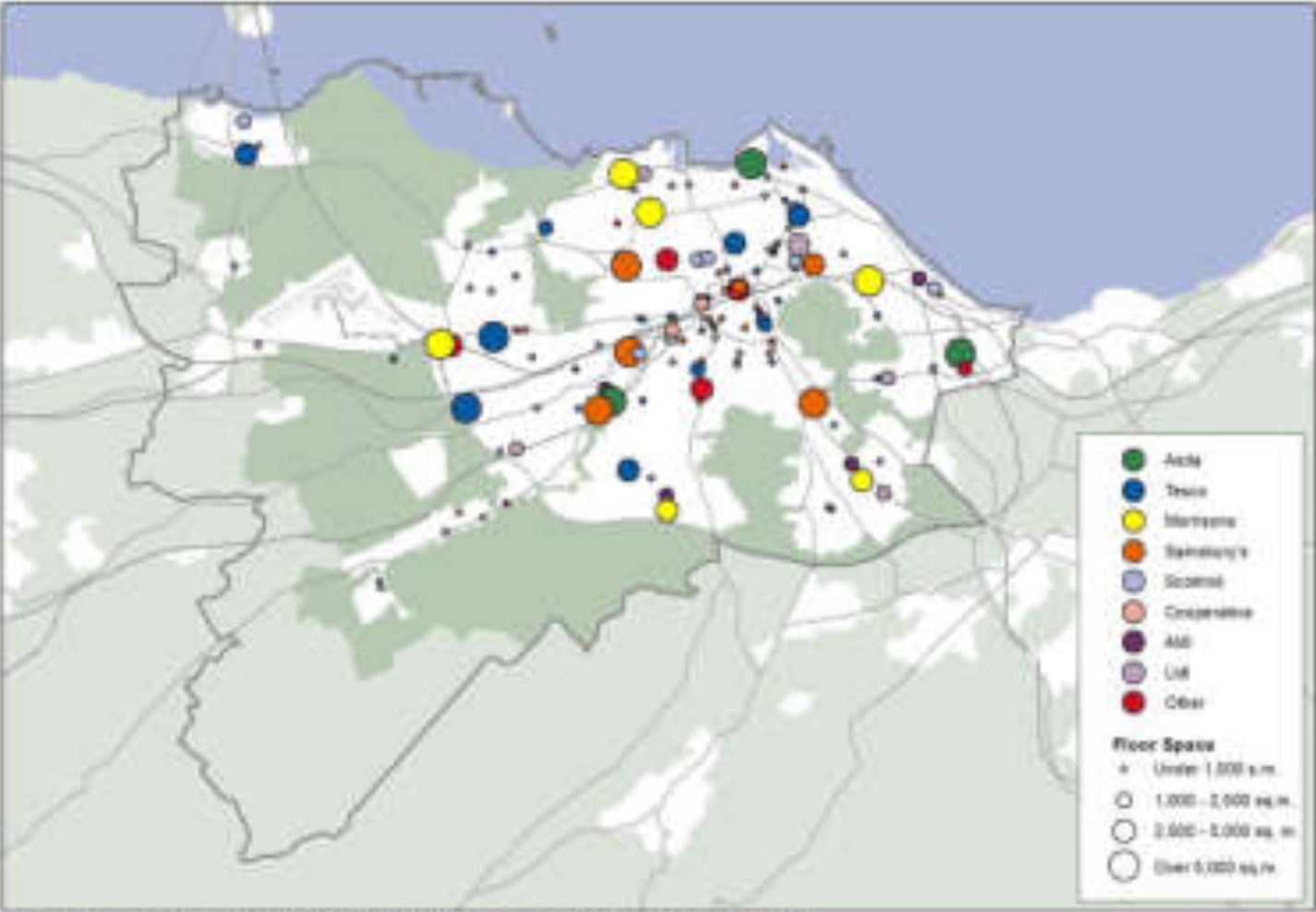


Source: CEC retail survey

The total number of retail outlets has remained fairly constant at around 7,000 units dipping slightly in the 2000s but increasing again by 2015. The number of comparison and convenience goods stores has decreased, offset by an increase in non-retail services such as cafes, pubs and high street offices.

The amount of floorspace has increased significantly over the last 20 years. Whilst the number of convenience and comparison goods outlets has decreased, the amount of floorspace available has increased. This is due to a number of retail parks opening and expanding and a large increase in the number and size of supermarkets. Map 31 shows the locations of supermarkets by operator and size within the city.

Map 31 Supermarkets operating in Edinburgh

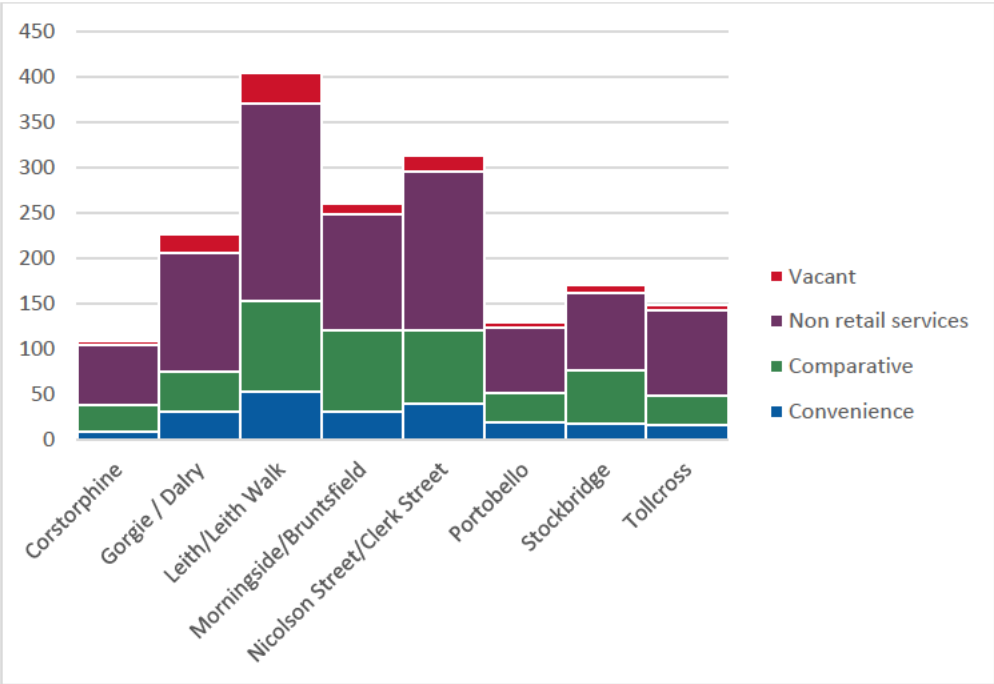


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Source: CEC retail survey

Chart 57 below shows the changes in the number of retail outlets by town centre. Morningside and Stockbridge have the greatest proportion of comparison goods stores whilst Tollcross has the greatest proportion of outlets in the non-retail services sector. At 7% of all retail outlets, Gorgie/Dalry and Leith/Leith Walk have the greatest proportion of vacant retail units.

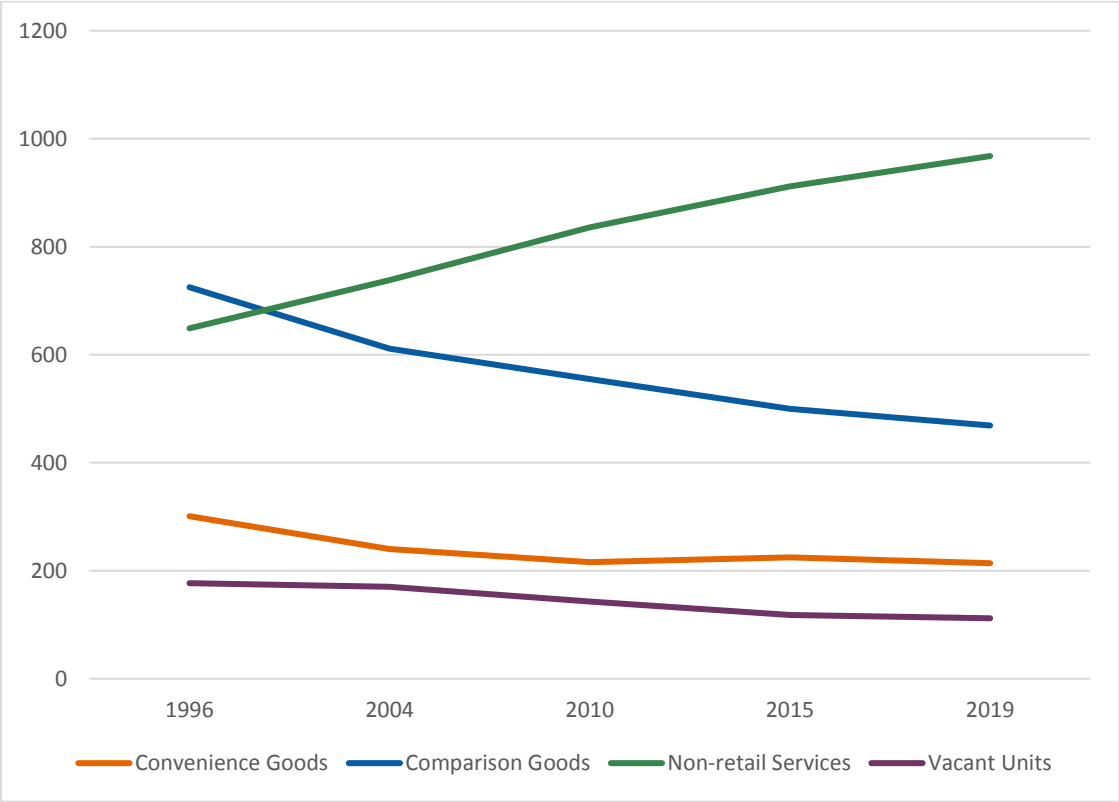
Chart 57. Retail outlets by town centre: 2019



Source: CEC retail survey

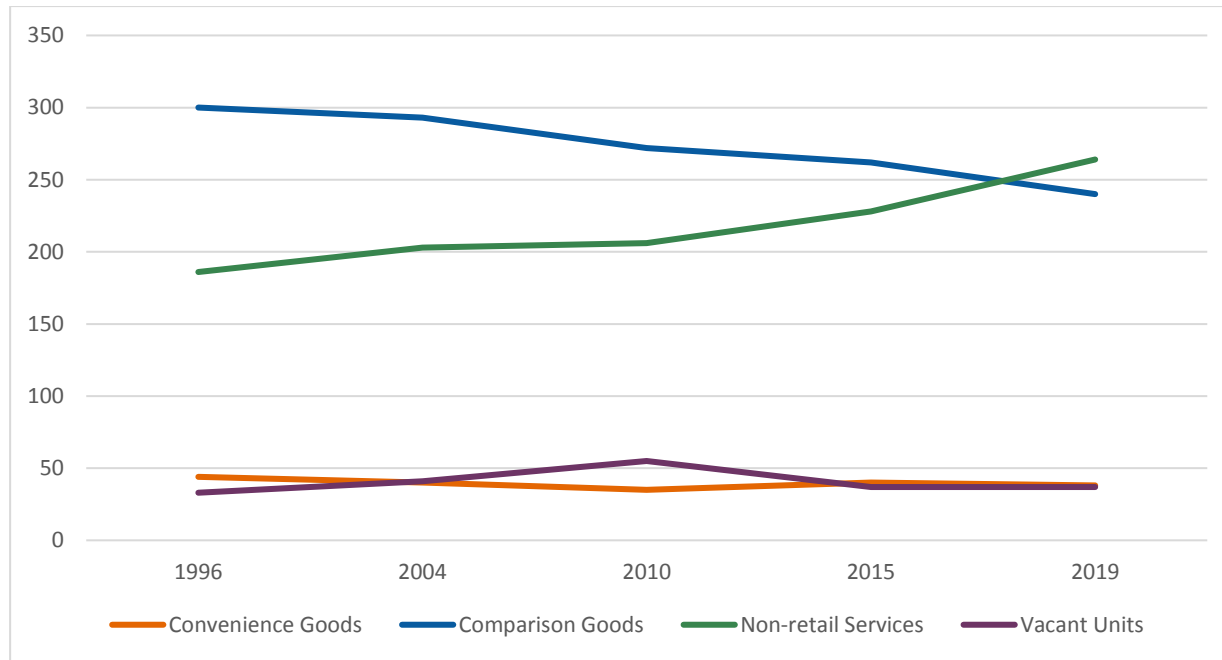
There has been a trend within the town centres towards a reduction in comparison goods stores and a corresponding increase in non-retail services such as coffee shops, restaurants and hairdressers. There has been a similar shift in the City centre but at a significantly reduced rate. Changes in the types of retail outlets for the town centres and city centre are shown in charts 58 and 59 below.

Chart 58: Changes in types of shop - Town centres



Source: CEC retail survey

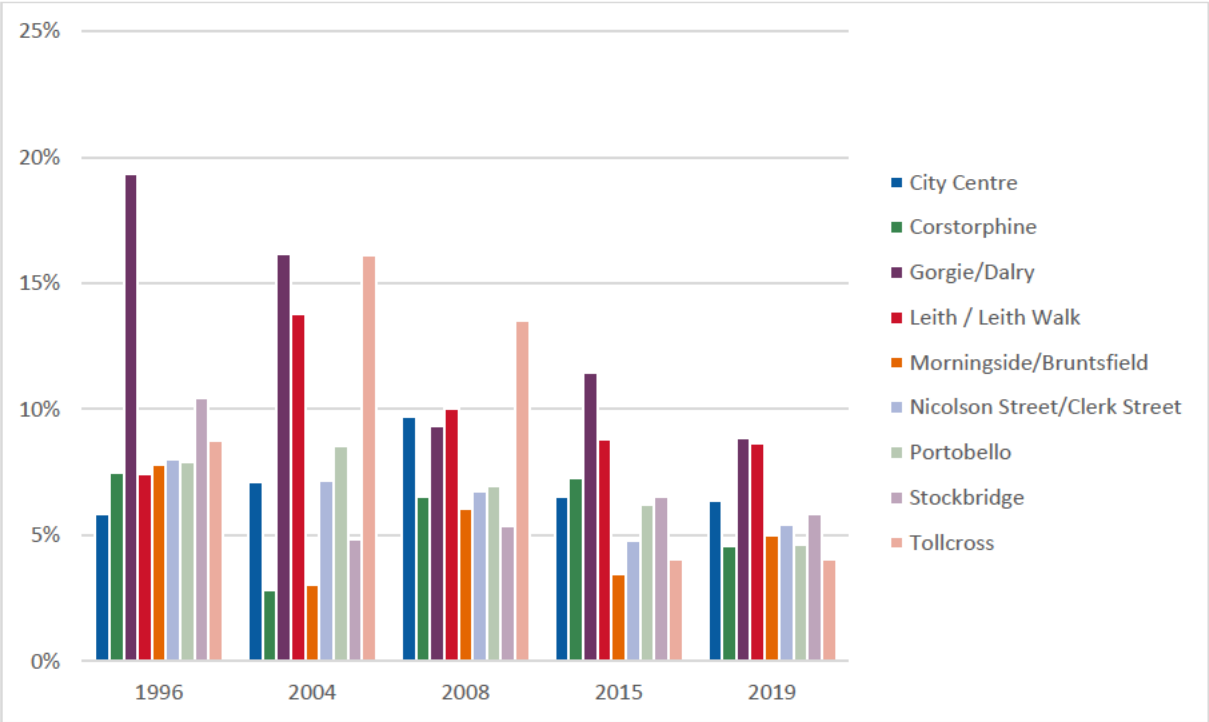
Chart 59: Changes in types of shop – City Centre



Source: CEC retail survey

Trends in vacant units for the individual town centres are shown in chart 60 below. On the whole, the proportion of retail units that are vacant has been reducing. Gorgie/Dalry has experienced the biggest reduction in vacant units since 1996, reducing from 19% to just 7% in 2018.

Chart 60: Change in vacant units by town centre

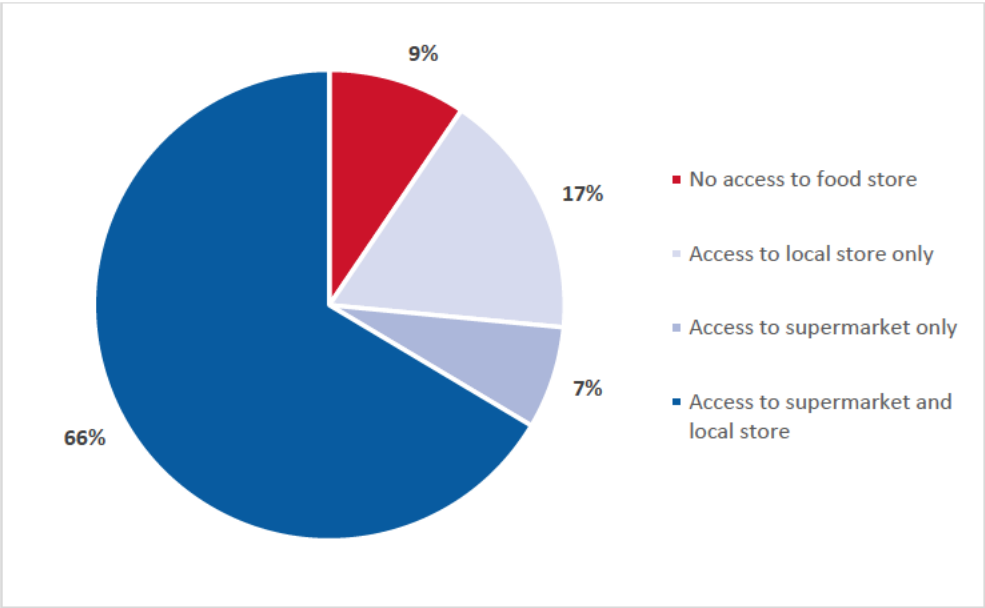


Source: CEC retail survey

Access to grocery stores

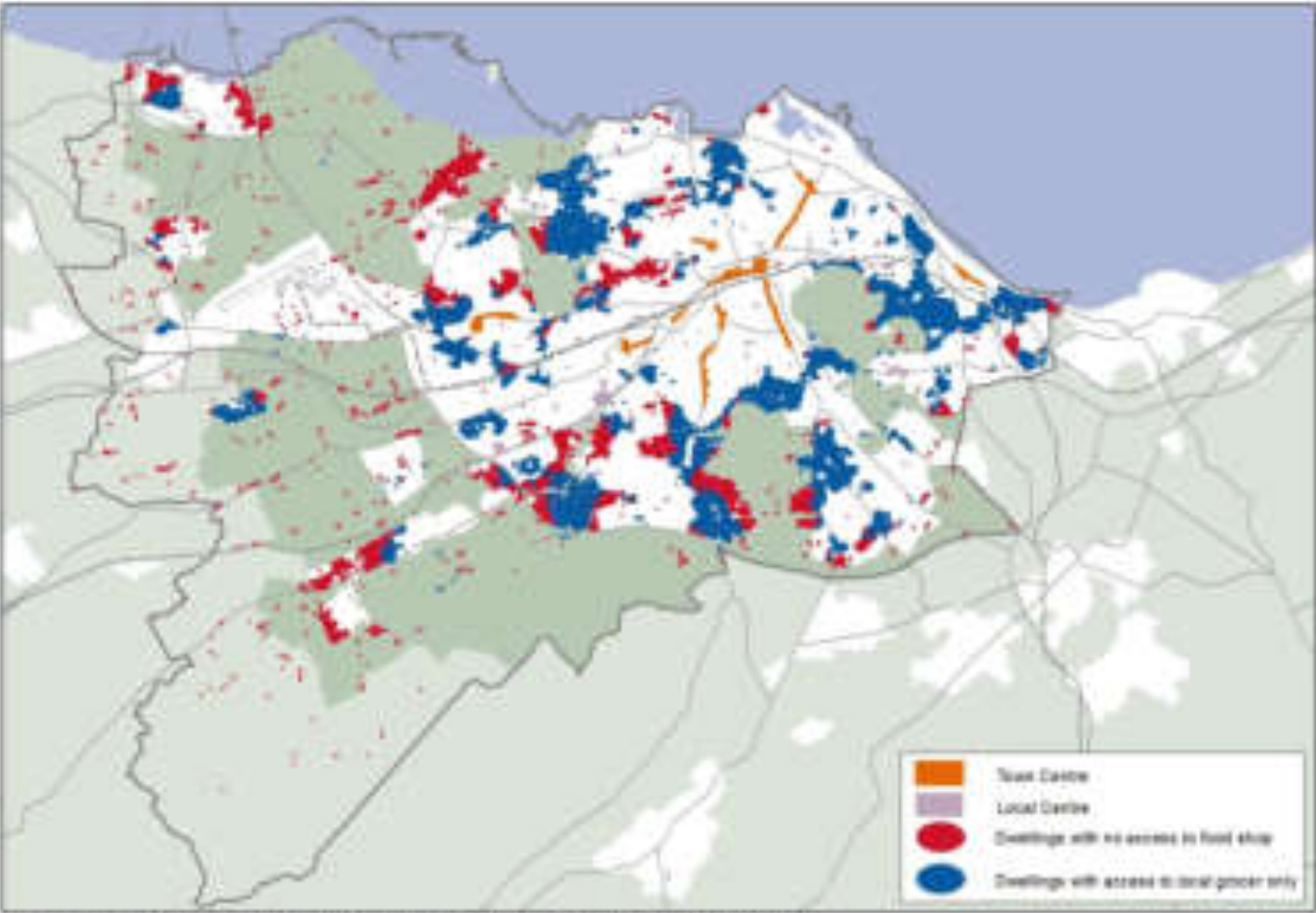
Less than 10 percent of dwellings in Edinburgh are further than 10 minute walk time from the nearest grocery store and nearly 75% are within 10 minutes walk time of a supermarket. Chart 61 breaks down the proportion of dwellings by access to food shops.

