

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

Mr Bennett.
16 Braehead Crescent
Edinburgh
EH4 6BP

Decision date: 9 October 2023

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

Change of use from residential to short term let (in retrospect).
At 406 Webster's Land Edinburgh EH1 2RX

Application No: 23/03777/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 31 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 property 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 4 Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this

property as a short term let will result in an unacceptable impact on local amenity and the loss of a residential property has not been justified.

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

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

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

The change of use of this property to a short-term let (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 or loss of residential accommodation. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

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 Lesley Porteous directly at lesley.porteous@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
406 Webster's Land, Edinburgh, EH1 2RX**

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

**Item – Local Delegated Decision
Application Number – 23/03777/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 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 or loss of residential accommodation. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

SECTION A – Application Background

Site Description

The application site is a one bedroom flat at 406 Webster's Land in the West Port. The property shares its access to West Port via a communal stair and a secure gated access.

Webster's Land is a large residential development comprising around 116 individual flats. It is in a mixed use area just off the Grassmarket. The Grassmarket has a high concentration of cafes, restaurants and bars. Public transport links are easily accessible from the site.

The site lies within the Old Town Conservation Area and the Old and New Towns of Edinburgh World Heritage Site.

Description Of The Proposal

The application is for a change of use from residential to short term let (sui-generis). No internal or external physical changes are proposed. The applicant has advised that the property has been used as a short term let since 2022. Therefore, the application is retrospective.

Supporting Information

National Planning Framework 4 Planning Statement.
Photos.

Relevant Site History

No relevant site history.

Other Relevant Site History

No relevant planning site history.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 4 September 2023

Date of Advertisement: 8 September 2023

Date of Site Notice: 8 September 2023

Number of Contributors: 5

Section B - Assessment

Determining Issues

Due to the proposed development falling within a conservation area, this report will first consider the proposals in terms of Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997:

- Is there a strong presumption against granting planning permission due to the development conflicting with the objective of preserving or enhancing the character or appearance of the conservation area?
- 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 character or appearance of the conservation area?

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

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

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

There are no external changes proposed. 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 are acceptable with regard to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

b) 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 policies to be considered are:

- NPF4 Sustainable Places Policy 1.
- NPF4 Heritage Assets and Places Policy 7.
- NPF4 Productive Places Tourism Policy 30.
- LDP Housing Policy Hou 7.
- LDP Transport Policies Tra 2 and Tra 3.

The non-statutory 'Listed Buildings and Conservation Area' guidance is a material consideration that is relevant when considering historic assets. The non-statutory 'Guidance for Businesses' (2023) is a material consideration that is relevant when considering change of use applications.

Conservation Area and Edinburgh World Heritage Site

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

This one-bedroom property is part of a five-storey residential block of 116 units. The entrance door of the flat is connected to the shared entrance gate by a series of external walkways that are linked by internal stairways. These are communal.

The applicant has submitted a statement to address the NPF 4 policies. In terms of amenity the applicant asserts that this is a one-bed flat, where a minimum of three nights and only a maximum of four guests is allowed. The statement highlights that the

property is in the centre of the old town surrounded by bars, cafes, restaurants and student accommodation. The applicant is also unaware of any complaints made against the STL use.

There is a mix of uses in the surrounding area and as such there is a fairly high ambient noise level. Consequently, the introduction of an STL use in this location will have no further deterioration in the amenity of the surrounding area. However, the use of the property as an STL would introduce an increased frequency of movement to the property. The proposed one bedroom STL use would enable visitors to arrive and stay at the premises for a short period of time on a regular basis throughout the year in a manner dissimilar to that of permanent residents. There is no guarantee that guests would not come and go frequently throughout the day and night, and transient visitors may have less regard for neighbours' amenity than individuals using the property as a principal home. There could also be a negative impact on residents' security.

The additional servicing that operating a property as an STL requires compared to that of a residential use is also likely to result in an increase in disturbance, further impacting on neighbouring amenity. However, this would be of lesser impact as it is likely that servicing would be conducted during the daytime.

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

Loss of residential accommodation

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

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

The applicant's planning statement asserts that due to the property already being used for STL use this would not have a negative impact on the loss of housing in the area.

