

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

100640402-002

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.							
Applicant or Agent Details							
Are you an applicant or an agent? * (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)							
Agent Details	Agent Details						
Please enter Agent details	S						
Company/Organisation:	Houghton Planning Ltd						
Ref. Number:		You must enter a B	uilding Name or Number, or both: *				
First Name: *	Paul	Building Name:	Alloa Business Centre				
Last Name: *	Houghton MRTPI	Building Number:					
Telephone Number: *	07780117708	Address 1 (Street): *	Whins Road				
Extension Number:		Address 2:	Alloa				
Mobile Number:		Town/City: *	Clacks				
Fax Number:		Country: *	Scotland				
		Postcode: *	FK10 3RF				
Email Address: *	paul@houghtonplanning.co.uk						
Is the applicant an individual or an organisation/corporate entity? *							
☑ Individual ☐ Organisation/Corporate entity							

Applicant Details						
Please enter Applicant details						
Title:	Ms	You must enter a Bu	ilding Name or Number, or both: *			
Other Title:		Building Name:	Roseland			
First Name: *	Ruth	Building Number:				
Last Name: *	Longman	Address 1 (Street): *	Salisbury Road			
Company/Organisation		Address 2:	Horsham			
Telephone Number: *		Town/City: *	West Sussex			
Extension Number:		Country: *	England			
Mobile Number:		Postcode: *	RH13 0AL			
Fax Number:]				
Email Address: *	paul@houghtonplanning.co.uk					
Site Address	Details					
Planning Authority:	City of Edinburgh Council					
Full postal address of the	e site (including postcode where available):					
Address 1:						
Address 2:						
Address 3:						
Address 4:						
Address 5:						
Town/City/Settlement:						
Post Code:						
Please identify/describe the location of the site or sites 113/5 Broughton Street Edinburgh EH1 3RZ						
Northing		Easting				

Description of Proposal
Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: * (Max 500 characters)
Change of use from residential to short term let (in retrospect).
Type of Application
What type of application did you submit to the planning authority? *
Application for planning permission (including householder application but excluding application to work minerals). Application for planning permission in principle. Further application. Application for approval of matters specified in conditions.
What does your review relate to? *
Refusal Notice. Grant of permission with Conditions imposed. No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.
Statement of reasons for seeking review
You must state in full, why you are a seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: * (Max 500 characters)
Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.
You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.
See Local Review Statement
Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? *
If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: * (Max 500 characters)

Please provide a list of all supporting documents, materials and evidence which you wish to to rely on in support of your review. You can attach these documents electronically later in the			d intend		
Application as submitted Report of Handling Decision Notice Local Review Statement and	supporting information				
Application Details					
Please provide the application reference no. given to you by your planning authority for your previous application.	23/03915/FULSTL				
What date was the application submitted to the planning authority? *	24/08/2023				
What date was the decision issued by the planning authority? *	15/11/2023				
Review Procedure					
The Local Review Body will decide on the procedure to be used to determine your review ar process require that further information or representations be made to enable them to determ required by one or a combination of procedures, such as: written submissions; the holding of inspecting the land which is the subject of the review case.	nine the review. Further	information i	,		
Can this review continue to a conclusion, in your opinion, based on a review of the relevant parties only, without any further procedures? For example, written submission, hearing sessing Yes X No		yourself and	other		
Please indicate what procedure (or combination of procedures) you think is most appropriate select more than one option if you wish the review to be a combination of procedures.	e for the handling of your	review. You	ı may		
Please select a further procedure *					
By means of inspection of the land to which the review relates					
Please explain in detail in your own words why this further procedure is required and the mawill deal with? (Max 500 characters)	tters set out in your state	ement of app	eal it		
To see the flat and local context.					
Please select a further procedure *					
Holding one or more hearing sessions on specific matters					
Please explain in detail in your own words why this further procedure is required and the ma will deal with? (Max 500 characters)	tters set out in your state	ement of app	eal it		
To debate STL policy and guidance.					
In the event that the Local Review Body appointed to consider your application decides to in	spect the site, in your op	oinion:			
Can the site be clearly seen from a road or public land? *		Yes 🗵 No			
Is it possible for the site to be accessed safely and without barriers to entry? *					

If there are reasons why you explain here. (Max 500 chara	think the local Review Body would be unable to undertake an unaccomacters)	panied site inspection, please			
Key required to enter flat.					
Checklist – App	olication for Notice of Review				
	g checklist to make sure you have provided all the necessary information may result in your appeal being deemed invalid.	on in support of your appeal. Failure			
Have you provided the name	and address of the applicant?. *	⊠ Yes □ No			
Have you provided the date a review? *	and reference number of the application which is the subject of this	Ⅺ Yes □ No			
If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? *					
	ent setting out your reasons for requiring a review and by what procedures) you wish the review to be conducted? *	Ⅺ Yes □ No			
require to be taken into accou at a later date. It is therefore	why you are seeking a review on your application. Your statement must unt in determining your review. You may not have a further opportunity essential that you submit with your notice of review, all necessary inforr w Body to consider as part of your review.	to add to your statement of review			
. ,	ocuments, material and evidence which you intend to rely on nich are now the subject of this review *	Ⅺ Yes ☐ No			
Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.					
Declare - Notic	e of Review				
I/We the applicant/agent cert	ify that this is an application for review on the grounds stated.				
Declaration Name:	Mr Paul Houghton MRTPI				
Declaration Date:	22/11/2023				



Local Review Statement 3F1 113 Broughton Street Edinburgh EH1 3RZ

Introduction

Houghton Planning Ltd has been instructed by Ms Ruth Longman (hereafter the applicant) to submit a local review for "Change of use from residential to short term let (in retrospect)" at 3F1 113 Broughton Street, Edinburgh, EH1 3RZ (ref: 23/03915/FULSTL).

The planning application was refused under delegated powers on 9th October 2023 for the following two reasons:

- "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".

This Statement starts by describing the site. Thereafter, it follows the same format as the Report of Handling, and only comments on that report, as necessary, and to put the applicant's compelling case for why planning permission should be granted.

Site Description

The Site Description in the Report of Handling is a reasonable summary.

Photographs of the interior were included with the planning application.

The property has no designated car parking, and guests are encouraged to use public transport, or park and ride facilities, if they have a car.

There is no outdoor space, and no communal garden, for the use of guests.

Determining Issues

These are agreed.



Assessment

Amenity

The applicant has never had any issues with the use of the flat, as a short term let. It appears as if the other occupiers of the building are generally of like mind, as none of them have apparently objected to the planning application based on residential amenity issues.

The one comment from an immediate neighbour relates to communal repairs, and a concern that short term letting may hasten the need for these. However, it should be noted that the applicant has contributed to any repairs that have been required to date, will do so in future and, even the person making the comment, seems to expect that to occur.

Otherwise, the remaining objections seem to be the sort of generic comments that are being submitted by interest groups, and individuals, politically opposed to short term lets in the City.

The lack of any issues is because the property is professionally managed, well maintained, and is occupied by guests who understand their responsibilities, and act accordingly.

People staying here have ready access to the City Centre, and its many tourism locations, and supporting services and facilities, and make frequent use of these, adding money to the local economy. This injection of money is important to many, many smaller businesses struggling in the current cost of living crisis.

The applicant considers that the comings and goings from the flat are no different from what would occur were they to have young professional tenants, or students, living in the flat. These types of occupiers may have the same, or a greater degree of, movements than those people staying in the flat on holiday.

Permanent residents can have vastly different movements depending on their student status, employment, leisure interests, family circumstances, health, or just their way of living being a night owl rather than a day person, for example. A doctor or nurse may work shifts coming in at odd times; a family with teenage children might enter and leave the flat many times during the day and night, and can be very noisy; a single person with care needs might be visited by carers several times a day. Users of a self-catering property are, therefore, unlikely to exhibit markedly distinct characteristics to more permanent residents.

Anti-social behaviour is just as likely in residential use as self-catering use. It is probably more prevalent from permanent residents because they feel more secure in their occupancy whereas a guest can be asked to leave immediately.



Servicing of self-catering accommodation is also not a particular difference because many residential occupiers use cleaners on a regular basis, especially if the occupier is in poor health.

Many city dwellers will have deliveries from the likes of Amazon, and takeaways at all times of the day and night, and probably far more than people staying on holiday who will not have the former, and are more likely to eat out spending money in local eateries that desperately need the custom, with the ongoing cost of living crisis.

The ambient noise level is barely impacted at all by this use. In that regard, the case officer accepts, at one point, that this area has a mix of uses, i.e. is it busy throughout the day, and relatively noisy, but then ignores that in considering the impact noise may have on the neighbours.

It should also be noted that Environment Health have not, it would appear, commented on the application. If there were a noise issue, then it would be expected that an Environmental Health Officer would be the appropriate person to comment on this issue not a planning officer.

The conclusion reached by the case officer that the amenity of neighbours is adversely affected is manifestly not supported by the evidence, and cannot, therefore, be given any weight whatsoever. Contrary to the conclusion drawn by the case officer, the proposal patently does comply with NPF 4 policy 30(e) part (i) and LDP policy Hou 7.

Loss of residential accommodation/Economic Benefit

The total number of dwellings in Edinburgh is around 248,000, as of 2018, of which two thirds are flats, i.e. circa 164,000 (City Plan 2030: Monitoring Statement). The loss of this one flat to the housing supply is, therefore, negligible.

For the record, 3,597 properties have applied for a short term let licence, as of 13th November 2023, according to the latest available short term let licence register, of which a considerable number do not involve secondary letting, or home letting, and are for home sharing, B&Bs, and Guesthouses, etc. So, the actual loss to the housing stock were all these properties to be granted licences, and most will not be, given the City Council's stated stance on the issue, is quite a low figure. The City Council has been reported in the press to have concluded in a committee report on the tourist tax that only 20% of short term lets may continue (Edinburgh Live 22nd August 2023), which would mean no more than circa 700 properties being permanently lost to the housing stock, which is 0.28% of the total stock. Even if every licence is granted, that is only 1.44% of the total stock. So far, 335 licences have been granted, as of 13th November 2023, of which 147 are described as for secondary letting, or home letting, i.e. those categories where a property would be potentially lost to the housing stock. This suggests that even 700 may be on the high side. This seems to be borne out by checking the numbers of Certificates of Lawfulness approved, given that only properties that have traded 10 or more years are likely to receive a licence at the end of the day, other than a few that secured planning permission (a handful) before the



City Council decided to refuse them on mass. That stands at 185 Certificates granted, as of 25th October 2023, with a further number to be determined. A further five Certificates have been granted on appeal, as of 25th October, with one Certificate appeal remaining to be determined. Whichever way you look at it, the numbers are nowhere near the estimates reported in the newspapers at various points, or the 14,000 figure, originally quoted in the City Plan 2030: Monitoring Statement, or the other figures quoted in that report of 8,740 entire properties being registered with Airbnb, or 3,620 that were stated as available for 90 days, or more, on the same platform.

There may be a housing shortage in Edinburgh, but this is not being caused by short term lets, but is rather a multifaceted issue that seeking to close short term lets will not solve. Rather, it needs a multi-agency approach, including the City Council, to kick-start new housebuilding, increase the delivery of affordable housing, and to bring back into use the many thousands of empty properties across the City. In 2022, it was reported in the Edinburgh News that, following a freedom of information request, it was determined that Edinburgh had 9,285 empty properties (27th December 2022).

As one example, the Examination of the new Local Development Plan is ongoing now, and it is clear, from the evidence, that the City Council rather than tackling its housing shortage, may well simply exacerbate it by restricting the supply of new housing, and perversely allocating sites for new housing that are in use by others with no intention of them offering their sites for development. Taking a more progressive approach to housebuilding would deliver far quicker, and more certain, results than trying to clamp down on short term lets in the hope that owners will turn into landlords, which itself is unlikely to happen given the disincentives currently for bringing forward housing to rent, including, but not limited to, rent controls, and changes to the rules around evictions. Therefore, the City Council may be successful in closing short term lets, but this is no panacea because whilst some owners may decide to take tenants, and/or students, which may happen here, many will simply leave their properties empty. So, instead of the economic benefit to the local area that derives from its use as a short term let, which seems to be accepted by the case officer in the Report of Handling, the local economy will see a significant reduction in spend, as the property remains empty for much of the year. The Council will still get its Council Tax, but the local restaurants, pubs, tourist sites, and shops, will lose the trade they get whilst the small businesses that help support the short term let use will see a drop in their income. Some of those businesses will not survive.

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.

As for the independent economic impact assessment commissioned by the Planning Service, it is interesting that the case officer now suggests it should carry little weight. That is because it does not help the City Council's case. Contrary to what is said in the Report of Handling, the report is supportive of the value of short term lets to the City economy when considered based on Gross Annual National and Local Taxation rather than Net Annual Local GVA Impact. Short term lets also create more jobs. The relevant table from the report is included below. Clearly, because this report does not support the narrative City Council planning officers have been asked to roll out on every short term let application, it has now been conveniently shelved, but, in reality, it should be given much more weight.

Edinburgh Average - Residential					Edinburgh Average - Short Term Let			
Unit Size	Net Local FTE Jobs	Net Annual Local GVA Impact	Gross Annual National and Local Taxation	Unit Size	Net Local FTE Jobs	Net Annual Local GVA Impact	Gross Annual National and Local Taxation	
1 bed	0.19	7,516	7,301	1 bed	0.23	4,714	12,419	
2 bed	0.31	12,559	16,267	2 bed	0.43	8,764	21,991	
3 bed	0.49	19,699	22,065	3 bed	0.60	12,288	30,467	
4 bed	0.62	25,117	32,040	4 bed	0.75	15,293	37,878	
5 bed	0.77	31,212	42,355	5 bed	1.03	21,018	51,650	

Edinburgh Central - Residential					Edinburgh Central - Short Term Let						
Unit Size	Net Local FTE Jobs		Local GVA		ross Annual ational and cal Taxation	Unit Size	Net Local FTE Jobs		Net Annual Local GVA Impact	Na	oss Annual ational and al Taxation
1 bed	0.20	£	8,212	£	8,088	1 bed	0.29	£	5,990	£	15,542
2 bed	0.33	£	13,208	£	16,937	2 bed	0.55	£	11,137	£	27,840
3 bed	0.51	£	20,706	£	22,780	3 bed	0.77	£	15,775	£	38,970
4 bed	0.66	£	26,417	£	33,174	4 bed	1.05	£	21,470	£	52,548
5 bed	0.82	£	32,841	£	43,142	5 bed	1.10	£	22,412	£	55,537

It has been clearly demonstrated in the Applicant's Supporting Statement, and this Statement, that the loss of the residential accommodation is outweighed by demonstrable local economic benefits. Therefore, the proposal complies with NPF 4 30(e) part (ii).



Overall Conclusion

The proposal complies with NPF 4 policy 30(e) and LDP policy Hou 7, and there are no material considerations that suggest otherwise.

Councillors are, therefore, respectfully requested to allow this local review, and grant planning permission.

Edinburgh housing crisis: More than 9,000 properties sitting empty amid soaring demand for housing

Startling new figures have revealed that more than 9,000 properties in Edinburgh are sitting empty, amid soaring demand for housing.

By Jolene Campbell

Published 27th Dec 2022, 12:35 BST

Edinburgh is the council area in Lothians – and across Scotland – with the most unoccupied properties at 9,285, according to freedom of Information requests.

Of these 8,589 are homes – that's more than four times the 1950 total reported by the council just several weeks ago.

But the shocking new figures from FOIs to all councils captures all types of properties including privately owned homes, council and also non-domestic. Miles Briggs MSP said it suggests the scale of the problem with vacant properties has been drastically underestimated.

The report out in early December on the latest empty home statistics for Edinburgh highlighted that housing supply in the Capital "remains under pressure in the wake of the pandemic and increasing demand".

Scottish Conservatives have blasted the figures as 'unacceptable' at a time when many people are struggling to either get on the housing ladder or find rented accommodation.

It comes after calls from a leading letting agent to tackle the city's housing crisis, sparked by concerns that soaring numbers on social housing waiting lists could further exacerbate existing shortages of homes.

The Scottish Conservatives have now issued a fresh call for compulsory sale orders for long-term unoccupied properties, a commitment made in their manifesto for the 2021 Scottish Parliament elections.

Shadow Cabinet Secretary for Social Justice, Housing and Local Government Miles Briggs MSP said:

"These figures are a national scandal when we consider that, during a housing crisis, many properties lie forgotten and derelict.

"It's appalling that viable housing stock is being wasted and neglected in this way, particularly in Lothian which is the fastest growing region of Scotland.

"Sadly, these issues are not unique to Lothian and we are seeing this replicated across Scotland.

"This is why the Scottish Conservatives would support compulsory sale orders for long-term unoccupied properties, and why we have proposed relaxing planning laws to allow for the conversion of unoccupied business buildings into accommodation.

"The SNP must commit to the ambitious housing targets that the Scottish Conservatives have proposed if they are to help the country out of the housing crisis that they created."

The council has been contacted for comment.

Edinburgh could see 80% reduction in short-term rental properties in new scheme

By Katrine Bussey and Katie Williams Reporter

22 August 2022

One self catering host said the new legislation would make will make Scotland a 'laughing stock around the world and damage economy, businesses and its people.'

Scotland's capital could see an 80 per cent drop in properties for hire on Airbnb when a new licensing scheme for short-term lets comes into force in a few weeks, a report for the City of Edinburgh Council has warned.

A paper, prepared for the authority's policy and sustainability committee, warned of the impact of changes in the accommodation sector.

It comes in the wake of concerns from the owners of short-term, rental properties, such as those on Airbnb, that the changes are an "act of self-sabotage on their businesses and livelihoods".

The council paper – details of which were posted on social media by Conservative councillor Iain Whyte – considers the "future supply of the short-term let sector".

And it states there is "an assumption of an 80 per cent reduction from the Edinburgh 2021 number of active listings reported on Airbnb, as a proxy for the size of short-terms lets".

The Scottish Government's new licensing scheme requires hosts of these properties to display energy performance ratings on listings, have adequate buildings and public liability insurance, as well as various fire and gas safety precautions.

Businesses have to register by October 1 to ensure they can continue trading, with housing minister Paul McLennan having said previously it is "important that there is appropriate regulation in place to ensure the safety of guests".

But, as of August 7, only a reported 245 licence applications had been submitted to the City of Edinburgh Council out of the 12,000 estimated properties currently used for short-term let.

Fiona Campbell, chief executive of the Association of Scottish Self-Caterers (ASSC), said: "The Scottish Government is urging short-term lets operators to rush to inflict an act of self-sabotage on their businesses and livelihoods.

"In the meantime, these same operators are urgently addressing their need to cover rising living costs and keep their businesses afloat."

Self-catering host Louise Dickins said: "The dramatic statistics released by Edinburgh today is only the first sign of things to come.

"This legislation will make Scotland a laughing stock around the world. A country inflicting harm to its economy, businesses and its people, all the while confused about why it's doing so.

She claimed the licensing system would be "putting hard-working people out of business, or stopping them from supplementing their income in an honest and decent way".

Ms Dickens demanded: "The Scottish Government must step in now, go back to the drawing board with this legislation and save Scotland's tourism industry from being destroyed."

A Scottish Government spokesperson said: "All councils are working through the increasing number of short-term let hosts applying for a licence by 1 October. To date, no short-term let licence applications have been refused in Edinburgh and as long as an application has been received by the deadline, hosts can continue to trade after that date.

"Good quality standards are at the heart of regulating the short-term let sector, as well as providing assurance to visitors and guests staying in Scotland.

"Many hosts will already be meeting licensing conditions as a matter of compliance with existing law or best practice. As well as ensuring short-term lets have to meet consistent standards, the licensing scheme will also provide accurate numbers of such lets for the first time.

"Edinburgh City Council has adjusted its short-term let policies to take account of a recent Judicial Review which required some aspects to be amended, and is accepting and processing more applications on a daily basis."

Council Leader Cammy Day said: "To be clear, we're no intention of reducing the number of short-term lets operating in the city by 80 per cent – nor do we expect this to happen.



Rising accommodation costs are 'grim reaper' for festivals - Fringe boss

Edinburgh International Festival leader warns that some of the festivals won't survive the next five years without more support

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By Katrine Bussey & Peter A Walker Content Editor

07:07 16 MAY 2023

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The Fringe Festival attract tens of thousands of performers and tourists to Edinburgh in August (Image: Getty Images)

A "strategic approach" to dealing with rising accommodation costs in Edinburgh is needed, the boss of the Edinburgh Festival Fringe has insisted, branding soaring bills in the capital as being the "grim reaper".

Shona McCarthy, the chief executive of the Edinburgh Festival Fringe Society, complained about the "dreaded rising cost of accommodation in Edinburgh".



She spoke out as she told MPs on Westminster's Scottish Affairs Committee that artists and venues involved with the Fringe were still suffering financially as a result of the pandemic.

"There is no one across the Fringe landscape who is not still in a recovery position, not still carrying debts and deficits from just surviving Covid."

Speaking about the rising costs that performers and others have to pay for accommodation in the city, McCarthy said: "That is definitely my grim reaper at the moment, and I think we need an Olympic response."

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.

McCarthy said while they were "very supportive of the short term lets legislation" - which involves new licences having to be awarded for properties rented out on a short term basis - she added it had "unintended consequences - particularly for artists".

She said: "It is something that we need a strategic approach to address in a real way if we are to continue to host such a major event every vear."

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Her comments came as she told MPs that both the Scottish and UK Governments could do more to help the festivals, which attract tens of thousands of performers and tourists to Edinburgh in August.

McCarthy said: "I think there is still huge opportunity both to invest in the festivals locally, because at the minute I think we all operate on shoestrings, we all operate on a huge amount of good will.

"Our marketing budgets are minuscule and yet we have these global reputations; there is an enormous amount the Scottish and UK Governments could do to promote the festivals overseas."

Meanwhile, Francesca Hegyi, the chief executive of the Edinburgh International Festival, said this was the first year they had received financial help from the UK Government – despite having being founded in 1947.

She said: "In the last eight years, we have 90 different instances of foreign governments investing in us, but the same isn't said for Scottish Government colleagues or our UK Government colleagues."

She described the summer festivals in the capital as being "enormous", describing them as being "second only in size to an Olympic Games" but adding that unlike the sporting tournament they happen every year.

Hegyi told MPs: "If you think of the effort that goes into staging a Commonwealth Games or even Eurovision over the weekend, it is sort of taken for granted we will happen every single year."

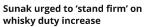
With some locals having voiced concern about the impact the festivals have on the capital, she conceded there was an "uncomfortable relationship" between the events and local government.

But Hegyi insisted: "We all need to get around the table and work out what is a sustainable future, including sustainable tourism for Edinburgh and for the festivals.

Privacy









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COMMENTS COMMENTS

In February, Festivals Edinburgh voiced fears that the introduction of licences for Airbnb-style lets could result in a third of the overall Fringe programme being lost.

In its written submission to MSPs, it noted the Fringe Society had made the "conservative estimate" that a third of its programme for 2024 could be lost with this "representing a minimum of £30m in additional economic impact and nearly 700 FTE [full time equivalent] jobs in the first year alone".

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LOCAL GOVERNMENT, HOUSING AND PLANNING COMMITTEE EVIDENCE ON SHORT-TERM LETS LICENSING: FESTIVALS EDINBURGH

1. EDINBURGH FESTIVALS' COLLECTIVE VIEWS ON SHORT-TERM LETS REGULATION

Festivals Edinburgh represents Edinburgh's 11 major international year-round festivals - from the Science Festival in spring through the peak summer festivals season to the winter festivals of Storytelling and Hogmanay. The festivals are collectively on a par with a FIFA World Cup or Commonwealth Games. As they take place on an annual basis, however, they bring recurrent benefits to their host city and country including in 2022 an estimated 4,000 additional FTE jobs for Scotland as a whole, and additional economic impact of well over £200m through wider spending in the hospitality, tourism, retail and wider service sectors.

Since 2018 our member festivals have discussed and agreed collective support for short-term lets regulation. However, we are concerned about unintended impacts on temporary home-sharing and home-letting in people's primary residences from the way the regulations are being interpreted and implemented. So we welcome the announcement by the Cabinet Secretary for Social Justice, Housing and Local Government of her intention to extend the date by which existing hosts must apply for a short-term let licence from 31 March 2023 to 30 September 2023.

This extension is a great assistance in giving short-term let hosts time to seek clarity on the still-emerging implications of local authority licensing schemes at a time when there are many additional pressures due to the cost of living crisis. Furthermore, it could provide a valuable opportunity for the Scottish Government and Scottish Parliament to consider how the national framework is being interpreted across the country, and to adjust provisions at the margins where necessary to avoid negative unintended consequences.

2. SECONDARY LETTING VERSUS PRIMARY RESIDENCES

Edinburgh's festivals are in favour of regulating secondary short-term letting, in the context of the housing crisis with serious year-round shortages of accommodation and price escalations being experienced by local tenants.

However, one of the problems in the short-term lets legislation is the conflation of commercial secondary letting and personal primary letting in people's own residences (home-sharing and homeletting). Only the former takes properties out of residential housing supply whereas the latter is very localised in character, providing an income opportunity for city residents in their own homes and retaining that income in the local economy to help offset cost of living pressures on households. In order to tackle commercial secondary letting issues, it is not necessary to damage brief periods of personal primary letting in people's own residences.

We estimate that brief periods of personal primary letting account for 25,400 bed nights for each day of Edinburgh's 25-day peak season in August, 27% of the supply needed in peak season. Further information on supply and demand estimates is provided at Annex A. This type of accommodation, which is more affordable than hotels or aparthotels, is of particular importance for the workers, artists and performers who transform Edinburgh into the world-leading festival city. Without them, Scotland would lose these unique cultural assets along with 4,000+ jobs and over £200m in direct additional economic impact, as well as weakening the wider leisure and visitor economy employing 44,000 in Edinburgh alone.

The other argument in favour of licensing home-sharing and home-letting is to reassure the public that all classes of short-term lets are safe and the people providing them are suitable. However, there is an anomaly in the national framework as short-term stays for educational purposes, including for example homestays for young language learners, have been excluded by Scottish Government under Article 3. (c) (ii) of the Order. If national policymakers are content for temporary use of homestays for school age children to be unlicensed, we ask for the same type of national exclusion to be applied in excluding temporary use of homestays for adults working on major festivals and events.

3. LOCAL INTERPRETATION OF NATIONAL PROVISION FOR TEMPORARY EXEMPTIONS

Instead of a national exclusion, the measure designed to cater for major festivals and events in the regulatory framework is to enable local licensing authorities to grant temporary exemptions, on application, during designated periods of up to six weeks in any 12 month period.

The Cabinet Secretary has confirmed that the legislation does not dictate a requirement for temporary exemption applications to include compliance with mandatory (Scotland wide) and additional (local) licence conditions. However, given the design of the national regulatory framework, the City of Edinburgh Council (CEC) has decided to apply many of the mandatory and additional licence conditions to temporary exemptions for home-sharing and home-letting. CEC has indicated to Festivals Edinburgh that the Council had asked for a discretionary licensing system and that it was ministers who decided it should be mandatory and apply to all types of licence. CEC has also stated that the local scheme is designed to ensure that the public is reassured that these short-term lets will be safe and effectively managed.

These local interpretations highlight that the provision in the framework for local temporary exemptions is not achieving its intended purpose. The SSI provides an opportunity to look at this again and apply an exclusion at national level, in light of the anomaly of educational guests being excluded from the scheme altogether but no other classes of temporary guests.

4. POTENTIAL CONSEQUENCES FOR EDINBURGH'S FESTIVALS ECONOMIC IMPACTS

Festivals Edinburgh is concerned that the conditions for temporary exemption will be a serious disincentive to city residents who want to open their own homes to guests for a brief period. The further details given in **Annex A** include likely costs of applying for an exemption, which could mean home-sharers with a spare room only break even in the final week of the peak festivals season. A survey of existing providers has shown that the conditions are likely to dissuade a majority of hosts.

The 2022 season returned at around 75% of 2019's record levels, so the festivals are already managing a post-Covid recovery and renewal of a different shape and scale in a challenging operating environment, with many participants and suppliers suffering lasting financial hardship. In this context, an estimated drop of 50% or more in temporary accommodation capacity next year would make the city increasingly unaffordable and unfeasible for festival participants and visitors, putting these global cultural assets for Scotland at risk of a downward spiral that would change their national and international impacts forever. The Fringe Society makes a conservative estimate that a further third of their programme could be lost in 2024, representing a minimum of £30m in additional economic impact and nearly 700 FTE jobs in the first year alone.

This reduction in scale could be a wider tipping point leading to the wholesale loss of many venue producers who operate on economies of scale, and putting a much larger proportion of the direct economic impacts at risk. That in turn would have a ripple effect on wider businesses and jobs in the city that benefit year-round from the festivals, in particular the 44,000 city jobs across service sectors such as bars, restaurants, hospitality and transport.

