

Mr Loudon
11 St Peters Place
Edinburgh
EH3 9PH

Decision date: 3 November 2023

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

Change of use to short term let accommodation (in retrospect).
At 1F 27 West Maitland Street Edinburgh EH12 5DX

Application No: 23/03878/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 20 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 [decision page](#) for further information, including how to appeal or review your decision.

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

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

The 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.

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Report of Handling

**Application for Planning Permission STL
1F 27 West Maitland Street, Edinburgh, EH12 5DX**

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

**Item – Local Delegated Decision
Application Number – 23/03878/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 six bedroom flat located on the north western side of West Maitland Street. The property shares its access to the street via a communal stairwell.

West Maitland Street 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 B listed building, 115-30 (inclusive nos) West Maitland Street, LB29292, 27/10/1964.

The application property is in the New Town Conservation Area and Edinburgh's World Heritage Site.

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.

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: 3 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) above which concluded that this would be preserved.

There are no external or internal works proposed and as such there will not be a significant impact on historic assets and places.

The proposal complies with NPF 4 Policy 7.

Proposed Use

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

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

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

The non-statutory Guidance for Businesses (2023) states that an assessment of a change of use of dwellings to a short term let will have regard to:

- The character of the new use and of the wider area;
- The size of the property;
- The pattern of activity associated with the use including numbers of occupants, the period of use, issues of noise, disturbance and parking demand and
- The nature and character of any services provided.

Amenity

The use of this property as an STL would introduce an increased frequency of movement to the property through the shared stair, with the six 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 economy, employment and tourist industry. Assessed in section c).

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

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

Impact to the character of the Listed Building. Assessed in section a).

The listed building will be insufficiently maintained. Obligations regarding the maintenance of the listed building do not change should the property be in short term let use.

Impact to the character of the World Heritage Site. Assessed in section c).

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

non-material considerations

The proposed use will result in increased rent for other properties in Edinburgh.

Tourists are better accommodated in hotels.

The proposed use would result in anti-social behaviour.

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 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 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: 20 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.

Appendix 2

Application Certification Record

Case Officer

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

Case Officer: James Armstrong

Date: 2 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: 3 November 2023



External email >

Contains topics of a financial nature >

To whom it may concern,

I am writing to comment in opposition to application reference number 23/03878/FULSTL at 1F 27 West Maitland Street, Edinburgh, EH12 5DX.

Edinburgh is facing a catastrophic housing crisis, with the latest Citylets report showing that over the past 10 years, rents in the city have increased by 80.6%, clearly well in excess of the incomes of residents. I live in Dalry, not too far away from this flat, and here this crisis is felt particularly acutely. 1-bed flats that would have been rented out at £650 per month only 2 years ago are currently fetching rents in excess of £1000. If it weren't for the Rent Freeze and the subsequent Rent Cap, sitting tenants in the area would have been facing 20-30% rent increases, which we are indeed observing whenever there is a change of tenant in a joint tenancy, which due to a glaring gap in current legislation allows a landlord to increase rents as much as they like.

It is well-established that short-term lets are a significant contributor to increasing rents and house prices, by allowing landlords to earn significantly more from their properties than any long-term tenant would be able to pay, and by bringing in significant competition from often absentee investors to everyone looking to buy a property to live in.

If we leave things to the "free market", the housing supply available to long-term residents will continue to dwindle, and it will indeed be lower-paid workers (like those who work in tourism) who will be at greatest risk of displacement from our city. At the same time, there are alternative ways of accommodating our tourists without this reducing the accommodation available to long-term residents, e.g. by expanding hotel capacity. And if the city still has to make a choice between marginally reducing tourist numbers and accommodating its own residents, I think it's completely reasonable that the latter is chosen. Even in a cold economic calculation long-term residents contribute way more to the economy of the city by the way of their productive output, taxes and spending, not to mention it is fundamentally "fairer" that people who need to live in the city to earn a living are given priority for housing to those who are here on holiday.

Granting planning permission to a property to operate as an STL (incl. via a certificate of

lawfulness) means a property is essentially lost forever as viable accommodation for long-term residents. I believe in the acute housing crisis that Edinburgh is currently facing, such a decision is unacceptable.

Apart from their disastrous impact on housing availability, short-term lets often cause considerable nuisance to neighbours. There are 2 STLs in my stairwell in Caledonian Crescent and at least once a week I get a tourist trying to unlock my door because they've mistaken my flat for the one they're staying in. Once this happened at 11 pm at night, just as I was going to bed for an early start at work the next day. Every so often these flats convert into party flats, which is especially disturbing for the several old and vulnerable residents in our stair. 1F 27 West Maitland Street is similarly located in a shared stair tenement, so I can wholly imagine residents there are experiencing similar problems to us. And even if they haven't had issues so far, there's no guarantee that the next guest won't cause considerable nuisance.