Chart 61: Dwellings by access to grocery stores



Dwellings with no grocery store within 10 minutes walking time or with access to a local food shop only are displayed on map 32.

Map 32: Dwellings with no supermarket within 10 minute walk time

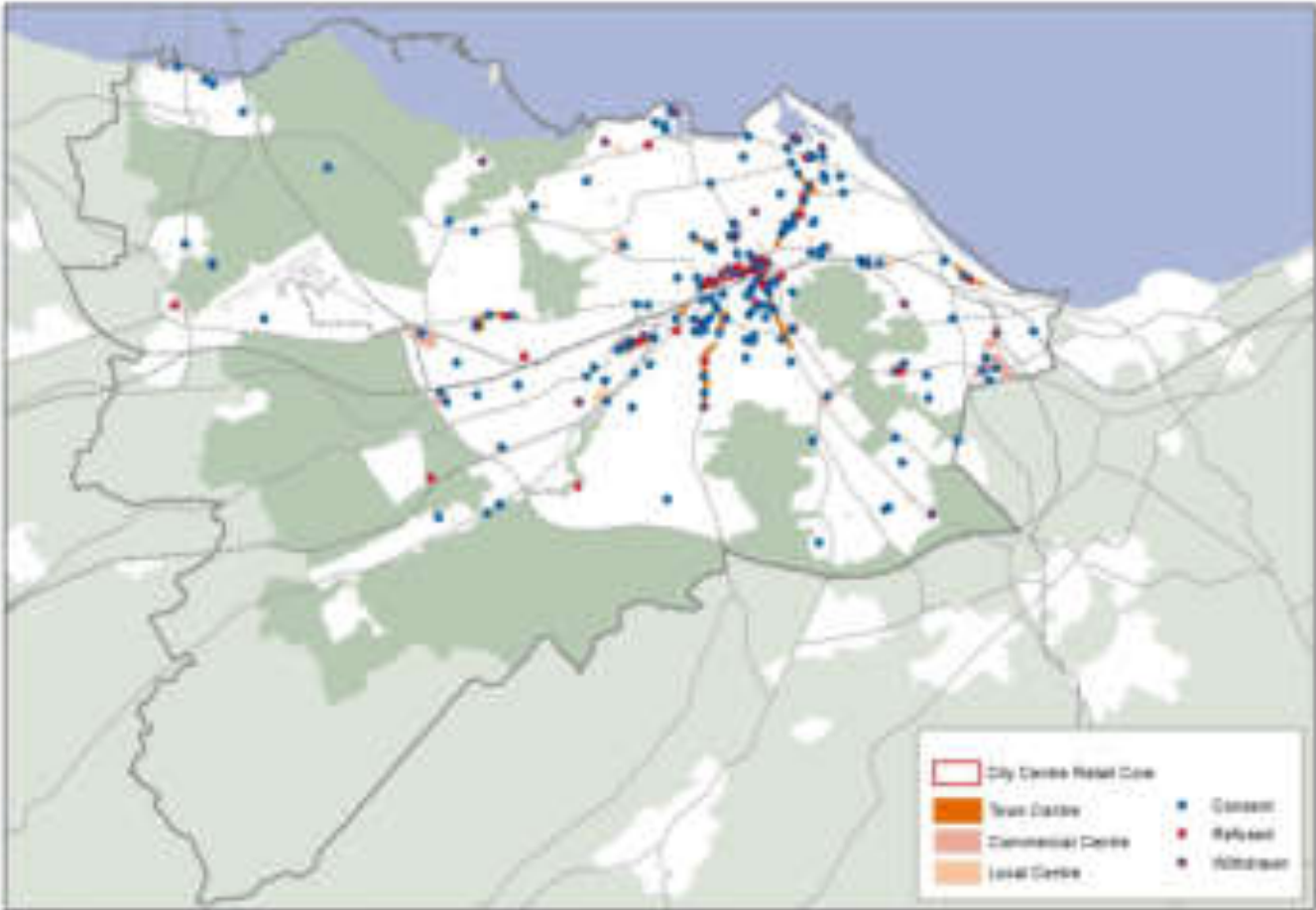


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New retail development

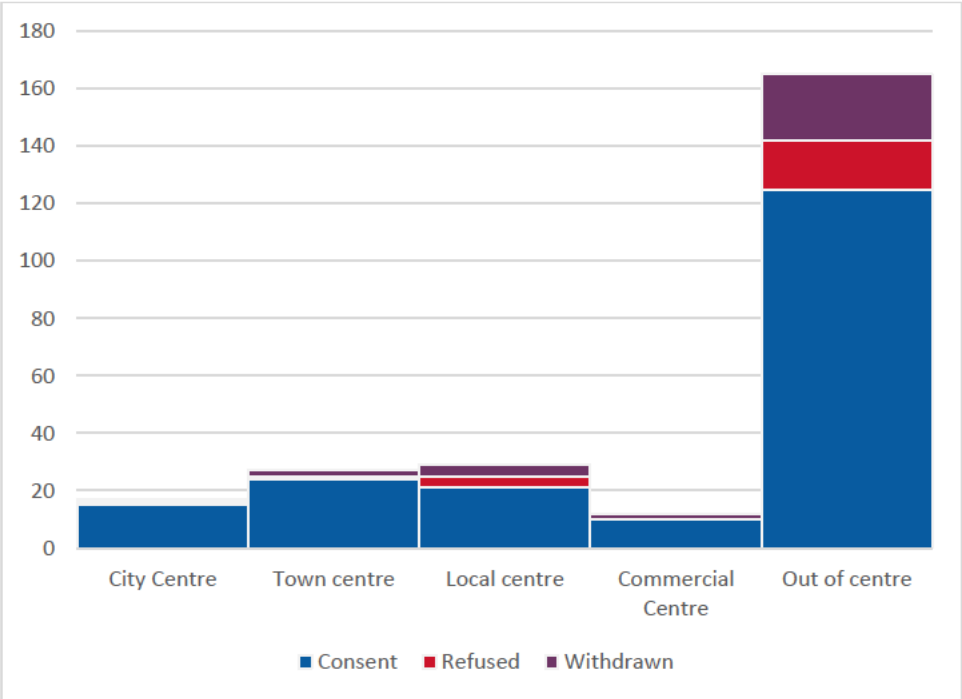
Map 33 shows the locations of planning applications for new retail development for the period 1 April 2014 to 31 March 2019. A breakdown of applications by location and decision is displayed in chart 62.

Map 33: Planning applications for retail development 2014 - 2019



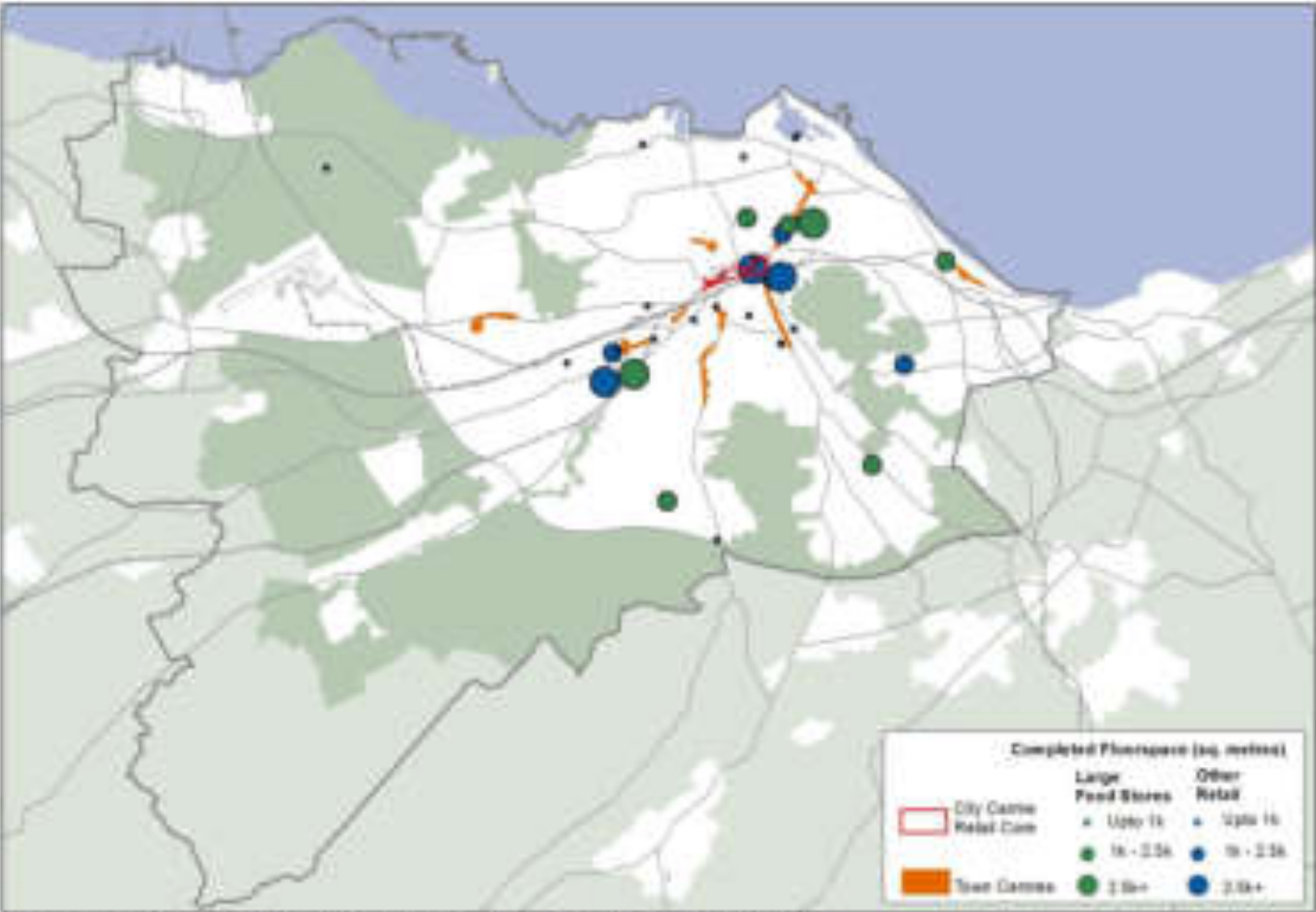
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Chart 62: Planning applications for retail development 2014 to 2019



Map 34 shows the locations of completed retail development over the period 2014 to 2019.

Map 34: Completed retail development 2014 – 2019



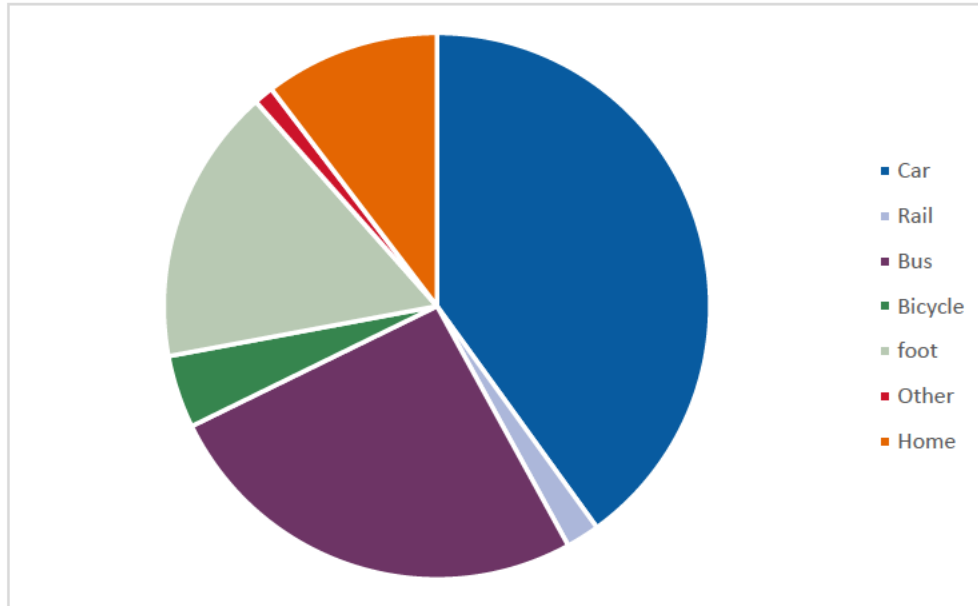
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Transport

Travel to Work

Chart 63 shows the proportion of Edinburgh's residents by their usual means of travel to work. Of all local authorities in Scotland, Edinburgh has the greatest proportion of residents that walk to work and the greatest proportion that travel by bicycle.

Chart 63: Mode of travel to work 2011

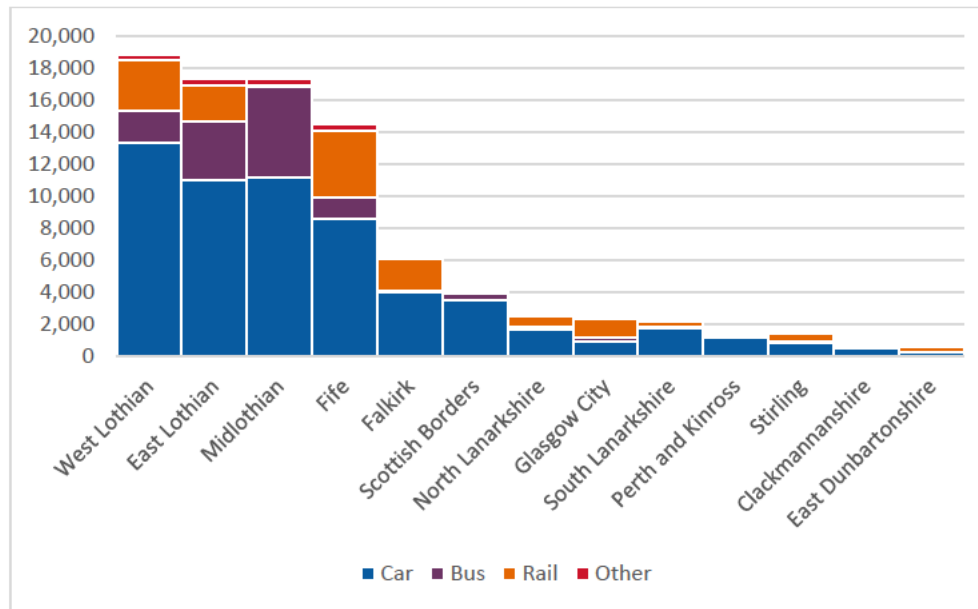


Source: 2011 Census

As the main employment centre for South East Scotland, there are significantly more people commuting into the city than residents commuting out. One third of workers in the city commute in from other local authority areas; this amounts to nearly 95,000 inward trips per day. The majority of in-commuters come from the council areas bordering the city, but there are also significant numbers of workers travelling in from Falkirk, Glasgow and North and South Lanarkshire.

Chart 64 shows the number of people commuting into Edinburgh to work. Two thirds of workers commuting from other council areas travel by car.

Chart 64: In-commuting to Edinburgh by local authority



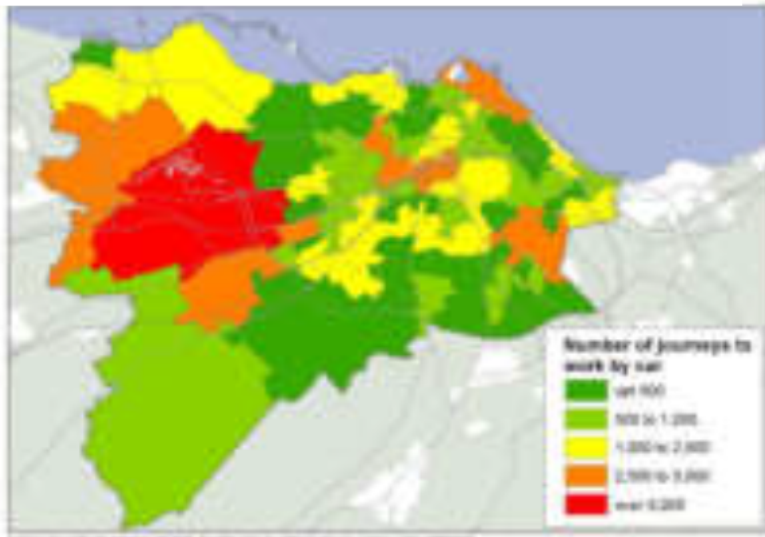
Source: 2011 Census.

Chart 65 shows how the mode of travel to work in Edinburgh has changed since 2001.

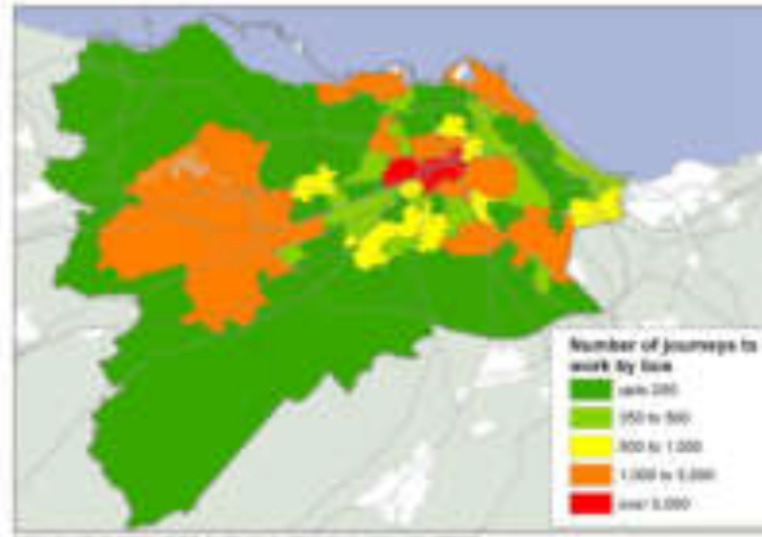
- Travel to work by car has decreased by 12%
- Travel to work by rail has increased by over 50%
- Travel to work by cycle has increased by nearly 60%
- Travel to work on foot has increased by 16%
- People working from homes has increased by 160%

Maps 35 to 38 show the number of travel to work trips made to locations within Edinburgh for commuters by car, bus, bicycle and on foot.

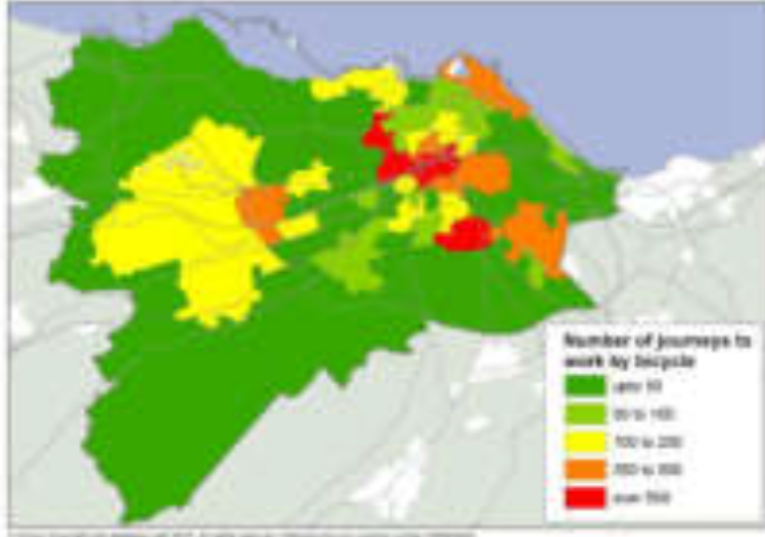
Map 35 Travel to work by car



Map 36 Travel to work by bus



Map 37 Travel to work by Bicycle



Map 38 Travel to work on foot

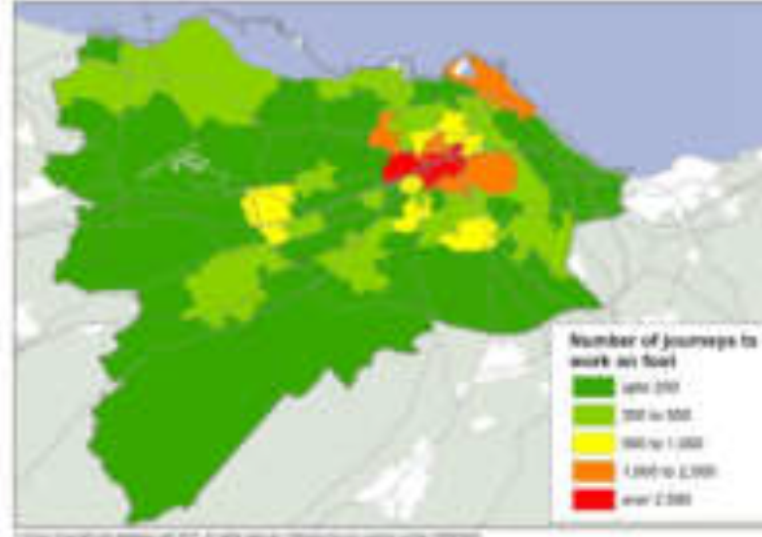
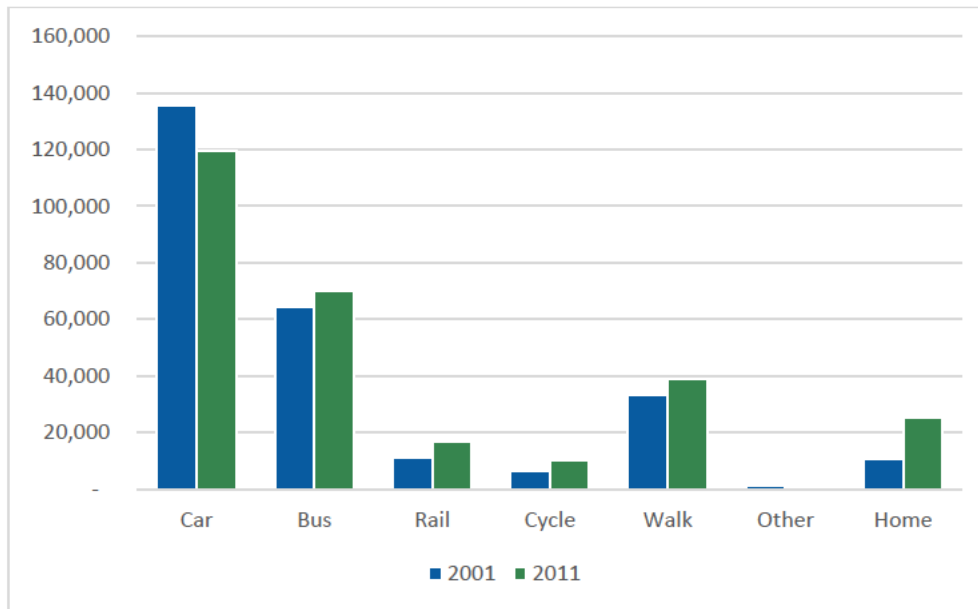