Despite these serious risks with national impacts for the creative, leisure and tourism economies, CEC has indicated to Festivals Edinburgh that it is not proposed to carry out economic assessment of the licensing arrangements, since Scottish Government undertook a business and regulatory impact assessment which explored some of the economic impacts and decided there was sufficient reason to introduce a licensing system.

5. COMMENTS FOR COMMITTEE'S CONSIDERATION

In conclusion, we would like to make three key comments for the Committee to consider:

- 1. To recommend that Scottish Government consider excluding from the scope of the regulations primary residential letting activity (home-sharing and home-letting) for major festivals and events in light of the anomaly around exclusion provisions where guests staying for educational purposes, but no other classes of temporary guests, are excluded in the Order.
- 2. To recommend that, if the issues related to primary residential letting activity (home-letting and home-sharing) remain in the legislation, Scottish Government consider including in the SSI the waiving of the requirement for licensing in circumstances where home-sharing or home-letting activity operates for less than six weeks a year in light of the problems outlined in section 3 above with local implementation of the current temporary exemption provision.
- 3. To examine how consistency is being achieved across Scotland in local authorities implementing the regulations, including impact assessments being undertaken into the implications of local policy decisions that cover economic as well as housing supply and neighbourhood impacts in light of the potential economic damage outlined at Annex A.

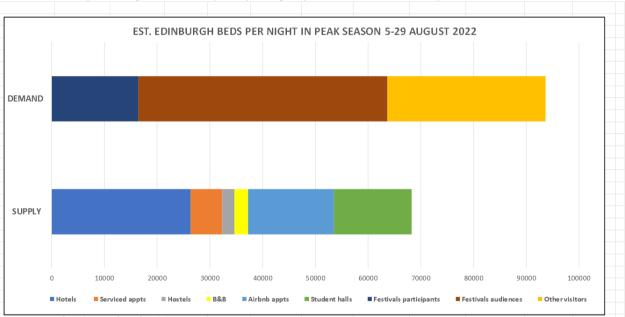
Festivals Edinburgh January 2023

TEMPORARY ACCOMMODATION SUPPLY AND DEMAND IN EDINBURGH'S AUGUST PEAK SEASON

Festivals Edinburgh has prepared new overview data about specific temporary surge supply and demand issues in and around the 25-night peak August season, using secondary data from sources including the festivals themselves, and published figures from City of Edinburgh Council and VisitScotland. We are keen to see city and national government officials review and improve on these estimates as part of an economic impact assessment of the policies.

Our latest estimate of the importance of home-sharing and home-letting to Edinburgh's peak festivals season is summarised in the bar chart shown below. If a significant proportion of this temporary accommodation supply is lost, the situation could cause spiralling damage to the 4000+ additional jobs directly created by the festivals; the 44,000 jobs supported in the capital's wider arts, hospitality and recreation sectors; and the world-class brands of the Edinburgh Festivals that benefit the whole of Scotland in tourism, business and diplomacy across the globe.

In these figures, informal home-sharing and home-letting is estimated at 25,400 bed nights, 27% of the overall peak provision required which is not covered by other types of visitor accommodation. This makes it the single largest category and the one most used by festival performers, artists and workers. These local owner occupiers are making their properties available for just over 10% of the year, so the issues of neighbourhood amenity and housing supply that concern residents are limited compared to commercial secondary letting. However, the longstanding city tradition of welcoming cultural visitors into people's own homes would be the first area to be damaged by current licensing requirements. These involve up-front costs of up to £800+ as noted below the table - which would mean in the first year that householders would only clear a surplus of £160 if renting out one room for the 25-night season at the recommended affordable single room rate for workers. At such a rate of return, many existing hosts surveyed by Fringe operators have said they would not continue.



Estimates of up-front costs of applying for a temporary exemption in Edinburgh for a 2-bed property for home-sharing or home-letting potentially total up to £845, as set out below:

- CEC fee for applying for temporary exemption is £250 for up to 5 occupants (£350 for up to 10 occupants)
- Public liability insurance for hosting two guests is typically £400 for an annual policy (short-term cover products are not widely available unless hosts decide to list on certain online platforms and use the public liability insurance they offer)
- Annual PAT testing of up to 10 items typically £45
- Cost of Electrical Condition Report for 2-bed property typically £150 (valid for 5 years)

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:

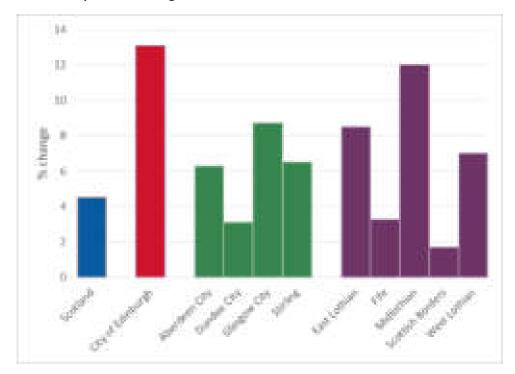
- To identify the key physical, economic, social and environmental changes occurring in Edinburgh since the adoption of the current Edinburgh Local Development Plan in November 2016;
- To assess the effectiveness of current planning policies; and
- To provide an information base to help assess the performance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

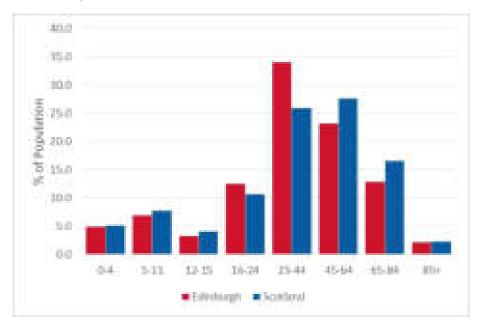
Chart 1. Population Change 2008 to 2018



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 Scotlish average in chart 2 below.

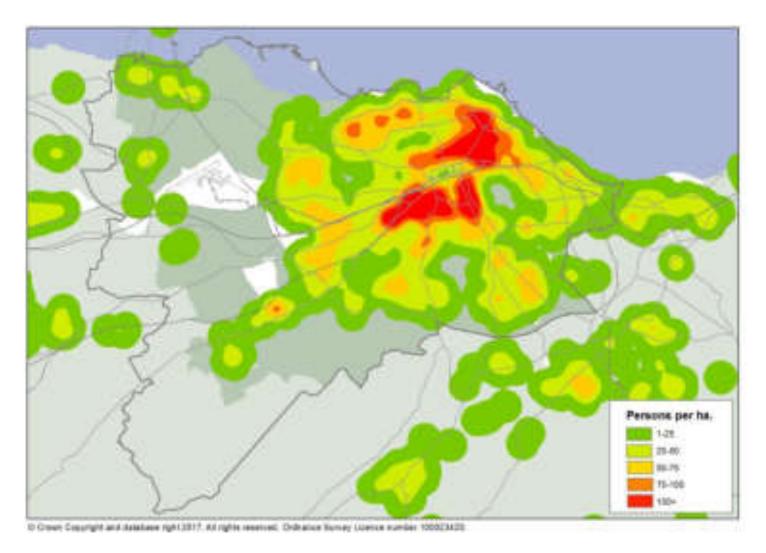
Chart 2: Population Structure 2018



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.

250000 250000 10000 10000 5000 104 3-11 12-13 26-34 25-44 43-54 15-84 857 4000

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.

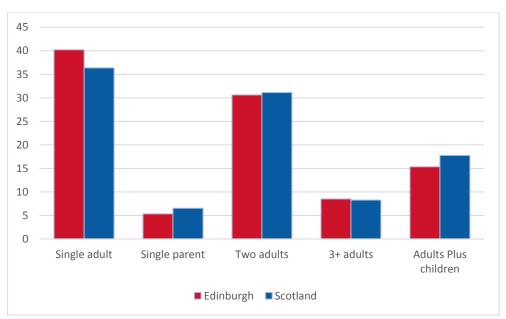


Chart 4: Households by Type 2016

Source: NRS 2016 based household projections

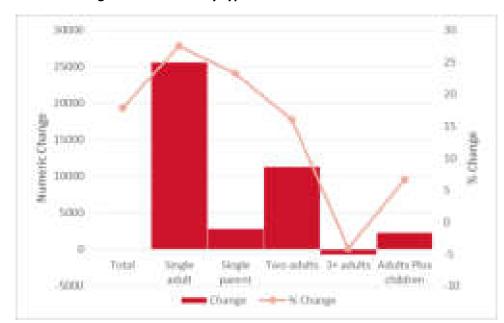


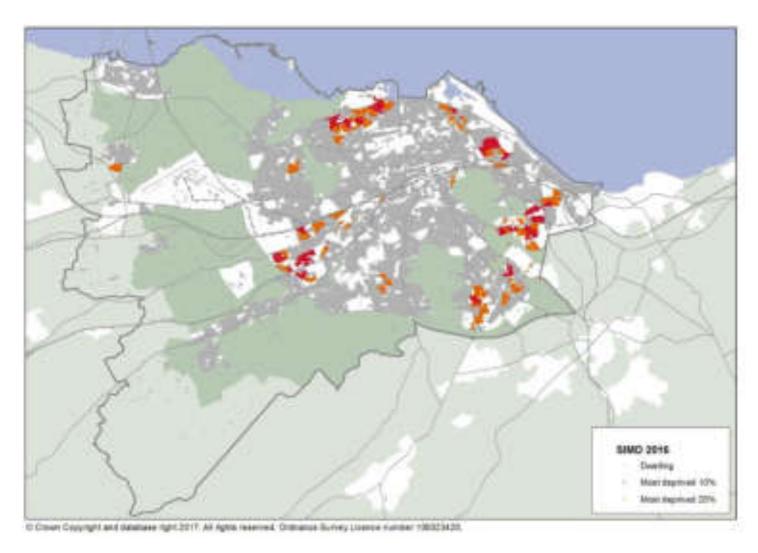
Chart 5: Change in households by type 2016 to 2032

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.

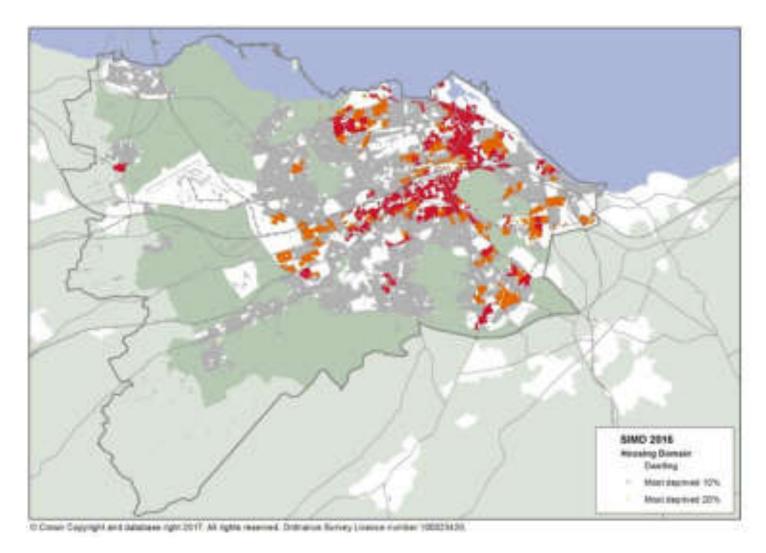
Map 2: SIMD 2016



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

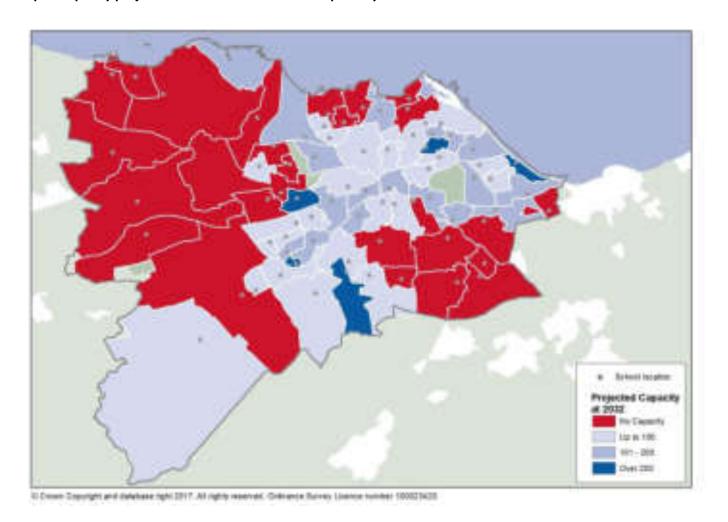
Education

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.

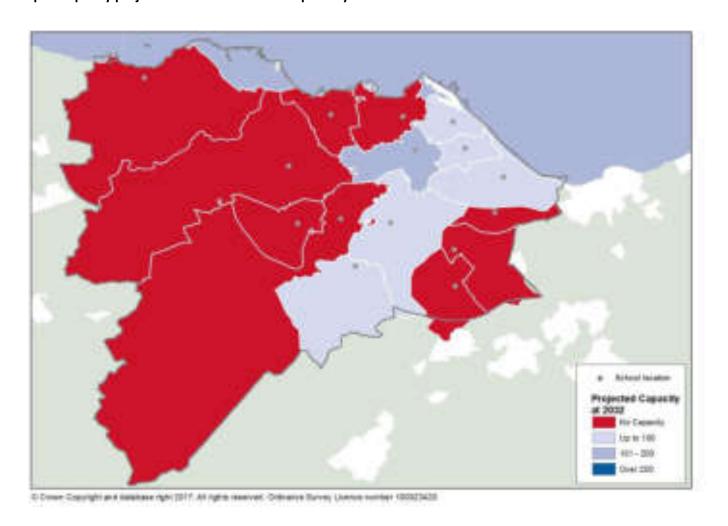
Maps 4 – 7 below show the projected capacities of Edinburgh's schools in 2032. The school role projections are based upon expected population increase due to new house building. The capacity projections do not take account of planned new school provision. The LDP action programme sets out a range of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

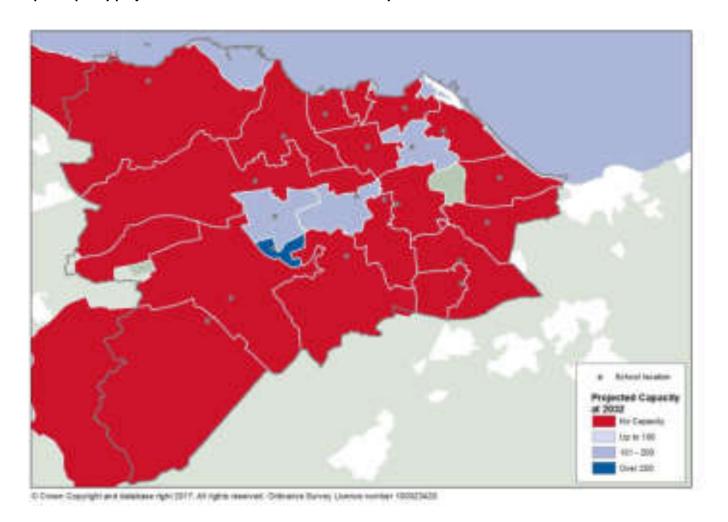
Map 4: Capacity projection for non-denominational primary schools 2032



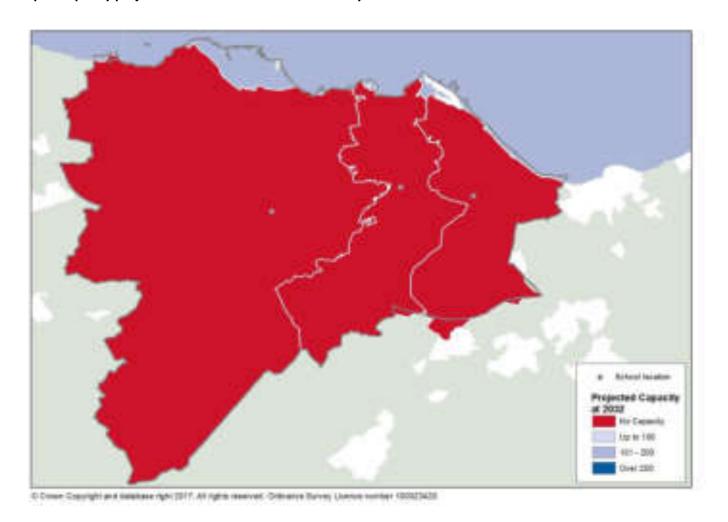
Map 5: Capacity projection for Roman Catholic primary schools 2032



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



Map 7: Capacity projection for Roman Catholic secondary schools 2032



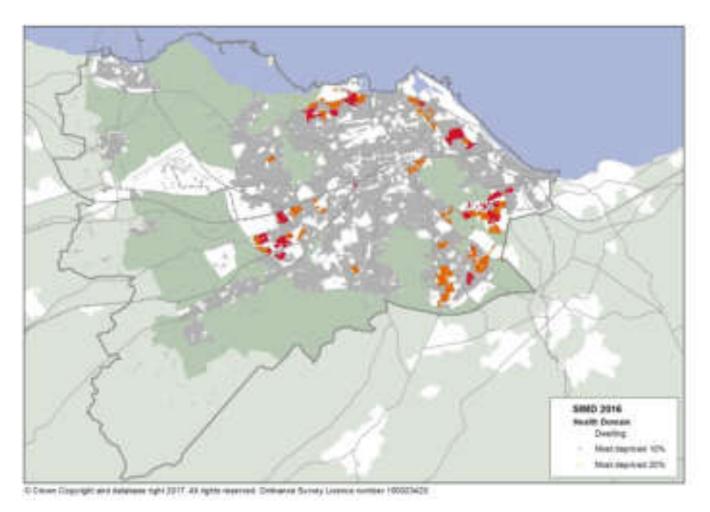
Health

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



Source: 2016 Scottish Index of Multiple Deprivation

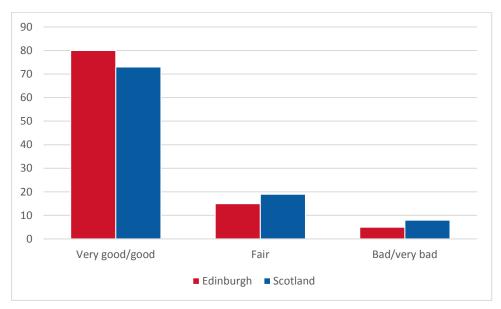
Scottish Health Survey

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.

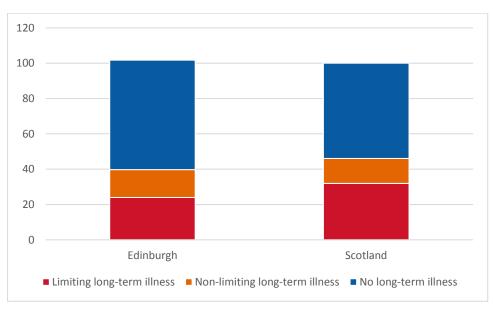
Chart 6: Self assessed general health



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

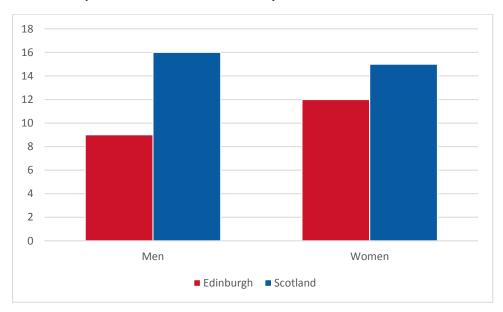


Cardiovascular disease

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 Scotish average.

Chart 8: Proportion of residents affected by Cardiovascular disease



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 whist Edinburgh women were lower.

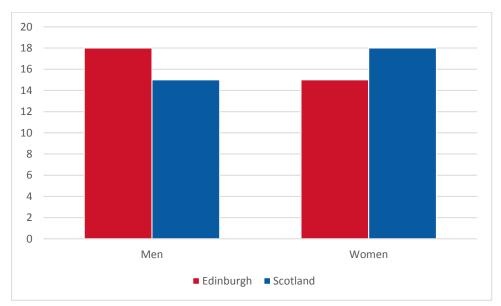


Chart 9: % of population scoring 4 or more on GHQ12 scale

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.

45
40
35
30
25
20
15
10
5
Men Women

■ Edinburgh ■ Scotland

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.

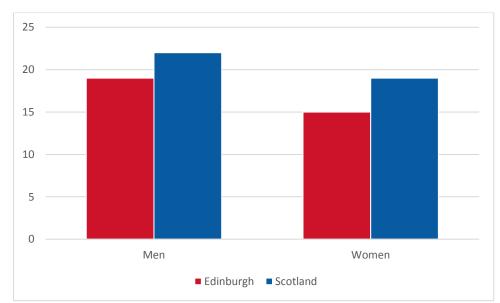


Chart 11: Proportion of participants that are regular smokers

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.

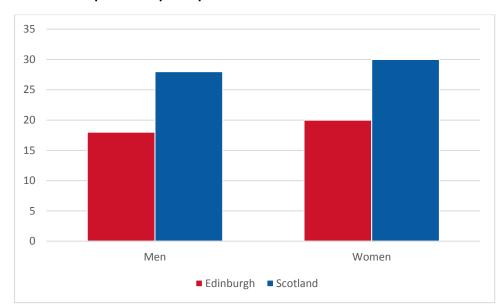


Chart 12: Proportion of participants classified as obese

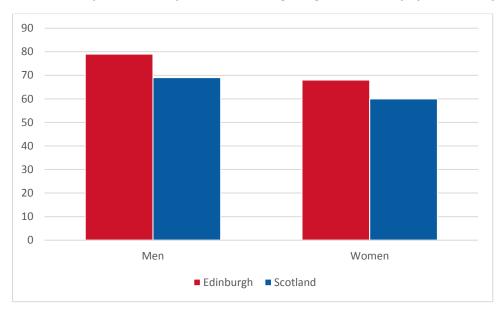
Source: Scottish Health Survey

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

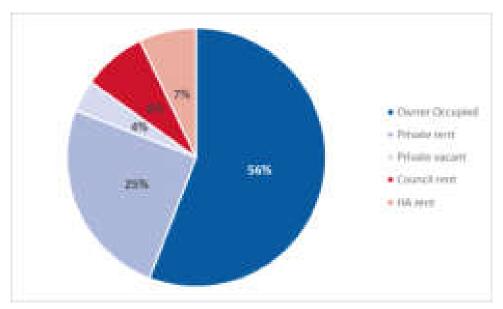


Housing

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

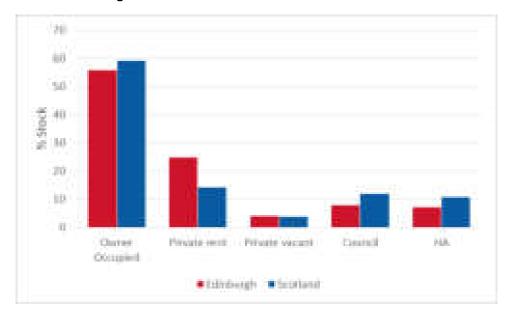
Chart 14. Housing stock by tenure



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.

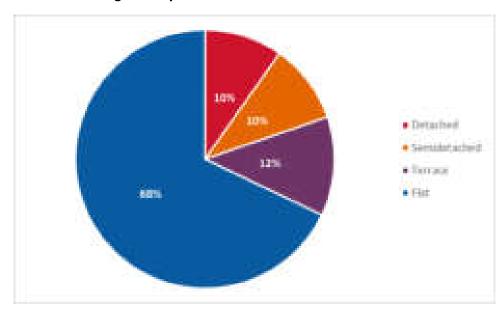
Chart 15: Housing Stock 2018



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.

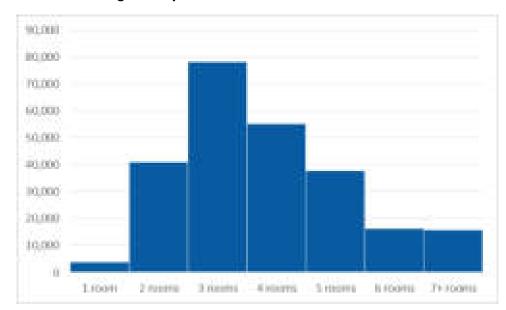
Chart 16. Housing stock by built form



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.

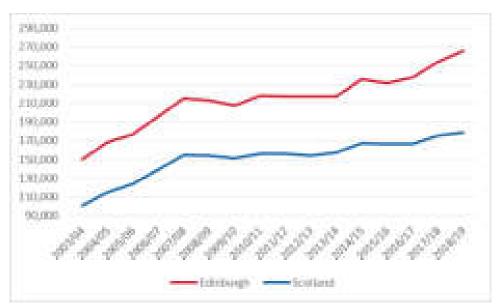
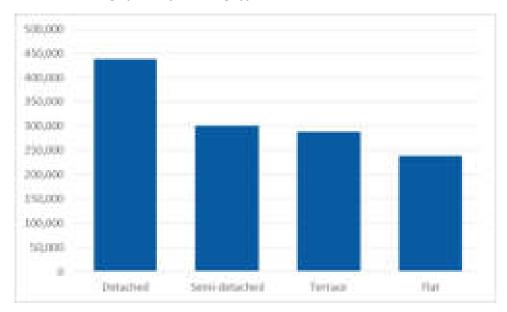


Chart 18. Average house prices 2003 to 2019

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

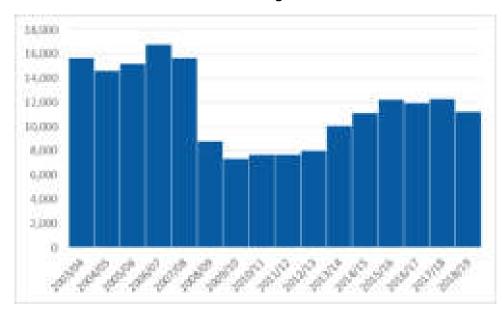


Source: Registers of Scotland

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.

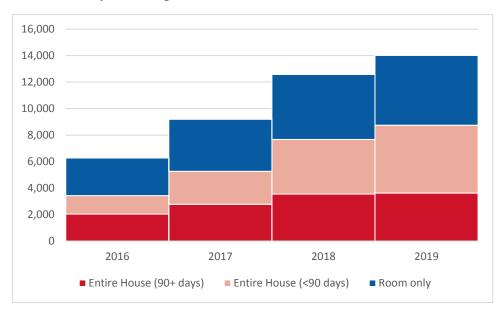
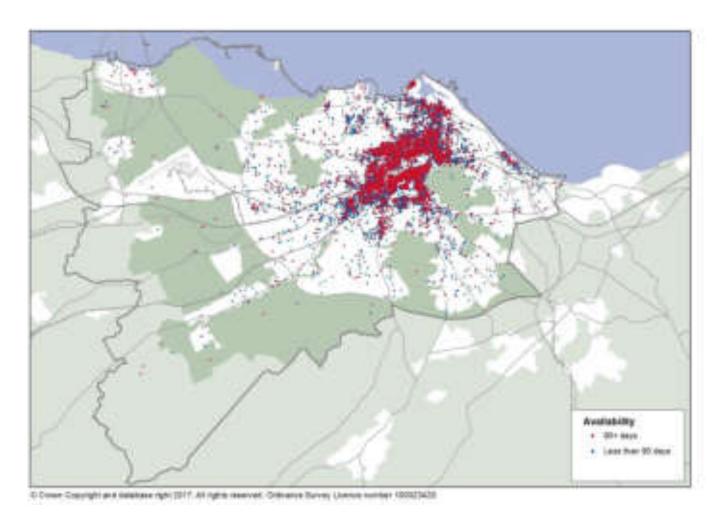


Chart 21: Properties registered with Airbnb

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



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

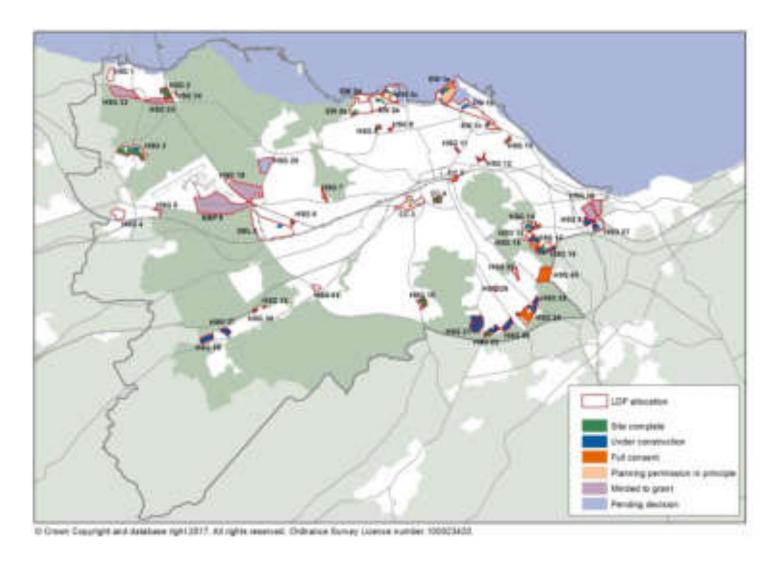


Table 2: Progress on allocated housing sites

		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	332 268	
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 South East Wedge South:	Under construction	220	260	9	251
HSG 40	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.

