

Mrs Morrison 9 Haynes Mead Berkhamsted HP4 1BU

Decision date: 19 October 2023

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

Change of use from residential to short term let (in retrospect). At 2F1 6 West Montgomery Place Edinburgh EH7 5EZ

#### Application No: 23/03980/FULSTL

## **DECISION NOTICE**

With reference to your application for Planning Permission STL registered on 7 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 property as a short term let will have a materially detrimental effect on the living conditions and amenity of nearby residents.

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

Please see the guidance notes on our <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 <u>Planning and Building Standards Online Services</u>

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

The change of use of this property to a short-term let (STL) will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

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

Should you have a specific enquiry regarding this decision please contact Lesley Porteous directly at lesley.porteous@edinburgh.gov.uk.

Sila

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 2F1 6 West Montgomery Place, Edinburgh, EH7 5EZ

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

Item – Local Delegated Decision Application Number – 23/03980/FULSTL Ward – B12 - Leith Walk

#### Recommendation

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

#### Summary

The change of use of this property to a short-term let (STL) will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

## **SECTION A – Application Background**

#### Site Description

The application site is a one-bedroom, second floor flat at 6 (2F1), West Montgomery Place. The property shares its access to the street via a communal stair. There is a shared garden to the rear.

West Montgomery Place is predominantly residential. There is a cafe open normal daytime hours at the corner with Montgomery Street. Public transport links are easily accessible from the site.

The site lies within the New Town Conservation Area.

#### **Description Of The Proposal**

The application is for a change of use from residential to short term let (sui-generis). No internal or external physical changes are proposed. The applicant advises that the short term let use has been in operation since 2016. Therefore the application is retrospective.

#### **Supporting Information**

Planning Statement. NPF 4 Planning Statement.

Relevant Site History

No relevant site history.

## **Other Relevant Site History**

No other relevant planning site history.

**Consultation Engagement** No consultations.

#### **Publicity and Public Engagement**

Date of Neighbour Notification: 8 September 2023 Date of Advertisement: 15 September 2023 Date of Site Notice: 15 September 2023 Number of Contributors: 4

## Section B - Assessment

## Determining Issues

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

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

• If the strong presumption against granting planning permission is engaged, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh it?

This report will then consider the proposed development under Sections 24, 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Having regard to the legal requirement of Section 24(3), in the event of any policy incompatibility between National Planning Framework 4 (NPF4) & Edinburgh Local Development Plan 2016 (LDP) the newer policy shall prevail.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling material considerations for not approving them?

If the proposals do not comply with the development plan, are there any compelling material considerations for approving them?

In the assessment of material considerations this report will consider:

- equalities and human rights;
- public representations; and
- any other identified material considerations.

## Assessment

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

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

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

The 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 from residential premises to a short term let will not have any material impact on the character of the conservation area. The change of use would preserve the appearance of the conservation area.

#### Conclusion in relation to the conservation area

The proposals are acceptable with regard to Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

## b) The proposals comply with the development plan?

National Planning Framework 4 (NPF4) was adopted by the Scottish Ministers on 13 February 2023 and forms part of the Council's Development Plan. NPF4 policies supports the planning and delivery of Sustainable Places, Liveable Places and Productive Places and are the key policies against which proposals for development are assessed. Several policies in the Edinburgh Local Development Plan (LDP) are superseded by equivalent and alternative policies within NPF4. The relevant policies to be considered are:

- NPF 4 Sustainable Places Policy 1.
- NPF 4 Historic Assets and Places Policy 7.
- NPF 4 Productive Places Tourism Policy 30.

- LDP Housing Policy Hou 7.
- LDP Transport Policies Tra 2 and Tra 3.

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

#### Conservation Area

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 proposals do not involve operational development. 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 application property shares its access to the street with other properties in the block via a communal stair and is located within a predominantly residential area. There is a low degree of activity in the immediate vicinity of the property at any time.

The applicant has submitted a planning statement addressing NPF 4 policies. The statement asserts that the property is very small and the flat is at the rear of the building and not visible from the street. The statement continues that the property is in a mixed use area and the guests do not have access to the shared rear garden, therefore there is no negative impact on residential amenity.

The use of the property as an STL would introduce an increased frequency of movement to the property. The proposed one bedroom STL use would enable visitors to arrive and stay at the premises for a short period of time on a regular basis throughout the year in a manner dissimilar to that of permanent residents. There is no

guarantee that guests would not come and go frequently throughout the day and night, and transient visitors may have less regard for neighbours' amenity than individuals using the property as a principal home. This could also have a negative effect on community cohesion and neighbours' security.

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

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

## Loss of residential accommodation

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

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

The applicant's planning statement addresses loss of residential accommodation. It states that the owners sometimes use the property when visiting relatives in the city therefore it is still used for residential purposes. The statement submits that the small size of the property and layout similiar to a hotel suite is not suitable for long term residential use. The statement asserts that STL guests use local businesses which is good for the local economy.

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

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).