Chart 65: Change in travel to work mode 2001 - 2011



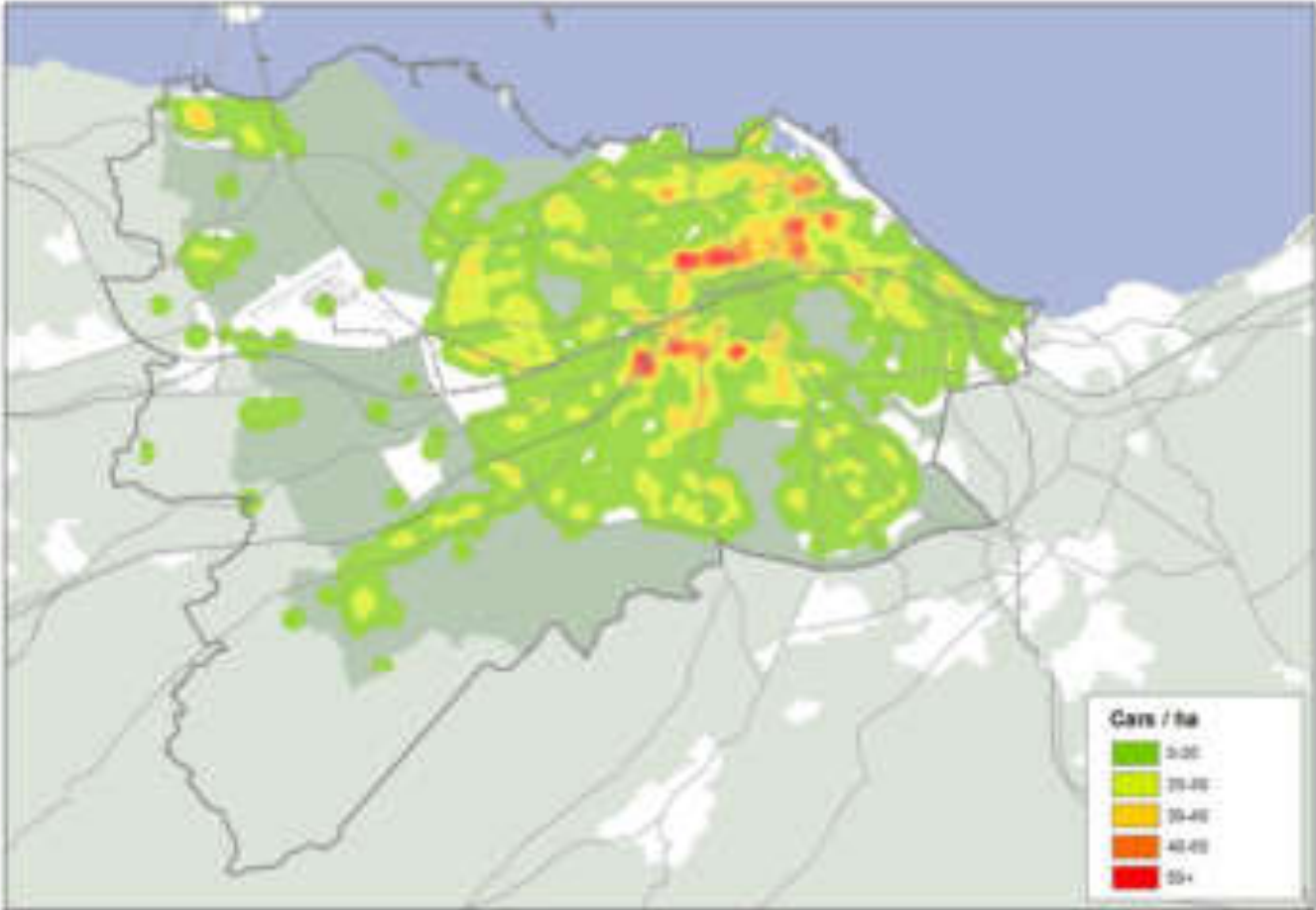
Source: 2001 and 2011 Census

It should be noted that the charts and maps above are based upon data from the 2011 Census and as such, predate the opening of the Borders railway in 2015. Similarly, when the Census was taken, the Airdrie to Bathgate railway link had only just opened. Both of these developments will have had a considerable effect on the number of commuters using rail which is not captured in the charts.

Car Ownership

Map 39 shows the density of cars owned in Edinburgh. The map is based upon census counts of the number of cars available to households. The density, therefore, is a product of both car ownership and overall density of residences.

Map 39: Density of cars owned



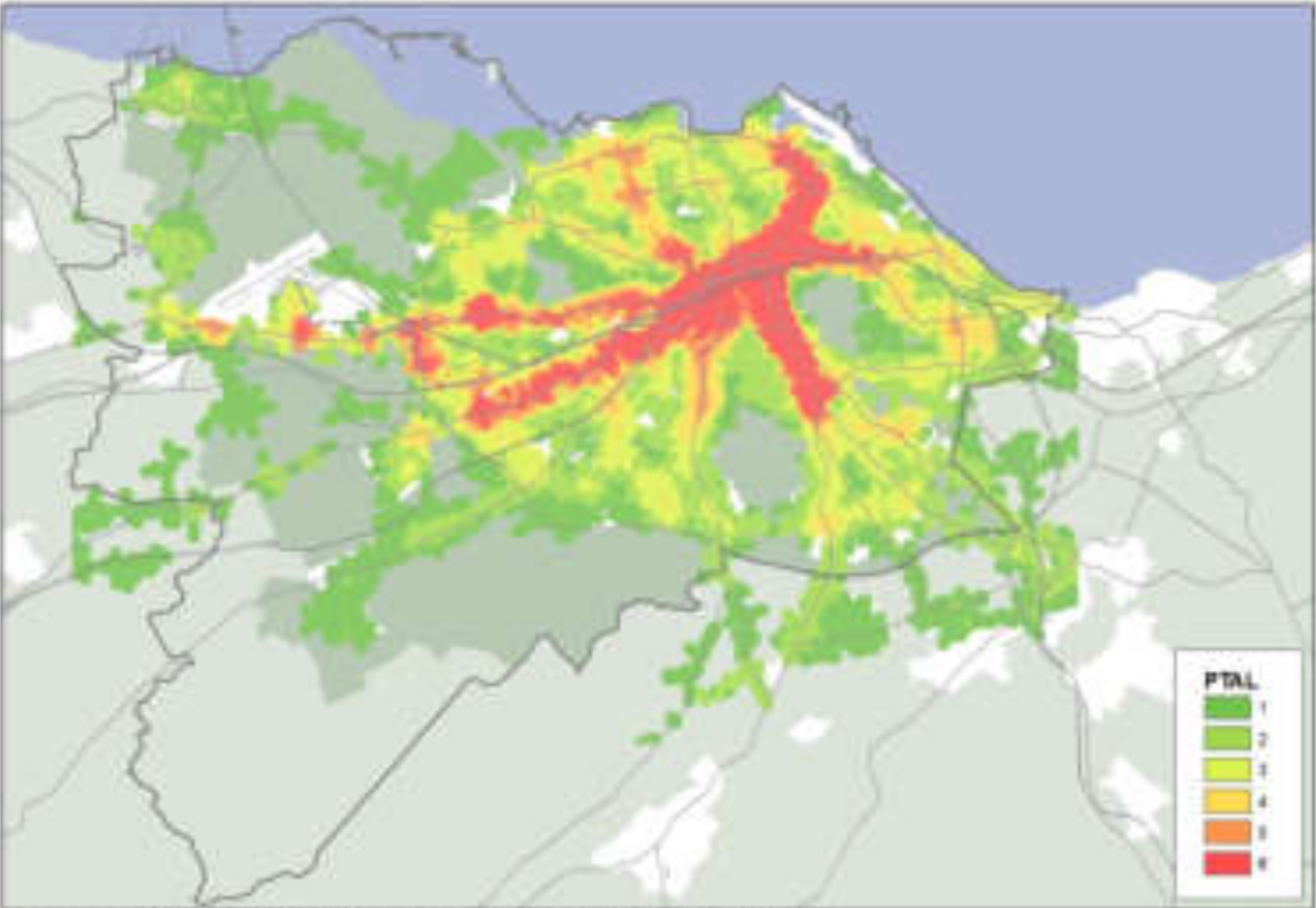
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Source: 2011 Census

Public Transport Accessibility

Edinburgh's population enjoys high level of public transport accessibility. The levels of public transport accessibility, measured in terms of the number and frequency of different services available is shown in map40 below. The PTAL measure gives an overall, relative measure of accessibility and ranks an area from 1 - very low accessibility to 6 - Very high accessibility. The score is based upon the number and frequency of different public transport services that can be accessed from a given point.

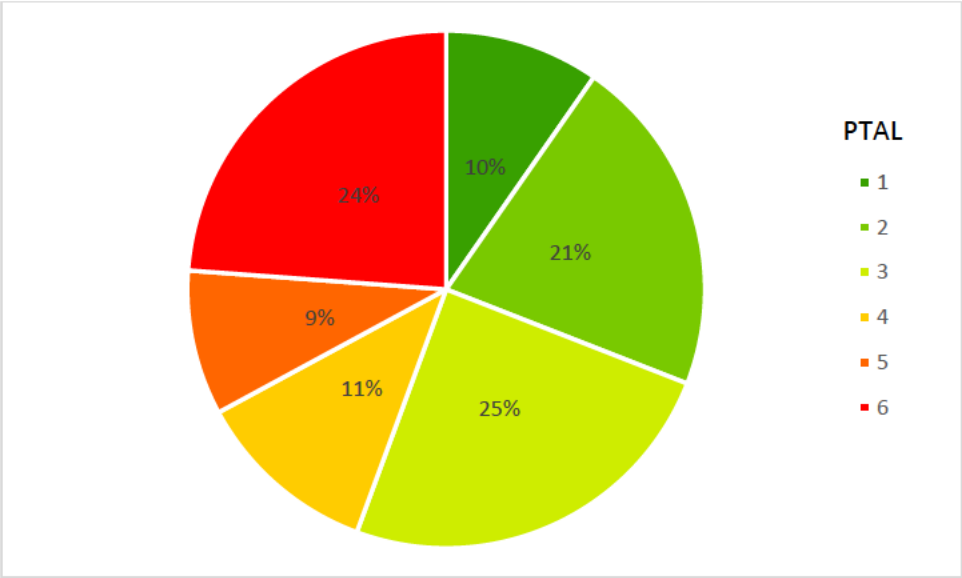
Map 40: Public Transport Accessibility Levels (PTALs)



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Residential areas tend to be lower in terms of accessibility than commercial centres. Overall, one third of Edinburgh’s population live in areas classed in the highest accessibility levels – PTAL 5 and 6, whilst just under a third live in the lowest accessibility levels – PTALS 1 and 2. Chart 66 gives a full breakdown of Edinburgh’s population by PTAL level.

Chart 66: Population by PTAL of residence 2018

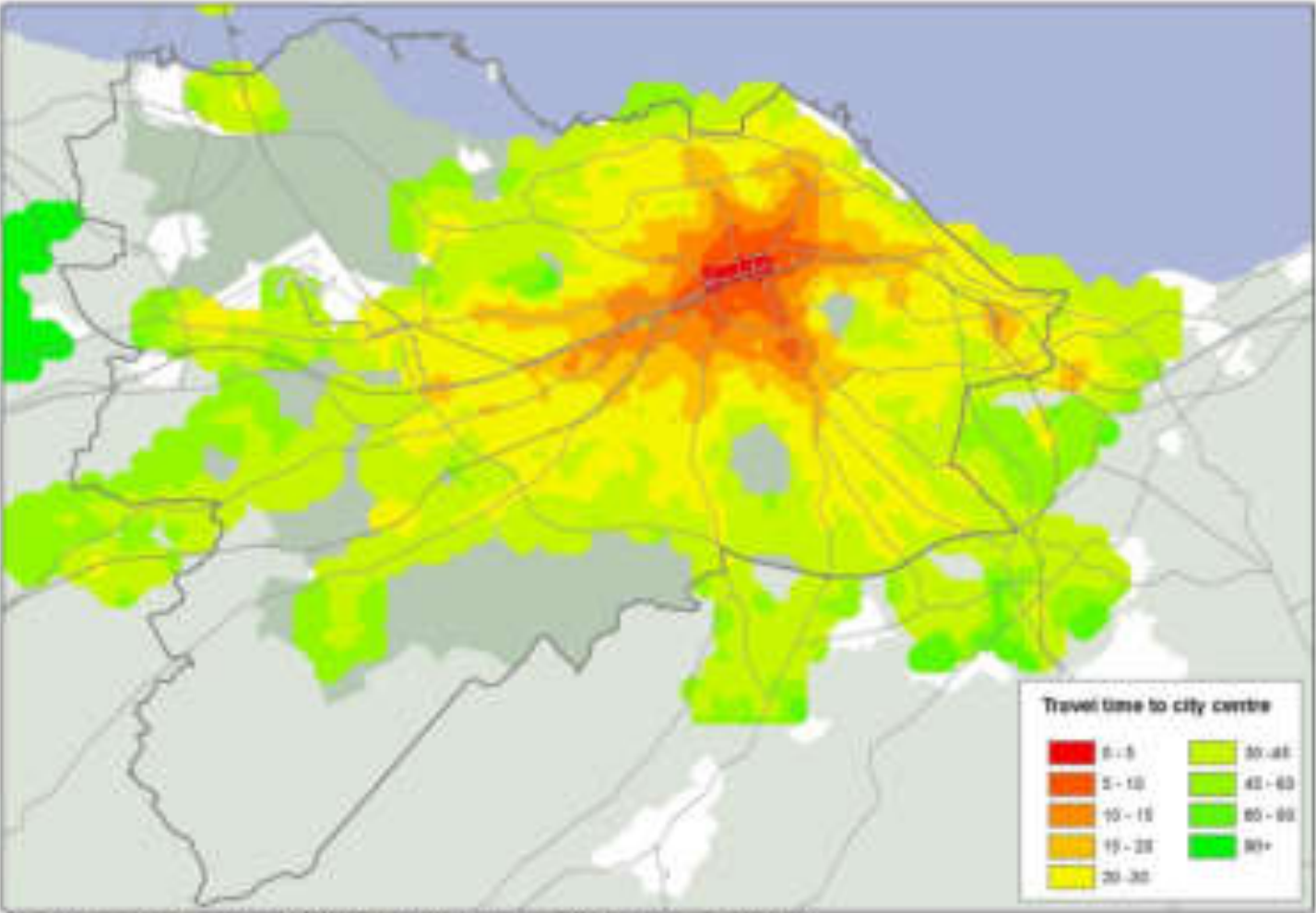


Source: NRS Small area population estimates 2018

Travel Time

The PTAL map shows that the City Centre is highly accessible in terms of the number and frequency of services stopping there. Map 41 below examines a different measure of accessibility – the amount of time it takes to reach the city centre by public transport.

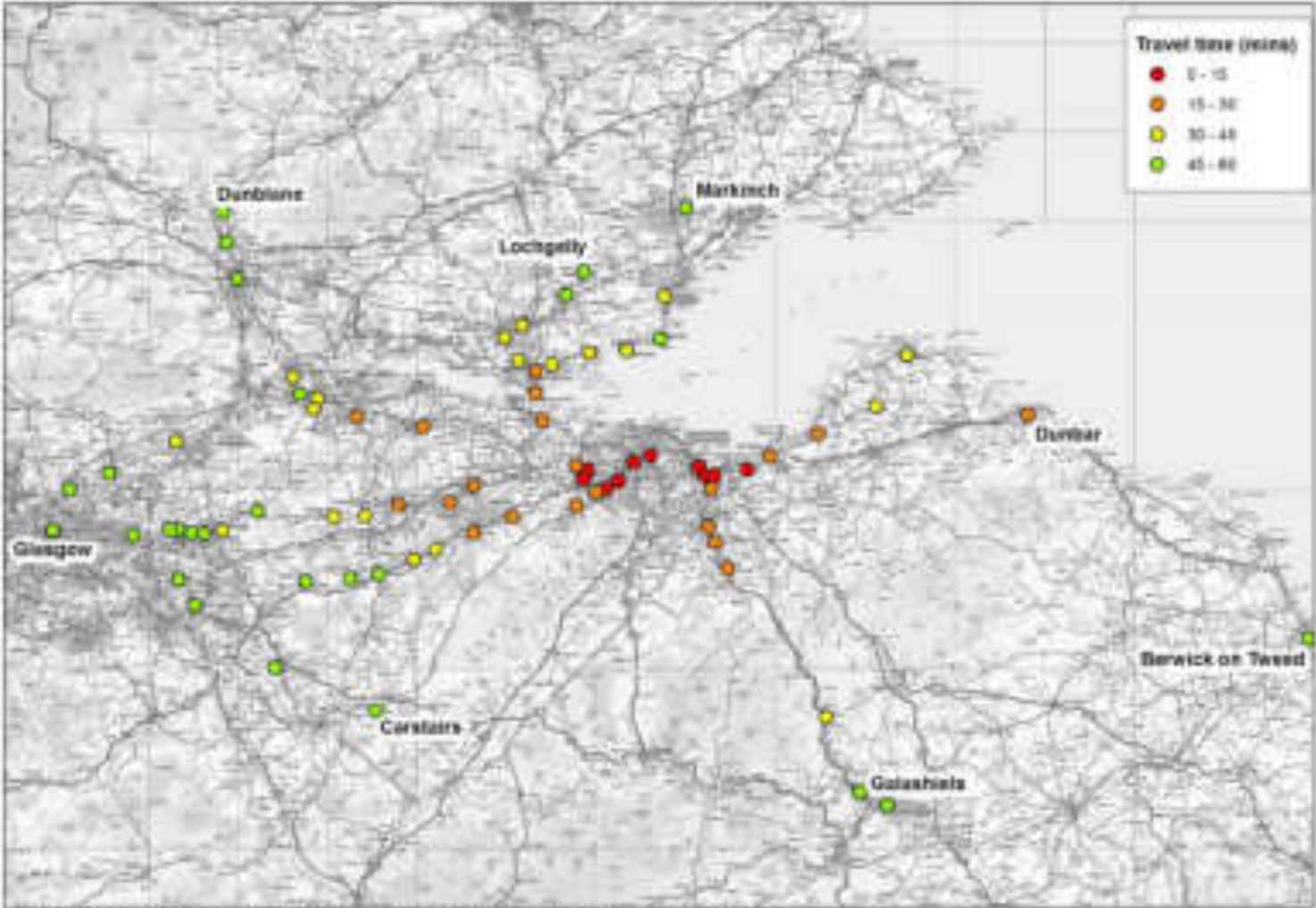
Map 41 Public transport travel time to city centre



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Map 42 shows the number of stations within 60 minutes travel time to Edinburgh