2000
1500
1500
1500
500
Completions Target 2009 - 2010 — Average target 2009 - 2016

Chart 22: Annual Housing Completions 2009 – 2019

Source: Annual Housing Land Audit and Completions Programme

Location of Housing Completions

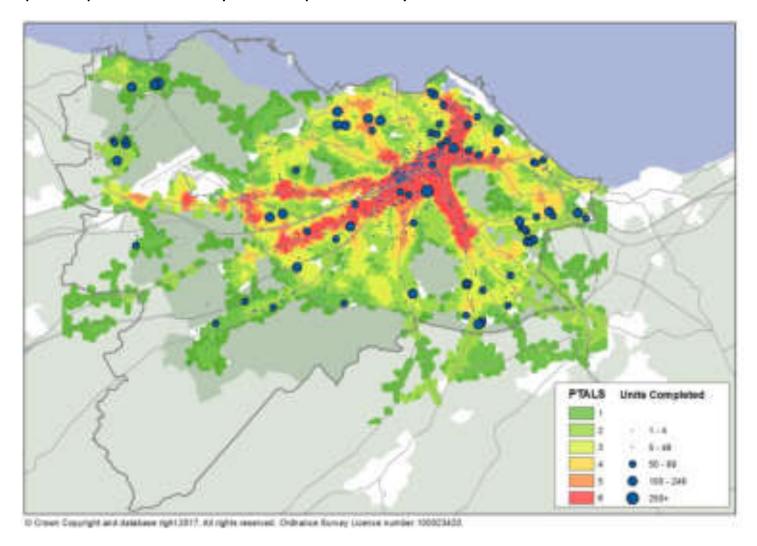
Map 11 below shows the locations of recent housing completions in terms of the public transport accessibility levels. The numbers of completed houses within the different accessibility bands is shown in table 3. Public transport accessibility is measured according to PTAL scores. The PTAL score is a 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



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 overlayed with recently completed and current housing sites.

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

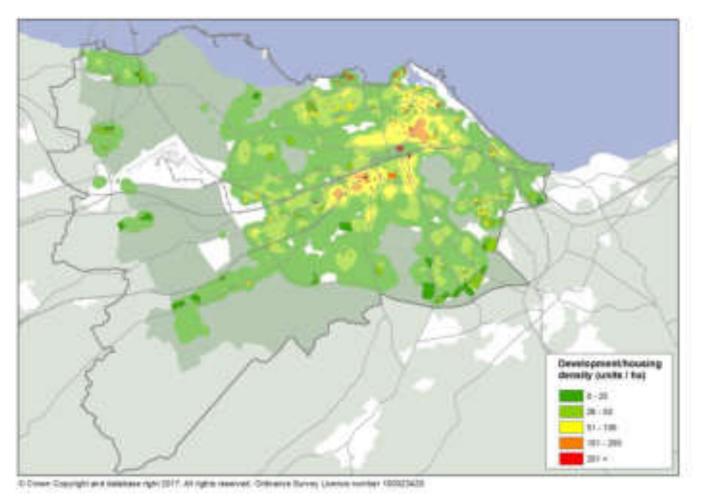
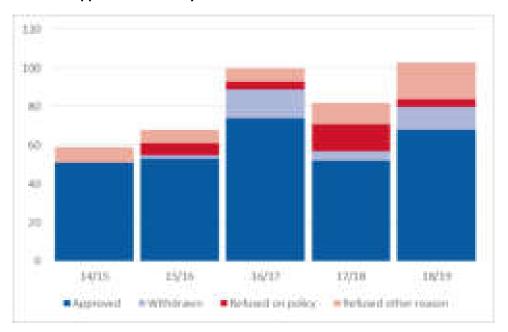


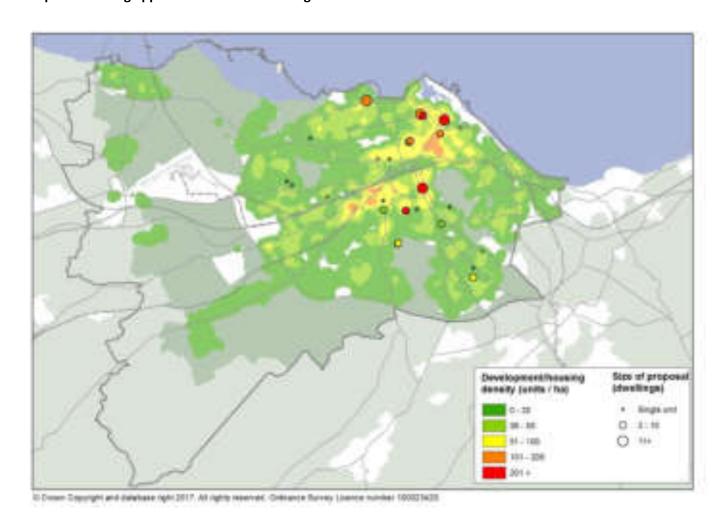
Chart 22 shows the number of times that Hou 4 has been specifically applied in determining planning applications for new housing, broken down by the eventual decision.

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



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

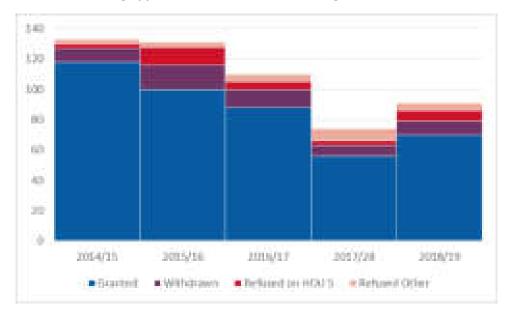
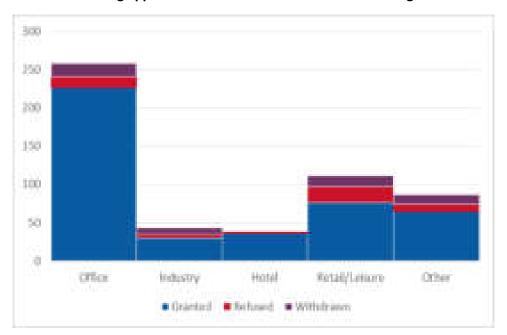


Chart 24 shows planning applications determined for conversion to housing based upon the existing use of the building.

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

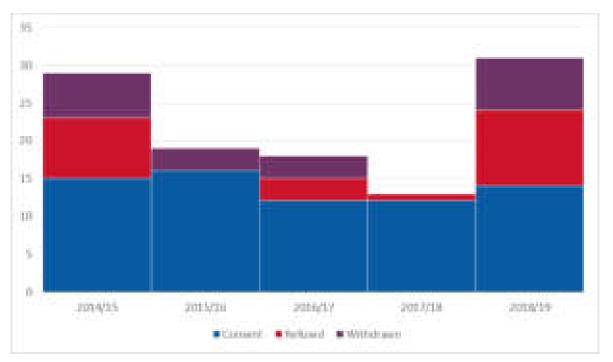
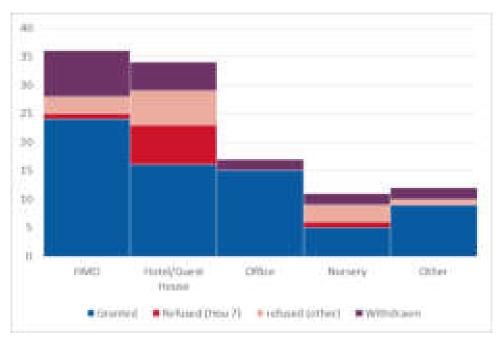


Chart 26: Planning applications determined 2014 – 2019 for change of use from residential



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.

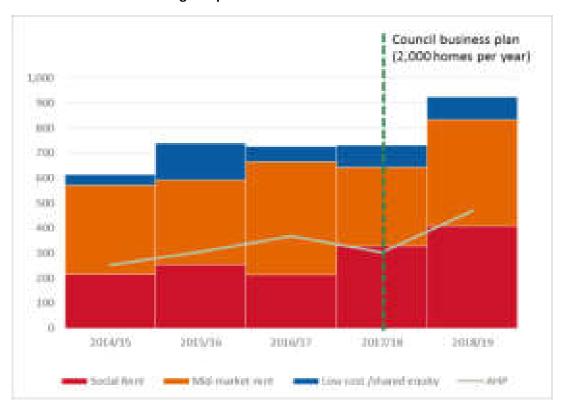


Chart 27: Affordable housing completions 2014 - 2019

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 -

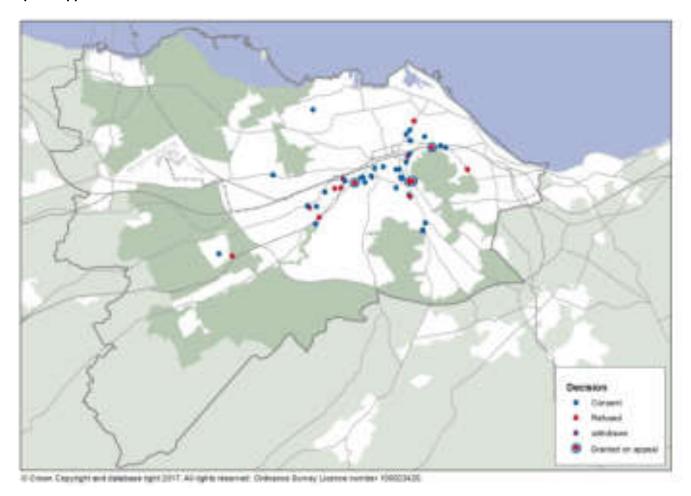
Planning permission will be granted for purpose-built student accommodation where:

- 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.

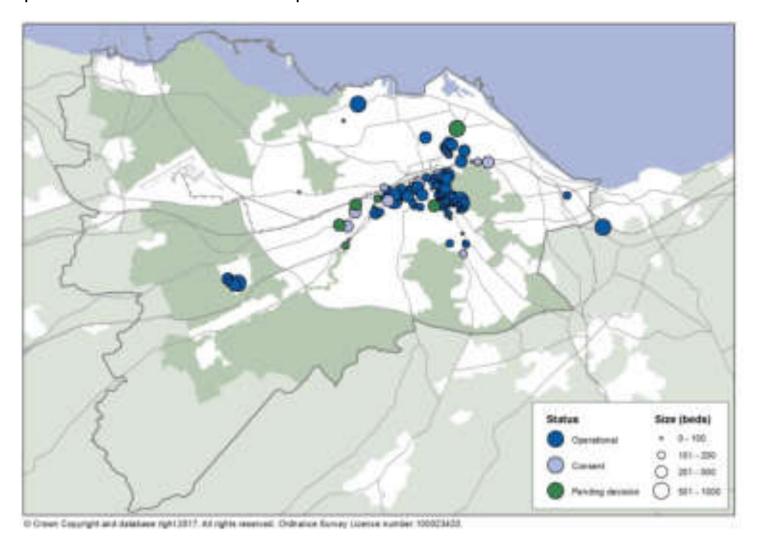
Map 14: Applications for student accommodation 2014 to 2019



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

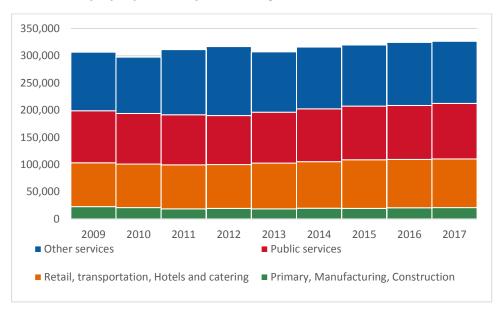


Economic Development

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

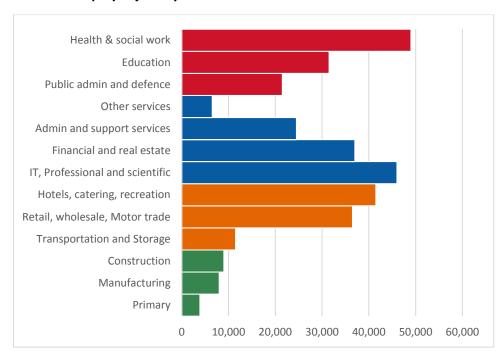
Chart 28: Employee jobs in City of Edinburgh



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.

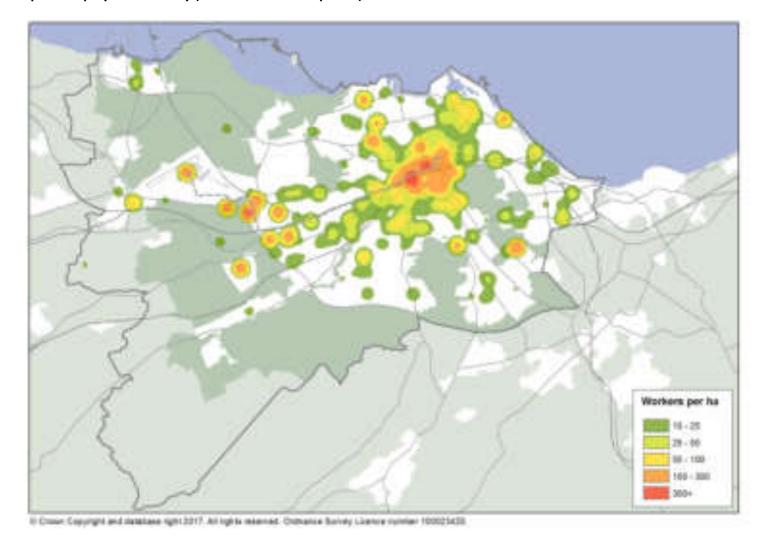
Chart 29: Employee jobs by sector



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)

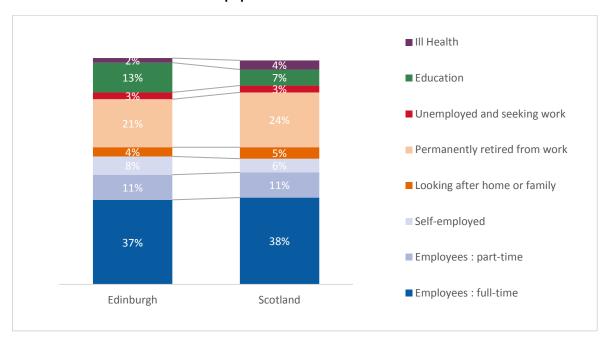


Source: 2011 Census

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

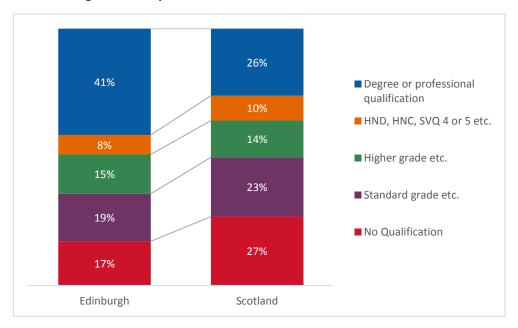


Source: Scottish Household Survey

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

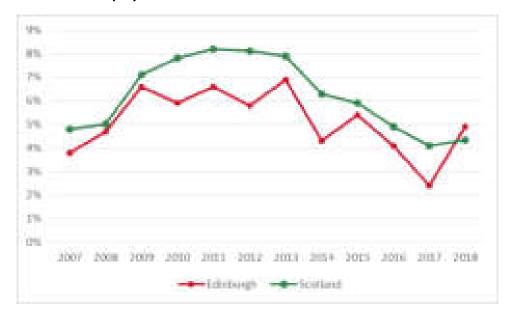


Source: 2011 Census

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.

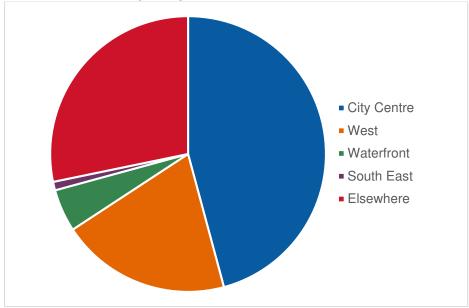
Table 4: Office activity 2014 - 2019

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



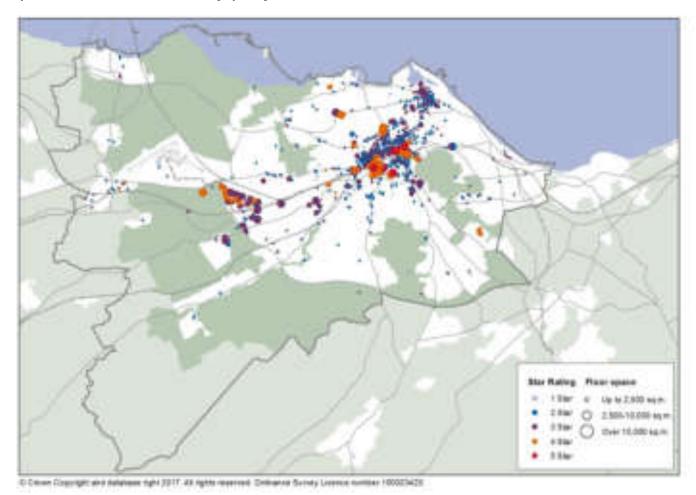
Source: Ryden

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



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

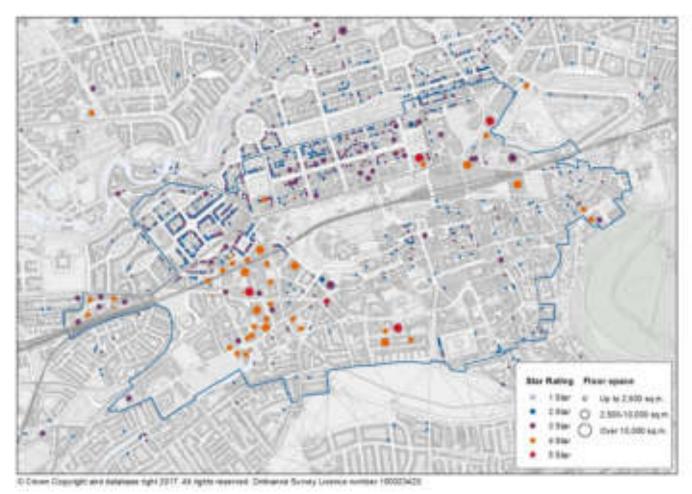


Chart 34: Average building size by location



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

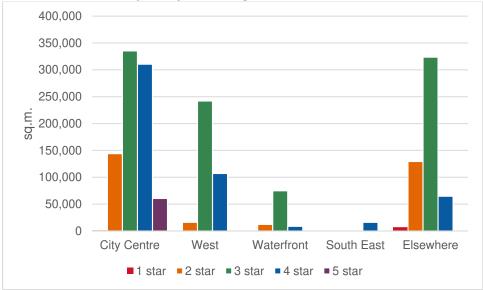
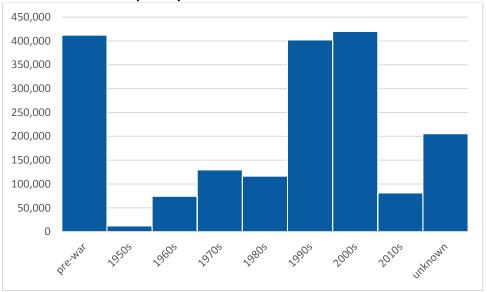


Chart 36 below indicates the decades in which office floorspace was built. The two clear peak eras are the pre-WW2 period when the city's tenements and townhouses were built, then the 1990s and 2000s. The post-crash slump entering the 2010s is also apparent.

Chart 36: Office floorspace by decade built



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:-

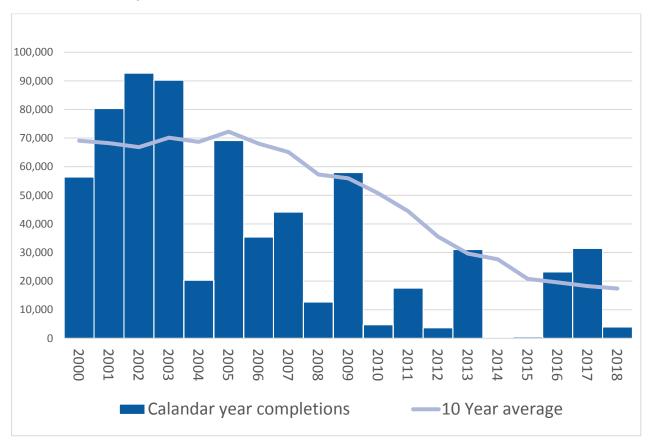
- 1,300 sq. m. (14,000 sq. ft.)
- multi-occupied
- built in the 1990s
- accommodating around 100 125 employees
- graded 3-star on a 5-star scale
- renting for around £180 per sq. m. (c.£17 per sq. ft.), and
- in an inner urban location close to the city centre.

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.

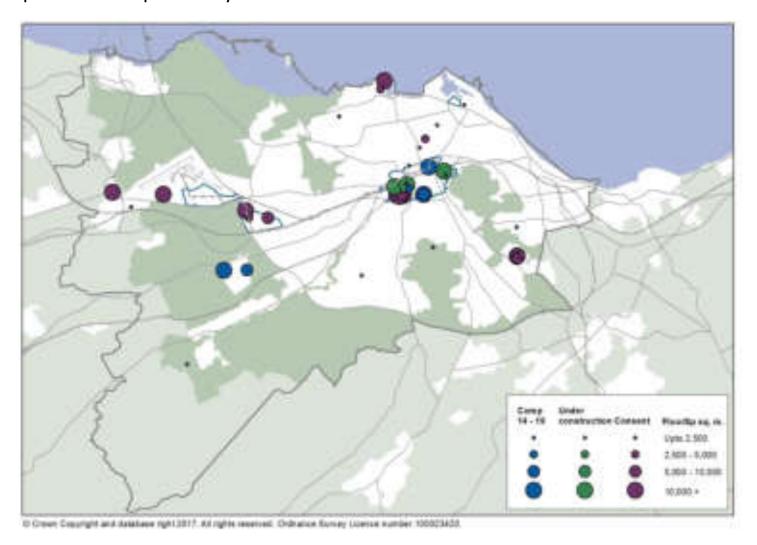
Occupier activity within the development pipeline is reducing supply. During 2017 and 2018 six developments have pre-let during construction. This letting activity leaves only two-and-a-half of eight very recent new city centre office developments still available.

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



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

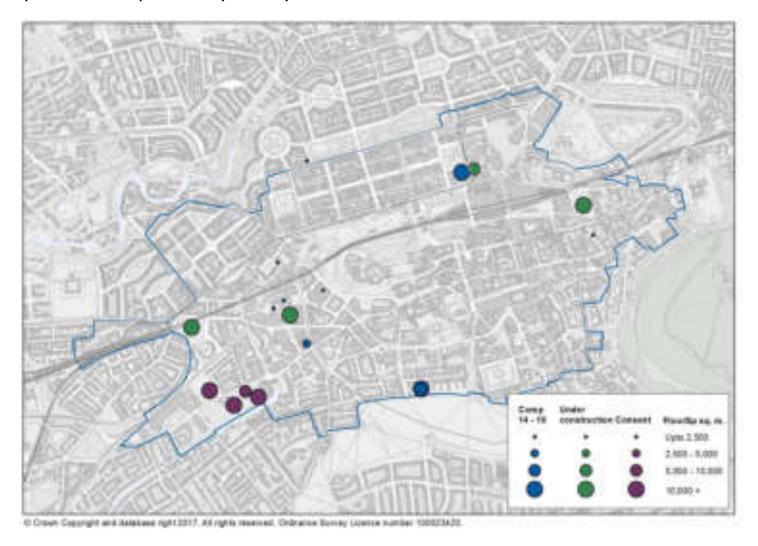


Table 5: Office pipeline

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	122158
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.

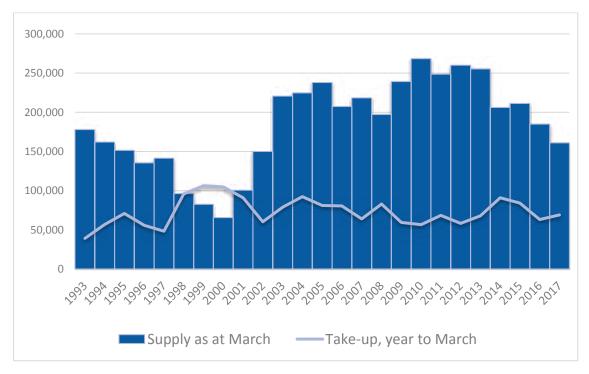
Offices can house more jobs and economic activity than in the past. However, that office space must be higher quality in terms of providing open-plan floorplates, capacity for flat screen information and communications technologies and desking systems, and comfort-cooling systems. Agile working with 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.

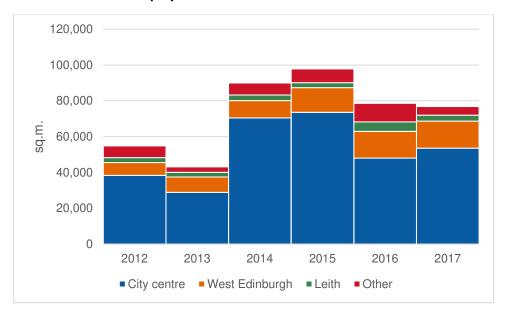
Chart 38: Take up of Office floorspace



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 Quartermile) 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



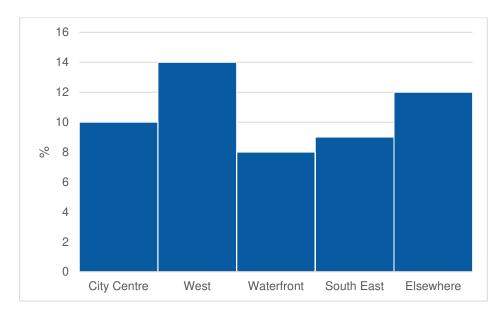
Source: Ryden Commercial Needs Study

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)

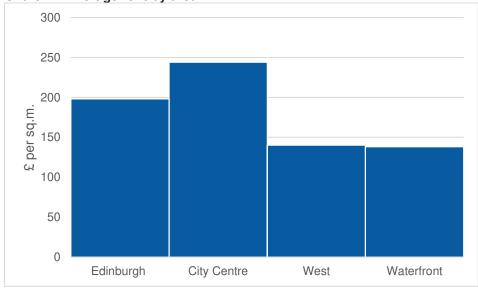
Chart 40: Vacancy rate by area



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



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.

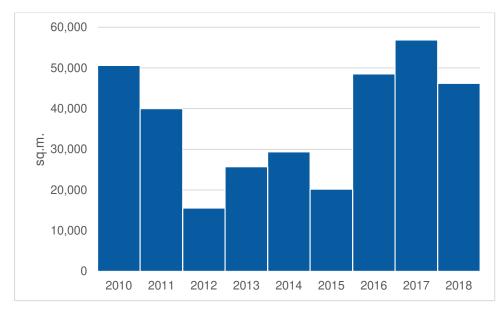


Chart 42: Edinburgh Occupier Demand (> 929 sq. m. (10,000sq.ft.))

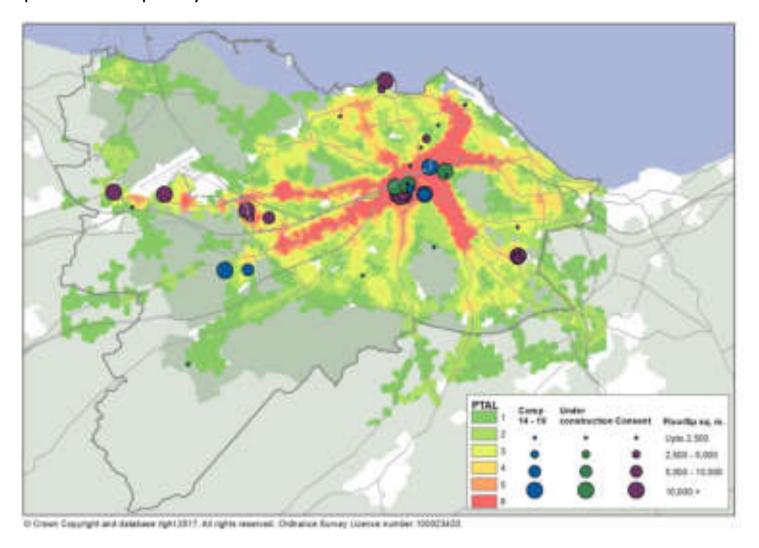
Source: Ryden

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

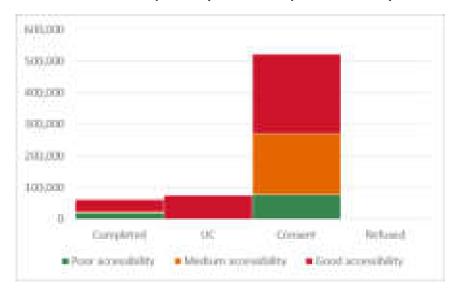


Details of the amount of floor space completed, under construction, consented and refused by accessibility level is detailed in table 6 and displayed graphically in chart 43. All of the office space in areas covered by Emp 1 are classified as good accessibility.