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

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

Car Parking

There is no off street car parking available within the site. As the site is in the heart of the Old Town car use is discouraged. The site is accessible to public transport. There are no cycle parking standards for STLs. Bikes could be parked within the property if required. 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

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

The following material planning considerations have been identified:

Emerging policy context

City Plan 2030 represents the settled will of the Council, and it has been submitted to Scottish Ministers for examination. As such, limited weight can be attached to it as a material consideration in the determination of this application.

Equalities and human rights

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

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

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.

Public representations

Five objections received. One from the Old Town Community Council and one from Tollcross Community Council.

A summary of the representations is provided below:

material considerations

- Negative impact on residential amenity (including security). Addressed in b) above.
- Negative impact on housing stock. Addressed in b) above.
- STLs bring few benefits to the local economy. Addressed in b) above.
- Contrary to LDP Policy Hou 7. Addressed in b) above.
- Contrary to NPF 4 Policy 30 (e). Addressed in b) above.

non-material considerations

- Contradicts Edinburgh City Plan 2030. Addressed in c) above.
- Increases litter and is a burden on refuse collection services. The applicant should agree a waste strategy with CEC's Waste Services.
- Encourages anti-social behaviour. This is a Police Scotland matter.
- STL properties can be overcrowded. This is a licensing issue.
- Too many STLs in the area. Each application must be considered on its individual merits.
- Detrimental to mental health of residents. This is not a material planning consideration.

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 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 or loss of residential accommodation. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

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 property 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 4 Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this property as a short term let will result in an unacceptable impact on local amenity and the loss of a residential property has not been justified.

Background Reading/External References

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

Further Information - [Local Development Plan](#)

Date Registered: 31 August 2023

Drawing Numbers/Scheme

01, 02

Scheme 1

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Lesley Porteous, Planning Officer
E-mail: lesley.porteous@edinburgh.gov.uk

Appendix 1

Consultations

No consultations undertaken.

Appendix 2

Application Certification Record

Case Officer

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

Case Officer: Lesley Porteous

Date: 6 October 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): Elizabeth McCarroll

Date: 8 October 2023

Comments for Planning Application 23/03777/FULSTL

Application Summary

Application Number: 23/03777/FULSTL

Address: 406 Webster's Land Edinburgh EH1 2RX

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

Case Officer: Improvement Team

Customer Details

Name: Dr Paul Beswick

Address: 6 Gillespie Street Edinburgh

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:TOLLCROSS COMMUNITY COUNCIL

4 September 2023

Head of Planning

Department of City Development

City Development - Planning & Strategy

Waverley Court

4 East Market Street

Edinburgh EH8 8BG

World Heritage Site Old Town Conservation Area Change of use from residential to short term let (in retrospect). at 406 Webster's Land Edinburgh EH1 2RX

23/03777/FULSTL

Case Officer: Improvement Team

Tollcross Community Council would like to object to this application for a short term let in this close-knit community with shared walkways and entrances. We object for the following reasons, many of which have been conveyed to us by local residents.

1. Nuisance caused to other residents :

a) Disturbance and noise - short-term lets bring an increased level of noise and disturbance. The groups occupying the property on a short-term basis are almost always on holiday with the

associated holiday mindset seven days a week. Most properties in Scotland do not have carpeted entrances and hallways as hotels do, so the banging of suitcases at all hours and the excited chatter of customers echoes at entrances and in hallways. There is additional noise and disturbance as groups bring their belongings in and out of properties, including dragging suitcases and banging them off walls and doors, damaging the paintwork. Cleaners and greeters attend to turn over each property between every short-term let, which can mean banging and vacuuming past midnight. Cleaners and laundry companies may leave trip hazards in shared areas such as large laundry bags. Some letting agencies offer "luggage drop off" services where suitcases are then left in common stairs to be retrieved by customers later.

b) Anti-social behaviour - Neighbours of short-term lets are almost guaranteed to experience anti-social behaviour from customers. Alcohol is a regular contributing factor which makes these situations particularly unpredictable and intimidating to deal with. Regular complaints have been made relating to waste disposal, parking issues, noise, people returning late at night or arriving early in the morning, customers ringing.

c) Security - The security of communal spaces is completely lost. Neighbours cannot tell who is supposed to be in the property and who is not, or who has keys to shared areas. The insecurity of a shared building is advertised by key safes which are installed without permission from neighbours or listed building consent. One doorway in this area has nine key boxes on the doorframe. There is evidence that short-term let customers are more likely to leave shared entrance doors open, which has resulted in residents coming home to unknown people using drugs, and engaging in other antisocial or threatening activities in their mutual shared areas. Residents of flats or properties with shared gardens are forced to share communal but still private areas of their homes with fee-paying strangers who they have never met before and are unlikely to meet again.