Map 42: Stations within one hour journey time of Edinburgh city centre

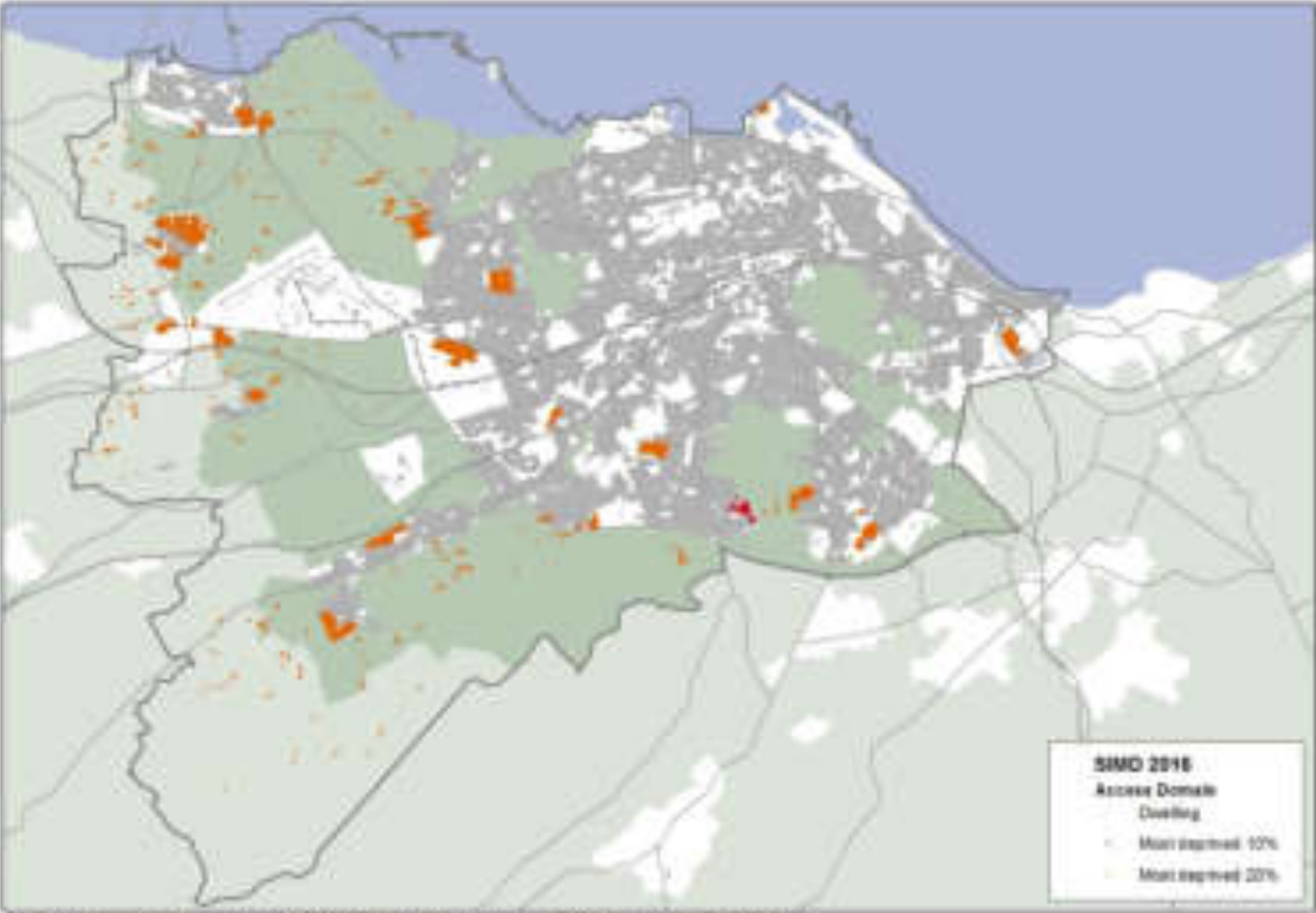


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Access to services

One of the domains used in the Scottish Index of Multiple Deprivation is the access domain. Areas are assessed in terms of access time via driving and public transport to a range of services including schools, a petrol station, GP, post office and a retail centre. Map 43 below shows the homes in Edinburgh that are classed within the worst 20% of Scotland in regards to the access domain of the SIMD 2016

Map 43: SIMD 2016 – Geographic access domain



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Source: 2016 Scottish Index of Multiple Deprivation

Environment

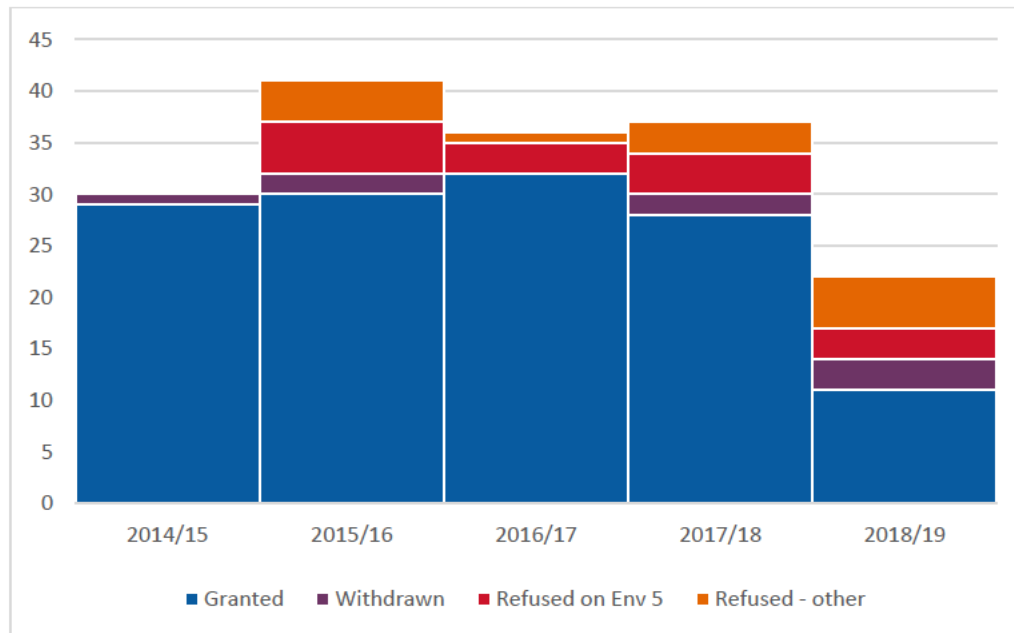
Built Environment

Conservation areas

There are 50 designated conservation areas in Edinburgh covering an area of 27 square kilometres - just under a quarter of Edinburgh's urban area. In total, there are around 125,600 people living within Edinburgh's conservation areas – a quarter of the City's residents. The designated conservation areas are shown in map 43 below.

Local Development Plan policy Env 5 allows the demolition of buildings in a conservation area only in exceptional circumstances. Chart 67 below shows the number of times that policy Env 5 has been specifically applied in determining planning applications.

Chart 67: Application of Policy Env 5: Conservation areas – demolition of buildings

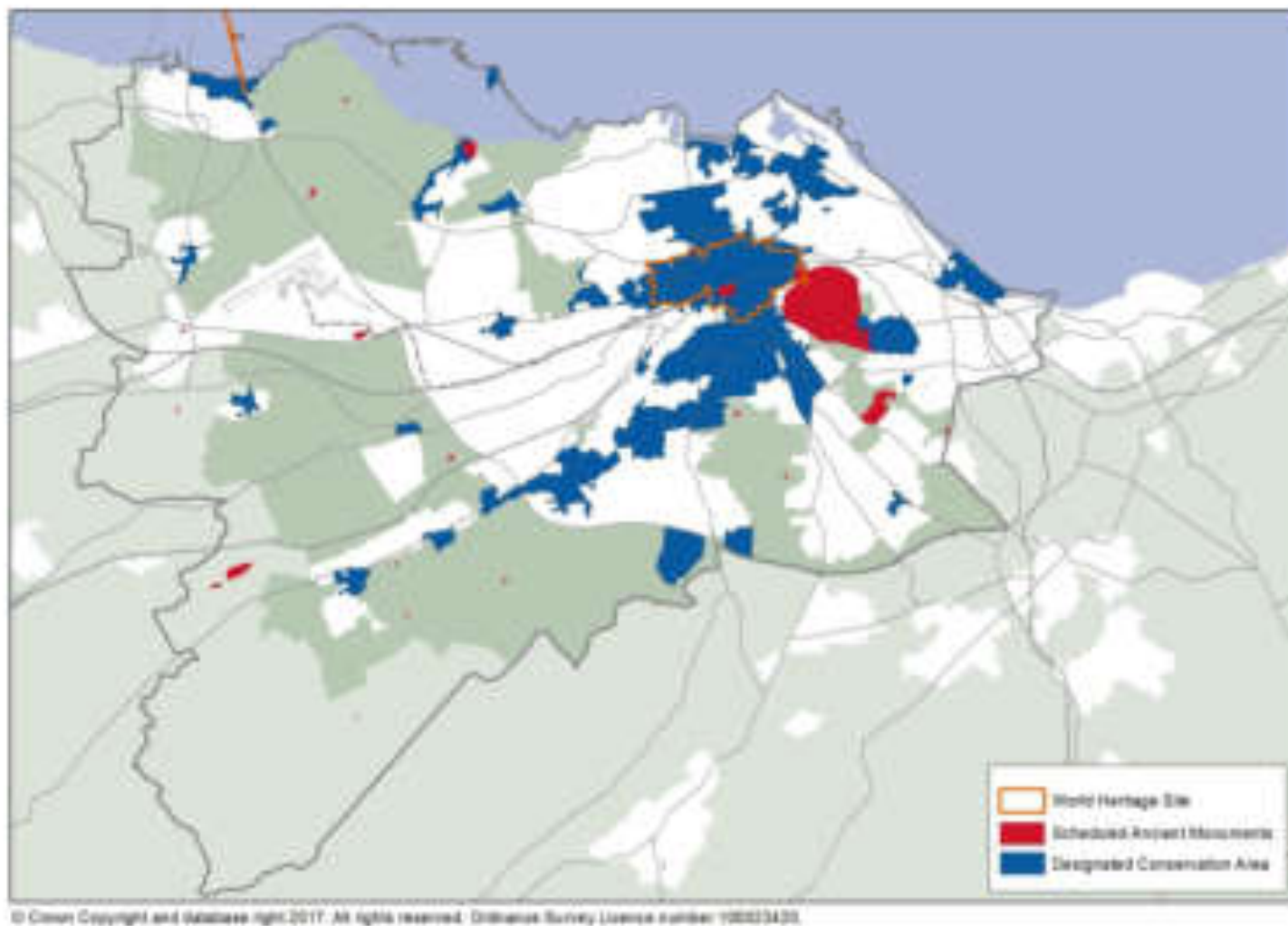


World Heritage Sites and Scheduled Ancient Monument

Edinburgh has two areas designated as World Heritage Sites – The Old and New Towns of Edinburgh and the Forth Rail Bridge. The Old and New Towns of Edinburgh World Heritage Site covers an area of 456 ha and is home to 24,550 residents. The boundaries of the World Heritage Sites are shown on map 43 below.

There are 57 scheduled ancient monuments in Edinburgh and these are also shown on map 43 below.

Map 43: Edinburgh's built environment

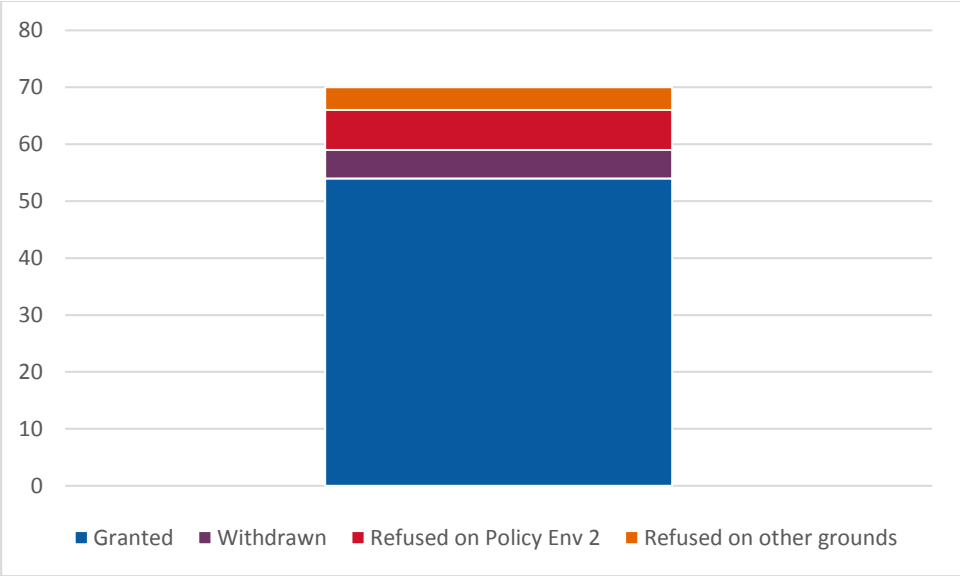


Listed Buildings

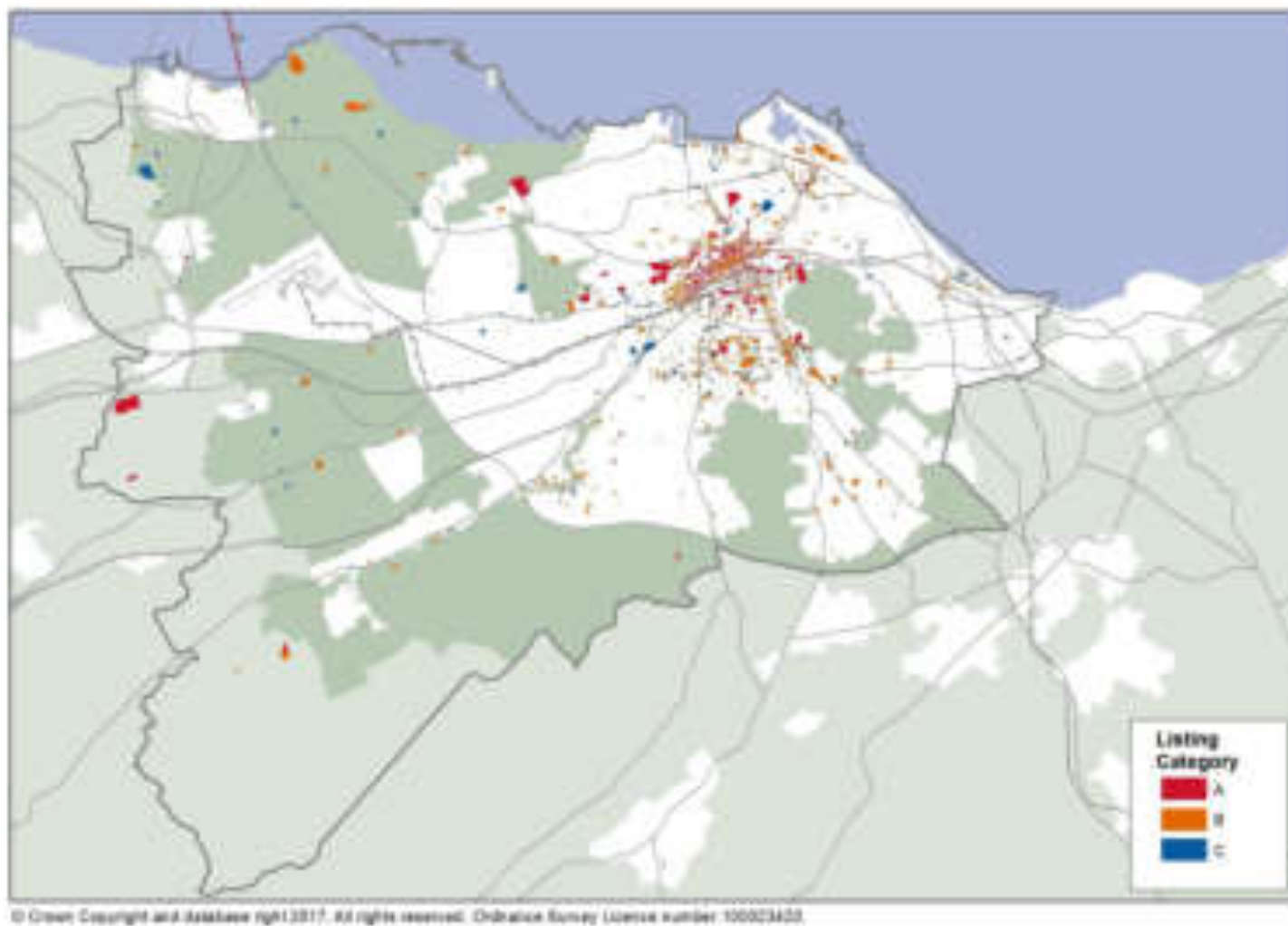
Edinburgh has the third largest concentration of listed buildings in the UK after London and Bath. In 2019, there were 4,258 listed items in Edinburgh. Listed items commonly account for several separate buildings in a single listing. Of, the 4,258 listed items, 733 are categorised as ‘A’ listed, 2,363 as ‘B’ and 1,162 as ‘C’. The distribution of Edinburgh’s listed buildings is shown in map 44 below.

Policy Env 2 of LDP protects listed buildings and only allows demolition in exceptional circumstances. Over the last 5 years, there has been 76 planning applications involving the demolition of listed buildings. Chart 68 shows the decisions made on these applications.

Chart 68: Application of policy Env 2 Listed Buildings – Demolition. 2014 to 2019



Map 44: Listed buildings in Edinburgh



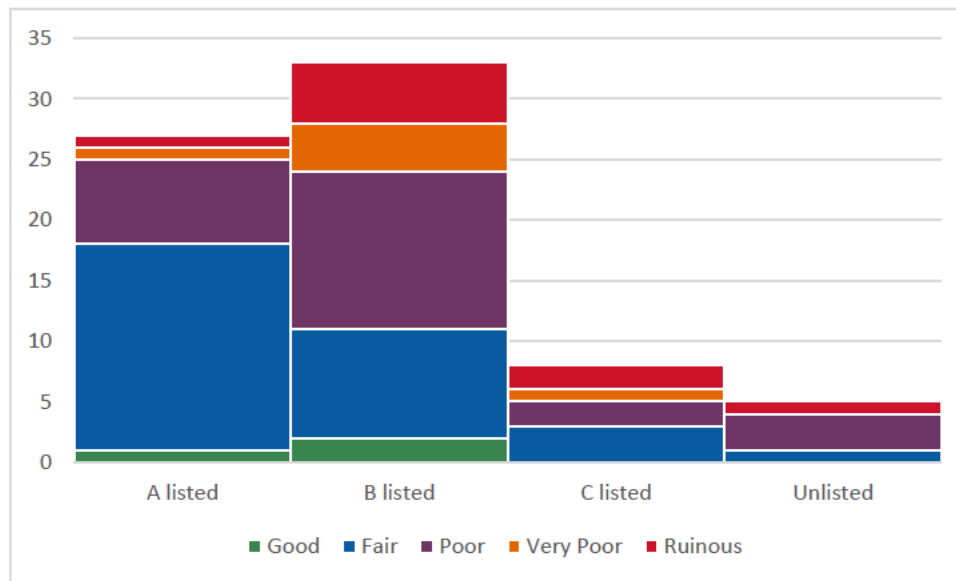
Source: Historic Scotland

Buildings at Risk

The Buildings at Risk Register has been in operation in Scotland since 1990 in response to a concern at the growing number of listed buildings and buildings in Conservation Areas that were vacant and had fallen into a state of disrepair. The Register is maintained by Historic Environment Scotland, and provides information on properties of architectural or historic merit throughout the country that are considered to be at risk.

There are currently 73 properties in Edinburgh on the register of which 19 are undergoing restoration. Chart 69 shows the assessed condition of buildings on the register.

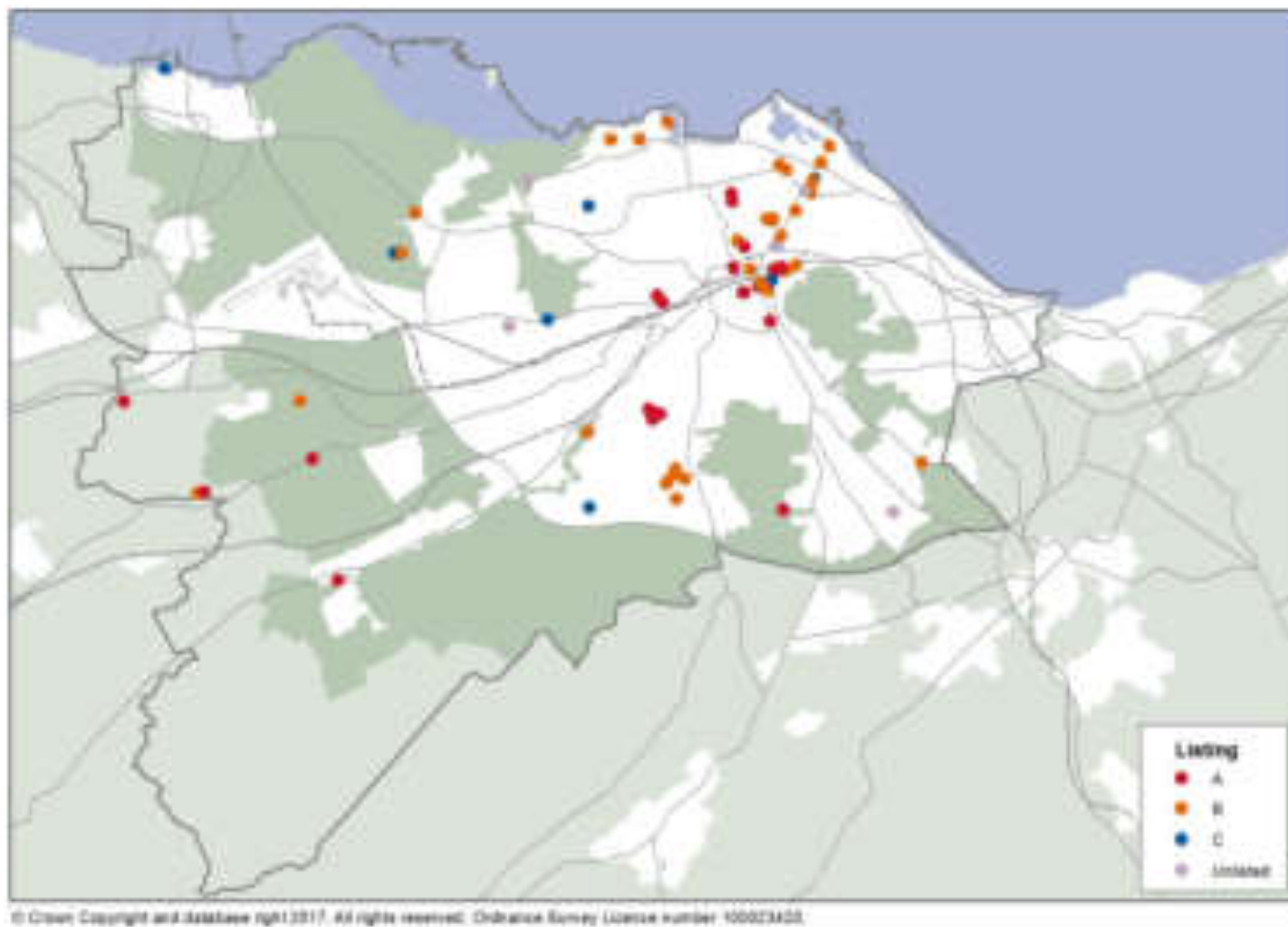
Chart 69: Condition of buildings on the buildings at risk register 2019



Source: Historic Environment Scotland

The location of buildings on the buildings at risk register is shown on map 45 below.