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

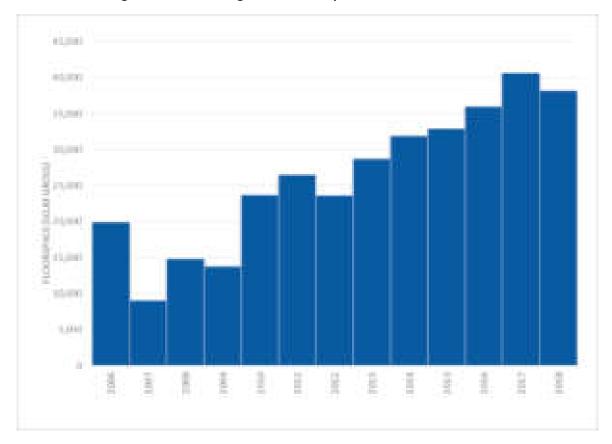
Chart 43: Office development by Public Transport Accessibility Level



Loss of Office Space

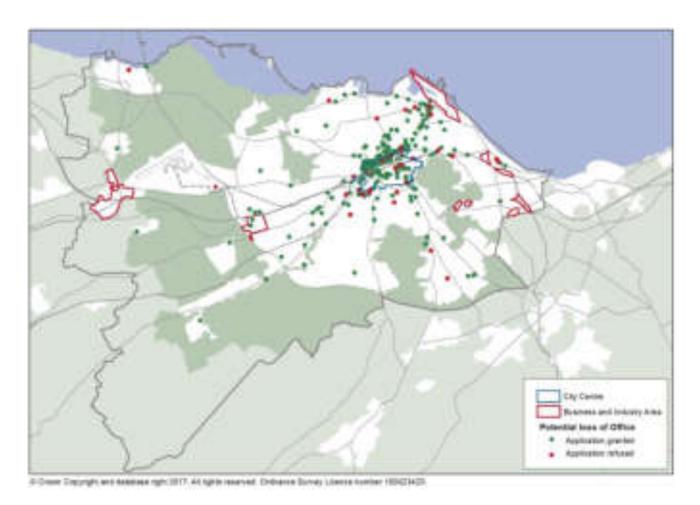
The number of planning applications consented involving the loss of office space has been steadily increasing over recent years. This is displayed in chart 44.

Chart 44: Planning consents involving loss of office space



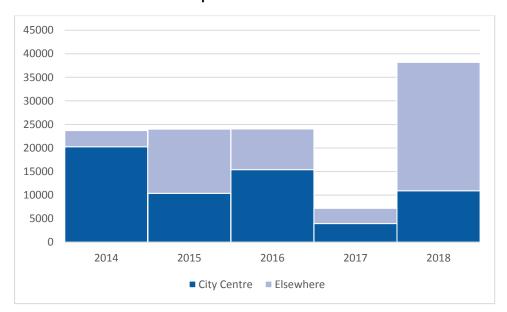
The locations of planning applications with the potential loss of office space is shown in map 23.

Map 23: Potential loss of office space

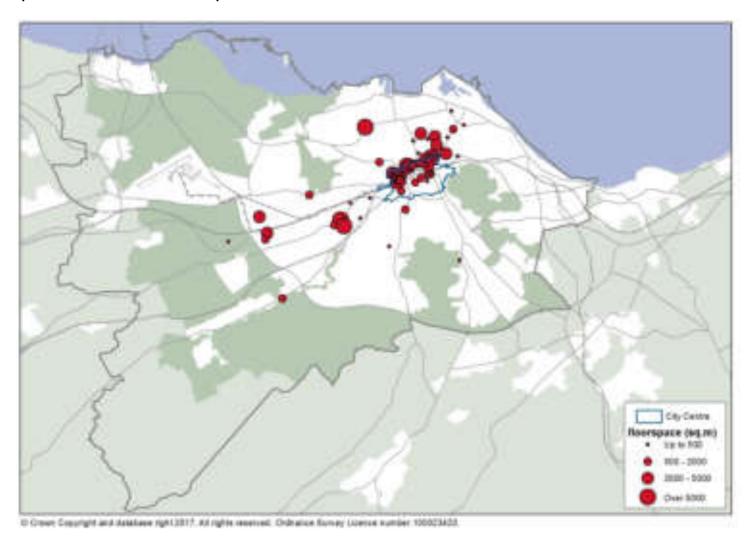


Over the last 5 years a total 117,060 sq. m. of office floorspace has been lost to other uses city wide. Chart 45 shows the losses per year. The location of these losses is shown on Maps 24 and 25.

Chart 45: Actual loss of office space 2014 - 2019



Map 24: Actual loss of office floor space 20014 - 2019



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

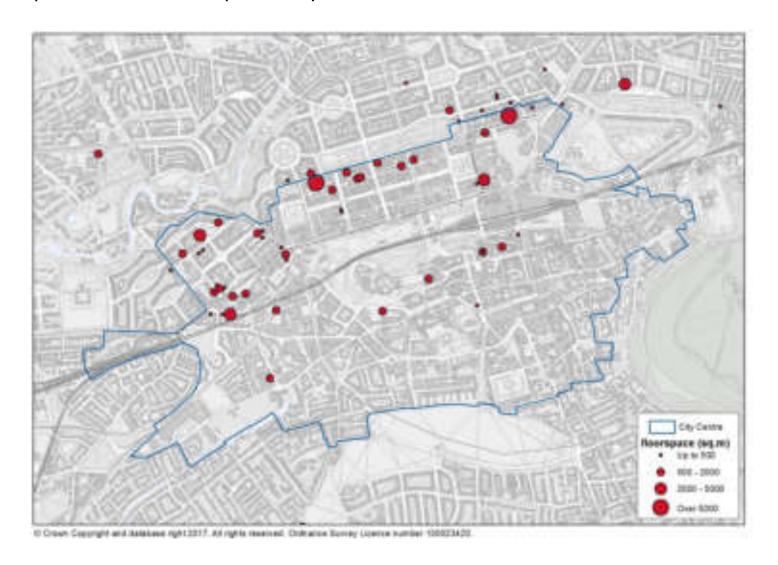
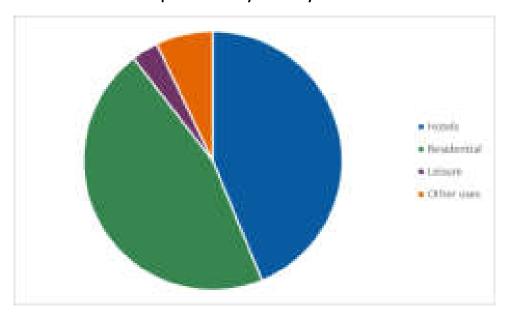


Chart 46 shoes the breakdown of new uses in the city centre in this period. Within the city centre the majority of office space lost in the last 5 years has been replaced by residential use and hotels.

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	1.00	1.00	1.00 (£198)	1.00	3.2 stars	1.00	1.00
	(100%)	(11.2%)	(100%)	9%	(100%)		(100%)	(100%)
City Centre	829,000	0.90	1.58	1.23 (£244)	1.73	3.4 stars	1.51	0.18
	(45%)	(10.1%)	(71%)	+12%	(78%)		(68%)	(8%)
West Edinburgh	365,000	1.24	0.8	0.71 (£140)	0.65	3.2 stars		3.00
	(20%)	(13.9%)	(18%)	-2%	(13%)			(60%)
Waterfront	96,000	0.76	1.00	0.70 (£138)		2.9 stars	0.58	1.00
	(5%)	(8.5%)	(5%)	+0%			(32%)	(5%)
South East	16,000 (1%)	0.84 (9.4%)	n/a	n/a	0.43 (15%)	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

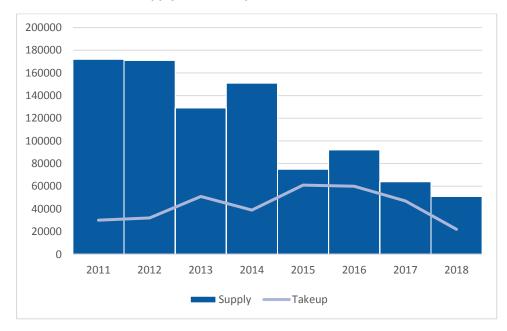


Chart 48: Industrial stock by star rating

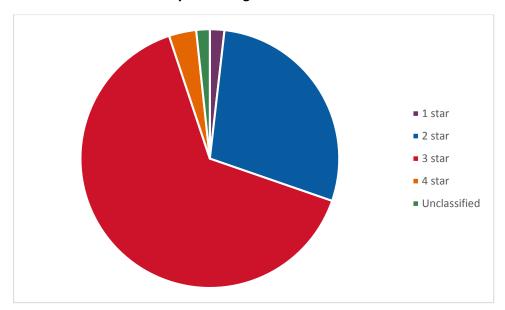


Chart 49: Units taken up since 2000 by size band

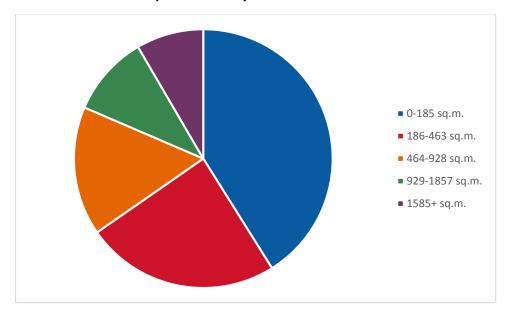
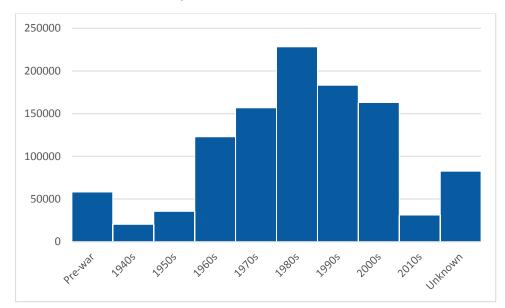
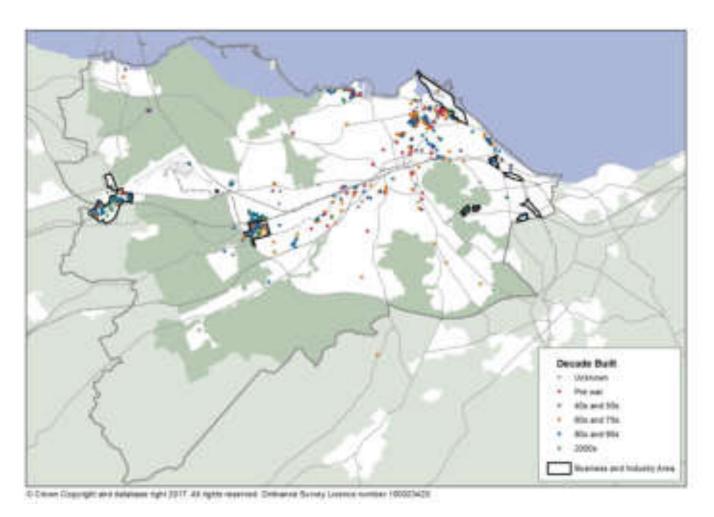


Chart 50: Industrial stock by decade built



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

Map 26: Industrial stock by age



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 floorpsace 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:

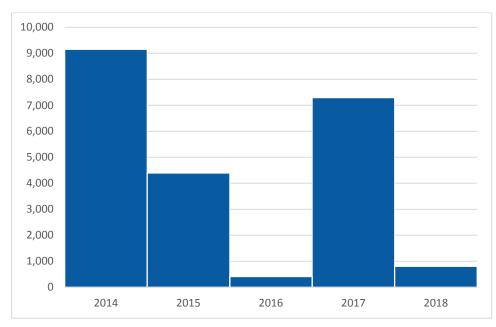
- 14 Bonnington Road Lane PPP minded to grant subject to legal agreement is the subject to a condition for the re-provision of 600 sq. m. Class 4 use
- 17 Fishwives Causeway 960 sq. m. commercial floorspace (Class 2 or 4 including healthcare, office, community space) but not flexible business floorspace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

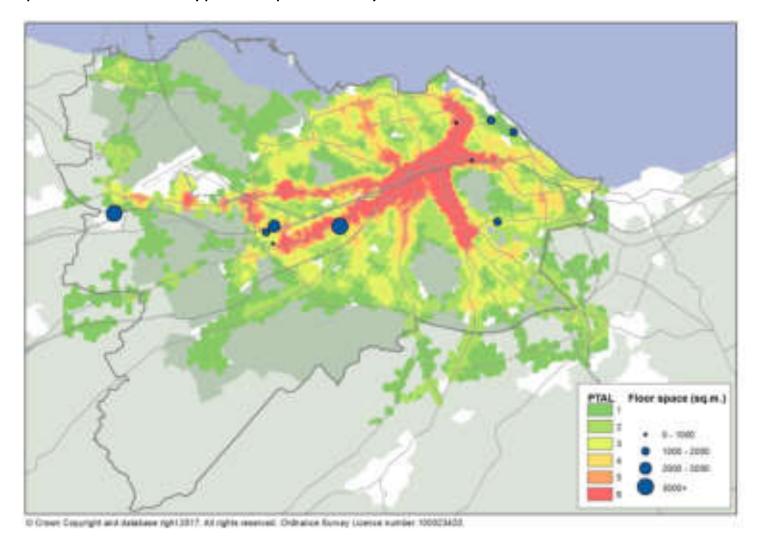
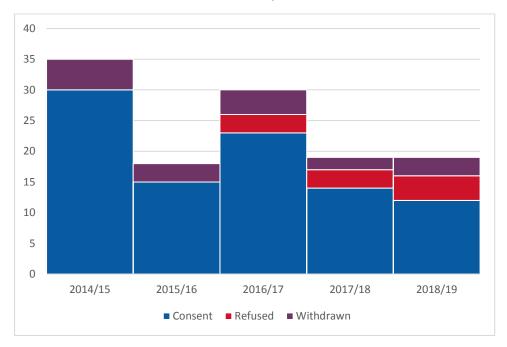


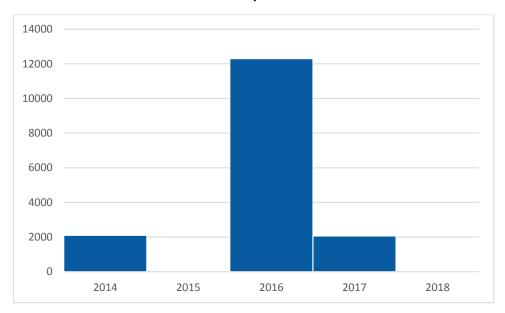
Chart 52 shows the number of planning applications decided for developments that would result in the loss of industrial floorspace. Few applications were refused. Not all applications are implemented. The actual loss of industrial floorspace that has occurred is shown on chart 53.

Chart 52: Potential loss of industrial floorspace



Source: City of Edinburgh Council planning service

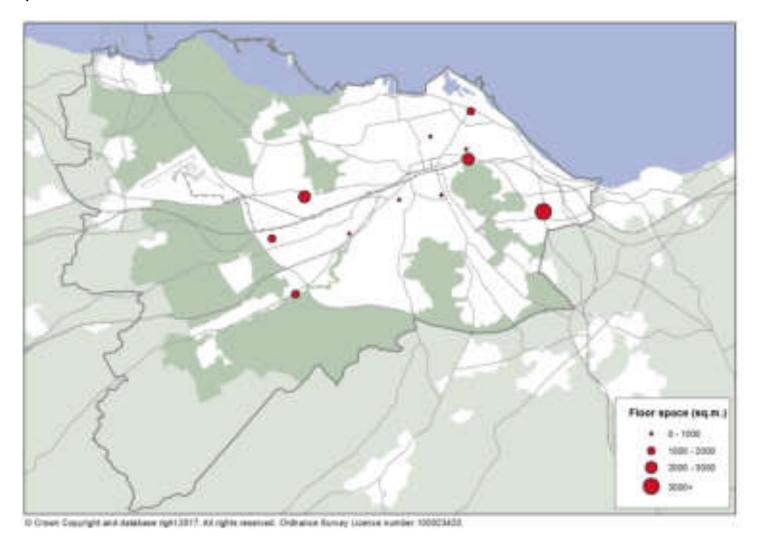
Chart 53: Actual loss of industrial floorspace



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



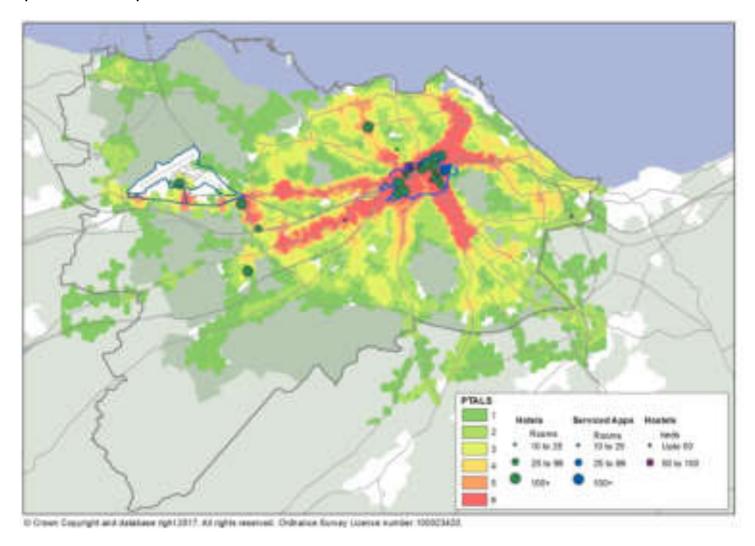
Hotels

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.

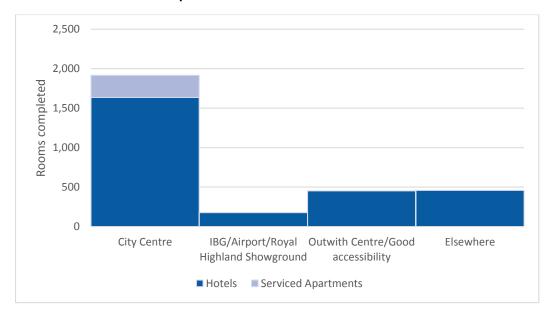
Map 29 shows the locations of new hotel development that has taken place since 2013 against public transport accessibility levels.

Map 29: Hotel development 2014 – 2019



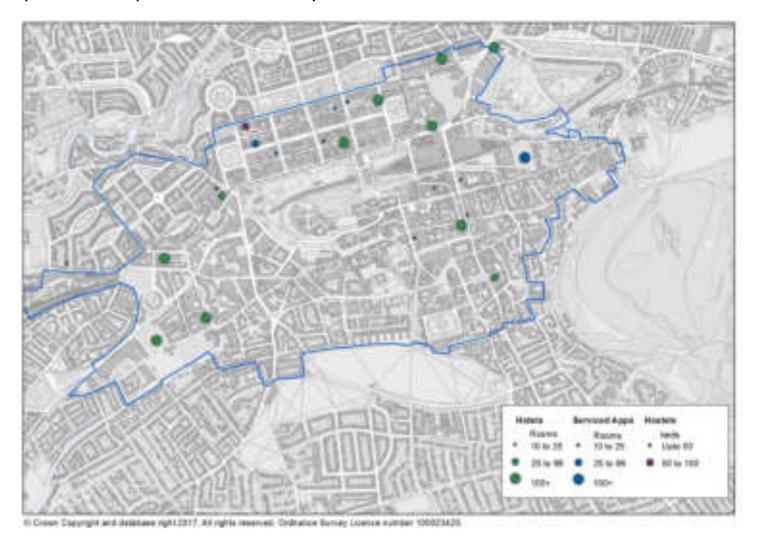
A locational analysis of rooms completed since 2014 is given in chart 54 below.

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



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

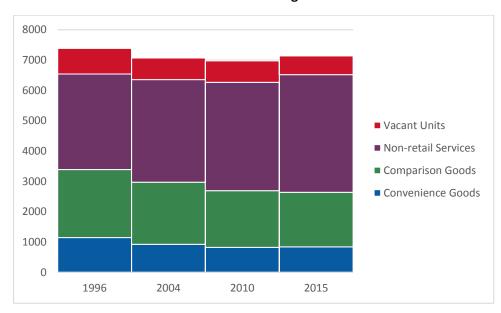
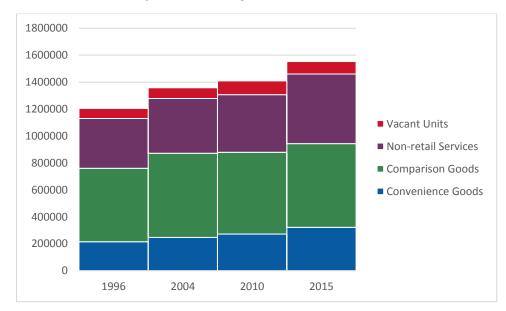


Chart 56 Retail floorspace in Edinburgh 1996 to 2015



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

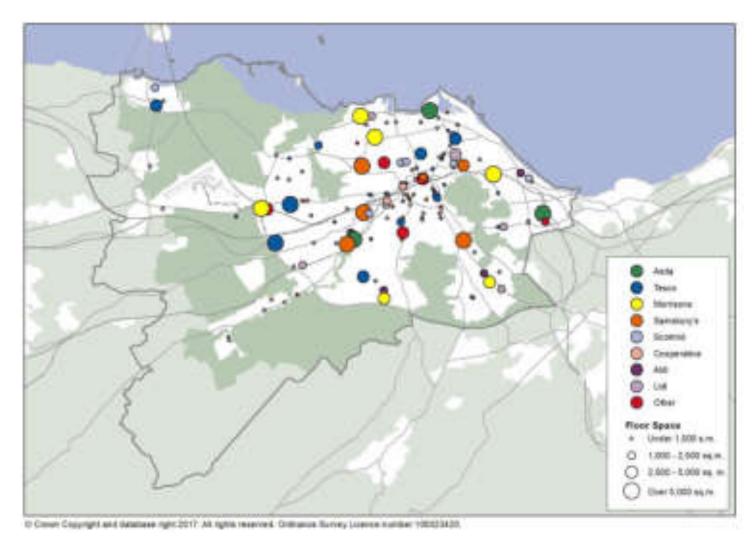


Chart 57 below shows the changes in the number of retail outlets by town centre. Morningside and Stockbridge have the greatest proportion of comparison goods stores whilst Tollcross has the greatest proportion of outlets in the non-retail services sector. At 7% of all retail outlets, Gorgie/Dalry and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

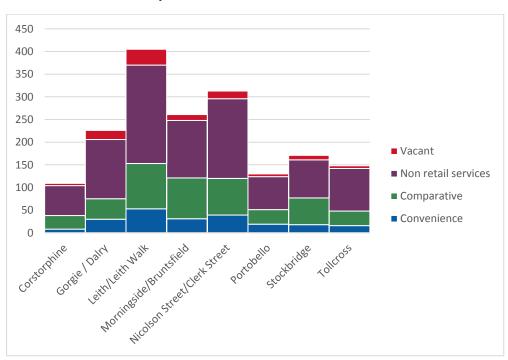


Chart 57. Retail outlets by town centre: 2019

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

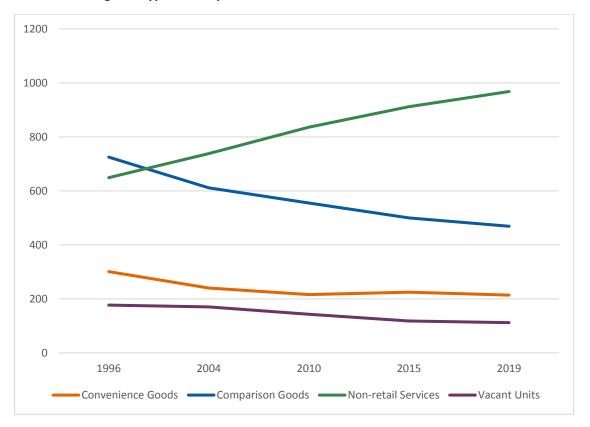
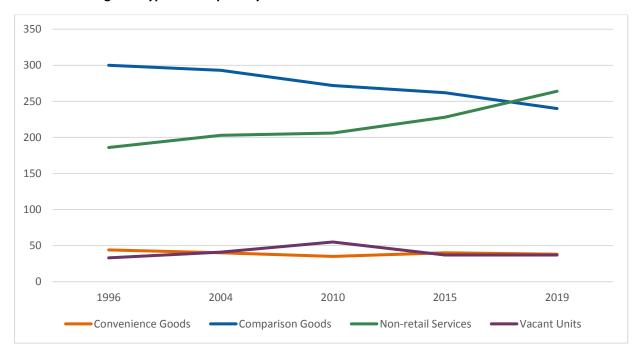


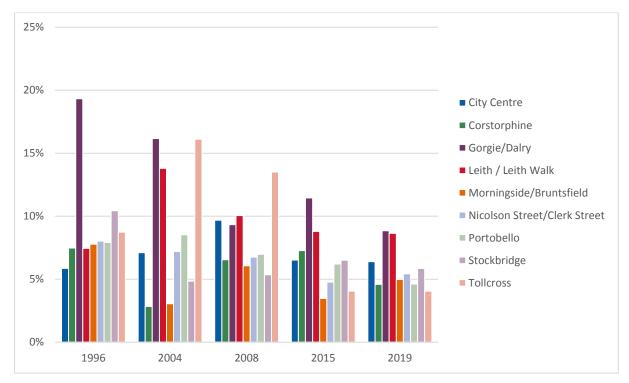
Chart 59: Changes in types of shop – City Centre



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.

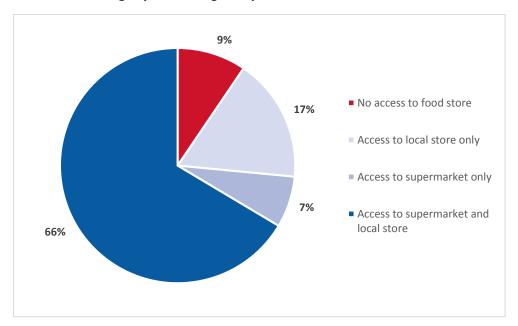
Chart 60: Change in vacant units by town centre



Access to grocery stores

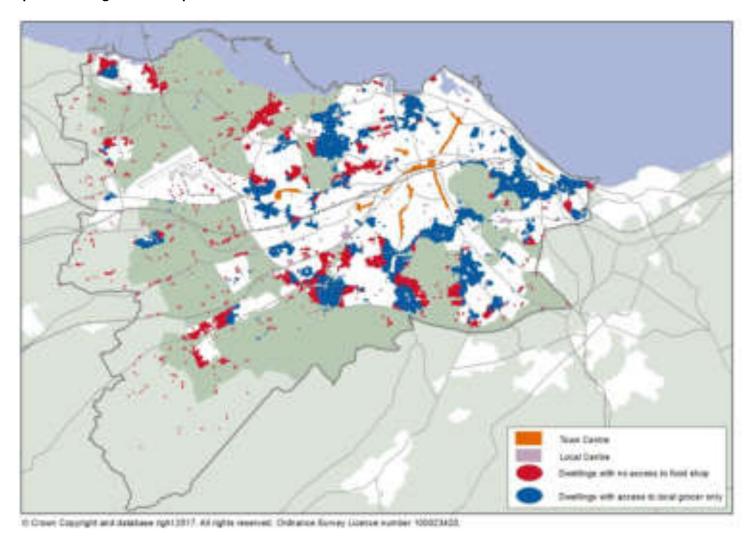
Less than 10 percent of dwellings in Edinburgh are further than 10 minute walk time from the nearest grocery store and nearly 75% are within 10 minutes walk time of a supermarket. Chart 61 breaks down the proportion of dwellings by access to food shops.