d) Overcrowding Short-term rentals often bring more than the advertised number of customers. Groups will also often invite their friends to visit and enjoy their short-term let bringing additional disturbance. Short-term let businesses often advertise for far more customers to stay than would normally reside in a property in relation to its size. In some instances, STLs have been used as party flats.

e) Waste disposal - Recycling is rarely carried out. Communal bins are often used and permanent residents are expected to manage putting out and collecting bins on behalf of the absent owners. Rubbish bags are often left out in communal stairs. Cleaners usually clean inside the short-term let properties but do not usually clean any shared areas. This leaves the residents to clear up after the customers or live in a poorer quality environment.

f) Mental health impacts - Residents draw huge comfort from a home which has a basic level of familiarity, stability and security. The regular intrusion of transient pleasure-seeking strangers is deeply unsettling. Neighbours of short-term lets regularly describe feeling acute stress, anxiety and other mental health impacts. This disproportionately impacts on disabled people, people with long term health conditions, people who live alone, children and young people.

2. An over-concentration of STLs in the Tollcross area and its consequences,

The very high concentration of STLs (coupled with increasing student residences) in central

Edinburgh has consequences for the nature of the area and its demography. Parts of the city centre and World Heritage Site are no longer part of a living city and have lost a large proportion of long-term residents. Some residents are being driven out of the city. Far too many tenements now have a majority of flats used as STLs. Furthermore, this causes a loss of facilities and shops that long-term residents rely upon and their replacement with facilities and shops that support tourists but not residents. This was a major reason given by residents moving out of Amsterdam.

The use of so many properties as STLs has an effect on property prices and rent levels with many residents on modest incomes no longer able to live in Edinburgh which we all acknowledge has a serious housing crisis.

It is for these reasons that we object to this application for a change of use and we hope that you will consider our objection favourably in your determination.

Yours faithfully,

Paul Beswick for Tollcross Community Council

Comments for Planning Application 23/03777/FULSTL

Application Summary

Application Number: 23/03777/FULSTL

Address: 406 Webster's Land Edinburgh EH1 2RX

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

Case Officer: Improvement Team

Customer Details

Name: Mr Timothy Murphy

Address: 407 Websters Land Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I do not wish for this application to be approved.

This city already has a short supply of long term let rental properties, particularly in the centre of the city. I feel that this property would be put to much better use if it were used to house individuals who wished to live and work in the city.

This flat shares a building with 10s of other flats, and with the number of those flats being converted to short term lets, the increased footfall within the building would cause an increase to the amount of noise and disruption to permanent residents who live in the other flats.

I for one have experienced the banging of suitcases everyday, drunk individuals making noise and ringing doorbells during the weeknights, disturbing those who need to sleep for work in the morning.

I hope you consider these comments and deny this application.

Comments for Planning Application 23/03777/FULSTL

Application Summary

Application Number: 23/03777/FULSTL

Address: 406 Webster's Land Edinburgh EH1 2RX

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

Case Officer: Lesley Porteous

Customer Details

Name: Mrs Elspeth Wills

Address: 3 Browns Place Edinburgh

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: With full support of the local community group GRASS The Old Town Community Council wishes to object to this new application.

Our grounds of objection are as follows:

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

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

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

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

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

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

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

Yours sincerely

Elspeth Wills

Planning - OTCC

From: Eden Anderson <Eden.Anderson@edinburgh.gov.uk>
Sent: 03 Oct 2023 11:06:44
To: myemails.dms@edinburgh.gov.uk
Cc:
Subject: FW: Objecting to STL application 23/03777/FULSTL
Attachments:

From: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk>
Sent: Monday, October 2, 2023 3:48 PM
To: Planning Support <Planning.Support@edinburgh.gov.uk>
Subject: FW: Objecting to STL application 23/03777/FULSTL

Hi Eden

I am now going to forward the reps I mentioned this morning for loading on to Idox.

First one- 23/03777/FULSTL. 406 Webster's Land.

Thanks
Lesley.