As mentioned, short-term lets have had a disastrous impact on the availability of housing in our city and often cause considerable nuisance to neighbours. This is why I'm opposed in principle to their operation in the city (with very few exceptions), and especially opposed to them being granted planning permission which essentially takes the property off the housing market forever. I believe alternative ways should be sought to accommodate Edinburgh's tourists that do not prevent local residents from finding a home, and their owners should seek to earn income by letting to long-term residents instead.

Regards,

Daniel Gospodinov



Comments for Planning Application 23/03878/FULSTL

Application Summary

Application Number: 23/03878/FULSTL

Address: 1F 27 West Maitland Street Edinburgh EH12 5DX

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

Case Officer: Improvement Team

Customer Details

Name: Mr Jon Grounsell

Address: 3 Palmerston Place Lane Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The property could sleep 9 persons as defined by HMO space standards. As a holiday let, with single beds in the rooms it would be possible to sleep 15 persons, and that is without utilising the lounge as an additional bedroom. This is the type of accommodation that perfectly suits the "stag" and "hen" party weekend market and I feel sure that is the market which this property would ultimately be geared towards.

As is well understood, "stag" and "hen" parties tend towards anti-social behaviour, when a great deal of alcohol is consumed, people stay up long into the night often when they return after nightclubs have closed and where the group can enjoy their own company in the accommodation as easily and more cheaply than at outside venues.

I did not know this property had been operating as a short-term let but I have been witness to such late night revelling, well after 4am on summer nights when the party goers do not seem to be aware of how loud their voices are and how far they carry when the windows are open. The kitchen of this property directly faces my bedroom, 15m away.

I am also aware that this property shares a communal garden with 8 other flats in three stairs. This garden is directly adjacent to my house, onto which I have windows facing on the boundary. If this is used in summer for outdoor parties or as a smoking station it would compromise both my own peace and seclusion and that of the other 8 properties.

I think it is a most unsuitable holiday-let premises in this location because of the clientelle it will attract and the impact it will have on residential neighbours to each side, above, facing the rear and being off a communal stair. I urge the council to refuse this application so that it can return to HMO use, for which there is an urgent need within the city centre.

Comments for Planning Application 23/03878/FULSTL

Application Summary

Application Number: 23/03878/FULSTL

Address: 1F 27 West Maitland Street Edinburgh EH12 5DX

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

Case Officer: Improvement Team

Customer Details

Name: Ms Fiona Serle

Address: 2 Palmerston Place Lane Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the retrospect granting of short term let approval for this property. Such a large property caters for big groups of holiday makers and as such is inappropriate in a residential tenement stair. There has in the past been noise from guests which is heard in the back of the building which echoes around the surrounding buildings.

Comments for Planning Application 23/03878/FULSTL

Application Summary

Application Number: 23/03878/FULSTL

Address: 1F 27 West Maitland Street Edinburgh EH12 5DX

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

Case Officer: Improvement Team

Customer Details

Name: Dr The Architectural Heritage Society of Scotland

Address: 15 Rutland Square, Edinburgh EH1 2BE

Comment Details

Commenter Type: Amenity Body

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The AHSS Forth & Borders Cases Panel has examined the proposals for the change of use to short-term let in a B-listed tenement by John Lessels, 1864, which lies within the New Town Conservation Area and World Heritage Site, and objects.

- 1) The proposals only relate to one property within the tenement, which is accessed from a shared stair. This would have a detrimental impact on the residential amenity of neighbouring properties, and limits the future of the flats not included within the application.
- 2) The change of use would contribute to the unsustainable growth of the short term let (STL) sector in Edinburgh. The economic benefits of tourism for Edinburgh are clear, and we celebrate the role that our architectural heritage plays in this sector. However, the current rising rate of STLs threatens the sense of place and community which are part of the city's attraction, and this is especially acute in the World Heritage Site.
- 3) Scottish Government Research has highlighted the links between STLs and the negative impacts of reduced availability of affordable housing, congestion and reduced quality of life through noise and disturbance (People, Communities and Places, October 2019, pp. iv-v)
- 4) With particular reference to architectural heritage the responsibility for the care and maintenance of communal areas and aspects of joint responsibility in listed buildings and conservation areas is diminished by the increase of short-term occupants. The change of use does not respect the special characteristics of history and place reflected in the building's designation and location in the World Heritage Site and would increase the negative impacts caused by the growth of STLs in Edinburgh.

The proposals contradict Edinburgh Council's Local Development Plan policies DES1, DES5, ENV4, and HOU7. It also conflicts with NPF4 30(e) part (ii), as it would result in the loss of residential accommodation. We therefore object to the application.