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



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

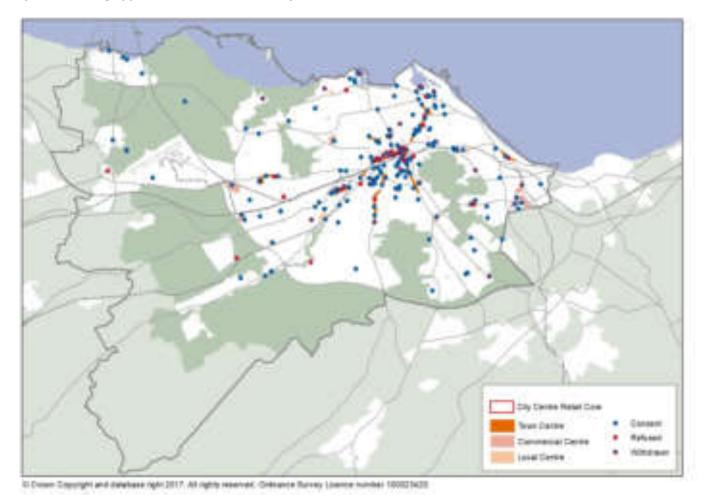
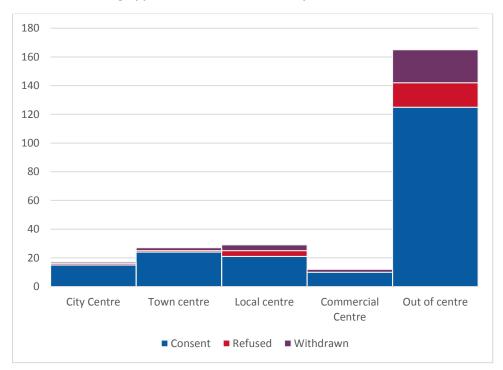
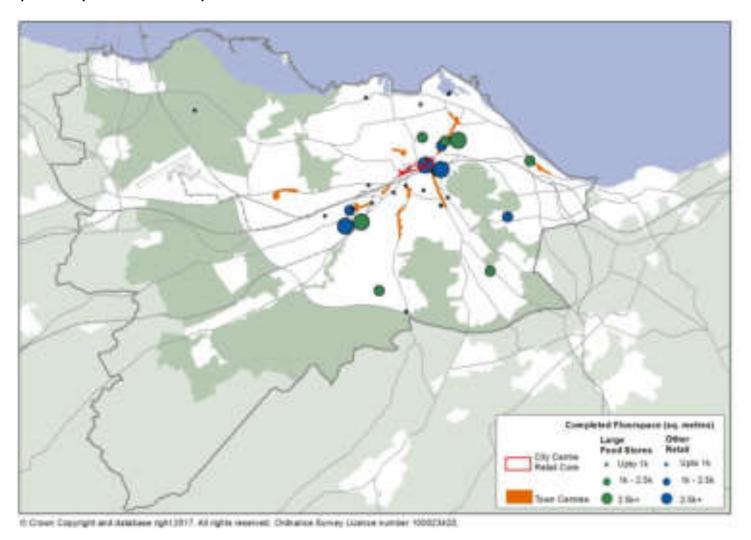


Chart 62: Planning applications for retail development 2014 to 2019



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

Map 34: Completed retail development 2014 – 2019

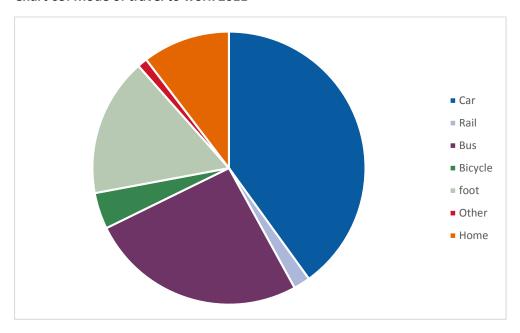


Transport

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.

20,000 18,000 16,000 14,000 12,000 10,000 8,000 6,000 4,000 2,000 0 scottish Border's South Lanakehire Clackmannanshire Morth Lanarteshire Glasgom City ■ Car ■ Bus ■ Rail ■ Other

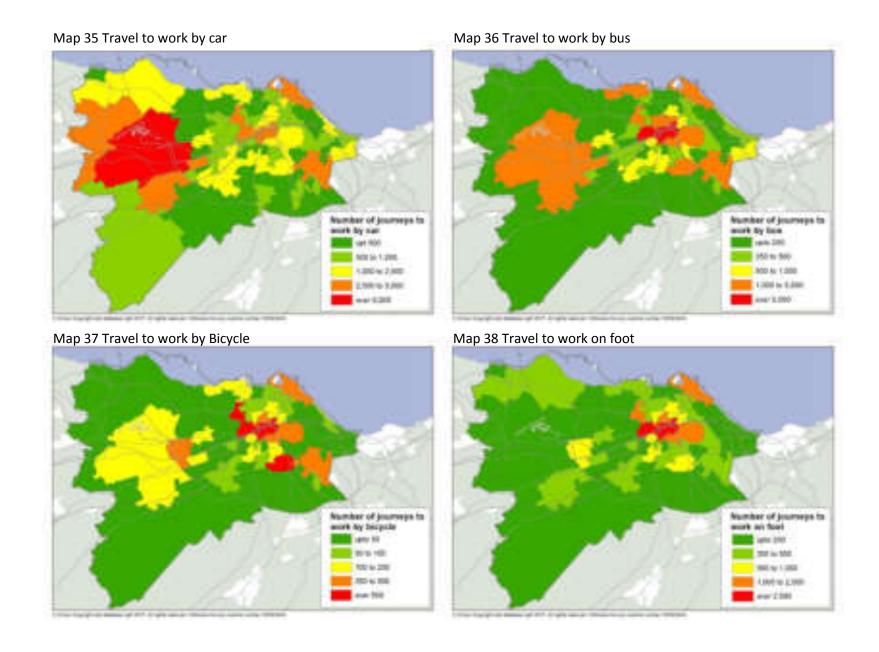
Chart 64: In-commuting to Edinburgh by local authority

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.



160,000 140,000 120,000 100,000 80,000 60,000 40,000 20,000 Car Bus Rail Cycle Walk Other Home ■ 2001 ■ 2011

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

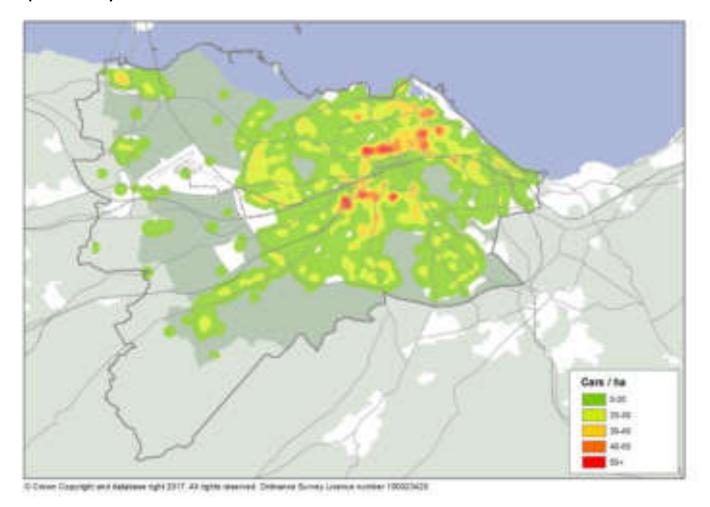
Source: 2001 and 2011 Census

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

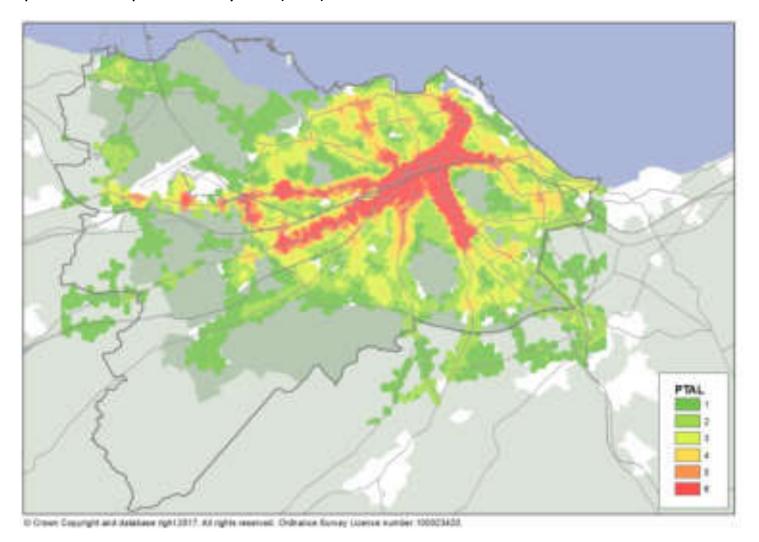


Source: 2011 Census

Public Transport Accessibility

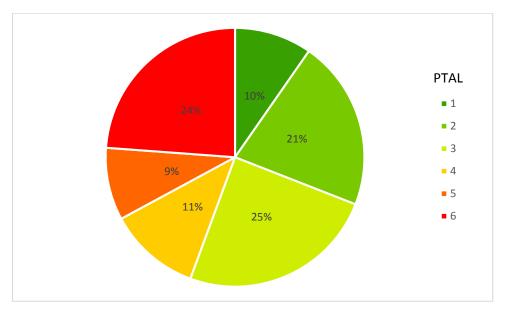
Edinburgh's population enjoys high level of public transport accessibility. The levels of public transport accessibility, measured in terms of the number and frequency of different services available is shown in map40 below. The PTAL measure gives an overall, relative measure of accessibility and ranks 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)



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

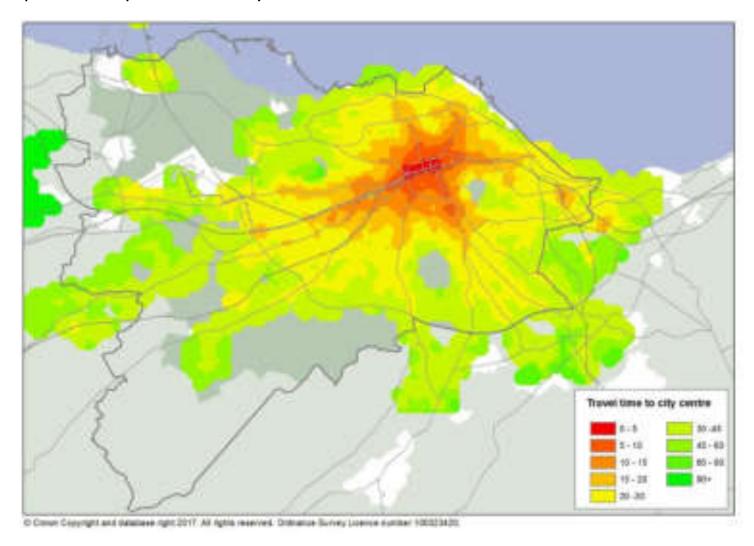


Source: NRS Small area population estimates 2018

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



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

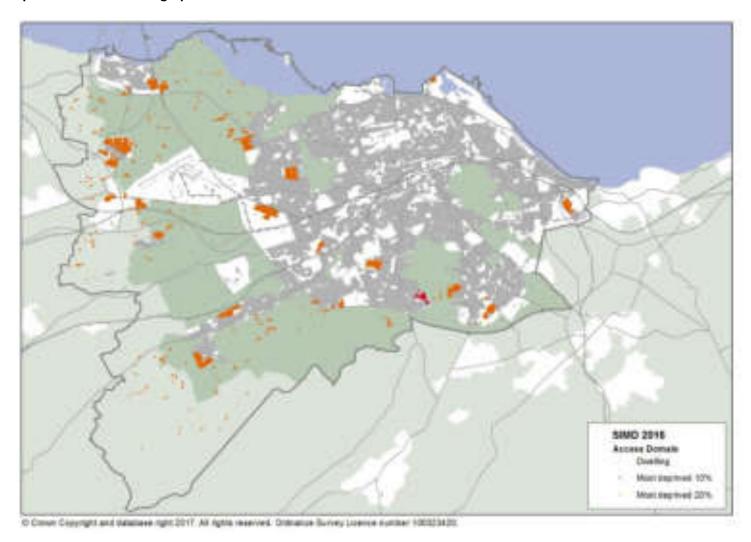
Map 42: Stations within one hour journey time of Edinburgh city centre



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



Source: 2016 Scottish Index of Multiple Deprivation

Environment

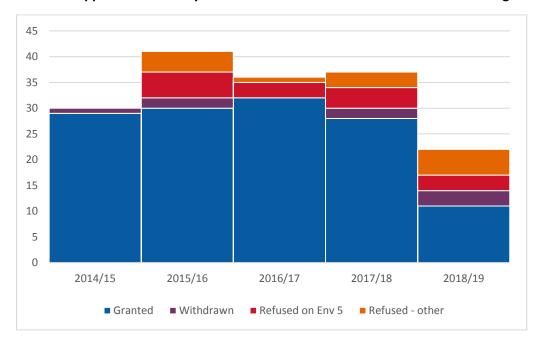
Built Environment

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

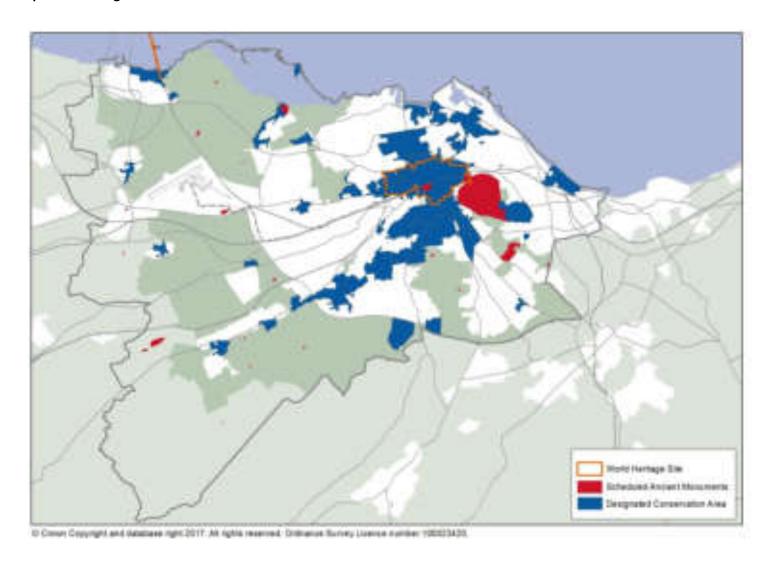


World Heritage Sites and Scheduled Ancient Monument

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

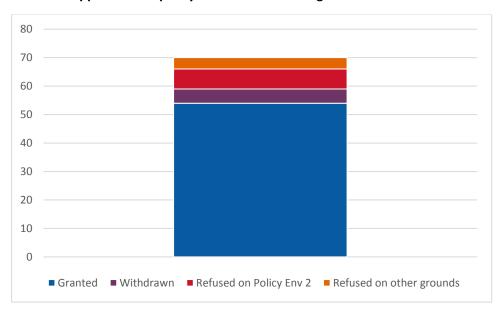


Listed Buildings

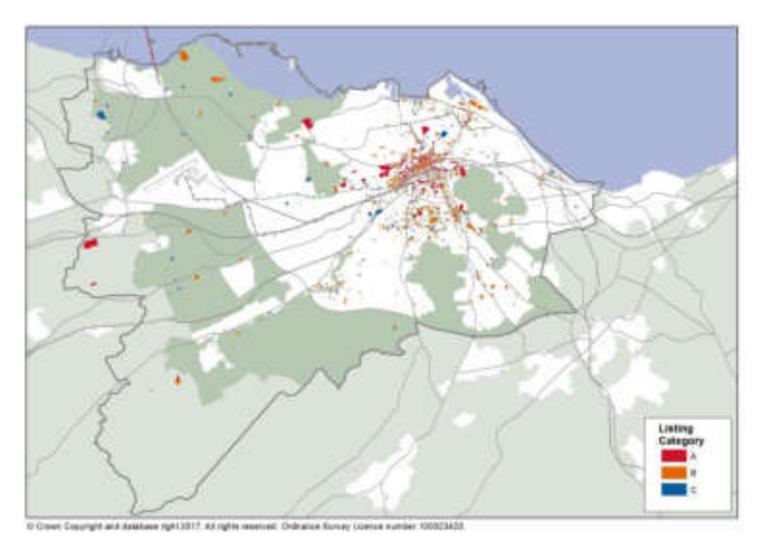
Edinburgh has the third largest concentration of listed buildings in the UK after London and Bath. In 2019, there were 4,258 listed items in Edinburgh. Listed items commonly account for several separate buildings in a single listing. Of, the 4,258 listed items, 733 are categorised as 'A' listed, 2,363 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.

35
30
25
20
15
10
A listed
B listed
C listed
Unlisted

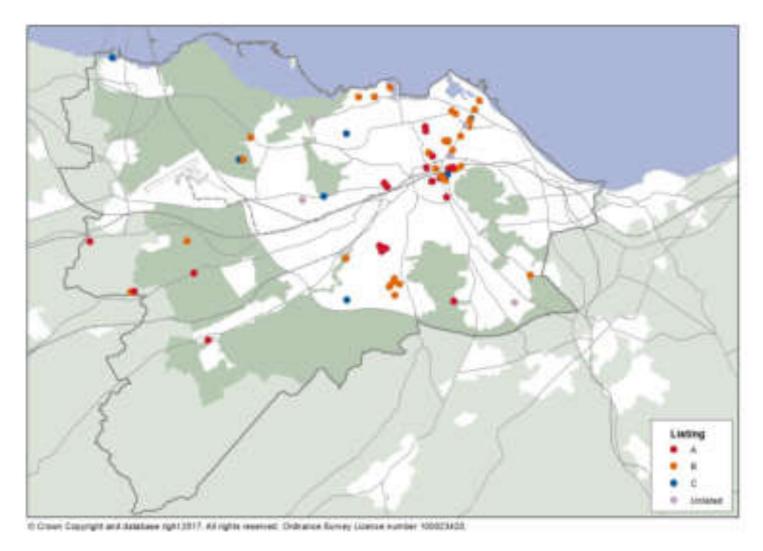
Good
Fair Poor
Very Poor
Ruinous

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.

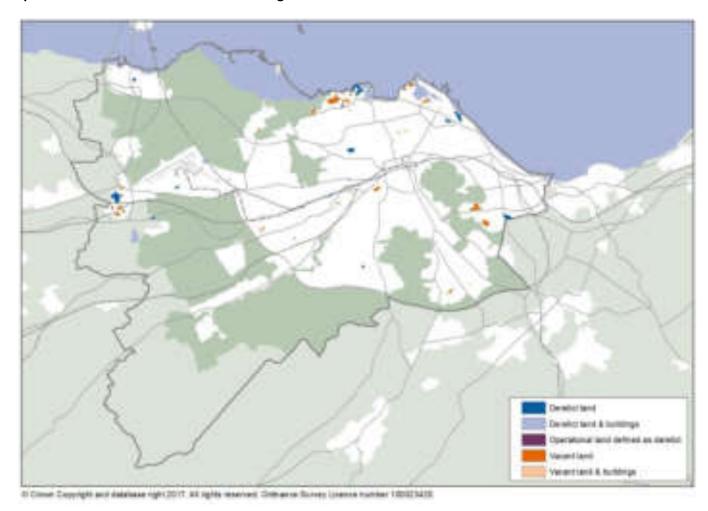
Map 45: Buildings at risk



Source: Historic Environment Scotland

Vacant and Derelict Land

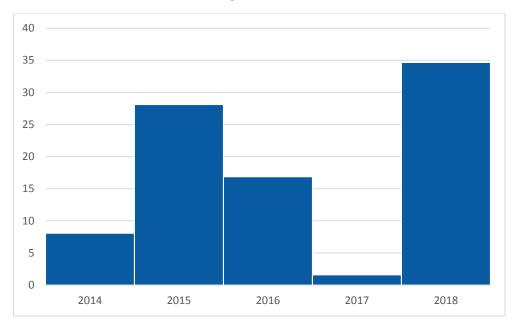
Map 46: Vacant and derelict land and buildings 2018



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.

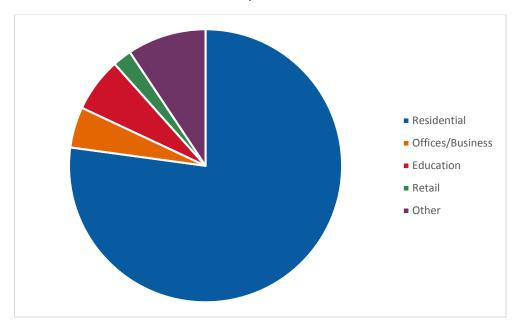
Chart 70: Vacant/derelict land brought back into use 2014 - 2018



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.

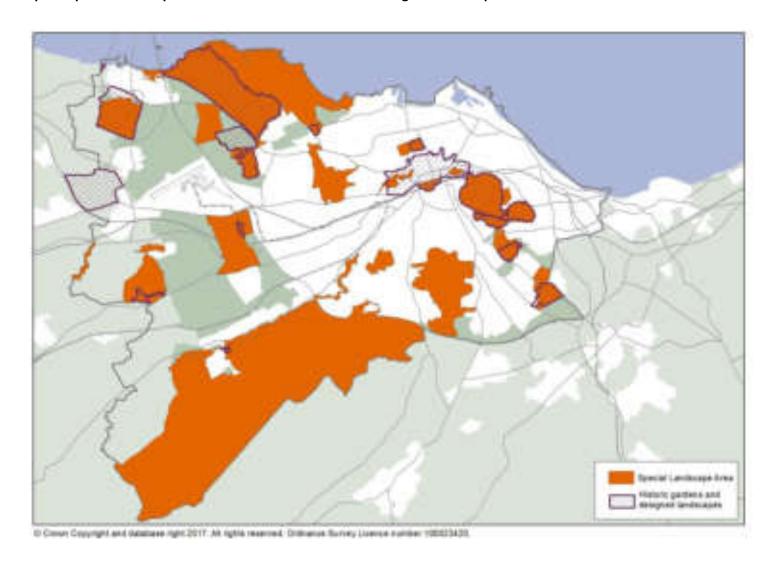
Sites of international and national importance

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.

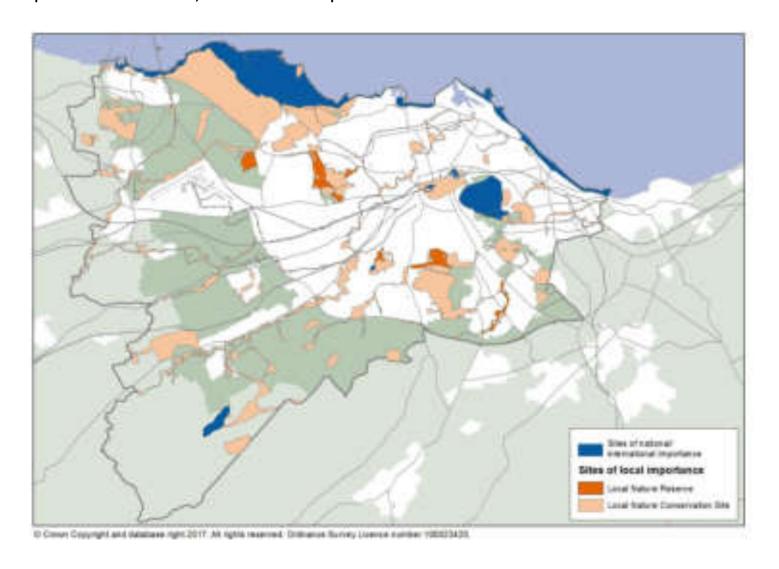
Sites of Local Importance

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



Map 48: Sites of international, national and local importance

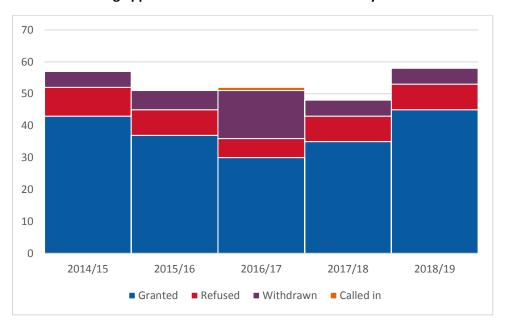


Development in the Greenbelt and Countryside

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

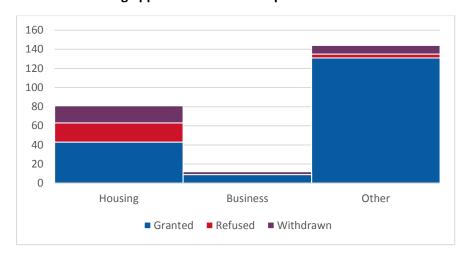
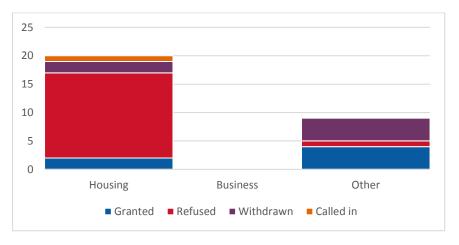


Chart 74: Planning application decided 1 April 2014 to 31 March 2019: Major developments



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).

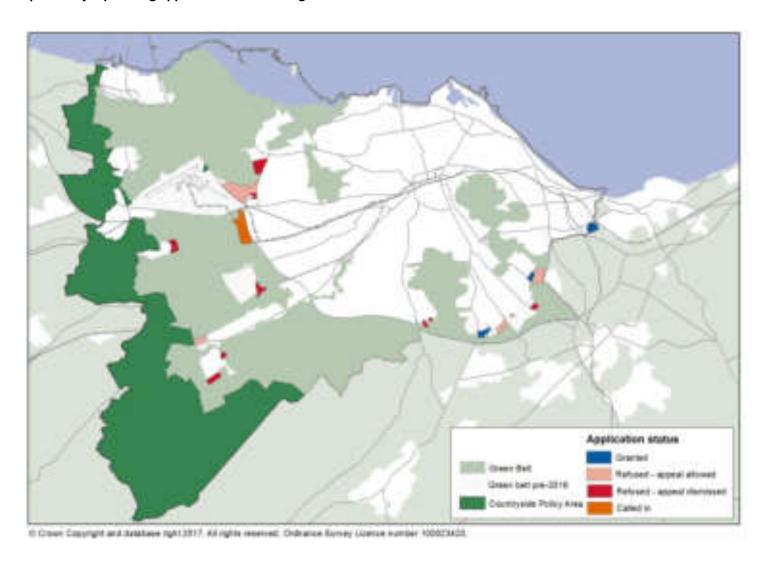
Appeals were dismissed at Cammo, Mansfield Road, Ratho Park Road, Freelands Road, Frogston Road West, Craigs Road, Drum Street, Harlaw Gait, Winton Gardens and Riccarton Mains Road.

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



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.

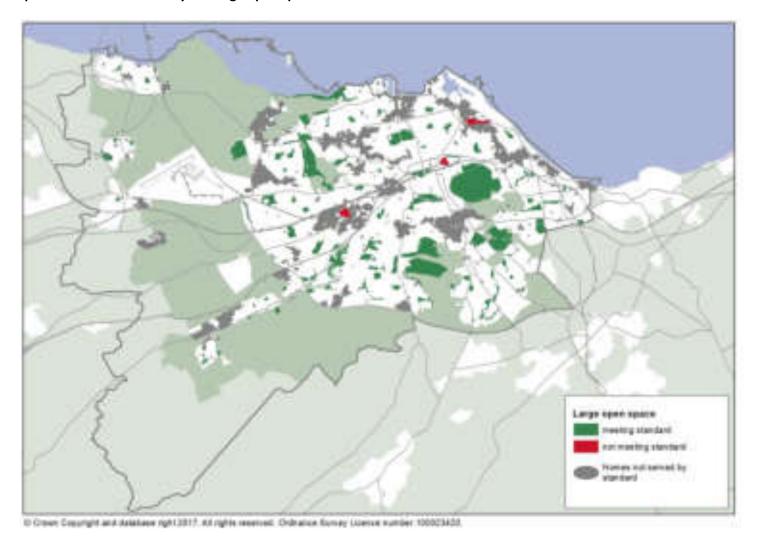
The open space strategy also sets a requirement for equipped play areas. All homes should have access to at least one of the following:

- 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

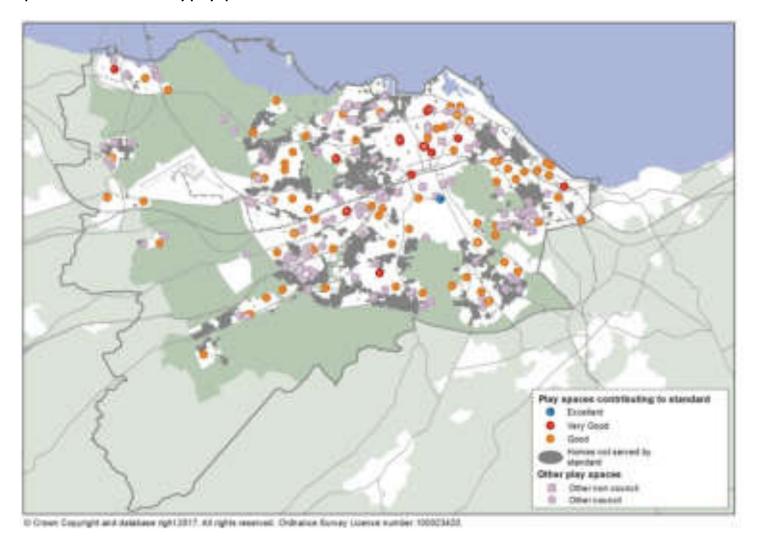
Map 51 below shows homes that are not currently served by the standard.