From: Planning <planning@edinburgh.gov.uk>
Sent: Saturday, September 30, 2023 12:09 PM
To: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk>
Subject: FW: Objecting to STL application 23/03777/FULSTL

[REDACTED]
Sent: Friday, September 29, 2023 5:52 PM
To: Planning <planning@edinburgh.gov.uk>
Cc: Margaret Graham <Cllr.Margaret.Graham@edinburgh.gov.uk>; Finlay McFarlane <Cllr.Finlay.Mcfarlane@edinburgh.gov.uk>;
Claire Miller (Councillor) <c.miller@edinburgh.gov.uk>; Joanna Mowat <Cllr.Jo.Mowat@edinburgh.gov.uk>
Subject: Objecting to STL application 23/03777/FULSTL

 External email >

To whom it may concern,

I am writing to comment in opposition to application reference number 23/03777/FULSTL at 406 Webster's Land Edinburgh EH1 2RX.

I am a resident of Bread Street and so find this short term let in my neighbourhood - Old Town. The amount of antisocial noise, litter and transient nature of the occupier has done harm to this neighbour's character. I've seen the amount of short term lets increase, and the very character of the area degraded and brought a materially detrimental effect on the living conditions.

It feels insulting as well that whilst this city is in the middle of a housing crisis, these homes are being taken away from residents such as myself, and given to tourist - especially when there are so many hotels in the area.

Regards,

[REDACTED]
53 (1f2) Bread Street
Edinburgh
EH39AH

From: Eden Anderson <Eden.Anderson@edinburgh.gov.uk>
Sent: 02 Oct 2023 11:07:58
To: myemails.dms@edinburgh.gov.uk
Cc:
Subject: FW: Objecting to STL application 23/03777/FULSTL
Attachments:

From: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk>
Sent: Monday, October 2, 2023 9:18 AM
To: Planning Support <Planning.Support@edinburgh.gov.uk>
Subject: FW: Objecting to STL application 23/03777/FULSTL

Good morning Eden

I hope you had great hols.

The objection below was e-mailed directly to me within the timescale.

Can you load on to Idox under 23/03777/FULSTL: 406 Webster's Land?

Thanks
Lesley.

Sent: Thursday, September 28, 2023 6:42 PM
To: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk>
Subject: FW: Objecting to STL application 23/03777/FULSTL

From: Lewis Esslemont [REDACTED]
Sent: Thursday, September 28, 2023 6:14 PM
To: Planning <planning@edinburgh.gov.uk>
Cc: Margaret Graham <Cllr.Margaret.Graham@edinburgh.gov.uk>; Finlay McFarlane <Cllr.Finlay.Mcfarlane@edinburgh.gov.uk>;
Claire Miller (Councillor) <c.miller@edinburgh.gov.uk>; Joanna Mowat <Cllr.Jo.Mowat@edinburgh.gov.uk>
Subject: Objecting to STL application 23/03777/FULSTL

 External email >

To whom it may concern,

I am writing to comment in opposition to application reference number 23/03777/FULSTL at 406 Webster's Land Edinburgh EH1 2RX.

Our city is in the midst of a catastrophic housing crisis, and I believe that every holiday let is one less home for ordinary residents to live in. This development would exacerbate the crisis for all residents of the city, displacing people from their communities, driving up rents, and further reducing the desperately needed numbers of homes in the city. Planning decisions should first and foremost cater for the needs and interests of the city's residents, and this proposed development runs counter to that.

Moreover, I believe that this development is incompatible with planning and development policies at both a local and national level.

The Edinburgh City Plan 2030 states that "[p]roposals which would result in the loss of residential dwellings through demolition or a change of use will not be permitted". Every proposed holiday let could be a residential dwelling, and I do not believe that granting this application is in keeping with the policies outlined in the City Plan.

The plan goes on to state that "[d]evelopments, including change of use which would have a materially detrimental effect on the

living conditions of nearby residents, will not be permitted.” The impact of high concentrations of holiday lets on nearby rent levels is well documented, and I believe that granting this application will exacerbate the hardship faced by tenants in the community, and therefore is not in keeping with the City Plan.

The Scottish Government's National Planning Framework 4 states:

“Development proposals for the reuse of existing buildings for short term holiday letting should not be supported if it would result in:

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

I strongly maintain that this development would have detrimental effects on the local amenity and character of the area, by removing what should be residential accommodation from local supply. I see no evidence that any local economic benefits outweigh this loss. It also seems clear to me that this development will place a significant burden on local services such as rubbish collection and public transport, negatively impacting all local residents within the community.

Regards,

78/5 Causewayside EH91SL