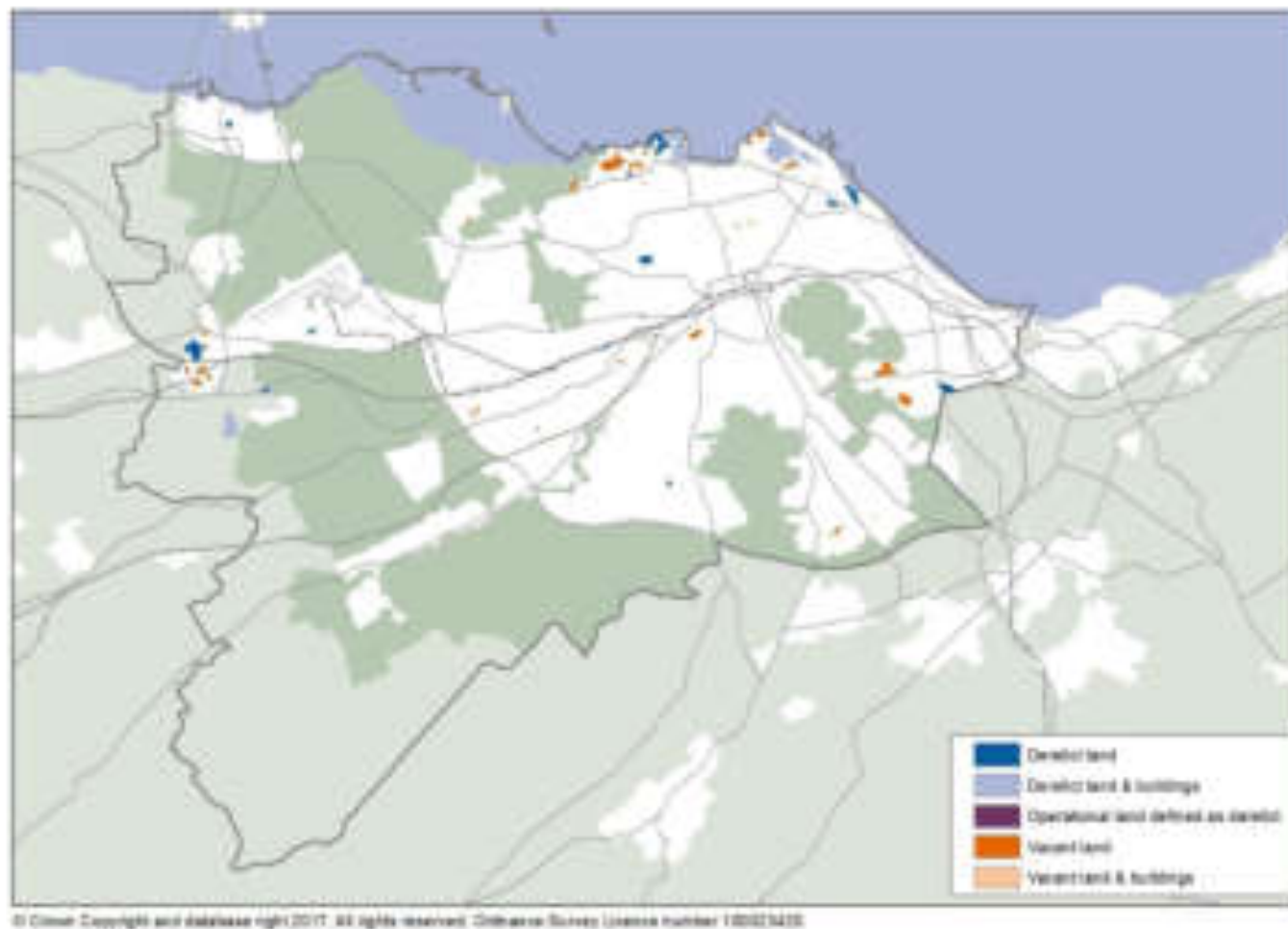
Map 45: Buildings at risk



Source: Historic Environment Scotland

Vacant and Derelict Land

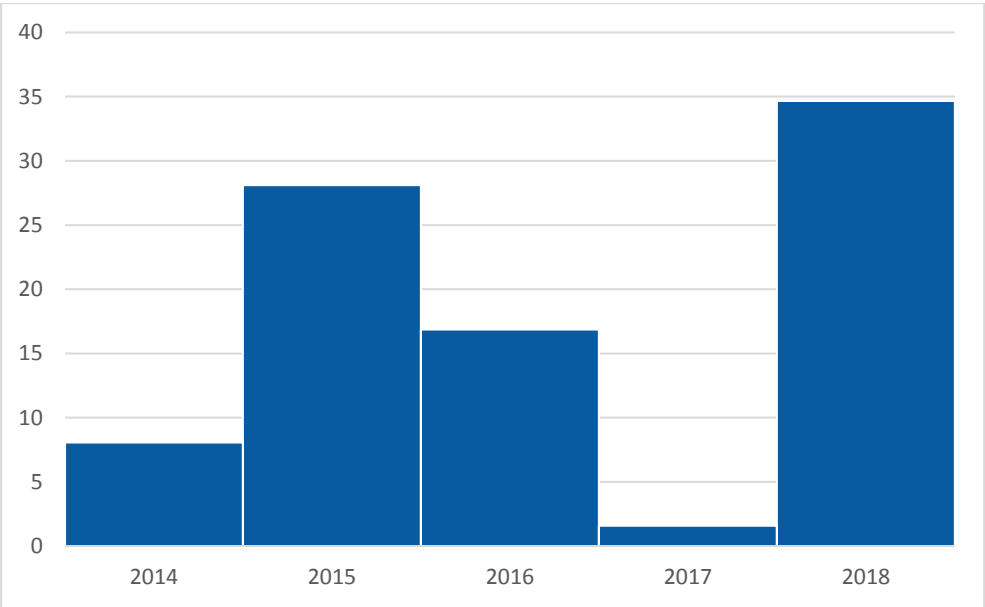
Map 46: Vacant and derelict land and buildings 2018



Map 46 above shows the location of land and buildings categorised as vacant or derelict.

Over the last five years, 90 ha. of vacant/derelict land has been brought back into use. Chart 70 shows the amount of land reclaimed over the last 5 years.

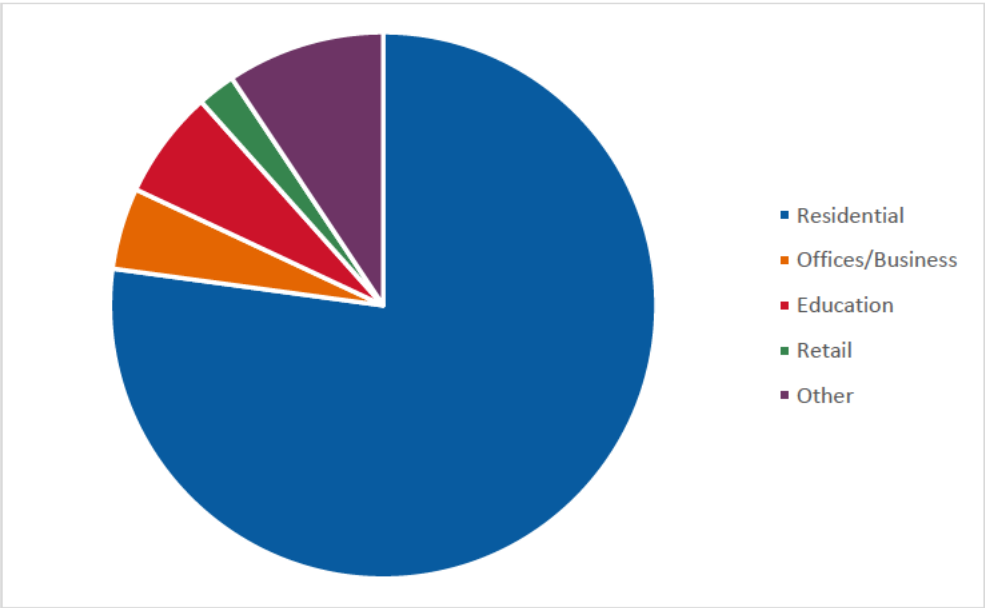
Chart 70: Vacant/derelict land brought back into use 2014 - 2018



Source: Scottish Vacant and Derelict Land Survey

Over three quarters of land brought back into use was for residential purposes. Chart 71 gives a breakdown of the new use of vacant/derelict land brought back into use.

Chart 71: New use of reclaimed vacant/derelict land 2014 - 2018



Source: Scottish Vacant and Derelict Land Survey

Natural Environment

Special Landscape Areas

Edinburgh has 22 areas designated as Special Landscape Areas covering an area of over 91 square kilometres. These areas are shown on map 47 below. Under LDP policy Env 11, planning permission for development which would have a significant adverse impact on the special character of these areas will not be granted. Over the last 5 years, 8 planning applications have been refused on the grounds of policy Env 11.

Historic Gardens and Designed Landscapes

There are 17 areas in Edinburgh recorded in the National Inventory of Gardens and Designed Landscapes covering an area of 25 square kilometres. These areas are shown on map 47 below.

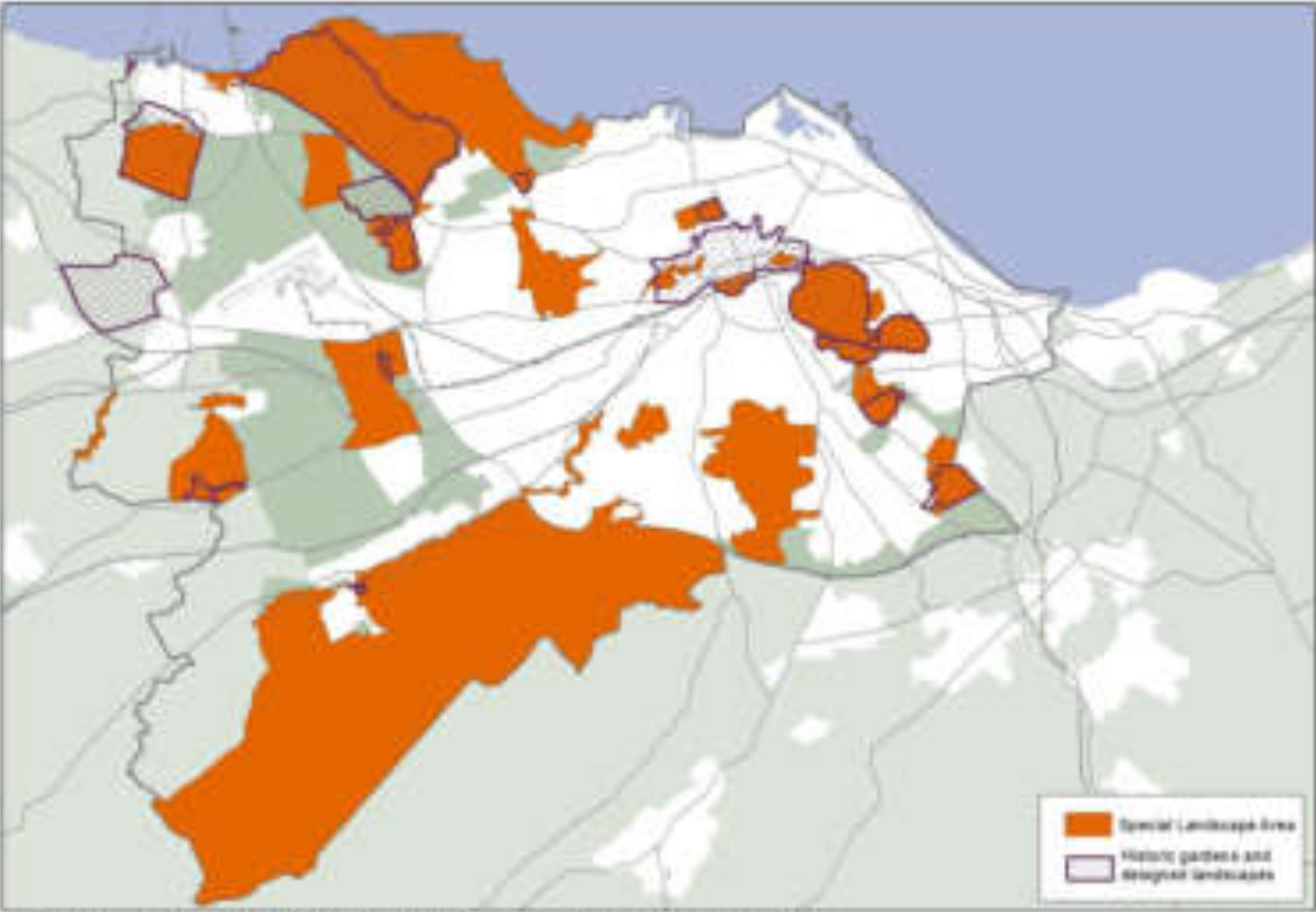
Sites of international and national importance

There are 3 three internationally important sites in Edinburgh known as 'Natura 2000 sites' designated under the Conservation (Natural Habitats, &c) Regulations 1994. These are Firth of Forth, Forth Islands (part) and Imperial Dock Special Protection Areas. The Firth of Forth is also designated as a Ramsar site classified under the Convention on Wetlands of International Importance. The Ramsar site boundary is the same as the Firth of Forth Special Protection Area. There are also four Sites of Special Scientific Interest which are considered by Scottish National Heritage to be of special interest by reason of their natural features. The Natura 2000 sites and the SSSIs are shown on map 48 below.

Sites of Local Importance

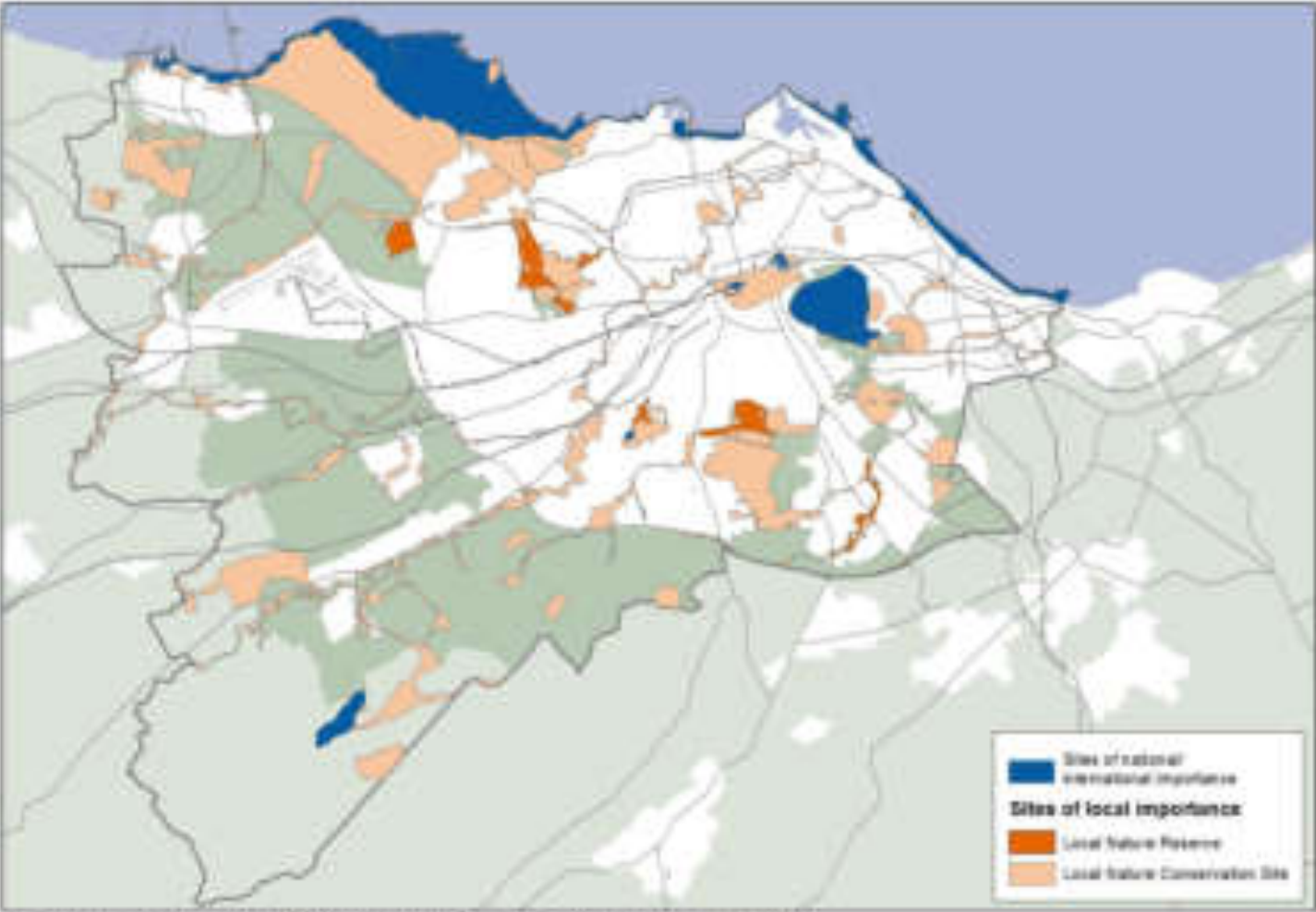
Local Nature Reserves and Local Nature Conservation Sites are considered sites of local importance. In total, there are 122 local nature conservation sites covering an area of 37 square kilometres and 7 local nature reserves covering an area of 2.21 square kilometres. These sites are shown on map 48 below

Map 47: Special Landscape Areas and Historic Gardens and Designed Landscapes



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Map 48: Sites of international, national and local importance



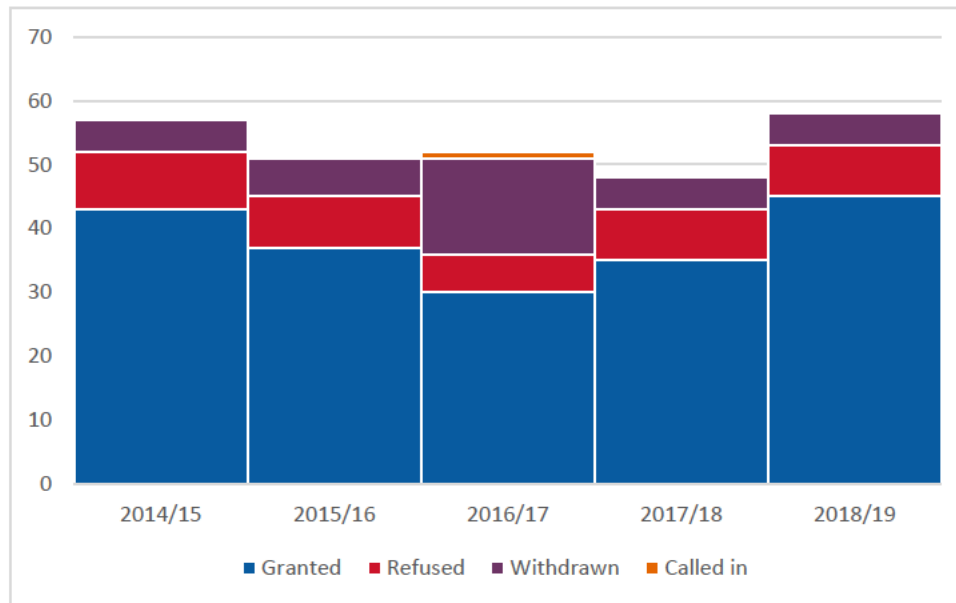
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Development in the Greenbelt and Countryside

It is necessary to control the type and scale of development in the greenbelt and countryside to enable these areas to fulfil their roles in terms of landscape setting and countryside recreation.

Over the last five years, there have been 233 applications decided for development in the Greenbelt and countryside policy area (excluding householder applications, applications to vary existing consent and applications for approval of matters specified in conditions). Chart 72 shows a breakdown of decisions on these applications.

Chart 72 Planning applications in the Greenbelt and countryside area



Charts 73 and 74 show the breakdown of decisions on applications in the greenbelt/countryside area by the type of application for major developments and local and developments.