Edinburgh's green network is shown on map 52.

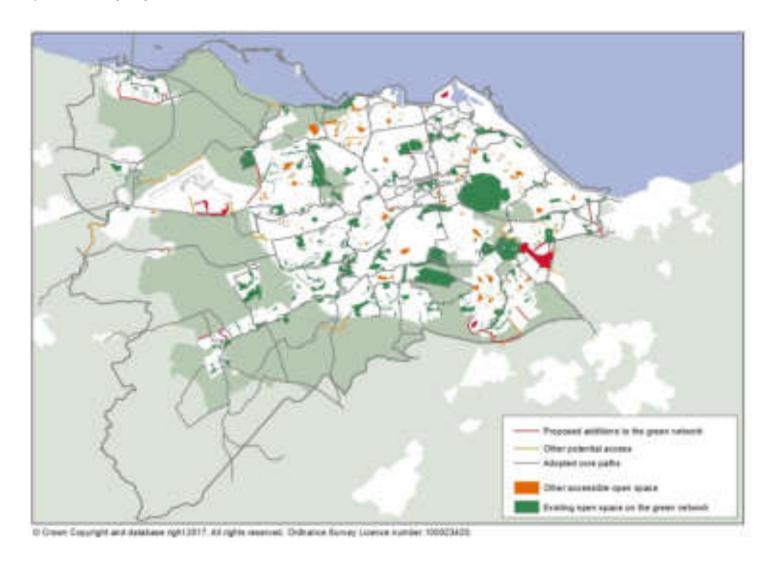
Map 50: Homes not served by the large open space standard



Map 51: Homes not served by play space standard



Map 52: Edinburgh's green network



Air quality

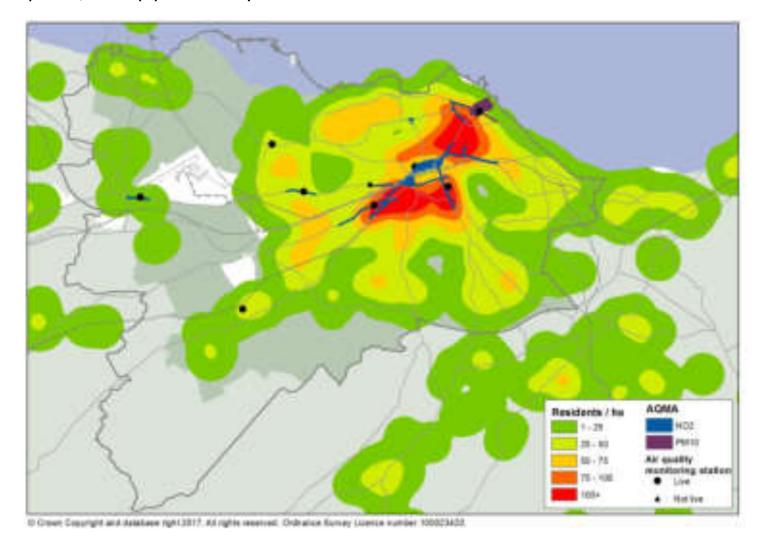
There are currently 6 Air Quality Management Areas (AQMAs) in Edinburgh, 5 for NO_2 pollution and one for PM_{10} pollution. Table 7 below lists the AQMAs along with the dates that they were declared and, in some cases, amended to include extensions or breaches of other averaging periods.

Table 7: Air Quality Management Areas in Edinburgh

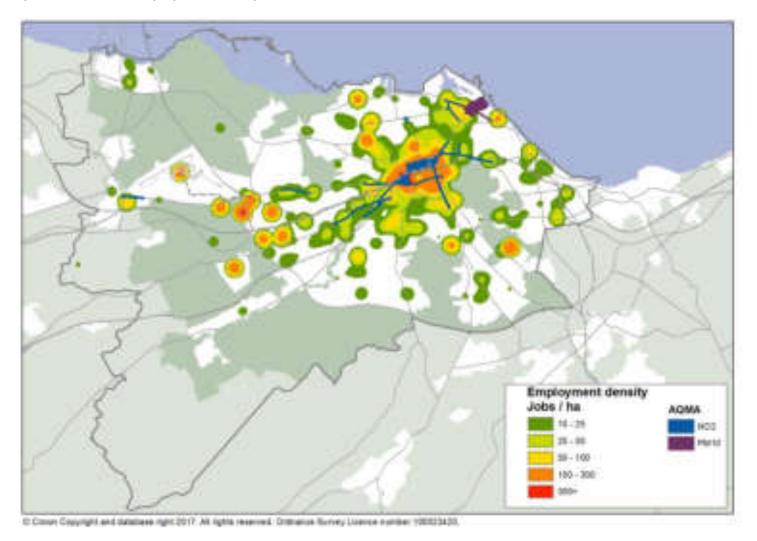
AQMA	Pollutant	Source of Pollutant	Declared/Amended
City Centre	NO ₂	Traffic	31/12/2000
			09/03/2009
			26/04/2013
			07/09/2015
			31/12/2006
St. John's Road	NO ₂	Traffic	09/03/2009
Great Junction Street	NO ₂	Traffic	09/03/2009
			26/04/2013
Glasgow Road	NO ₂	Traffic	26/04/2013
Inverleith Row	NO ₂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

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

Map 53: AQMAs and population density



Map 54: AQMAs and employment density



Nitrogen dioxide (NO₂) emissions

In 2017, NO_2 was monitored at 7 permanent automatic (continuous) monitoring stations. Table 8 below lists the annual average NO_2 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 40vg/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

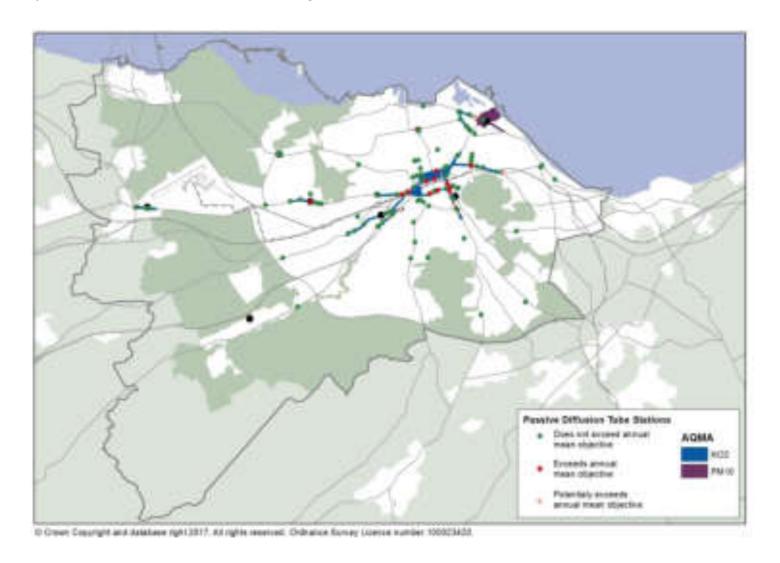
^{*} Insufficient data captured

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



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

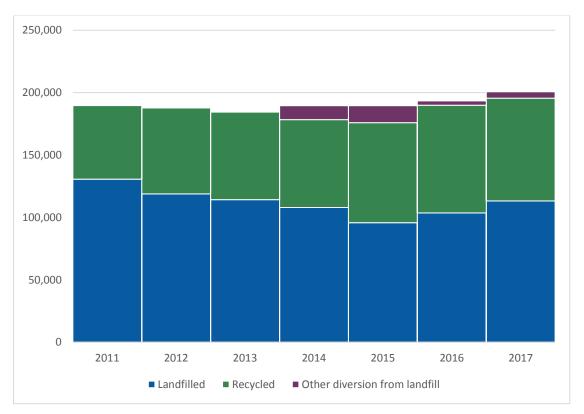


Chart 76: Business waste generated 2011 to 2016

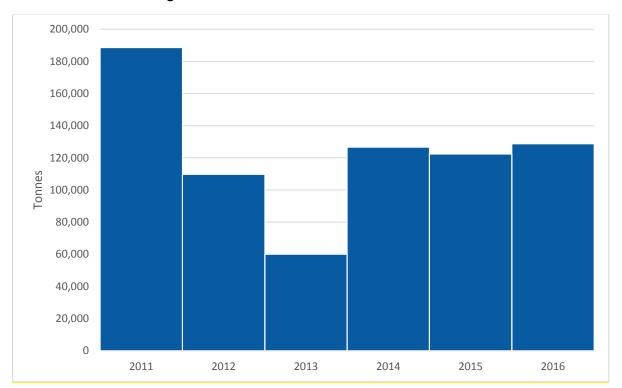
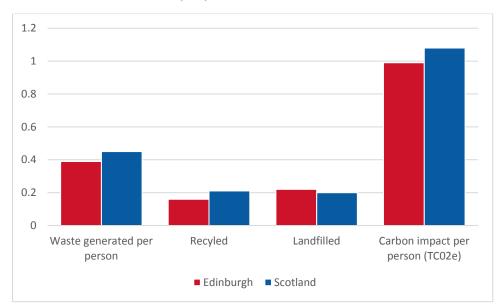


Chart 77: Household waste per person 2017 (tonnes)



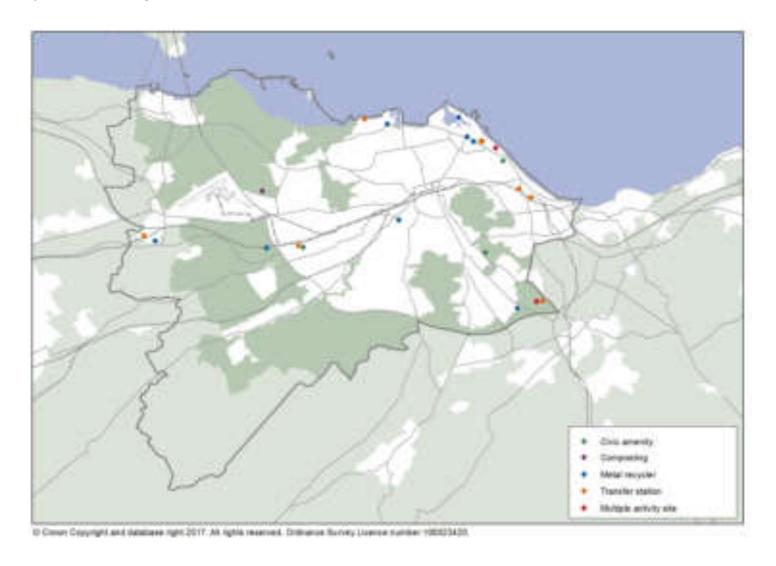
Waste management facilities

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



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.

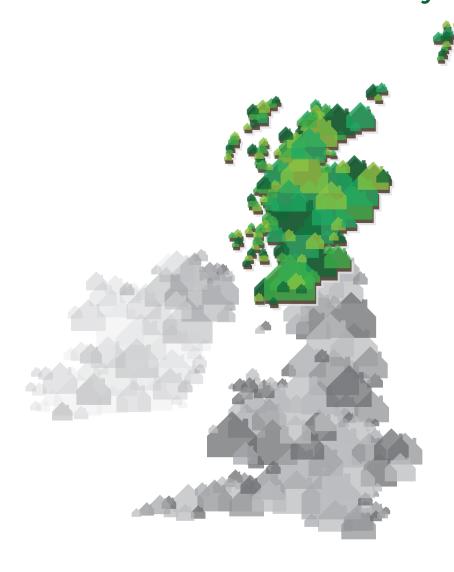
Minerals

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.

Economic Impact of Self-Catering Sector to the Scottish Economy



produced by



for Association of Scotland's Self Caterers and the Professional Association of Self-Caterers

August 2021







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This economic impact assessment was sponsored by SuperControl

Executive Summary

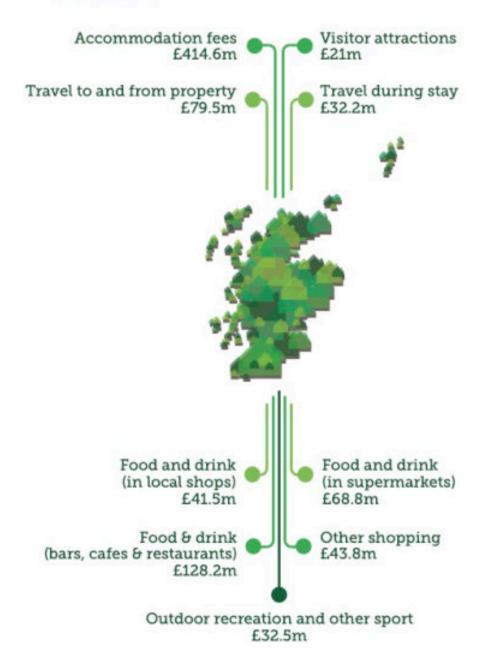


- 17,794 properties
- 2.4 million visitor nights per year
- £867.1 million total visitor spend
- Supports 23,979 FTE jobs
- £672.3 million Contribution to the Scottish economy

Areas with the greatest number of properties 1. Highland & Western Isles (5,580)

- 2. Dunbartonshire / Argyll & Bute (2,343)
- 3. Lothian (1,870)
- 4. Tayside (1,432)
- 5. Dumfries & Galloway (1,386)

Gross Visitor Spend by Item (Scotland)



2 Introduction

Since 2010 tourism has been the fastest growing sector in the UK in employment terms¹. By 2025, Britain aims to have a tourism industry worth over £257bn, supporting 3.8 million jobs. This is equivalent to almost 10% of UK GDP and around 11% of the total UK jobs².

The sector is predicted to grow at an annual rate of 3.8% through to 2025 – faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail³.

The Deloitte *Tourism: Jobs and Growth Report*⁴ found that the marginal revenue required to create a job in UK tourism is estimated to be around £54,000. For every 1% increase in total expenditure in UK tourism, it might be expected that full-time equivalent employment will increase by 0.9%.

Self-catering is an important component of the tourism industry. In order to fully understand its contribution, the Association of Scotland's Self-Caterers (ASSC) and the Professional Association of Self-Caterers UK (PASC UK) commissioned Frontline Consultants (Frontline) to carry out an independent Economic Impact Assessment of the self-catering industry in the UK. This includes an overall UK-wide report, providing headline findings for the UK and its four countries; plus detailed individual country reports for England, Scotland, Wales and Northern Ireland.

This report is for Scotland.

2.1 Research objectives

The objectives of the economic impact assessment were to:

- assess expenditure by property-owners and managers, and visitors in the local economy
- provide an independent, evidence-based, understanding of the direct and indirect economic impact/contribution of the self-catering sector in Scotland
- estimate the full-time equivalent jobs supported by the sector
- assess the impact of Covid-19 presenting feedback from 2019 and 2020

2.2 Methodology

The UK self-catering sector is diverse and made up of a number of small businesses. It is inherently difficult to gather a complete data set on the sector. In order to develop the economic model an 8-month data gathering exercise was undertaken to understand the number and make-up of self-catering properties across the UK.

The **number of self-catering properties** in each country was determined as follows:

- England and Wales VOA registrations
- Scotland NDR registrations
- Northern Ireland Local Authority registrations

¹ https://www.visitbritain.org/visitor-economy-facts

² https://www.visitbritain.org/visitor-economy-facts

https://www.visitbritain.org/visitor-economy-facts

⁴https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/Tourism Jobs and Growth 2013.pdf

The **make-up of those self-catering properties** was based on a review of 1,000,724 transaction records provided to us by SuperControl to understand:

- property size
- occupancy levels for each property on each day of the year

The model includes over a million separate economic impact calculations, which were then reaggregated to produce as accurate as possible an estimate of the true economic impact of the sector.

This is a comprehensive approach that avoids any double counting and uses only verified data.

While these datasets are not 100% of the UK market, they are substantial, and provide the most comprehensive assessment of the sector to date. Findings therefore provide a conservative estimate of the scale of the self-catering sector.

3 Operators Survey

This section provides evidence from an e-survey of self-catering operators across Scotland. The survey was open from February-April 2021 and distributed by key partners.

3.1 Composition of the overall Scotland self-catering industry

Based on the information provided by NDR registrations and data provided by SuperControl, in 2020 there were 17,794 self-catering properties operating in Scotland. The majority of these were three bedroom or less properties. Table 2.1 provides a breakdown of these by region and number of bedrooms.

Table 2.1: Composition of the industry

		Total nu	mber of be	drooms		Total
Location	0-1	2	3	4	5+	Number of
						properties
Ayrshire	16%	50%	16%	10%	9%	840
Central Scotland	14%	34%	26%	14%	11%	621
Dumfries & Galloway	13%	34%	34%	9%	11%	1,386
Dunbartonshire / Argyll & Bute	14%	32%	27%	13%	14%	2,343
Fife	8%	34%	31%	11%	16%	704
Glasgow City	22%	34%	22%	13%	10%	200
Grampian	17%	39%	28%	10%	7%	1,153
Highland & Western Isles	17%	39%	27%	9%	8%	5,580
Lanarkshire	11%	61%	11%	11%	6%	123
Lothian	20%	38%	28%	5%	9%	1,870
Orkney & Shetland	7%	57%	29%	0%	7%	672
Renfrewshire	30%	30%	20%	0%	20%	78
Scottish Borders	14%	38%	23%	13%	12%	792
Tayside	20%	20%	20%	20%	20%	1,432
Total	16%	37%	27%	10%	11%	17,794

(Source: ASSC⁵)

3.2 Sampling methodology and geographic locations

Self-catering properties across Scotland were invited to participate in the research. This was done by the various sponsor groups reaching out to operators, encouraging them to complete an e-survey.

The Steering Group and Frontline came together at various stages throughout the project to review the response rates, identifying which geographic areas were under-represented and those were targeted accordingly.

945 operators running a total of **2,173** properties across Scotland responded to the survey, giving a 99% confidence +/- 3% margin of error. This means that there is a 99% probability that the sample accurately reflects the wider population and is therefore representative of the self-catering sector in Scotland.

⁵ ASSC provided data on the total number of self-catering properties in Scotland based on units on non-domestic business rates (NDR). The breakdown by number of bedrooms is based on data provided by SuperControl

The geographic location of the surveyed self-catering operators was broadly representative of the sector as a whole with most regions having a minimum of 10% response rate with the exception of Glasgow City, Lothian and Renfrewshire.

Table 2.2: Location of surveyed self-catering operators

	Surveyed	operators	Total number of	Percentage of
Location	Number of operators	Number of properties ⁶	properties across Scotland	properties consulted
Ayrshire	48	110	840	13%
Central Scotland	27	62	621	10%
Dumfries & Galloway	58	133	1,386	10%
Dunbartonshire / Argyll & Bute	103	237	2,343	10%
Fife	49	113	704	16%
Glasgow City	7	16	200	8%
Grampian	56	129	1,153	11%
Highland & Western Isles	239	550	5,580	10%
Lanarkshire	10	23	123	19%
Lothian	57	129	1,870	7%
Orkney & Shetland	25	58	672	10%
Renfrewshire	2	5	78	6%
Scottish Borders	43	99	792	13%
Tayside	205	472	1,432	33%
Unknown	16	37	-	
Total	945	2,173	17,794	12%

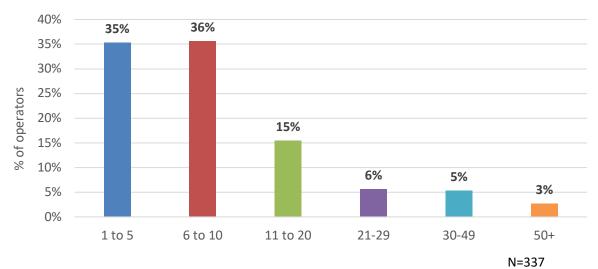
Source: Frontline Self-Catering Operator Survey, 2021

3.3 Property summary

Operators ran or owned, on average, 2.3 properties. Properties owned, ranged from one to 60 with 60% owning just one.

Over two-thirds (71%) of properties have capacity for up to ten people.

Figure 2.1: Number of Guests



⁶ We only had a response from 329 operators on number of properties owned/run and have therefore used the average (2.3) and factored this up to total operators responding

3.4 Length of season and occupancy rates

In 2019 the majority of self-catering properties (93%, 2027) operated all year round. In 2020 this reduced, with only 75% (142) operating all year; this was due to Covid-19 lockdown restrictions.

Surveyed operators were asked what they considered to be their peak, high, mid and low seasons during a standard operating year. Generally their responses were:

- peak = July, August, Christmas and New Year
- high = May, June and September
- mid = April and October
- low = January, February, March, November and December

Operators were also asked to report their typical occupancy rates for the following:

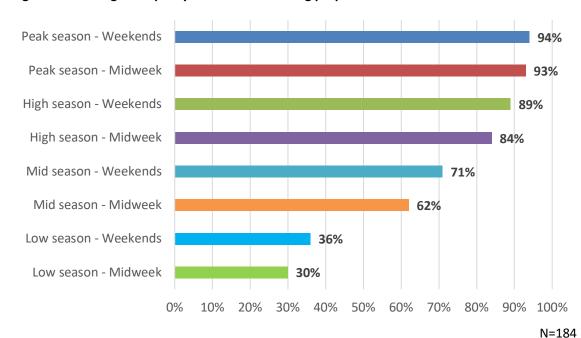


Figure 2.2: Average occupancy rates of self-catering properties

At peak, occupancy levels reached an average of 94% at the weekend and 93% midweek. During high season occupancy was 89% at the weekend and 84% during the week. Mid-season occupancy levels were 71% at the weekend and 62% mid-week with low season dropping to 36% at the weekend and 30% mid-week.

Operators were also asked about their average weekly occupancy level between 3 July and 30 September 2020 and the same period in 2019.

Table 2.4: Average weekly occupancy level between 3 July and 30 September (2019 and 2020)

	Under 10% 11-25% 26-50%		51-75%		76-90%		91% or above					
	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
Scotland	12%	1%	7%	1%	14%	3%	18%	9%	19%	25%	30%	61%
Scotianu	(23)	(2)	(13)	(2)	(26)	(5)	(34)	(16)	(37)	(44)	(58)	(110)

 $^{^7}$ The response rate is lower for this question as many respondents opted for us to use the data held by SuperControl. AS1006-00 Scotland

The same was asked for the period of the 1 October and 30 November 2020 and 2019 as shown below.

Table 2.5: Average weekly occupancy level between 1 October and 30 November (2019 and 2020)

	Unde	r 10%	11-2	25%	26-	50%	51-7	75%	76-9	90%	91% or	above
	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
Scotland	38%	3%	17%	6%	23%	22%	10%	30%	7%	23%	6%	15%
Scotiand	(72)	(6)	(32)	(11)	(44)	(40)	(19)	(54)	(13)	(41)	(11)	(26)

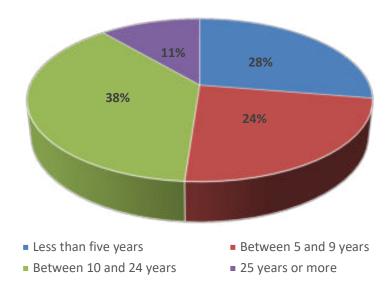
Occupancy levels provided by operators completing the survey were significantly higher than the occupancy levels derived from SuperControl data. The SuperControl data was based on 4,594 properties in Scotland and therefore this data was used to calculate the economic impact. Occupancy data from SuperControl can be seen in Appendix 1 and is more in line with general tourism occupancy figures.

92% (199) of operators had a minimal length of stay. This was, on average, 3.6 nights.

3.5 Property ownership and financial data

In just under half of cases, operators saw their self-catering properties as long-term investments, with 49% (317) of operators noting that they had owned and operated their properties for more than ten years.

Figure 2.3: Length of time survey participants have owned/operated their self-catering property



N=649

The vast majority of respondents (88%, 589) paid business rates for their properties.

Operators were asked to provide details of their turnover across 2017, 2018, 2019 and 2020. Table 2.6 shows the averages as well as total turnover across surveyed operators. This demonstrates that until 2020, average operator turnover was increasing (15% from 2017 through to 2019). **Not surprisingly the turnover drop in 2020 was significant, with a fall of 45% compared to 2019.**

Table 2.6: Operator turnover

	2017	2018	2019	2020
Number of respondents	204	224	253	256
Average turnover	£41,037	£43,379	£47,318	£26,114
Total turnover	£8,371,632	£9,716,897	£11,971,447	£6,685,061

When asked about their property portfolio, **80%** (259) said it remained the same during **2020** with a further 13% (43) saying it decreased and 7% (22) saying it increased. **During 2021, 77%** (250) **expect it to stay the same, 1**3% (4) expect it to decrease while 10% (32) expect it to increase.

3.6 Cancellation policy

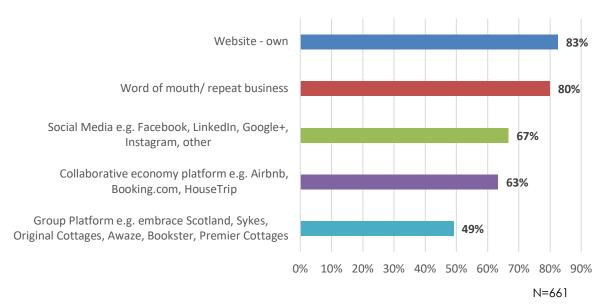
The majority (85%, 528) of operators stated that their cancellation policies became more flexible during Covid-19 with 12% (77) saying they stayed the same and just 3% (17) said their policy got stricter. Operators responded as follows about their cancellation policy:

- 38% (235) had bookings fully refundable up to a certain number of days prior to arrival
- 25% (155) provided a partial refund depending on how close to arrival they cancel
- 24% (151) had fully flexible bookings and would refund up to the day of arrival
- 7% (42) stated that anything paid by the guest at the point of cancellation is non-refundable
- 6% (37) had non-refundable bookings unless guests re-book the dates

3.7 Property promotion

Operators were asked how they promote and market their properties. Results are shown in Figure 2.4. Operators were asked to tick all that applied. **Website (83%)** and **word of mouth (80%)** were the most popular used methods of promotion.

Figure 2.4: Routes to promote and market rental properties



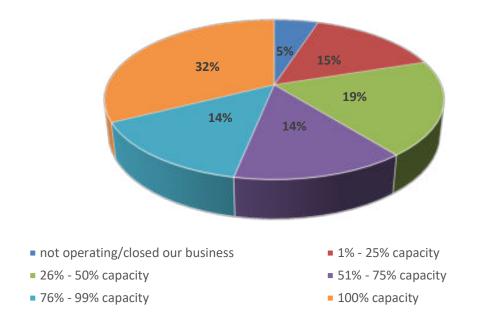
When looking at social media platforms in more detail, operators noted using the following:

- Facebook 95% (515)
- Instagram 52% (280)
- LinkedIn 13% (70)

3.8 Visitors and tourist season

Operators were asked what was the average capacity that their business was open during 2020 (this excludes periods of lockdown or when properties were in the highest tiers and could not open). Findings were as follows:

Figure 2.5: Average capacity during Covid-19



N=660

5% (33) were not operating at all while 32% (214) were at 100% capacity.

3.9 Accessibility, community integration and environment

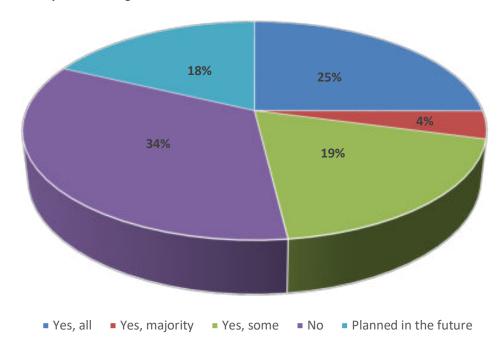
37% (202) of operators have properties that have accessibility features with a further 13% (27) planning for these in the future.

Some of the most common accessibility features included:

- no stairs or steps to enter (87%, 175)
- step-free path to entrance (79%, 169)
- wide entrance for guests (67%, 136)
- well-lit path to entrance (64%, 130)
- wide hallways (56%, 113)
- step-free shower (47%, 96)
- handheld shower head (42%, 85)

Operators were asked if their properties have green credentials. Just under half (48%, 259) said yes to some degree with a further 18% (95) planning for such credentials in the future.