#### Car Parking

There is no car parking available at the property. This is acceptable and there is no requirement for cycle parking for STLs. The proposal complies with policies Tra 2 and Tra 3.

## Conclusion in relation to the Development Plan

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the city as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7.

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

The following material planning considerations have been identified:

#### Emerging policy context

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

#### Equalities and human rights

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

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

#### Independent economic impact assessment

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

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

#### Public representations

Four objections received.

A summary of the representations is provided below:

#### material considerations

-Negative impact on residential amenity (including community cohesion and residents' security). Addressed in b) above.

-Negative impact on housing stock. Addressed in b) above.

-Incompatible with NPF 4 Policy 30 (e). Addressed in b) above.

non-material considerations

-Incompatible with City Plan 2030. Addressed in c) above. -Burden on rubbish collection. The applicant must agree a waste strategy with CEC's Waste Services.

## Conclusion in relation to identified material considerations

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

## **Overall conclusion**

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity. The proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

## **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following;

#### Reason for Refusal

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

2. The proposal is contrary to National Planning Framework 4 Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this

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

## Background Reading/External References

To view details of the application go to the Planning Portal

Further Information - Local Development Plan

Date Registered: 7 September 2023

**Drawing Numbers/Scheme** 

01, 02

Scheme 1

David Givan Chief Planning Officer PLACE The City of Edinburgh Council

Contact: Lesley Porteous, Planning Officer E-mail:lesley.porteous@edinburgh.gov.uk Appendix 1

## Consultations

No consultations undertaken.

Appendix 2

## **Application Certification Record**

## Case Officer

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

Case Officer: Lesley Porteous

Date: 18 October 2023

## **Authorising Officer**

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

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

Authorising Officer (mRTPI): Lynsey Townsend

Date: 18 October 2023

From: Eden Anderson <Eden.Anderson@edinburgh.gov.uk> Sent: 03 Oct 2023 10:32:47 To: myemails.dms@edinburgh.gov.uk Cc: Subject: FW: Objecting to STL application 23/03980/FULSTL Attachments:

From: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk> Sent: Monday, October 2, 2023 4:46 PM To: Planning Support <Planning.Support@edinburgh.gov.uk> Subject: FW: Objecting to STL application 23/03980/FULSTL

Eden

This one for 2F1 6 West Montgomery Place. 23/03980/FULSTL

Lesley.

From: Planning <<u>planning@edinburgh.gov.uk</u>> Sent: Monday, October 2, 2023 12:25 PM To: Lesley Porteous <<u>Lesley.Porteous@edinburgh.gov.uk</u>> Subject: FW: Objecting to STL application 23/03980/FULSTL

Sent: Monday, October 2, 2023 12:09 PM

To: Planning cplanning@edinburgh.gov.uk

Cc: Jack Caldwell <<u>Cllr.Jack.Caldwell@edinburgh.gov.uk</u>>; James Dalgleish <<u>Cllr.James.Dalgleish@edinburgh.gov.uk</u>>; Amy McNeese-Mechan <<u>Cllr.Amy.McNeese-Mechan@edinburgh.gov.uk</u>>; Susan Rae <<u>Susan.Rae@edinburgh.gov.uk</u>> Subject: Objecting to STL application 23/03980/FULSTL

🔅 External email >

First time sender >

Dear Edinburgh Council,

I am writing to comment in opposition to application reference number 23/03980/FULSTL at 2F1 6 West Montgomery Place Edinburgh EH7 5EZ.

I live locally, just round the corner at 2F2, 28 Wellington Street (EH7 5ED).

Edinburgh is a chaotic place to live in right now, if you aren't a home owner. Every holiday let is one less home for ordinary residents to live in. This development would exacerbate the crisis for all residents of the city, displacing people from their communities, driving up rents, and further reducing the desperately needed numbers of homes in the city. Planning decisions should first and foremost cater for the needs and interests of the city's residents, and this proposed development runs counter to that.

This development is incompatible with planning and development policies at both a local and national level.

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

The plan goes on to state that "[d]evelopments, including change of use which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted." The impact of high concentrations of holiday lets on nearby rent levels is well documented, and I believe that granting this application will exacerbate the hardship faced by tenants in the

community, and therefore is not in keeping with the City Plan.

The Scottish Government's National Planning Framework 4 states:

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

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

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

Regards,

2F2, 28 Wellington Street Edinburgh EH75ED From: Eden Anderson <Eden.Anderson@edinburgh.gov.uk> Sent: 03 Oct 2023 10:51:37 To: myemails.dms@edinburgh.gov.uk Cc: Subject: FW: Objecting to STL application 23/03980/FULSTL Attachments:

From: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk> Sent: Monday, October 2, 2023 4:38 PM To: Planning Support <Planning.Support@edinburgh.gov.uk> Subject: FW: Objecting to STL application 23/03980/FULSTL

Eden

This one for 2F1 6 West Montgomery Place: 23/03980/FULSTL.

Lesley.