Chart 73: Planning application decided 1 April 2014 to 31 March 2019: local developments

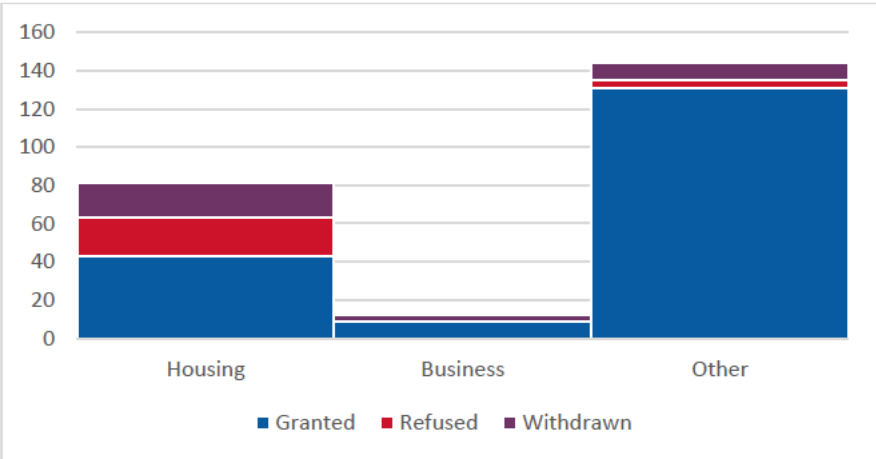
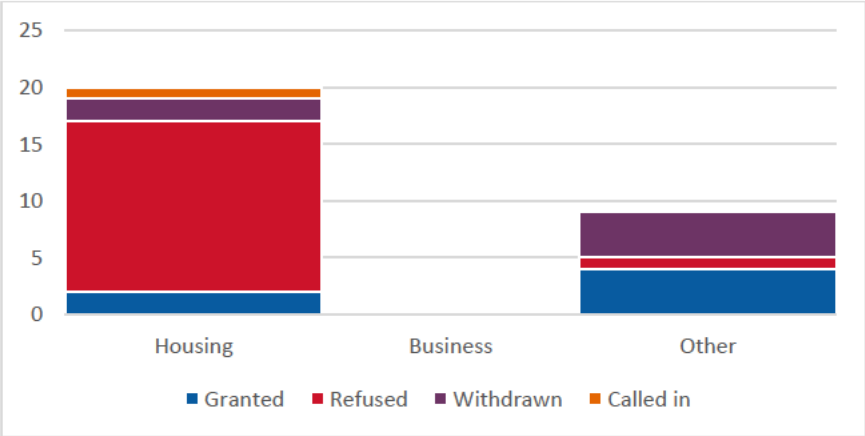


Chart 74: Planning application decided 1 April 2014 to 31 March 2019: Major developments



Major applications for housing in the Greenbelt

Of the three major applications for housing development granted within the green belt, two were new applications on sites that had already been given consent for development at appeal at Edmonstone Estate and Burdiehouse. The remaining site at Newcraighall was consented as an acceptable departure from the policy as the site was allocated in the development plan and there was only a small incursion to the green belt.

Of the 15 applications that were refused consent, five successfully appealed the decision (Edmonstone, Ravelrig Road, North of Lang Loan, East Craigs and Gilmerton Dykes).

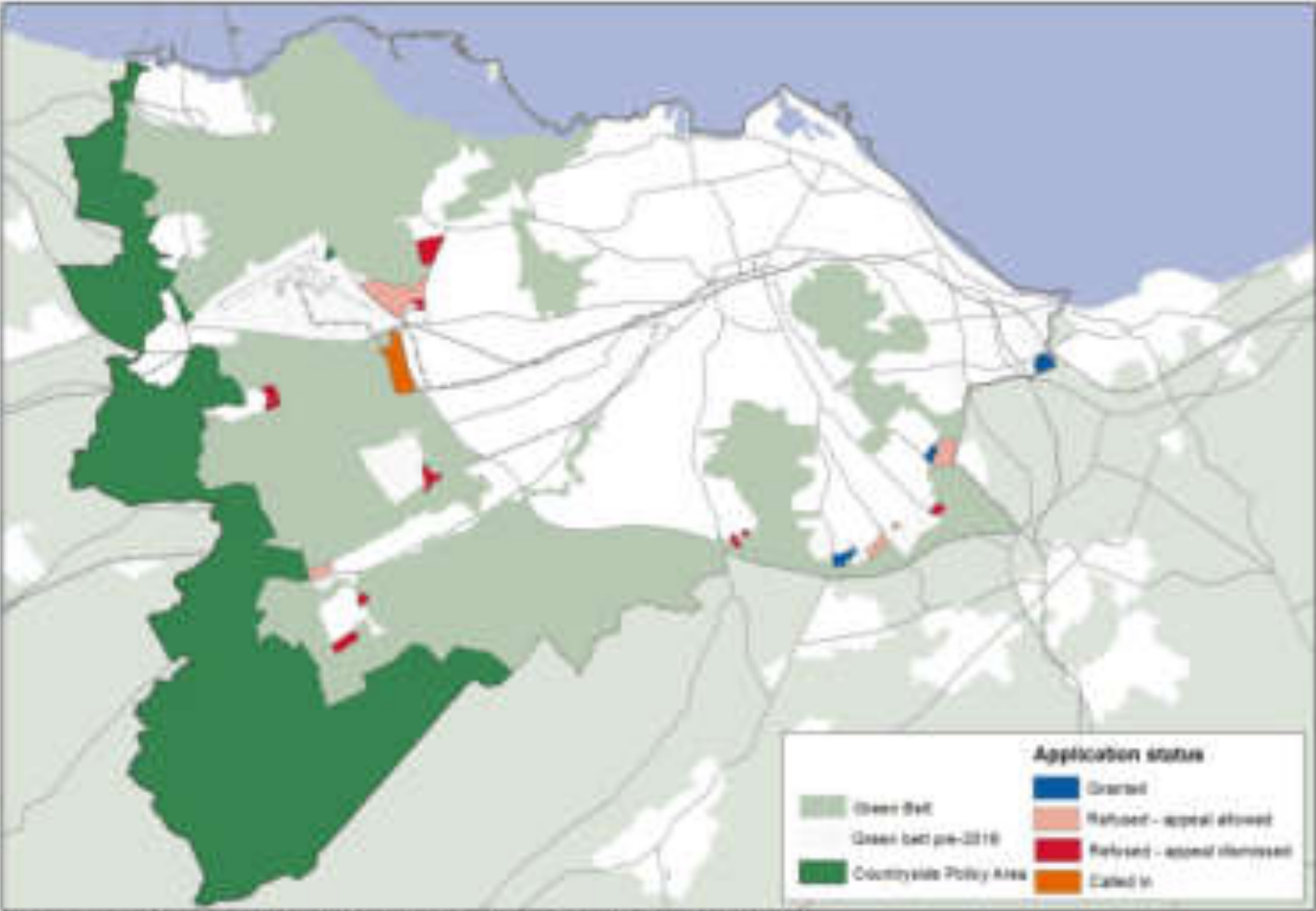
Appeals were dismissed at Cammo, Mansfield Road, Ratho Park Road, Freelands Road, Frogston Road West, Craigs Road, Drum Street, Harlaw Gait, Winton Gardens and Riccarton Mains Road.

The locations of applications granted, refused – appeal upheld and refused – appeal dismissed are shown on map 49 below.

Other major applications within the greenbelt

Of the 4 major applications granted for non-housing use, 3 were considered compliant with green belt policy, whilst one was granted as a departure from green belt policy.

Map 49: Major planning applications for housing 2014 – 2019



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Access to open space

City of Edinburgh Council's open space strategy – Open Space 2021 seeks to ensure that all homes are within 800m of an accessible large greenspace of over 2 ha and this greenspace should be of good quality. Map 50 below shows the homes within Edinburgh that are not within 800m of green space that meets the standard.

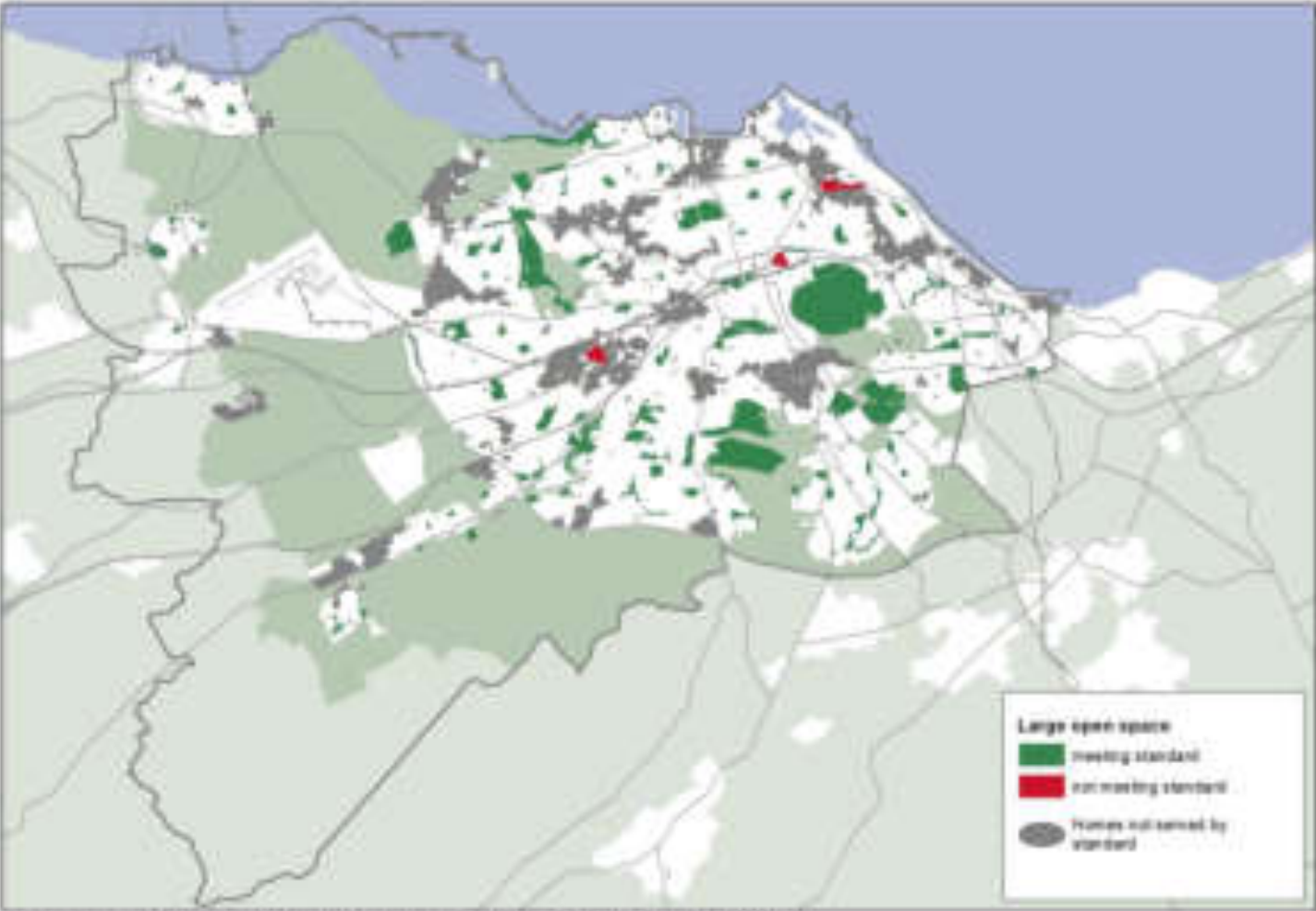
The open space strategy also sets a requirement for equipped play areas. All homes should have access to at least one of the following:

- good play value (51 – 70) within 800 metres walking distance
- very good play value (71 – 100) within 1200 metres walking distance
- excellent play value (101 +) within 2000 metres direct distance

Map 51 below shows homes that are not currently served by the standard.

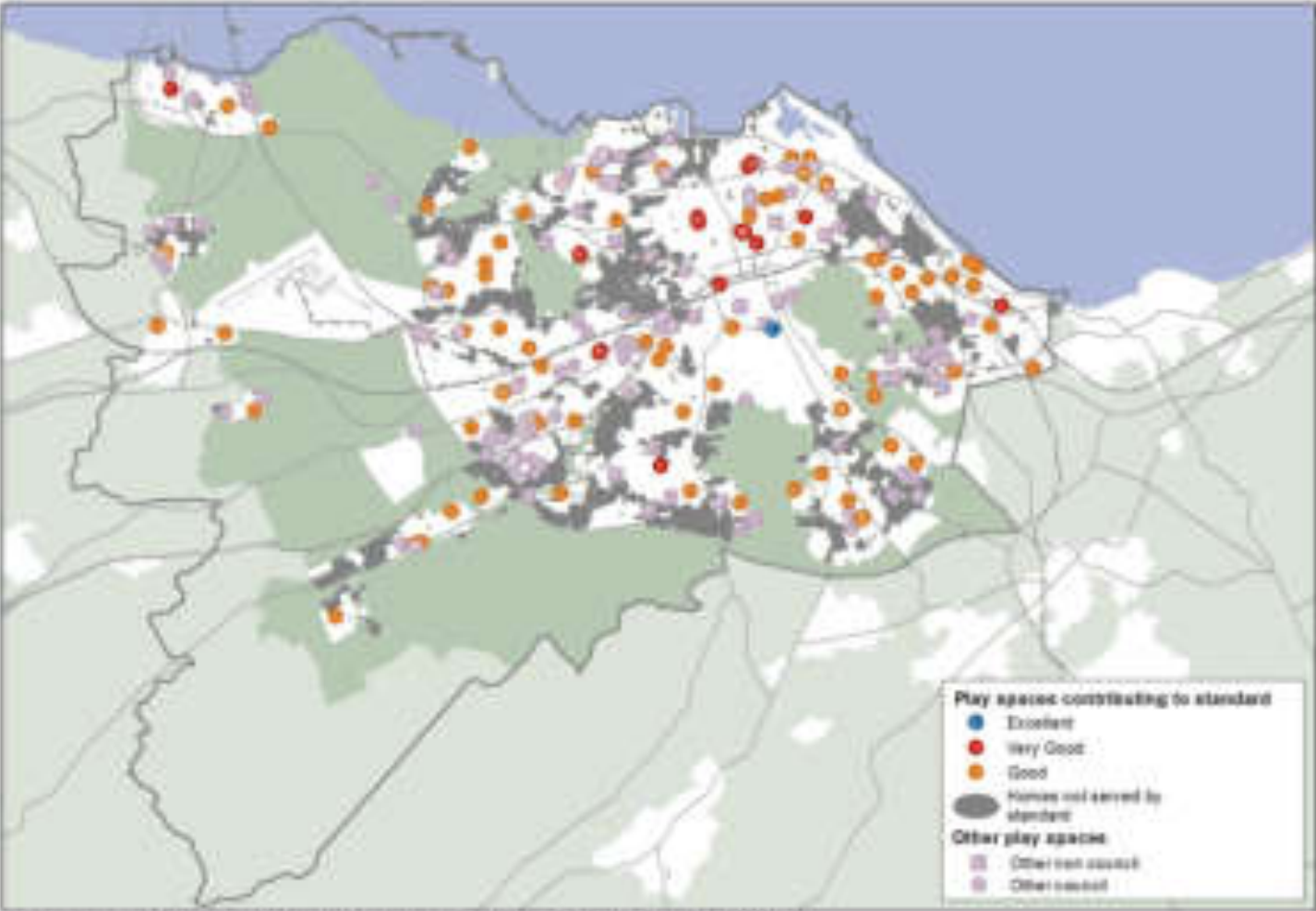
Edinburgh's green network is shown on map 52.

Map 50: Homes not served by the large open space standard



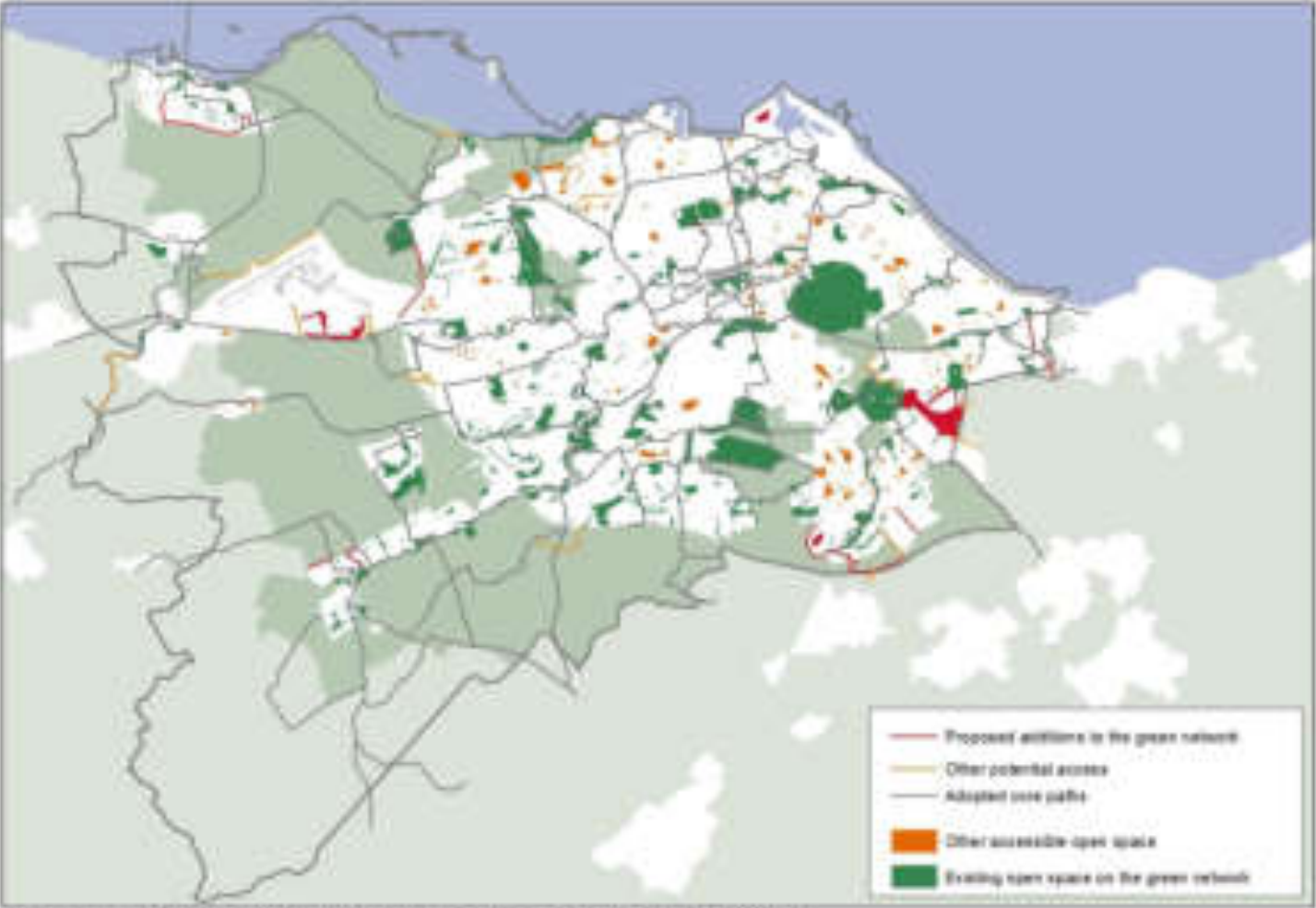
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Map 51: Homes not served by play space standard



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Map 52: Edinburgh's green network



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Air quality

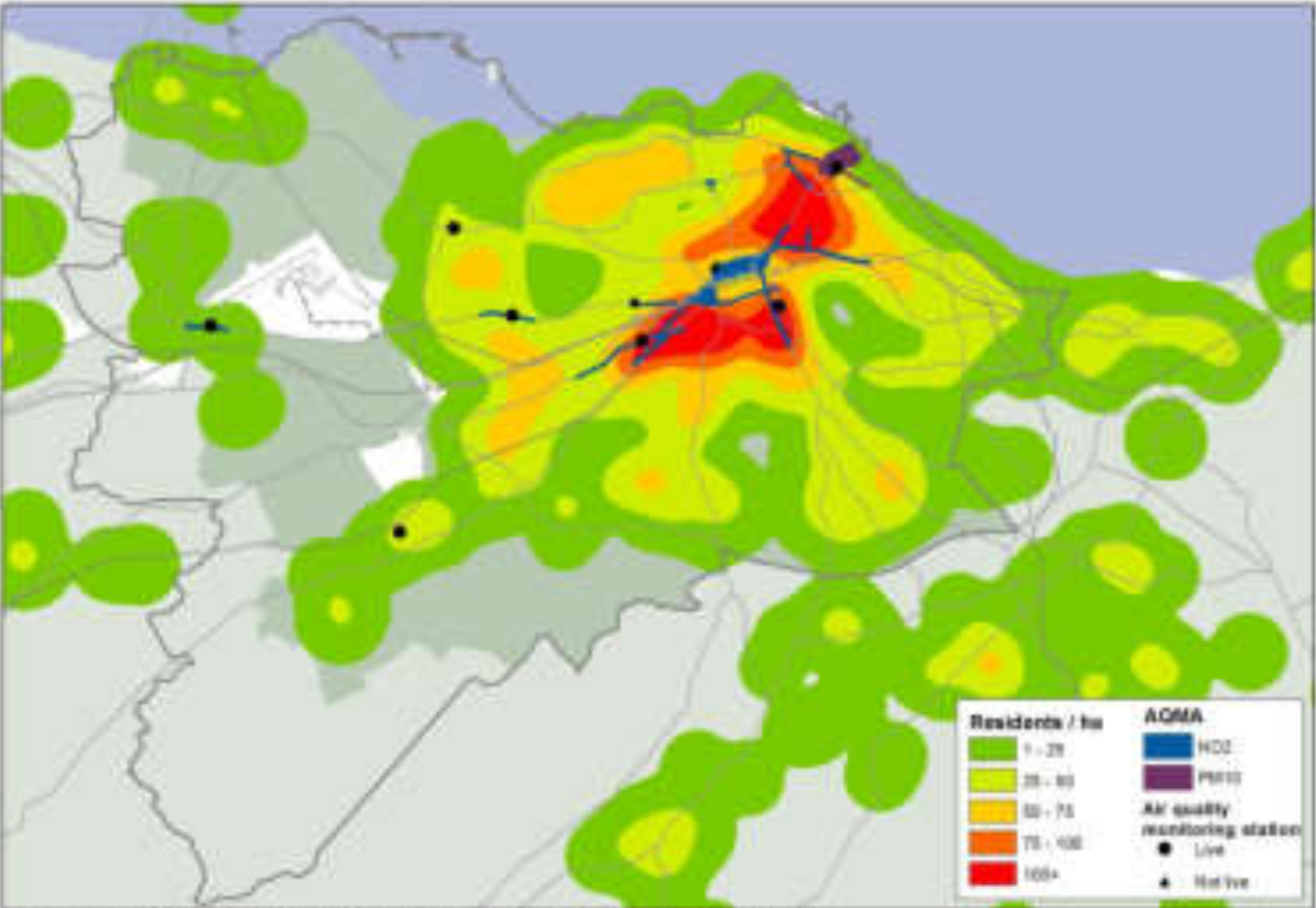
There are currently 6 Air Quality Management Areas (AQMA) in Edinburgh, 5 for NO₂ pollution and one for PM₁₀ pollution. Table 7 below lists the AQMA along with the dates that they were declared and, in some cases, amended to include extensions or breaches of other averaging periods.