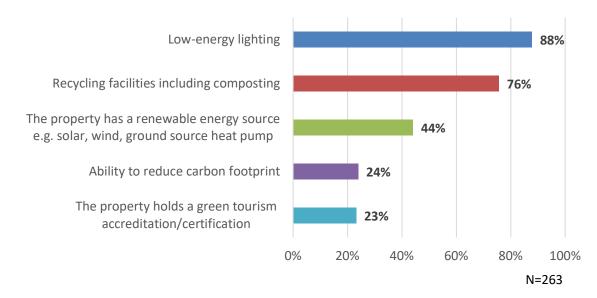
Figure 2.6: Properties with green credentials



N=537

Green credentials are highlighted in Figure 2.7. 88% of operators had low-energy lighting, 76% recycling facilities and 44% had a renewable energy source.

Figure 2.7: Green credentials held



Operators noted the following ways in which their business integrates with the local community.

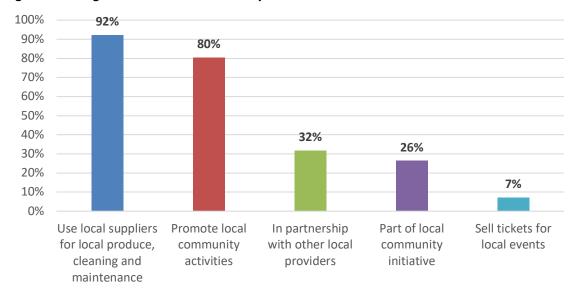


Figure 2.8: Integration with local community

N=515

3.10 Staffing and expenditure

Surveyed operators were asked about staff numbers in part and full-time roles (Table 2.7). Results show that during high season operators employed, on average, 1.5 staff fulltime and 3.3 part time (paid staff). During low season, fulltime staff dropped to 0.6 while part time staff reduced to 2.2. Unpaid staff dropped from 2.1 fulltime in high season to 0.8 in low season. While part time went from 4.1 in high season to 6.7 in low season.

Table 2.7: Average number of staff in employment 2019

	High season				Low season				
	Paid employment			npaid Ioyment		Paid loyment	Unpaid employment		
	Total	Avg. per operator	Total	Avg. per operato	Total	Avg. per operator	Total	Avg. per operator	
Full time (35 hours per week or more)	163	1.5	269	2.1	55	0.6	83	0.8	
Part time (25-35 hours per week)	30	0.4	56	0.6	13	0.2	157	1.3	
Part time (15-25 hours per week)	38	0.4	75	0.8	33	0.5	296	1.5	
Part time (5-15 hours per week)	92	0.8	219	1.3	55	0.6	260	1.8	
Part time (0-5 hours per week)	164	1.7	213	1.4	82	0.9	82	2.1	

Surveyed operators were asked to provide details of their expenditure, for a range of areas in the last full financial year (2019) and then future expenditure in 2020. The total expenditure for each is presented in Tables 2.8 and 2.9. Findings show that current and or future spend is almost half of spend in 2019.

Table 2.8: Spend in 20198

	2019	9
	Total	Avg. per
	expenditure	operator
Wages and salaries (including cleaning staff)	£4,218,798	£13,293
Capital expenditure on your property (including extensions and	CE 702 020	C10 24F
property maintenance)	£5,783,930	£18,245
Agency and OTA fees	£820,829	£2,589
Painting and decorating	£848,202	£1,527
Food and drink, welcome pack consumables	£269,142	£849
Furnishings	£538,984	£1,700
Laundry	£566,346	£1,786
Business services (e.g. accountancy, web design and booking systems)	£511,911	£1,630
Cleaning and cleaning products & equipment (excluding staff salaries)	£300,156	£953
Maintenance (gardening, window cleaning, plumber)	£399,347	£1,260
Marketing (online, printed)	£236,849	£1,031
Accessibility features	£8,440	£27
Green credentials	£45,969	£146
Other (specify what)	£409,456	£1,296
Total expenditure	£14,137,530	£46,332

N=318

Table 2.9: Current or future spend in 20209

		2020	
	Total	Avg. per	Change
	expenditure	operator	since
			2019
Wages and salaries (including cleaning staff)	£2,283,985	£7,228	-46%
Capital expenditure on your property (including extensions and property maintenance)	£2,364,821	£7,507	-59%
Agency and OTA fees	£428,568	£1,352	-48%
Painting and decorating	£291,647	£920	-66%
Food and drink, welcome pack consumables	£138,499	£437	-49%
Furnishings	£349,985	£1,104	-35%
Laundry	£393,150	£1,240	-31%
Business services (e.g. accountancy, web design and booking systems)	£399,904	£1,261	-22%
Cleaning and cleaning products & equipment (excluding staff salaries)	£218,298	£691	-27%
Maintenance (gardening, window cleaning, plumber)	£422,535	£1,333	+6%
Marketing (online, printed)	£243,537	£768	+3%
Accessibility features	£2,790	£8	-67%
Green credentials	£13,294	£42	-71%
Other (specify what)	£30,800	£109	-92%
Total expenditure	£7,581,813	£24,000	-49%

N=318

 $^{^{\}rm 8}$ Reporting where the majority of the financial year was in 2019. $^{\rm 9}$ Reporting where the majority of the financial year was in 2020.

Per property, expenditure was £20,144 in 2019 reducing to £10,435 in 2020. This is based on operators owning, on average, 2.3 properties.

Grossing that spend up to the total population (17,794 self-catering properties across Scotland), operators spent a total of £358.4m in 2019 reducing to £185.7m in 2020. Table 2.10 shows grossed total expenditure.

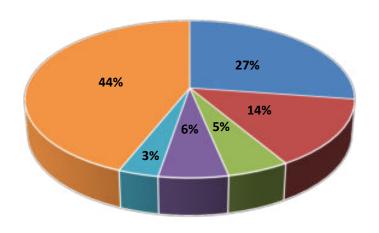
Table 2.10: Grossed current or future spend on each of the following

	201	L 9		2020			
Total expenditure	Avg. per operator	Avg. per property	Grossed to total population	Total expenditure	Avg. per operator	Avg. per property	Grossed to total population
£14,679,442	£46,332	£20,144	£358.4	£7,581,813	£24,000	£10,435	£185.7m

12% (49) of operators stated that they had taken on additional staff (full time or part-time) to assist with the government endorsed cleaning protocols and reopening guidelines. **On average operators employed an additional 1.5 cleaning staff.**

Furthermore, 87% (322) noted that **cleaning costs increased as a result of Covid-19.** Over half (56%) said that they were blocking days between bookings for additional cleaning as shown in Figure 2.9. Over one quarter (27%) said they occasionally blocked for cleaning, but not between every booking while 28% had between 1-3 days blocked for cleaning between each booking. 44% did not block for cleaning.

Figure 2.9: Additional cleaning days



- occasionally, but not between every booking
- at least 1 day between each booking
- at least 2 days between each booking
- at least 3 days between each booking
- more than 3 days between each booking

No

N=319

Thinking about now and in the future, operators were asked how much they have or will have invested in their properties last year, this year and next year. Table 2.11 summarises the investment.

Table 2.11: Operator investment

	Last financial year (2019/20)	This financial year (2020/21)	Next financial year (2021/22)
Less than £10k	61% (212)	81% (261)	85% (247)
£11k to £25k	25% (87)	16% (52)	12% (36)
£26k up to £50k	8% (28)	2% (8)	2% (5)
Over £51k	6% (22)	3% (11)	1.5% (4)

4 Visitors Survey

An online visitor survey was open from March - May 2021. The survey was disseminated widely by sponsors and stakeholders. **718 visitors completed the survey.** Table 3.1 shows the spread of visitors across the Scottish regions. Visitors were asked to tell us about a visit in 2020 i.e., during Covid-19 (Visit 1) and during 2019 (Visit 2).

Table 3.1: Location of holiday self-catering properties visited

Landing	Visitors				
Location	Visit during 1 (2020)	Visit during 2 (2019)			
Ayrshire	62	79			
Central Scotland	33	26			
Dumfries & Galloway	48	40			
Dunbartonshire / Argyll & Bute	68	72			
Fife	26	32			
Glasgow City	3	10			
Grampian	32	25			
Highland & Western Isles	256	223			
Lanarkshire	-	2			
Lothian	38	48			
Orkney & Shetland	12	10			
Renfrewshire	1	1			
Scottish Borders	26	25			
Tayside	113	88			
Total consulted	718	681			

Source: Frontline Self-Catering Visitor Survey, 2021

4.1 Visitor origin and number of trips

The majority of survey participants lived in Scotland (60%) with 37% from England. 1% were from Wales and 0.1% from Northern Ireland. 2% came from outside the UK.

Table 3.2: Visitor home country

Location	Visitors
Scotland	60% (433)
England	37% (266)
Wales	1% (5)
Northern Ireland	0.1% (1)
Outside the UK ¹⁰	2% (13)

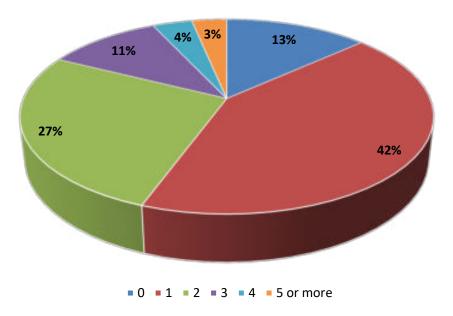
Source: Frontline Self-Catering Visitor Survey, 2021 N=718

¹⁰ This is an underrepresentation of actual overseas numbers and is a result of difficulty in engaging this group to participate in the study.

AS1006-00 Scotland

13% of respondents had not stayed in a self-catering property in the UK during the last 12 months (up until November 2020) with a further 42% staying only once. 27% stayed twice.

Figure 3.1: Number of visits to self-catering properties in the past 12 months (up to and including November 2020)

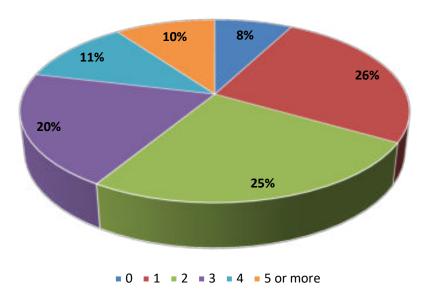


Source: Frontline Self-Catering Visitor Survey, 2021

N=705

Looking at the year before (up to November 2019), just over half of respondents (51%) had stayed in a self-catering property once or twice. A further 41% stayed three or more times with just 8% saying they did not stay in a self-catering property during this time.

Figure 3.2: Number of visits to self-catering properties in the past 12 months (up to and including November 2019)



Source: Frontline Self-Catering Visitor Survey, 2021

N=714

Covid-19 was the main reason for the decrease in stays during 2020.

4.2 Visitor characteristics

This section looks at findings from visitors for up to two visits to a self-catering property. Visit 1 is the most recent visit i.e., 2020 and visit 2 is pre-Covid-19 i.e. 2019. On average visitors spent 6.2 nights during visit 1 and 6.3 nights in visit 2. The distribution of responses is shown in Figure 3.3 and demonstrates a very consistent trend between visit 1 and 2.

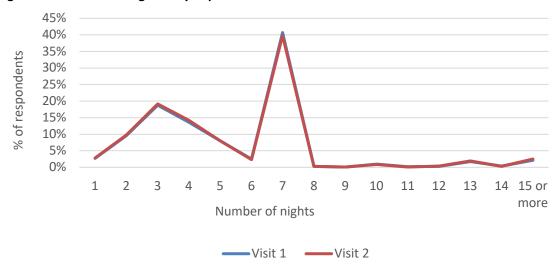


Figure 3.3: Number of nights stayed per visit

Source: Frontline Self-Catering Visitor Survey, 2021

N=567

Figure 3.4 shows the month in which the visits began. For visit 1 (2020) August, September and October were the most popular with significantly fewer visiting in March – June (compared with visit 2 (2019)). This was due to the lockdown measures imposed in March last year followed by the easing over the summer.

Looking at visit 2 (2019) there is a more even distribution across the months with a slight peak over July to October.

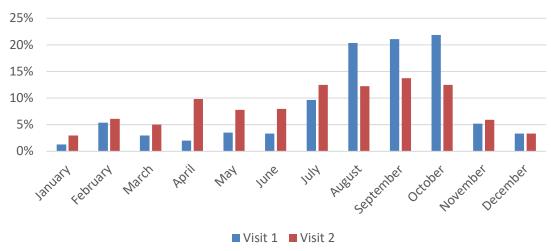


Figure 3.4: Month during which visit began

Source: Frontline Self-Catering Visitor Survey, 2021 N= 540

Tables 3.3 and 3.4 shows the number of adults, children and pets in each party for visit 1 (2020) and visit 2 (2019).

During visit 1 (2020), the average adult group size was 2.7 and 29% of groups included children. Where parties were travelling with children, the average number of children in each group was 2. 37% of groups brought a pet.

Table 3.3: Number of adults, children and pets in each group during visit 1 (2020)

	Number of adults	Number of children	Number of pets
1	3%	28%	67%
2	65%	50%	26%
3	11%	15%	7%
4	12%	5%	
5	3%	1%	
6	3%	0%	
7	1%	0%	
8	1%	0%	
9	0%	0%	
10+	1%	0%	
Average	2.7	2	1.3

Source: Frontline Self-Catering Visitor Survey, 2021

When looking at visit 2 (2019), the average adult group size was 3.1, and 26% of all groups included children. Where parties were travelling with children, the average number of children in each group was 2.3. 34% of groups brought a pet and no groups brought more than 3 pets.

Table 3.4: Number of adults, children and pets in each group during visit 2 (2019)

	, 1 0 1 0 1					
	Number of adults	Number of children	Number of pets			
1	1%	27%	59%			
2	49%	41%	31%			
3	12%	14%	10%			
4	19%	8%				
5	6%	6%				
6	6%	2%				
7	2%	0%				
8	2%	1%				
9	1%	0%				
10+	3%	0%				
Average	3.1	2.3	1.3			

Source: Frontline Self-Catering Visitor Survey, 2021

4.3 Visitor expenditure

Visitors who stayed in self-catering property (during visit 2, 2019), spent, on average, £2,264 during their visit. This reduced to £2,107 for visit 1 (2020).

Table 3.5: Average visitor spend per party

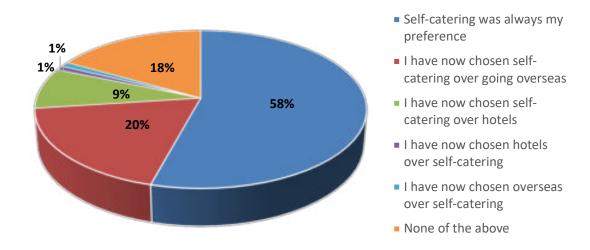
	Aver	age spend pe	r party
Area of expenditure	Visit 1 (2020)	Visit 2 (2019)	Change since 2019
Transport to and from the property	£173	£208	-17%
Travel during stay	£96	£84	14%
Accommodation fees	£1,024	£1,082	-5%
Food and drink (in supermarkets)	£194	£180	8%
Food and drink (in local shops and farmers markets)	£103	£108	-5%
Food and drink (in bars, cafes, pubs and restaurants)	£295	£335	-12%
Other shopping (e.g. gifts, clothes, souvenirs)	£111	£114	-3%
Outdoor recreation (e.g. sailing, surfing, cycling, horse riding)	£46	£58	-21%
Visitor attractions (e.g. heritage sites, theme parks, gardens)	£39	£55	-28%
Outdoor sports (shooting, fishing)	£27	£40	-33%
Total	£2,107	£2,264	-7%

Source: Frontline Self-Catering Visitor Survey, 2021

4.4 Impacts of Covid-19

Respondents were asked, as a result of Covid-19, which statement best applies:

Figure 3.7: As a result of Covid-19



N=717

58% said self-catering in the UK was always my preference followed by 18% now choosing self-catering over going overseas.

On a scale of 1 (not likely at all) to 10 (very likely), visitors were asked to what extent they were likely to continue using self-catering in the future. 95% rated their likeliness to stay in self-catering in the future as 7 or more out of 10, with 78% rating 10.

90% 78% 80% 70% % of respondents 60% 50% 40% 30% 20% 10% 7% 10% 3% 1% 1% 0% 0% 0% 0% 0% 2 1 3 4 5 6 7 8 9 10 (1 Not likely at all – 10 Very likely)

Figure 3.8: Extent to which visitors were likely to use self-catering in the future

N= 717

Over two-thirds (74%, 406) of respondents said that they have had to cancel plans to holiday with people from outside of their household due to Covid-19.

On a scale of 1 (not very important) to 5 (very important), visitors were asked, as a direct result of Covid-19, how important the cleaning standards are in their choice of self-catering accommodation. Almost all (99%) rated this 3 or more, with 84% saying very important.

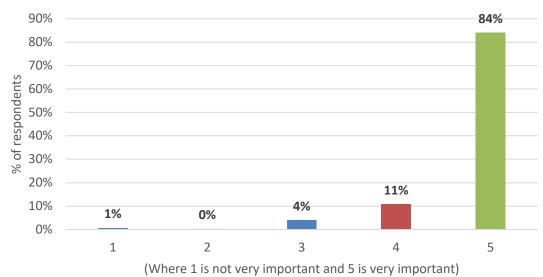


Figure 3.9: Importance of cleaning standards in choice of self-catering accommodation

N=718

Using the same rating scale of 1 (not very important) to 5 (very important), visitors were then asked, how important is having flexible cancellation terms due to Covid-19. Almost all rated this 3 or above (99%) and 88% said very important.

100% 88% 90% 80% % of respondents 70% 60% 50% 40% 30% 20% 9% 10% 2% 1% 0% 0% 5 1 3 (Where 1 is not very important and 5 is very important)

Figure 3.10: How important is having flexible cancellation terms due to Covid-19

N=717

Key features of flexible cancellation terms included:

- a full refund (73%, 518)
- ability to rebook with the same terms and conditions (69%, 497)
- refundable deposit (48%, 342)

5 Findings from Economic Impact Assessment

This section highlights the economic impacts that have occurred as a result of visitors use of self-catering properties in the UK in 2019 and 2020. This assessment was conducted in accordance with HM Treasury *Green Book* appraisal and evaluation guidance.

As part of this analysis, we measured the economic value of the sector, using the following five key indicators:

- 1. **Number of properties:** the number of self-catering properties that are available in Scotland, using data supplied to us by the ASSC.
- 2. **Visitor nights per year:** the total number of overnight stays that took place in self-catering properties in Scotland over the course of 2019 and 2020, based on a review of transaction records provided to us by SuperControl (see Appendix 1 for occupancy breakdown).
- 3. **Total visitor spend:** the total combined value of all expenditure made by visitors to the country during the course of 2019 and 2020, including the money that they spent on accommodation fees, travel to and from the properties, travel during their stay, food and drink (in shops, supermarkets pubs and bars), other shopping, outdoor recreation and trips to visitor attractions, based on evidence of visitor spending patterns acquired through our survey of visitors to Scottish self-catering properties.
- 4. **Total full time equivalent (FTE) jobs supported:** the total number of full-time equivalent jobs that the self-catering sector support in the local economy, through money spent in Scotland by visitors to self-catering properties. A full-time equivalent job can be defined as the number of full time (35 hour per week) permanent (52 week per year) jobs that this expenditure supports¹¹.
- 5. **Total economic contribution:** the total amount of Gross Value Added (GVA) in each area that can be attributed to expenditure by visitors to self-catering properties. The term GVA can be defined as the total amount of extra value that visitor expenditure contributes to the economy. This is broadly equivalent to either wages plus profit (i.e. the proportion of value added that goes to the company's employees and the proportion that goes to the company's owners) or to turnover minus cost of sale. For example, if a company were to buy enough coffee beans to make 100 cups of coffee for £40, and sell each cup for £1 each, the turnover impact of these transactions would be £100, the cost of sale would be £40, and the value added would be £60.

In the case of FTE jobs supported, and total economic contribution, the analysis includes indirect and induced expenditure that has occurred as a result of the multiplier effect, such as money spent by the employees of self-catering businesses, and by the business itself in the local economy.

Detailed results tables are provided in Appendix 2, a glossary of technical terms in Appendix 3, and a description of the economic impact calculation methodology in Appendix 4.

This section presents a summary of the visitor expenditure, GVA and full-time equivalent (FTE) employment impacts of the self-catering sector in Scotland, broken down by region.

¹¹ As some people work part time or seasonally, and as some workers spend part of their time providing services to tourist visitors and some of their time providing services to local residents, the total number of workers who jobs are at least partially dependent on self-catering visitors will be higher than this figure.

5.1 Impact by Scottish region

It is estimated that in 2019 visitors to Scottish self-catering properties spent a total of £867.1m in the economy. This visitor expenditure supports 23,979 FTE jobs and contributed £489.3m of GVA to the Scottish economy. This resulted in a total economic contribution of £672.3m.

In 2020 visitors spent a total of £614.8m in the economy. This visitor expenditure supports 17,002 FTE jobs and contributed £346.9m of GVA to the Scottish economy. This resulted in a total economic contribution of £476.7m. This was a 29% reduction to the previous year. Tables 5.1 and 5.2 summarise the impact at a regional level in 2019 and 2020. The section that follows provides an infographic summary of impact findings for Scotland for 2019 as this was a more 'typical year'.

Table 5.1: Economic impacts by Scottish region 2019

	Total visitor	Total visitor	Total GVA	Total FTE	Total economic
	nights	spend (£m)	impact (£m)	employment	contribution (£m)
Ayrshire	114,084	41.0	23.1	1,134	31.8
Central Scotland	84,340	30.3	17.1	838	23.5
Dumfries & Galloway	188,238	67.7	38.2	1,871	52.5
Dunbartonshire / Argyll & Bute	318,212	114.4	64.5	3,163	88.7
Fife	91,325	32.8	18.5	908	25.5
Glasgow City	27,163	9.8	5.5	270	7.6
Grampian	156,593	56.3	31.8	1,557	43.6
Highland & Western Isles	757,841	272.4	153.7	7,533	211.2
Lanarkshire	16,705	6.0	3.4	166	4.7
Lothian	253,972	91.3	51.5	2,524	70.8
Orkney & Shetland	91,267	32.8	18.5	907	25.4
Renfrewshire	10,593	3.8	2.1	105	3.0
Scottish Borders	107,564	38.7	21.8	1,069	30.0
Tayside	194,485	69.9	39.4	1,933	54.2
Scotland total	2,412,382	867.1	489.3	23,979	672.3

Source: Frontline, 2021

Table 5.2: Economic impacts by Scottish region 2020

	Total visitor	Total visitor	Total GVA	Total FTE	Total economic
	nights	spend (£m)	impact (£m)	employment	contribution (£m)
Ayrshire	85,703	29.1	16.4	804	22.5
Central Scotland	63,359	21.5	12.1	594	16.7
Dumfries & Galloway	141,410	48.0	27.1	1,327	37.2
Dunbartonshire / Argyll & Bute	239,050	81.1	45.8	2,243	62.9
Fife	68,606	23.3	13.1	644	18.0
Glasgow City	20,405	6.9	3.9	191	5.4
Grampian	117,637	39.9	22.5	1,104	30.9
Highland & Western Isles	569,311	193.1	109.0	5,341	149.8
Lanarkshire	12,549	4.3	2.4	118	3.3
Lothian	190,791	64.7	36.5	1,790	50.2
Orkney & Shetland	68,562	23.3	13.1	643	18.0
Renfrewshire	7,958	2.7	1.5	75	2.1
Scottish Borders	80,805	27.4	15.5	758	21.3
Tayside	146,103	49.6	28.0	1,371	38.4
Scotland total	1,812,250	614.8	346.9	17,002	476.7

Source: Frontline, 2021

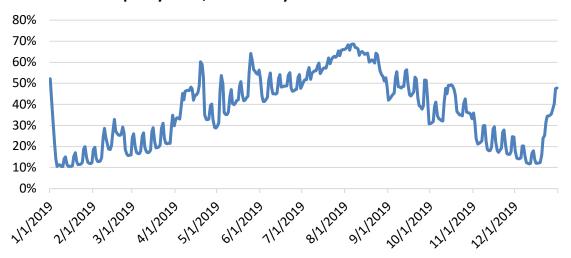
Appendix 1 – SuperControl Occupancy Data

Occupancy figures are likely to underestimate the true occupancy rate as:

- there were some days in 2020 when each property was not available for occupancy due to Covid-19 restrictions (though some of the unfulfilled bookings for these nights will still be in the database)
- some properties may have been available for booking through a range of different platforms, and therefore there may be some bookings that are not captured in this database
- some owners may have only made their properties available for booking some of the time, and either occupied them themselves, rented them on a tenancy basis, or closed them for maintenance or for the off-season at other times of the year

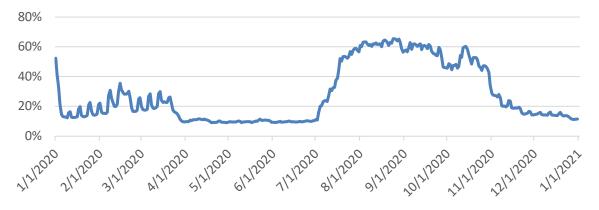
Scotland

Occupancy rates, 1st January 2019 to 31st December 2019



N= 4,594 properties

Occupancy rates, 1st January 2020 to 31st December 2020



N= 4,867 properties

Appendix 2 – Detailed Impact Findings

Total Visitor Nights

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	17,703	57,042	17,703	11,802	9,835	114,084
Central Scotland	12,049	28,917	21,688	12,049	9,639	84,340
Dumfries & Galloway	24,010	63,386	63,386	17,287	20,168	188,238
Dunbartonshire / Argyll & Bute	45,459	101,020	85,867	40,408	45,459	318,212
Fife	7,718	32,157	30,013	10,719	10,719	91,325
Glasgow City	5,891	9,163	5,891	3,600	2,618	27,163
Grampian	26,413	60,373	43,393	15,093	11,320	156,593
Highland & Western Isles	126,564	294,802	208,368	69,456	58,652	757,841
Lanarkshire	1,856	10,209	1,856	1,856	928	16,705
Lothian	49,907	97,596	70,979	12,200	23,290	253,972
Orkney & Shetland	6,519	52,152	26,076	0	6,519	91,267
Renfrewshire	3,178	3,178	2,119	0	2,119	10,593
Scottish Borders	14,703	41,014	24,763	13,929	13,155	107,564
Tayside	38,897	38,897	38,897	38,897	38,897	194,485
Scotland total	380,866	889,905	640,998	247,295	253,318	2,412,382

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	13,299	42,851	13,299	8,866	7,388	85,703
Central Scotland	9,051	21,723	16,292	9,051	7,241	63,359
Dumfries & Galloway	18,037	47,618	47,618	12,987	15,151	141,410
Dunbartonshire / Argyll & Bute	34,150	75,889	64,505	30,355	34,150	239,050
Fife	5,798	24,157	22,547	8,052	8,052	68,606
Glasgow City	4,425	6,884	4,425	2,704	1,967	20,405
Grampian	19,842	45,354	32,598	11,339	8,504	117,637
Highland & Western Isles	95,078	221,463	156,532	52,177	44,061	569,311
Lanarkshire	1,394	7,669	1,394	1,394	697	12,549
Lothian	37,492	73,317	53,321	9,165	17,496	190,791
Orkney & Shetland	4,897	39,178	19,589	0	4,897	68,562
Renfrewshire	2,387	2,387	1,592	0	1,592	7,958
Scottish Borders	11,045	30,811	18,603	10,464	9,883	80,805
Tayside	29,221	29,221	29,221	29,221	29,221	146,103
Scotland total	286,117	668,522	481,536	185,775	190,299	1,812,250

Total Visitor Spend (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	6.4	20.5	6.4	4.2	3.5	41.0
Central Scotland	4.3	10.4	7.8	4.3	3.5	30.3
Dumfries & Galloway	8.6	22.8	22.8	6.2	7.2	67.7
Dunbartonshire/Argyll & Bute	16.3	36.3	30.9	14.5	16.3	114.4
Fife	2.8	11.6	10.8	3.9	3.9	32.8
Glasgow City	2.1	3.3	2.1	1.3	0.9	9.8
Grampian	9.5	21.7	15.6	5.4	4.1	56.3
Highland & Western Isles	45.5	106.0	74.9	25.0	21.1	272.4
Lanarkshire	0.7	3.7	0.7	0.7	0.3	6.0
Lothian	17.9	35.1	25.5	4.4	8.4	91.3
Orkney & Shetland	2.3	18.7	9.4	0.0	2.3	32.8
Renfrewshire	1.1	1.1	0.8	0.0	0.8	3.8
Scottish Borders	5.3	14.7	8.9	5.0	4.7	38.7
Tayside	14.0	14.0	14.0	14.0	14.0	69.9
Scotland total	136.9	319.9	230.4	88.9	91.1	867.1