Table 7: Air Quality Management Areas in Edinburgh

AQMA	Pollutant	Source of Pollutant	Declared/Amended
City Centre	NO ₂	Traffic	31/12/2000 09/03/2009 26/04/2013 07/09/2015
St. John's Road	NO ₂	Traffic	31/12/2006 09/03/2009
Great Junction Street	NO ₂	Traffic	09/03/2009 26/04/2013
Glasgow Road	NO ₂	Traffic	26/04/2013
Inverleith Row	NO ₂	Traffic	26/04/2013
Salamander Street	PM ₁₀	Industrial, fugitive emissions, traffic, re-suspended coal dust	20/01/2017

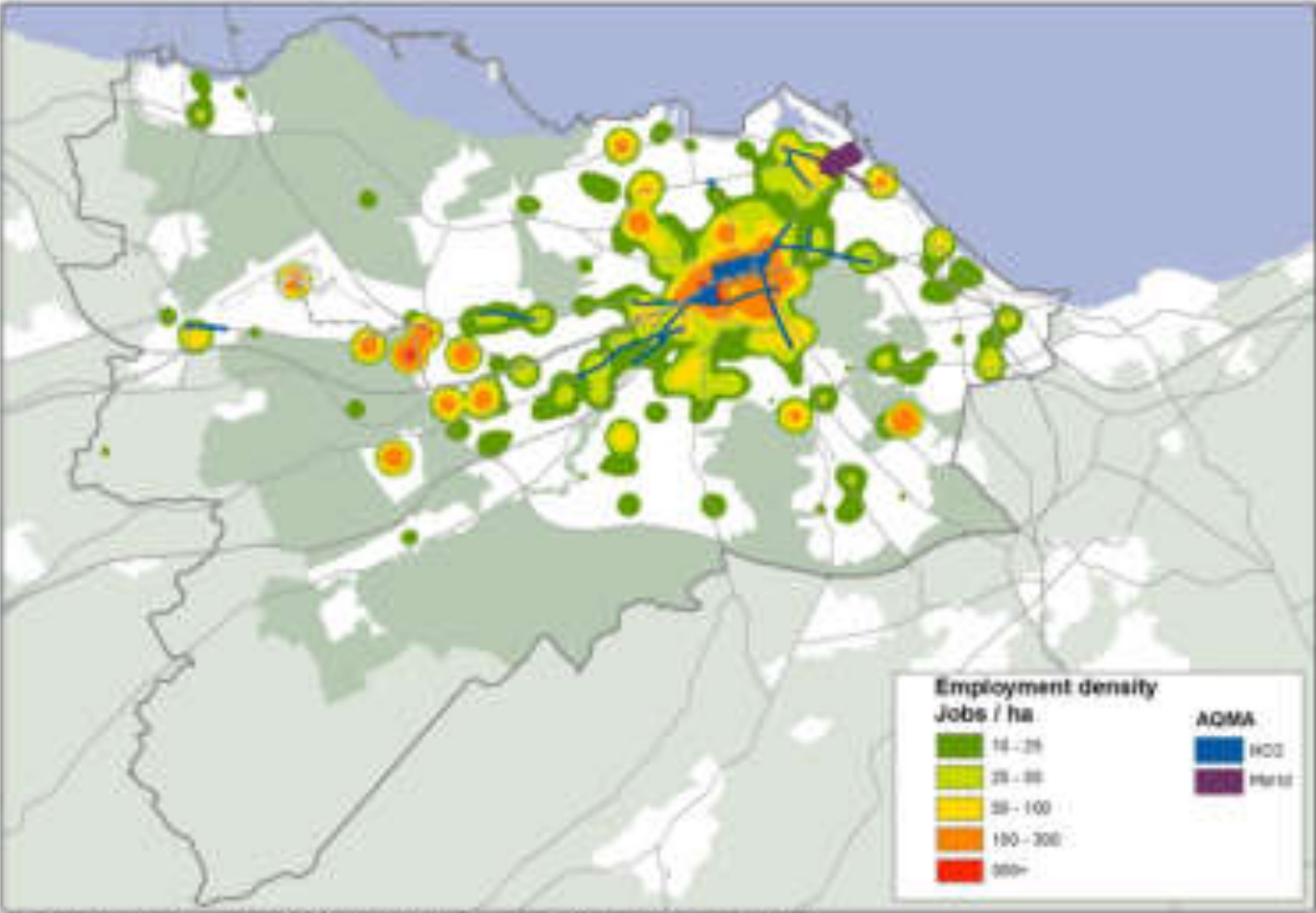
The locations and coverage of the AQMA are shown on maps 53 and 54 alongside population density and employment density.

Map 53: AQMAs and population density



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Map 54: AQMAs and employment density



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Nitrogen dioxide (NO₂) emissions

In 2017, NO₂ was monitored at 7 permanent automatic (continuous) monitoring stations. Table 8 below lists the annual average NO₂ emissions recorded at each of the monitoring stations. The locations of the stations are shown on the maps above.

The table shows that at most of the monitoring stations, levels of NO₂ are below the annual mean objective of 40µg/m³

Table 8: Annual mean NO₂ monitoring results

Monitoring station	2010	2011	2012	2013	2014	2015	2016	2017
Queen Street	37	29	28	26	27	24		
Gorgie Road	41	37	39	38	34	32	33	30
St. John's Road	71	65	58	57	59	65	53	53
Currie	10	6	8	8	7	7	7	6
St. Leonard's	31	25	24	22	22		23	20
Salamandar Street	30	29	30	28	27	28	27	25
Queensferry Road		29	40	34	36	33	32	*n/a
Glasgow Road			29	27	27	26	28	26

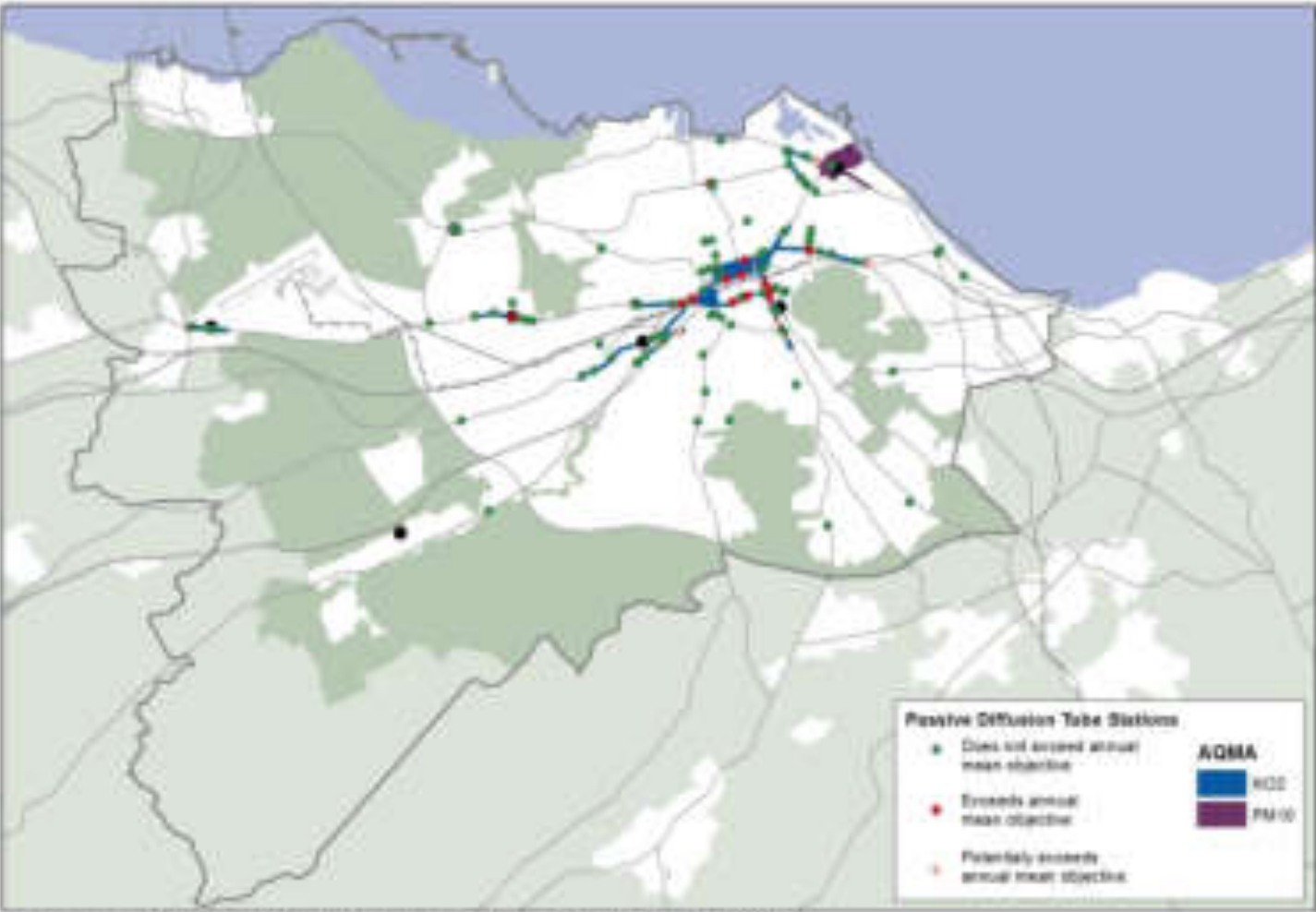
* Insufficient data captured

The annual mean nitrogen dioxide concentrations at all sites except St John's Road, shows they are slightly decreasing, hence a downward trend. At St John's Road the matter is more defined for both annual mean and hourly concentrations showing a more significant downward trend.

The council also undertook non-automatic, Passive Diffusion Tube (PDT) monitoring of NO₂ at 132 sites across the city during 2017. Data from the non-automatic monitoring network, which measures at over 130 sites across the city, shows the wider geographically spread of breaches of the NO₂ annual mean objective (in 2017). The locations of these sites are shown on map 55 below. Analysis of the non-automatic monitoring (PDT) results shows the annual mean objective continues to be exceeded at locations within the Central, St John's Road and Glasgow Road AQMAs.

In the Inverleith Row AQMA (ID55), the result (40µg/m³) is at the annual mean objective, therefore for the first time the objective is met in this AQMA. Monitoring data at locations in the Great Junction Street AQMA also show that the annual mean objective is met.

Map 55. Passive Diffusion Tube (PDT) monitoring of NO2



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Particulate Matter (PM₁₀)

Table 9 compares the ratified and adjusted monitored PM₁₀ annual mean concentrations with the Scottish air quality objective of 18µg/m³.

Data from Salamander Street shows a breach of the annual mean Scottish Objective. Concrete crushing activity at Albert Docks from the recycling of material from the Edinburgh St James project, may have resulted in a slight increase in concentration in 2017. During some months there was 350 tonnes of material crushed, recycled and returned to the city centre construction site.

Table 9 Annual mean PM₁₀ monitoring results

	2010	2011	2012	2013	2014	2015	2016	2017
Queen Street	19	16	16	17	17	16		
St. John's Road								12
Currie	11	13	11	12	11	10	10	8
St. Leonard's	14	15	16	14	13	10	11	10
Salamander St.	27	27	24	22	21	22	18	19
Queensferry Road		21	18	19	19	16	19	22
Glasgow Road			15	16	16	16	17	16

PM10 trends from measured data at the urban background and suburban sites in Edinburgh shows a slight downward trend (slight decrease in concentrations with time). There is more of a defined downward trend at Salamander Street in the PM10 AQMA, which is generally affected by industrial, fugitive and road sources.

A more detailed appraisal of air quality in Edinburgh is given in the ['2018 Air Quality Annual Progress Report \(APR\) for City of Edinburgh Council'](#).

Waste

The effective management and re-use of waste is essential to a sustainable future, with policy on waste management driven by EU Directives and national policies, targets, and standards. Key measures include landfill bans for certain waste and promotion of energy recovery. In Edinburgh there is a new target of diverting 60% of waste by the end of the current administration's term.

The current National Waste Management Plan for Scotland is the Zero Waste Plan (ZWP). SEPA regularly reviews the shortfall in operational capacity required to meet the Zero Waste Plan targets and regulations. The shortfall is allocated to groups of local authorities or development plan areas. The latest tables (2013) set out an additional capacity requirements of 460,000 tonnes for the SESplan area.

The SESplan waste technical note sets out the additional infrastructure capacity requirement to meet the requirements based on 2014 capacity tables. Regional capacity calculation for 2015 show a total capacity for the SESplan region that is lower than that set out in 2014 calculations. Additional capacity required for source segregated recyclables is much reduced while capacity needed for unsorted waste has increased.

The ZWP sets a limit of 5% on the proportion of waste arisings going to landfill by 2025. The ZWP sets out a 10 year rolling landfill capacity requirement. Capacity reports are provided at strategic development plan level. Comparison between the 20 year requirement and residual capacity shows a supply of around 20 years exists within the SESplan area before taking into account sustainable waste management measures. The Proposed Strategic Development Plan does not identify any requirement for additional landfill capacity within the SESplan area.

SEPA derives information from statutory waste data received from operators of licensed and permitted waste management sites, and from operators of activities exempt from full waste management licensing. Charts 75 and 76 below show the amount of household waste and business waste generated. Overall, the amount of household waste generated has increased by 5.8% compared to an increase in population of 7.4%. The amount of household waste dealt with through landfill over the period fell by 13.3% whilst the amount recycled increased by 39.3%.

Chart 77 compares Edinburgh to the Scottish average in terms of amount of household waste generated per resident.

Chart 75: Household waste 2011 to 2017

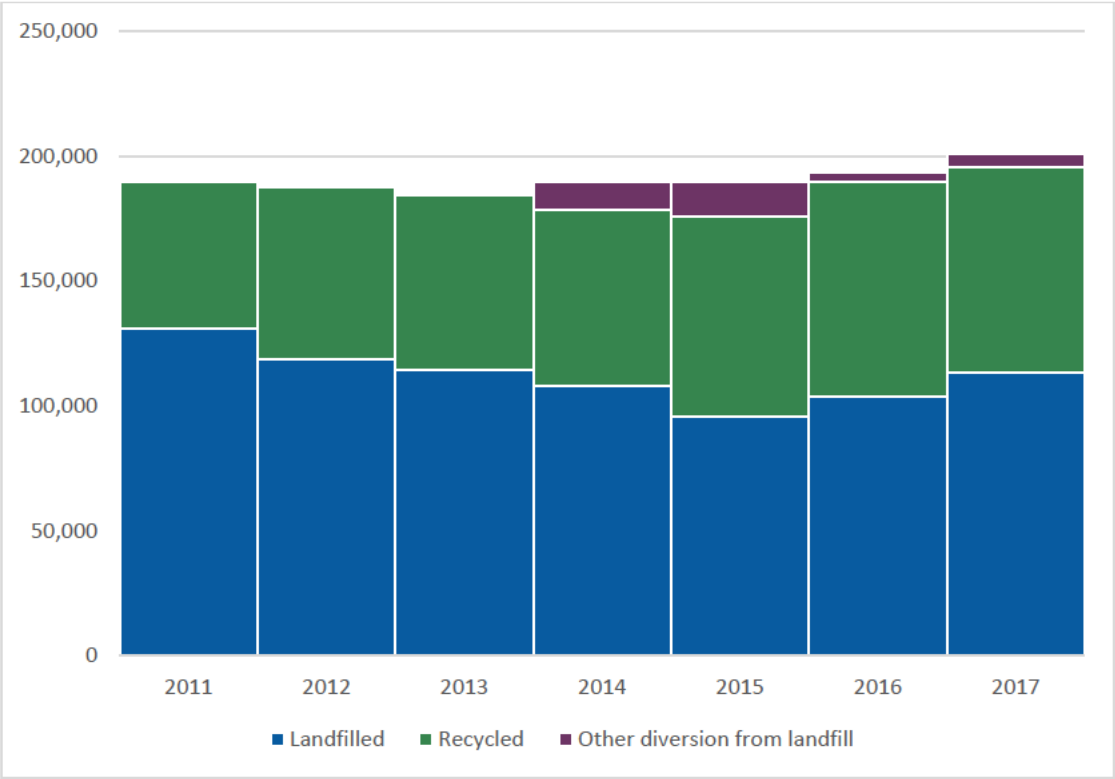


Chart 76: Business waste generated 2011 to 2016

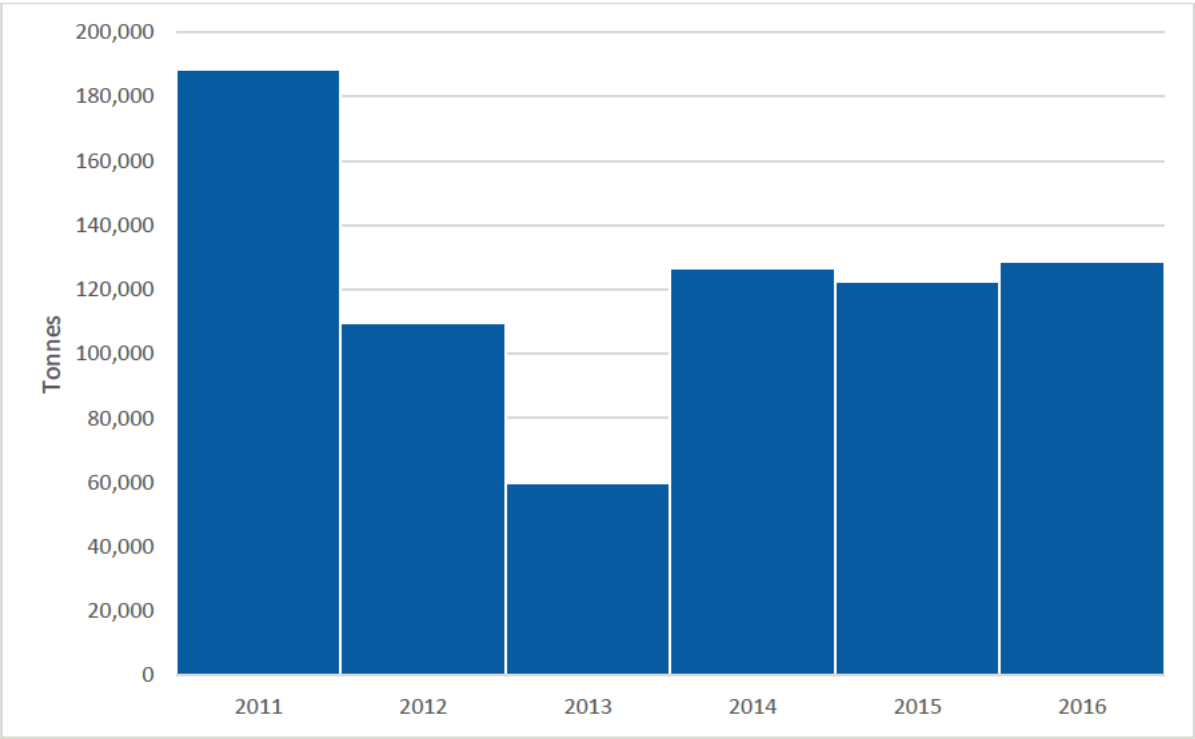
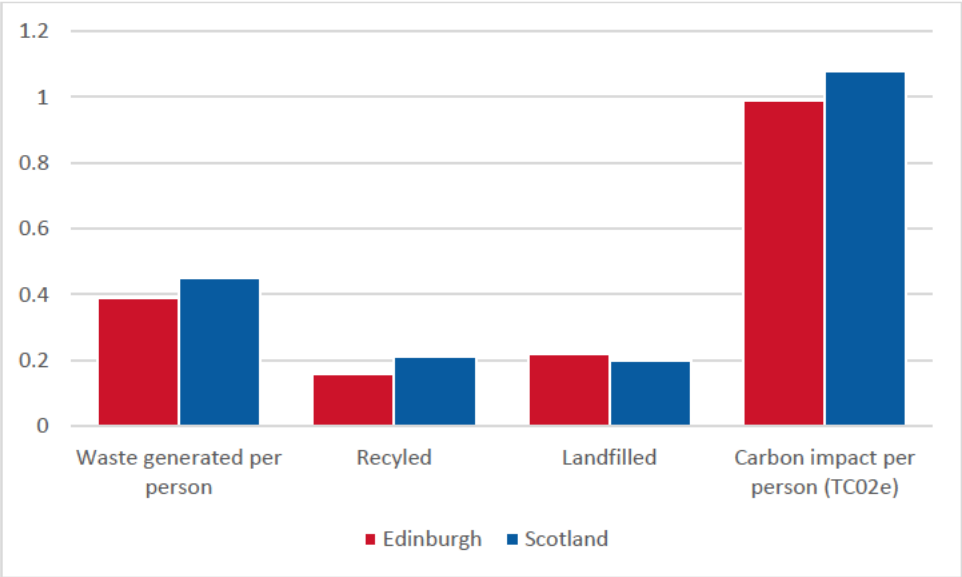


Chart 77: Household waste per person 2017 (tonnes)



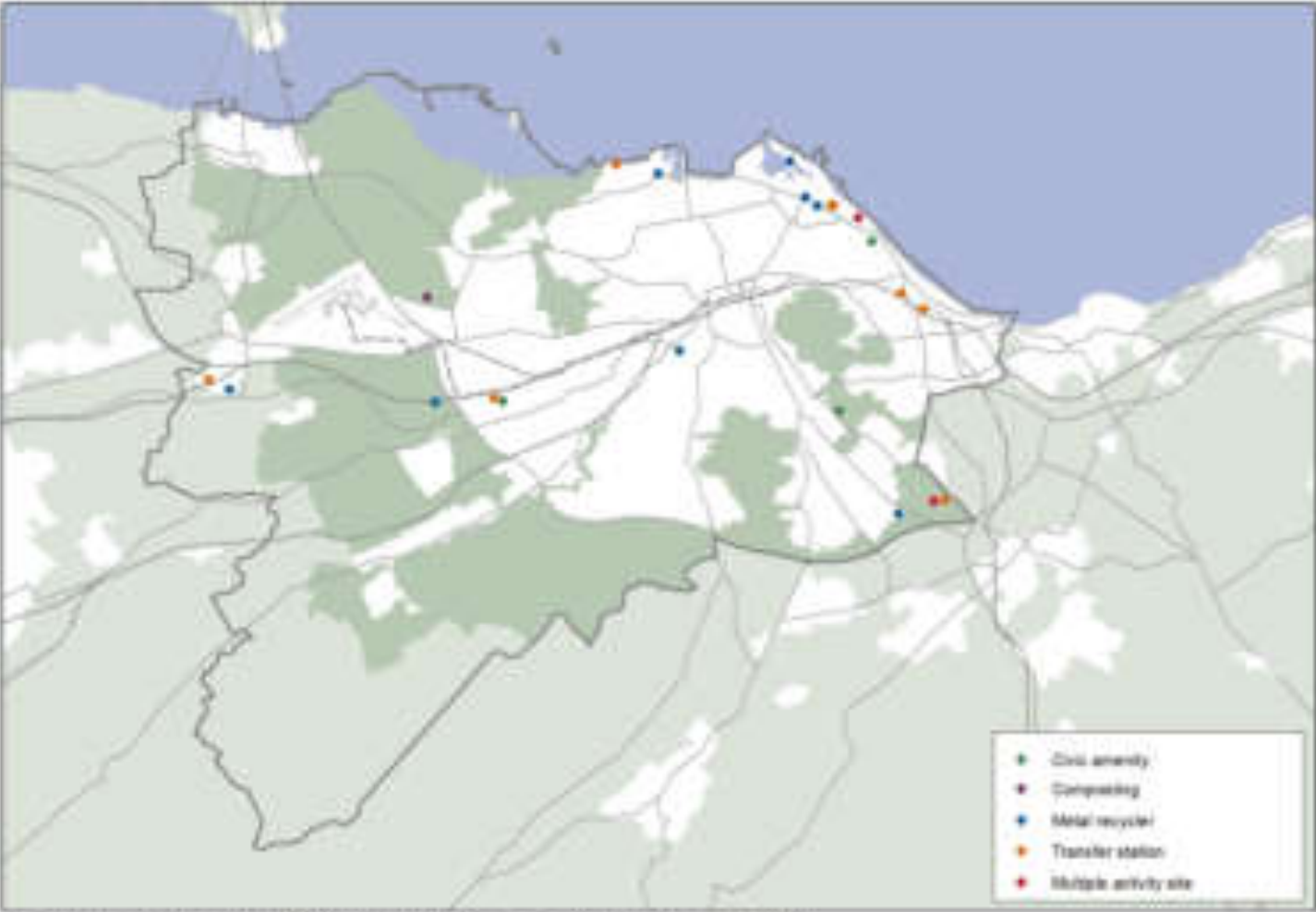
Waste management facilities

There are currently 22 licensed waste management facilities operating in Edinburgh. These are shown on map 56 below.

City of Edinburgh Council operates 4 licensed waste management sites:

- Sighthill Community Recycling Centre at Bankhead Avenue
- Old Dalkeith Road Community Recycling Centre
- Seafield Community Recycling Centre at Fillyside Road.
- Braehead Quarry Civic Amenity Site

Map 56: Waste management facilities



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The Council's Waste and Recycling Strategy was published in 2010, and covers the period to 2025. A review of the strategy took place in 2018. To deal with municipal needs two new/enhanced waste transfer stations are identified at Bankhead and Seafield. The three existing Household Waste Recycling Centres will remain. The provision of household waste recycling centres will be kept under review as the city grows.

A food processing facility at Millerhill opened during 2016 and an energy recovery centre is due to open in 2019.

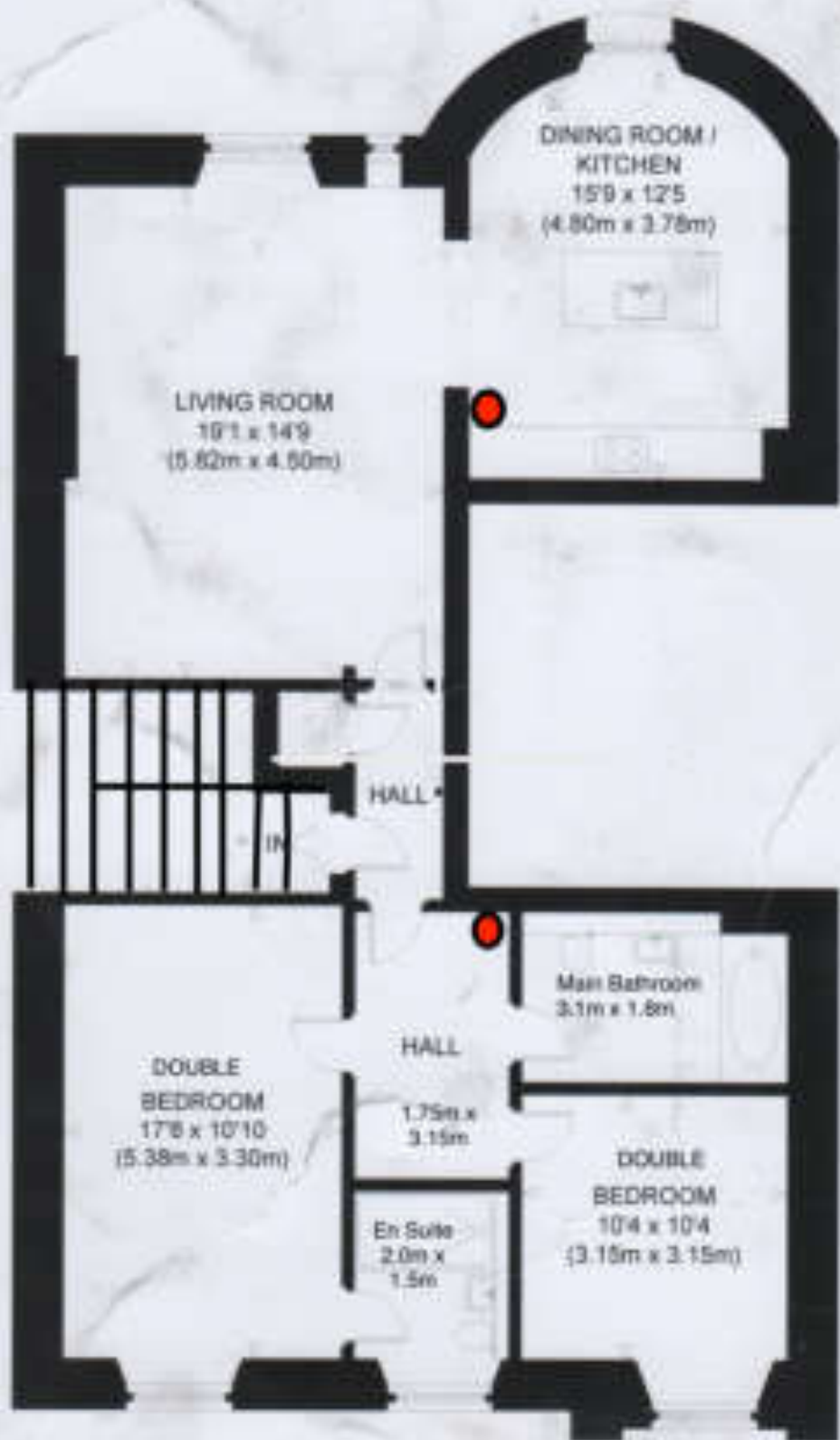
Powderhall Waste Transfer Station (safeguarded in LDP1) was previously used to sort and compact waste prior to it being transferred to a landfill site at East Barns in East Lothian. The Waste Transfer Station was closed in late-2016, with alternative facilities being used on an interim basis until the new energy-from-waste plant at Millerhill enters service in 2019. The Millerhill facility is safeguarded for waste processing uses in the Midlothian Local Development Plan November 2017.


Minerals

The only mineral activity in Edinburgh is the working of hard rock for use in the construction industry. There are 4 consented aggregate quarries; Hillwood at Ratho, Bonnington Mains, Ravelrig and Craigiehill. Craigiehill is subject to a review of a dormant minerals permission for restoration of the quarry. Policy RS5 protects these sites. This policy has not been used over the last five years.

SEsplan updated Minerals Technical Note indicates that the supply of aggregates remains in excess of 10 years with levels of supply at 32-34 years for sand and gravel and 15-32 years for hard rock. A Minerals Working Group is being established by SEsPlan. This group will review the aggregate resources of the city region (based on Scottish Government minerals survey data and relevant locally sourced information) to ensure there is a sufficient aggregates landbank of permitted reserves for construction aggregates of at least 10 years.

There are deposits of coal in the west and south east and small areas of peat in the south west.



 Fire extinguisher



LAND REGISTER
OF SCOTLAND

Officer's ID / Date

6443
21/3/2017

TITLE NUMBER

MID165241



ORDNANCE SURVEY
NATIONAL GRID REFERENCE

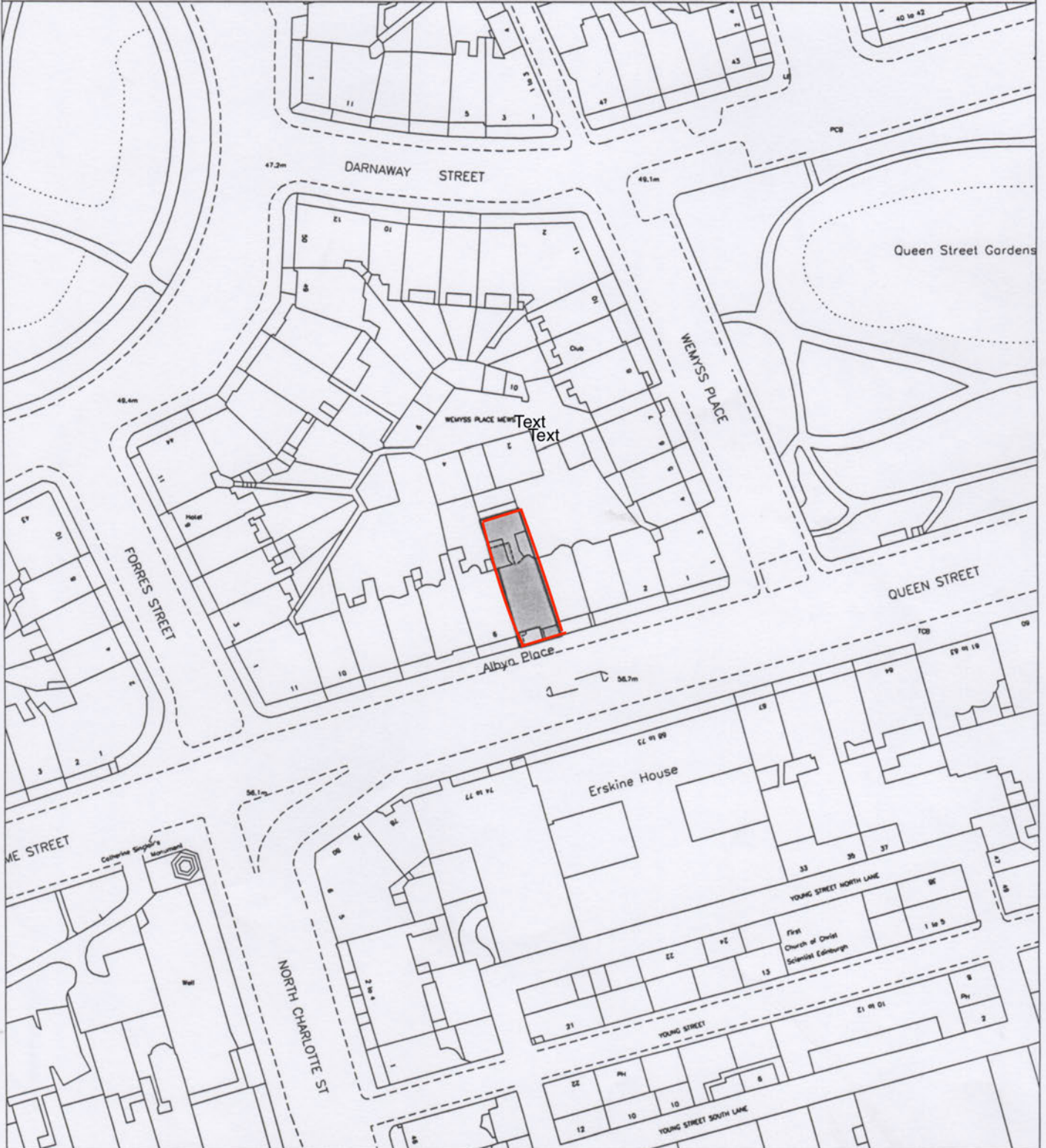
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NT2473NE NT2474SE

Survey Scale

1/1250

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Planning Statement

Flat 4, 5 Albyn Place, Edinburgh, EH2 4NG

Introduction

Houghton Planning Ltd has been instructed by Mr Paul and Mrs Fiona Lingard to submit a planning application for “*Use of flat for short-term let use (sui generis) and residential flat*” at Flat 4, 5 Albyn Place, Edinburgh, EH2 4NG.

No internal or external alterations are proposed.

Site Description

Number 5 Albyn Place is part of a Category A listed terrace. It sits within the New Town Conservation Area, World Heritage Site, and the New Towns Historic Gardens and Designed Landscapes.



Flat 4 is on the top (third) floor of the building, and comprises a lounge, kitchen, two bedrooms, and two bathrooms.

The flat is accessed by stairs from a shared entrance door.

Photographs of the interior are included with the planning application.

The property has no designated car parking, and no communal garden.

Management Guidelines

The property has been a short term let since November 2015 without any complaints having been received.

It is well managed to ensure that the amenity of neighbouring properties is protected. The following guidelines are applied:

- The maximum number of guests in the flat is four.
- Check in is after 3pm on the day of arrival, and no later than 10pm, and check-out is by 11am on the day of leaving. Guests are asked not to leave before 8am.
- No single sex groups, or groups where everyone is under twenty-five, are permitted.
- There is strictly no smoking, no parties, and no pets.
- Quiet hours are between 10PM and 9AM, and guests are asked to keep the noise down on the communal stairwell, and in the flat, and to respect the neighbours in the building.
- Guests are requested not to bounce suitcases up the stairs and, if they expect to have a lot of heavy luggage, to contact the applicants who will arrange for someone to carry it up and down for them.

With the above in force, and with parts of the flats carpeted, and with secondary glazing in place, the applicants are not aware of any of the neighbours having complained about the use.

Development Plan

The development plan comprises National Planning Framework 4 (2023) (NPF4) and the Edinburgh Local Development Plan (2016) (LDP).

Supplementary guidance is contained in Guidance for Businesses (2023).

NPF4 and the LDP contain a range of policies that apply to all developments. However, only those immediately relevant to the proposals are included below.

The key policy in NPF4 is Policy 30 e).

Criterion e) states that *“Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:*

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

In terms of the LDP, the most relevant policy is Policy Hou 7 Inappropriate Uses in Residential Areas, which states that *“Developments, including changes of use, which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted”*.

The Guidance in terms of how to interpret Policy Hou 7 (and NPF4 e)) is as follows.

<p>The character of the new use and of the wider area.</p>	<p>Where the location is predominantly commercial in character and there are no residential properties in nearby, adverse impacts on amenity are less likely. This means it is more likely short-term lets (STLs) can be supported in such locations.</p> <p>Where the location is mixed in character (residential / commercial) regard will be had to the nature of surrounding uses and the proximity of the proposal site to residential properties. Where there is likely to be a further deterioration on residential amenity in such mixed areas, it is unlikely that short term let proposals will be supported.</p> <p>Where the street has a quiet nature or low ambient noise levels (particularly at night-time), STL will not generally be supported. No weight will be given to the existence of neighbouring unlawful STLs as justification for the grant of planning permission for an STL.</p> <p>The Planning service will assess the merits of any proposal against its impact on the lawful planning use of nearby properties. Where the area is wholly residential, it is unlikely that short-term let proposals will be supported.</p>
<p>The size of the property.</p>	<p>Larger properties can have a greater capacity for guests. Where there are greater numbers of guests, there is increased potential for noise and disturbance. Both the number and size of rooms will be taken into account when considering this.</p>
<p>The pattern of activity associated with the use including numbers of occupants, the period of use, issues of noise, disturbance, and parking demand.</p>	<p>If the property is accessed off a stair where there are other flats off that stair, it is very unlikely that a change of use will be supported. This is because it has been found that existing residents of flats within stairs are particularly affected by the pattern of activity which often results from STL use where multiple sets of guests stay for short periods of time throughout the year. Guests of the short-term let properties can arrive late at night and make noise and cause disturbance in a way which residents of that stair would not, given they will know of the impacts that they have on one another and be able to manage those impacts in a neighbourly way. Examples of disturbance include bumping suitcases up stair and using washing machines in the middle of the night.</p> <p>If the property does have its own main door access regard must be had to the other criteria within this table.</p> <p>Planning permission is granted to property rather than individuals, which means that property can change hands and</p>

	<p>be operated in a different way than was intended by the applicant for planning permission. Because of this, when considering the pattern of activity associated with a use, only limited regard can be had to how an applicant intends to manage that.</p> <p>It should be noted that licensing of STLs is separate from the planning system.</p>
<p>The nature and character of any services provided.</p>	<p>Where there is access to a communal garden which can be used by existing residential properties, or where there is a garden that would form part of the curtilage of an STL and would be in close proximity to residential gardens, STLs will generally not be supported. Where parking is provided, this will be considered within the context of the Council’s parking policies and guidance.</p>

Assessment

The most relevant policy to this proposal is NPF4 Policy 30 e), which requires the consideration of two main issues. Firstly, the impact the use may have on the amenity of the neighbourhood, and, secondly, the local economic benefits of the proposal.

Dealing with the first of these, the use of the flat as a holiday let has not caused any issue for neighbours as far as the applicants are aware. It is well managed, guests comply with the strict management guidelines in place, and the property is set out in a way that tends to prevent noise escapes.

At the macro scale, the self-catering sector is hugely important to Scottish tourism in terms of jobs, revenue, and the world-class experiences offered to guests.

Figures from Frontline Consultants produced in 2021 suggest that the Lothians had over a quarter of a million visitor nights in 2020, a total visitor spend of over £91 million that year, and supported over 2,500FTE jobs (see attached).

The self-catering sector is particularly important for Edinburgh by providing somewhere to stay for people visiting the city to work, rest, and play, and supports the world famous festival, and other cultural activities.

The festival issue is particularly pertinent given that a lack of accommodation is seen as a particular problem for the festival, as evidenced by what was provided in evidence by Festivals Edinburgh to the Scottish Government’s Local Government, Housing and Planning Committee when they considered the issue of licencing in early 2023 (see attached). Edinburgh Festival Fringe Society has also had significant press coverage regarding the impact of legislation on the availability and affordability of accommodation: *“Earlier this year, Festivals Edinburgh, which brings together the bosses of the city’s various festivals, warned they were facing an “economic shock” as a result of new short-term letting regulations”* (see Insider article attached). This view is supported by Fringe Edinburgh’s report: ‘Edinburgh Accommodation Supply and

Affordability - A Red Risk for The Edinburgh Festival Fringe and major challenge for The Festival City and Edinburgh's reputation as a welcome, accessible, open cultural capital – 2023', which has been shared with the City Council.

At the micro scale, the new accommodation will support various local cleaning and property management companies involved in the business.

VisitScotland suggest that an overseas visitor to Scotland spends £60 per day locally, so based upon a occupancy rate of 90%, and two adult visitors occupying the flat, it will generate a spend of well over £19,000 contributing to the local economy.

Based on the above, the change of use of the flat is considered to comply with NPF4 Policy 30 e).

Turning to the City Council's guidance, Albyn Place is central, and reasonably busy with people and traffic during the day, and at night. For those reasons, it is considered that this is an area where the guidance may allow short term letting to continue.

This is helped by the fact that the property is relatively small, is adults only, and the management guidelines highlight the need for people to be quiet in the stairwell, and to respect the neighbours. This is reflected in the applicants receiving no complaints from their neighbours.

For the above reasons, the use of the flat as short-term letting accommodation is compliant with the Guidance.

Conclusion

The use of this flat as short-term letting accommodation has been considered against NPF4 Policy 30 e), and is compliant. Furthermore, it also accords with the City Council's Guidance on short-term letting accommodation, and thus Policy HOU7 in the LDP.

For the above reasons, it is hoped that the application can be supported.