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	4.5	14.5	4.5	3.0	2.5	29.1
Central Scotland	3.1	7.4	5.5	3.1	2.5	21.5
Dumfries & Galloway	6.1	16.2	16.2	4.4	5.1	48.0
Dunbartonshire/Argyll & Bute	11.6	25.7	21.9	10.3	11.6	81.1
Fife	2.0	8.2	7.6	2.7	2.7	23.3
Glasgow City	1.5	2.3	1.5	0.9	0.7	6.9
Grampian	6.7	15.4	11.1	3.8	2.9	39.9
Highland & Western Isles	32.3	75.1	53.1	17.7	14.9	193.1
Lanarkshire	0.5	2.6	0.5	0.5	0.2	4.3
Lothian	12.7	24.9	18.1	3.1	5.9	64.7
Orkney & Shetland	1.7	13.3	6.6	0.0	1.7	23.3
Renfrewshire	0.8	0.8	0.5	0.0	0.5	2.7
Scottish Borders	3.7	10.5	6.3	3.6	3.4	27.4
Tayside	9.9	9.9	9.9	9.9	9.9	49.6
Scotland total	97.1	226.8	163.4	63.0	64.6	614.8

Direct GVA (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	3.6	11.6	3.6	2.4	2.0	23.1
Central Scotland	2.4	5.9	4.4	2.4	2.0	17.1
Dumfries & Galloway	4.9	12.9	12.9	3.5	4.1	38.2
Dunbartonshire / Argyll & Bute	9.2	20.5	17.4	8.2	9.2	64.5
Fife	1.6	6.5	6.1	2.2	2.2	18.5
Glasgow City	1.2	1.9	1.2	0.7	0.5	5.5
Grampian	5.4	12.2	8.8	3.1	2.3	31.8
Highland & Western Isles	25.7	59.8	42.3	14.1	11.9	153.7
Lanarkshire	0.4	2.1	0.4	0.4	0.2	3.4
Lothian	10.1	19.8	14.4	2.5	4.7	51.5
Orkney & Shetland	1.3	10.6	5.3	0.0	1.3	18.5
Renfrewshire	0.6	0.6	0.4	0.0	0.4	2.1
Scottish Borders	3.0	8.3	5.0	2.8	2.7	21.8
Tayside	7.9	7.9	7.9	7.9	7.9	39.4
Scotland total	77.3	180.5	130.0	50.2	51.4	489.3

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	2.5	8.2	2.5	1.7	1.4	16.4
Central Scotland	1.7	4.2	3.1	1.7	1.4	12.1
Dumfries & Galloway	3.5	9.1	9.1	2.5	2.9	27.1
Dunbartonshire/Argyll & Bute	6.5	14.5	12.3	5.8	6.5	45.8
Fife	1.1	4.6	4.3	1.5	1.5	13.1
Glasgow City	0.8	1.3	0.8	0.5	0.4	3.9
Grampian	3.8	8.7	6.2	2.2	1.6	22.5
Highland & Western Isles	18.2	42.4	30.0	10.0	8.4	109.0
Lanarkshire	0.3	1.5	0.3	0.3	0.1	2.4
Lothian	7.2	14.0	10.2	1.8	3.3	36.5
Orkney & Shetland	0.9	7.5	3.8	0.0	0.9	13.1
Renfrewshire	0.5	0.5	0.3	0.0	0.3	1.5
Scottish Borders	2.1	5.9	3.6	2.0	1.9	15.5
Tayside	5.6	5.6	5.6	5.6	5.6	28.0
Scotland total	54.8	128.0	92.2	35.6	36.4	346.9

Direct Multiplier

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	1.3	4.3	1.3	0.9	0.7	8.7
Central Scotland	0.9	2.2	1.6	0.9	0.7	6.4
Dumfries & Galloway	1.8	4.8	4.8	1.3	1.5	14.3
Dunbartonshire / Argyll & Bute	3.4	7.7	6.5	3.1	3.4	24.1
Fife	0.6	2.4	2.3	0.8	0.8	6.9
Glasgow City	0.4	0.7	0.4	0.3	0.2	2.1
Grampian	2.0	4.6	3.3	1.1	0.9	11.9
Highland & Western Isles	9.6	22.4	15.8	5.3	4.4	57.5
Lanarkshire	0.1	0.8	0.1	0.1	0.1	1.3
Lothian	3.8	7.4	5.4	0.9	1.8	19.3
Orkney & Shetland	0.5	4.0	2.0	0.0	0.5	6.9
Renfrewshire	0.2	0.2	0.2	0.0	0.2	0.8
Scottish Borders	1.1	3.1	1.9	1.1	1.0	8.2
Tayside	3.0	3.0	3.0	3.0	3.0	14.8
Scotland total	28.9	67.5	48.6	18.8	19.2	183.0

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	1.0	3.1	1.0	0.6	0.5	6.1
Central Scotland	0.6	1.6	1.2	0.6	0.5	4.5
Dumfries & Galloway	1.3	3.4	3.4	0.9	1.1	10.1
Dunbartonshire/Argyll & Bute	2.4	5.4	4.6	2.2	2.4	17.1
Fife	0.4	1.7	1.6	0.6	0.6	4.9
Glasgow City	0.3	0.5	0.3	0.2	0.1	1.5
Grampian	1.4	3.2	2.3	0.8	0.6	8.4
Highland & Western Isles	6.8	15.9	11.2	3.7	3.2	40.8
Lanarkshire	0.1	0.5	0.1	0.1	0.0	0.9
Lothian	2.7	5.2	3.8	0.7	1.3	13.7
Orkney & Shetland	0.4	2.8	1.4	0.0	0.4	4.9
Renfrewshire	0.2	0.2	0.1	0.0	0.1	0.6
Scottish Borders	0.8	2.2	1.3	0.7	0.7	5.8
Tayside	2.1	2.1	2.1	2.1	2.1	10.5
Scotland total	20.5	47.9	34.5	13.3	13.6	129.8

Total Economic Contribution – Direct, indirect and Induced GVA (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	4.9	15.9	4.9	3.3	2.7	31.8
Central Scotland	3.4	8.1	6.0	3.4	2.7	23.5
Dumfries & Galloway	6.7	17.7	17.7	4.8	5.6	52.5
Dunbartonshire/Argyll & Bute	12.7	28.2	23.9	11.3	12.7	88.7
Fife	2.2	9.0	8.4	3.0	3.0	25.5
Glasgow City	1.6	2.6	1.6	1.0	0.7	7.6
Grampian	7.4	16.8	12.1	4.2	3.2	43.6
Highland & Western Isles	35.3	82.2	58.1	19.4	16.3	211.2
Lanarkshire	0.5	2.8	0.5	0.5	0.3	4.7
Lothian	13.9	27.2	19.8	3.4	6.5	70.8
Orkney & Shetland	1.8	14.5	7.3	0.0	1.8	25.4
Renfrewshire	0.9	0.9	0.6	0.0	0.6	3.0
Scottish Borders	4.1	11.4	6.9	3.9	3.7	30.0
Tayside	10.8	10.8	10.8	10.8	10.8	54.2
Scotland total	106.1	248.0	178.6	68.9	70.6	672.3

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	3.5	11.3	3.5	2.3	1.9	22.5
Central Scotland	2.4	5.7	4.3	2.4	1.9	16.7
Dumfries & Galloway	4.7	12.5	12.5	3.4	4.0	37.2
Dunbartonshire / Argyll & Bute	9.0	20.0	17.0	8.0	9.0	62.9
Fife	1.5	6.4	5.9	2.1	2.1	18.0
Glasgow City	1.2	1.8	1.2	0.7	0.5	5.4
Grampian	5.2	11.9	8.6	3.0	2.2	30.9
Highland & Western Isles	25.0	58.3	41.2	13.7	11.6	149.8
Lanarkshire	0.4	2.0	0.4	0.4	0.2	3.3
Lothian	9.9	19.3	14.0	2.4	4.6	50.2
Orkney & Shetland	1.3	10.3	5.2	0.0	1.3	18.0
Renfrewshire	0.6	0.6	0.4	0.0	0.4	2.1
Scottish Borders	2.9	8.1	4.9	2.8	2.6	21.3
Tayside	7.7	7.7	7.7	7.7	7.7	38.4
Scotland total	75.3	175.8	126.7	48.9	50.1	476.7

Direct full time equivalent employment

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	176	567	176	117	98	1,134
Central Scotland	120	287	216	120	96	838
Dumfries & Galloway	239	630	630	172	200	1,871
Dunbartonshire / Argyll & Bute	452	1,004	854	402	452	3,163
Fife	77	320	298	107	107	908
Glasgow City	59	91	59	36	26	270
Grampian	263	600	431	150	113	1,557
Highland & Western Isles	1,258	2,930	2,071	690	583	7,533
Lanarkshire	18	101	18	18	9	166
Lothian	496	970	706	121	232	2,524
Orkney & Shetland	65	518	259	0	65	907
Renfrewshire	32	32	21	0	21	105
Scottish Borders	146	408	246	138	131	1,069
Tayside	387	387	387	387	387	1,933
Scotland total	3,786	8,846	6,371	2,458	2,518	23,979

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	125	402	125	83	69	804
Central Scotland	85	204	153	85	68	594
Dumfries & Galloway	169	447	447	122	142	1,327
Dunbartonshire / Argyll & Bute	320	712	605	285	320	2,243
Fife	54	227	212	76	76	644
Glasgow City	42	65	42	25	18	191
Grampian	186	426	306	106	80	1,104
Highland & Western Isles	892	2,078	1,469	490	413	5,341
Lanarkshire	13	72	13	13	7	118
Lothian	352	688	500	86	164	1,790
Orkney & Shetland	46	368	184	0	46	643
Renfrewshire	22	22	15	0	15	75
Scottish Borders	104	289	175	98	93	758
Tayside	274	274	274	274	274	1,371
Scotland total	2,684	6,272	4,518	1,743	1,785	17,002

FTE employment multiplier

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	66	212	66	44	37	424
Central Scotland	45	107	81	45	36	314
Dumfries & Galloway	89	236	236	64	75	700
Dunbartonshire/Argyll & Bute	169	376	319	150	169	1,183
Fife	29	120	112	40	40	340
Glasgow City	22	34	22	13	10	101
Grampian	98	224	161	56	42	582
Highland & Western Isles	471	1,096	775	258	218	2,817
Lanarkshire	7	38	7	7	3	62
Lothian	186	363	264	45	87	944
Orkney & Shetland	24	194	97	0	24	339
Renfrewshire	12	12	8	0	8	39
Scottish Borders	55	152	92	52	49	400
Tayside	145	145	145	145	145	723
Scotland total	1,416	3,308	2,383	919	942	8,968

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	47	150	47	31	26	301
Central Scotland	32	76	57	32	25	222
Dumfries & Galloway	63	167	167	46	53	496
Dunbartonshire/Argyll & Bute	120	266	226	107	120	839
Fife	20	85	79	28	28	241
Glasgow City	16	24	16	9	7	72
Grampian	70	159	114	40	30	413
Highland & Western Isles	334	777	549	183	155	1,998
Lanarkshire	5	27	5	5	2	44
Lothian	132	257	187	32	61	669
Orkney & Shetland	17	137	69	0	17	241
Renfrewshire	8	8	6	0	6	28
Scottish Borders	39	108	65	37	35	284
Tayside	103	103	103	103	103	513
Scotland total	1,004	2,346	1,690	652	668	6,359

Direct, indirect and induced FTE employment impact

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	242	779	242	161	134	1,558
Central Scotland	165	395	296	165	132	1,152
Dumfries & Galloway	328	866	866	236	275	2,571
Dunbartonshire/Argyll & Bute	621	1,380	1,173	552	621	4,346
Fife	105	439	410	146	146	1,247
Glasgow City	80	125	80	49	36	371
Grampian	361	825	593	206	155	2,139
Highland & Western Isles	1,729	4,026	2,846	949	801	10,350
Lanarkshire	25	139	25	25	13	228
Lothian	682	1,333	969	167	318	3,469
Orkney & Shetland	89	712	356	0	89	1,246
Renfrewshire	43	43	29	0	29	145
Scottish Borders	201	560	338	190	180	1,469
Tayside	531	531	531	531	531	2,656
Scotland total	5,202	12,154	8,754	3,377	3,460	32,947

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	171	552	171	114	95	1,105
Central Scotland	117	280	210	117	93	817
Dumfries & Galloway	233	614	614	167	195	1,823
Dunbartonshire/Argyll & Bute	440	978	832	391	440	3,081
Fife	75	311	291	104	104	884
Glasgow City	57	89	57	35	25	263
Grampian	256	585	420	146	110	1,516
Highland & Western Isles	1,226	2,855	2,018	673	568	7,339
Lanarkshire	18	99	18	18	9	162
Lothian	483	945	687	118	226	2,459
Orkney & Shetland	63	505	253	0	63	884
Renfrewshire	31	31	21	0	21	103
Scottish Borders	142	397	240	135	127	1,042
Tayside	377	377	377	377	377	1,883
Scotland total	3,688	8,618	6,207	2,395	2,453	23,361

Appendix 3 – Glossary of Technical Terms

Total visitor spend: money spent by visitors to the area (this does not include any money spent further down the supply chain through multiplier effects).

Full time equivalent (FTE) employment impacts: the number of full time (35 hour per week) permanent (52 week per year) jobs that this expenditure supports. Note that as some people work part time or seasonally, and as some workers spend part of their time providing services to tourist visitors and some of their time providing services to local residents, the total number of workers who jobs are at least partially dependent on self-catering visitors will be higher than this figure.

Gross value added (GVA): the total amount of extra value that visitor spend contributes to the economy. This is broadly equivalent to either wages plus profit (i.e. the proportion of value added that goes to the company's employees and the proportion that goes to the company's owners) or to turnover minus cost of sale. For example, if a company were to buy enough coffee beans to make 100 cups of coffee for £40, and sell each cup for £1 each, the turnover impact of these transactions would be £100, the cost of sale would be £40, and the value added would be £60.

Indirect multiplier (or Type I multiplier): additional knock-on benefits that take place as a result of payments made further down the supply chain. Examples may include money that the owner pays to a local accountant to do produce their accounts, or to a local tradesperson to fix any plumbing or electrical problems that might occur in the property.

Induced multiplier: additional knock on benefits caused by the expenditure of salaries by property owners and staff. An example may include the expenditure of people who work at the property in a local shop.

(the) Multiplier effect (or Type II multiplier): this term relates to the combined impacts of the indirect and induced multipliers.

Occupancy rate: the proportion off properties that have a paying visitor staying in them on any particular day of the year.

Turnover: the total value of all sales made by a business.

Appendix 4 – Economic Impact Methodology

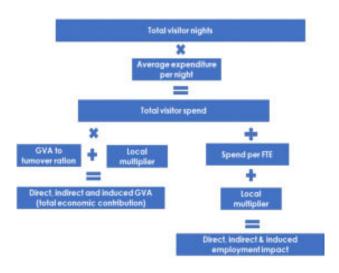
As part of the economic impact model, a net economic impact figure was calculated for every possible combination of:

• day of the year: we applied different occupancy rate assumptions to each of the days in 2019 and 2020, based on evidence from our analysis of SuperControl data

In other words, the model includes over a separate economic impact calculation, which were then reaggregated to produce as accurate as possible an estimate of the true economic impact of the sector.

For each of these combinations of date, we calculate our impact based on the following equation:

Economic impact calculation summary



Specific Guest Rules

House rules include the following:

- Guests are vetted, as far as possible, by checking previous stays information online, and asking guests to provide, in confidence, some information on themselves, and the purpose of their visit.
- The applicant does not allow any single sex groups, nor any groups where guests all are under 25. There is a six guest limit and, whilst children are permitted, there is a no pets policy.
- Absolutely no parties, or events of any kind, are permitted.
- Guests are requested to be quiet after 11pm.
- There is a no smoking policy within the property.
- Check-in times are between 3 pm and midnight. Guests must check out by 11am, but are asked not to leave before 8am unless absolutely necessary.



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	100640402-001		
	ique reference for your online form only. The Planning A quote this reference if you need to contact the planning A		
Type of Applica	tion		
What is this application for? P	lease select one of the following: *		
X Application for planning p	permission (including changes of use and surface minera	l working).	
Application for planning p	permission in principle.		
Further application, (inclu	uding renewal of planning permission, modification, variati	on or removal of a plar	nning condition etc)
Application for Approval	of Matters specified in conditions.		
Description of F	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 (in retrospect).		
Is this a temporary permission	1? *		☐ Yes ☒ No
If a change of use is to be inc (Answer 'No' if there is no cha	luded in the proposal has it already taken place?		X Yes ☐ No
Has the work already been st	arted and/or completed? *		
□ No □ Yes – Started ☑	Yes - Completed		
Please state date of completion	on, or if not completed, the start date (dd/mm/yyyy): *	01/09/2022]
Please explain why work has	taken place in advance of making this application: * (Max	500 characters)	1
Started prior to need for pla	nning permission.		
Applicant or Ag	ent Details		
Are you an applicant or an ag	ent? * (An agent is an architect, consultant or someone e	lse acting	
on behalf of the applicant in c	onnection with this application)	☐ App	olicant 🗵 Agent

Agent Details					
Please enter Agent detail	s				
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: *	07780117708	Address 1 (Street): *	Whins Road		
Extension Number:		Address 2:	Alloa		
Mobile Number:		Town/City: *	Clacks		
Fax Number:		Country: *	Scotland		
		Postcode: *	FK10 3RF		
Email Address: *	paul@houghtonplanning.co.uk				
Is the applicant an individ	ual or an organisation/corporate entity? * nisation/Corporate entity				
Applicant Det	ails				
Please enter Applicant de	etails				
Title:	Ms	You must enter a Building Name or Number, or both: *			
Other Title:		Building Name:	Roseland		
First Name: *	Ruth	Building Number:			
Last Name: *	Longman	Address 1 (Street): *	Salisbury Road		
Company/Organisation		Address 2:	Horsham		
Telephone Number: *		Town/City: *	West Sussex		
Extension Number:		Country: *	England		
Mobile Number:		Postcode: *	RH13 0AL		
Fax Number:					
Email Address: *	paul@houghtonplanning.co.uk				

Site Address [etails			
Planning Authority:	City of Edinburgh Council			
Full postal address of the s	te (including postcode where available):			
Address 1:				
Address 2:				
Address 3:				
Address 4:				
Address 5:				
Town/City/Settlement:				
Post Code:				
Please identify/describe the	location of the site or sites			
113/5 Broughton Street	Edinburgh EH1 3RZ			
Northing	Easting			
Pre-Applicatio	 n Discussion			
	roposal 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 (re 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? * 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 acce	ss? * Yes X 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 the types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).	se are for the use of particular				
Water Supply and Drainage Arrangements					
Will your proposal require new or altered water supply or drainage arrangements? *	☐ Yes ☒ No				
Do your proposals make provision for sustainable drainage of surface water?? * (e.g. SUDS arrangements) *	☐ Yes ☒ No				
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? *					
 No, using a private water supply No connection required 					
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 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 No Don't Know				
Trees					
Are there any trees on or adjacent to the application site? *	☐ Yes ☒ 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)? *	🛛 Yes 🗌 No				

If Yes or No, please provide further details: * (Max 500 characters)					
Bin storage					
Residential Units Including Conversion					
Does your proposal include new or additional houses and/or flats? *					
All Types of Non Housing Development – Proposed	d New Floorspace				
Does your proposal alter or create non-residential floorspace? *	X Yes □ No				
All Types of Non Housing Development – Proposed Details	d New Floorspace				
For planning permission in principle applications, if you are unaware of the exact proposed floor estimate where necessary and provide a fuller explanation in the 'Don't Know' text box below.	space dimensions please provide an				
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): *					
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 char	acters)				
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 Interes	st				
Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning selected member of the planning authority? *	ervice or an 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? *	X 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 and Mrs DEREK and LESLIE WATSON and LESLIE MARY WATSON				
Address:	35, Bellvue Place, Edinburgh, EH7 4BS				
Date of Service o	of Notice: *	24/08/2023			
Name:	Mr and Mrs William and Gill Hosker				
Address:	Knockbracken, Edderston Road,, Peebles, EH45 9DT				
Date of Service of Notice: *		24/08/2023			
Name:	Mr Imogen Caird				
Address:	19/5, McDonald Road, Edinburgh, EH7 4LX				
Date of Service of Notice: *		24/08/2023			

(2) - None of the la	and to which the application relates constitutes or forms part of an agricultural holding;					
or –						
applicant has serv	art of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the ed notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the panying application was an agricultural tenant. These persons are:					
Name:						
Address:						
Date of Service of	Nation: *					
Date of Service of	Notice.					
	pplicant has taken reasonable steps, as listed below, to ascertain the names and addresses of the other owners or s and *have/has been unable to do so –					
Full Registers of	f Scotland property search undertaken.					
Signed:	Paul Houghton MRTPI					
On behalf of:	Ms Ruth Longman					
Date:	23/08/2023					
	☑ Please tick here to certify this Certificate. *					
Checklist	– Application for Planning Permission					
Town and Country	Planning (Scotland) Act 1997					
The Town and Co	untry Planning (Development Management Procedure) (Scotland) Regulations 2013					
in support of your	moments to complete the following checklist in order to ensure that you have provided all the necessary information application. Failure to submit sufficient information with your application may result in your application being deemed ng authority will not start processing your application until it is valid.					
that effect? *	er application where there is a variation of conditions attached to a previous consent, have you provided a statement to					
	Not applicable to this application					
you provided a sta	ication for planning permission or planning permission in principal where there is a crown interest in the land, have tement to that effect? *					
	Not applicable to this application					
development belo you provided a Pro	ication for planning permission, planning permission in principle or a further application and the application is for nging to the categories of national or major development (other than one under Section 42 of the planning Act), have an application Consultation Report? *					
∟ Yes ∟ No	X 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 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 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	l
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. * A Design Statement or Design and Access Statement. * A Flood Risk Assessment. * A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). * Drainage/SUDS layout. * A Transport Assessment or Travel Plan Contaminated Land Assessment. * Habitat Survey. * A Processing Agreement. * 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 describe

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: 23/08/2023

Payment Details

Online payment:
Payment date:

Created:



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

Ms Longman. Roseland Salisbury Road Horsham RH13 0AL

Decision date: 15 November 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 3F1 113 Broughton Street Edinburgh EH1 3RZ

Application No: 23/03915/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 27 September 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 <u>decision page</u> for further information, including how to appeal or review your decision.

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

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

The proposal complies with sections 64 and 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will preserve or enhance the character or appearance of the conservation area, and does not harm the character of the listed building, its setting, or the setting of neighbouring listed buildings.

The change of use of this property to a Short Term Let (STL) will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity. The proposal does not comply with Development Plan policy NPF4 policy 30(e) and LDP plan policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

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

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

Chief Planning Officer

PLACE

The City of Edinburgh Council

NOTES

- 1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at www.eplanning.scot or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email localreviewbody@edinburgh.gov.uk.
- 2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

Report of Handling

Application for Planning Permission STL 3F1 113 Broughton Street, Edinburgh, EH1 3RZ

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

Item – Local Delegated Decision Application Number – 23/03915/FULSTL Ward – B11 - City Centre

Recommendation

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

Summary

The proposal complies with sections 64 and 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will preserve or enhance the character or appearance of the conservation area, and does not harm the character of the listed building, its setting, or the setting of neighbouring listed buildings.

The change of use of this property to a Short Term Let (STL) will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity. The proposal does not comply with Development Plan policy NPF4 policy 30(e) and LDP plan 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 three bedroom flat located on the eastern side of Broughton Street. The property shares its access to the street via a communal stairwell.

The section of Broughton Street that the application site is located on is of mixed character, featuring a number of commercial units as well as residential properties. Public Transport links are highly accessible from the site.

The application property is part of a category C listed building, 113 and 115 Broughton Street, LB45935, 10/03/1999.

The application property is in the New Town Conservation Area.

Description Of The Proposal

The application is for the retrospective change of use of the property from residential to short term let (sui generis) (STL). No internal or external physical changes are proposed.

Supporting Information

Guest guidelines Photos

Relevant Site History

No relevant site history.

Other Relevant Site History

No other relevant site history was identified.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 15 November 2023

Date of Advertisement: 6 October 2023 **Date of Site Notice:** 6 October 2023

Number of Contributors: 4

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 that 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.

As stated previously, there are no external changes proposed. The change of use will not impact on the character or appearance of the conservation area. Therefore, the proposal does not conflict with the objective of preserving or enhancing the character or 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

The impact on the setting of the listed building and on the setting of neighbouring listed buildings has been assessed in section a).

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 use of this property as an STL would introduce an increased frequency of movement to the property through the shared stair, with the three bedrooms of the property enabling 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.

Whilst the amenity impact of the proposed STL use to neighbouring residents living outside of the shared stair is sufficiently mitigated by the mix of uses and high ambient noise level in the surrounding area, the proposed use would have an unacceptable impact on residents that are living in the stair. The noise generated by the proposed use would be significantly different from the ambient background noise that neighbouring residents living within the building might reasonably expect, and consequently will have a significantly detrimental effect on their living conditions and amenity. There could also be a negative impact on community cohesion and residents' safety.

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

Further, it is important to recognise that residential occupation of the property contributes to the economy, in terms of providing a home and the spend in relation to the use of the property as a home, including the use of local services and resultant employment, as well as by making contributions to the local community.

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

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

Four objections were received. A summary is provided below:

material considerations in objection

The proposal results in the loss of residential accommodation. Assessed in section c). Negative impact to the local community. Assessed in section b) and c).

Contrary to the Development Plan. Assessed in section c).

Negative impact to the character of the area. Assessed in section b).

Negative impact to the local area's sense of place. Assessed in section b).

Impact to local services (refuse and recycling). Suitable refuse and recycling facilities are contained within the application site.

Impact to local services (public transport). The change of use of the dwelling will not have a significant impact on public transport in the area.

Negative impact to neighbouring amenity (security). Assessed in section c).

Negative impact to neighbouring amenity (noise). Assessed in section c).

Negative impact to neighbouring amenity (general). Assessed in section c).

Concerns relating to the maintenance of the listed building. Obligations regarding maintenance of the building are unaffected by the change of use.

non-material considerations

The proposed use will result in increased rent for other properties in Edinburgh. Neighbour notification incorrectly served. The neighbour has received the notification.

Conclusion in relation to identified material considerations

The 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 proposal complies with sections 64 and 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will preserve or enhance the character or appearance of the conservation area, and does not harm the character of the listed building, its setting, or the setting of neighbouring listed buildings.

The change of use of this property to an STL will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity. The proposal does not comply with Development Plan policy NPF4 policy 30(e) and LDP plan 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: 27 September 2023

Drawing Numbers/Scheme

01, 02

Scheme 1

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

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

Appendix 1

Consultations

No consultations undertaken.

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: James Armstrong

Date: 14 November 2023

Authorising Officer

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

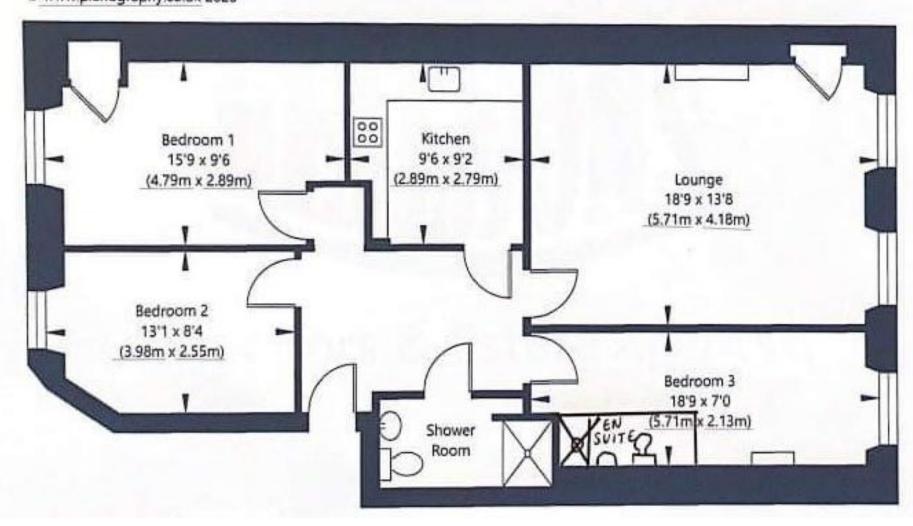
I can confirm that I have checked the Report of Handling and agree the recommendation by the case officer.

Authorising Officer (mRTPI): Damian McAfee

Date: 15 November 2023

Third Floor
Approx. Gross Internal Area
81.41 Sq M / 876 Sq Ft.
Not to scale. For identification only.
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