From: Planning <<u>planning@edinburgh.gov.uk</u>> Sent: Monday, October 2, 2023 8:56 AM To: Lesley Porteous <<u>Lesley.Porteous@edinburgh.gov.uk</u>> Subject: FW: Objecting to STL application 23/03980/FULSTL

sent: Sunday, October 1, 2023 6:14 PM To: Planning <planning@edinburgh.gov.uk>

Cc: Jack Caldwell <<u>Cllr.Jack.Caldwell@edinburgh.gov.uk</u>>; James Dalgleish <<u>Cllr.James.Dalgleish@edinburgh.gov.uk</u>>; Amy McNeese-Mechan <<u>Cllr.Amy.McNeese-Mechan@edinburgh.gov.uk</u>>; Susan Rae <<u>Susan.Rae@edinburgh.gov.uk</u>> Subject: Objecting to STL application 23/03980/FULSTL

🔅 External email >

First time sender >

To whom it may concern,

I am writing to comment in opposition to application reference number 23/03980/FULSTL at 2F1 6 West Montgomery Place Edinburgh EH7 5EZ. Our city is in the midst of a catastrophic housing crisis, and I believe that every holiday let is one less home for ordinary residents to live in. This development would exacerbate the crisis for all residents of the city, displacing people from their communities, driving up rents, and further reducing the desperately needed numbers of homes in the city. Planning decisions should first and foremost cater for the needs and interests of the city's residents, and this proposed development runs counter to that.

Moreover, I believe that this development is incompatible with planning and development policies at both a local and national level. The Edinburgh City Plan 2030 states that "[p]roposals which would result in the loss of residential dwellings through demolition or a change of use will not be permitted". Every proposed holiday let could be a residential dwelling, and I do not believe that granting this application is in keeping with the policies outlined in the City Plan. The plan goes on to state that "[d]evelopments, including change of use which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted."

The impact of high concentrations of holiday lets on nearby rent levels is well documented, and I believe that granting this application will exacerbate the hardship faced by tenants in the community, and therefore is not in keeping with the City Plan. The Scottish Government's National Planning Framework 4 states: "Development proposals for the reuse of existing buildings for short term holiday letting should not be supported if it would result in: • an unacceptable impact on the local amenity or character of a neighbourhood or area; or • the loss of residential accommodation where such loss is not outweighed by local economic benefits."

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

Regar (3 Dryden Gait, Edinburgh, EH7 4QR)

From: Eden Anderson <Eden.Anderson@edinburgh.gov.uk> Sent: 03 Oct 2023 10:59:17 To: myemails.dms@edinburgh.gov.uk Cc: Subject: FW: Objecting to STL application 23/03980/FULSTL Attachments:

From: Lesley Porteous <Lesley.Porteous@edinburgh.gov.uk> Sent: Monday, October 2, 2023 4:04 PM To: Planning Support <Planning.Support@edinburgh.gov.uk> Subject: FW: Objecting to STL application 23/03980/FULSTL

Eden

This one for 2F1 6 West Montgomery Place: 23/03980/FULSTL.

Lesley.

From: Planning <<u>planning@edinburgh.gov.uk</u>> Sent: Saturday, September 30, 2023 12:15 PM To: Lesley Porteous <<u>Lesley.Porteous@edinburgh.gov.uk</u>> Subject: FW: Objecting to STL application 23/03980/FULSTL

Sent: Friday, September 29, 2023 8:15 PM To: Planning <a href="mailto:splanning@edinburgh.gov.uk">planning@edinburgh.gov.uk</a>

Cc: Jack Caldwell <<u>Cllr.Jack.Caldwell@edinburgh.gov.uk</u>>; James Dalgleish <<u>Cllr.James.Dalgleish@edinburgh.gov.uk</u>>; Amy McNeese-Mechan <<u>Cllr.Amy.McNeese-Mechan@edinburgh.gov.uk</u>>; Susan Rae <<u>Susan.Rae@edinburgh.gov.uk</u>> Subject: Objecting to STL application 23/03980/FULSTL

Ø External email ≯

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

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

The plan goes on to state that "[d]evelopments, including change of use which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted." The impact of high concentrations of holiday lets on nearby rent levels is well documented, and I believe that granting this application will exacerbate the hardship faced by tenants in the community, and therefore is not in keeping with the City Plan.

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

Regards,

Flat 29, 120 Lawrie Reilly place, EH75FG

## **Comments for Planning Application 23/03980/FULSTL**

## **Application Summary**

Application Number: 23/03980/FULSTL Address: 2F1 6 West Montgomery Place Edinburgh EH7 5EZ Proposal: Change of use from residential to short term let (in retrospect). Case Officer: Improvement Team

## **Customer Details**

Name: Miss Katharin Wood Address: 87 Montgomery Street Flat 3F1 Edinburgh

## **Comment Details**

Commenter Type: Neighbour-Residential Stance: Customer objects to the Planning Application Comment Reasons:

Comment:Whilst this flat is small and the information provided suggests that the applicant has been letting it responsibly, I feel that a consistent approach should be given - I do not agree with the multitude of flats being let on Airbnb/short term holiday lets, as they impact on the development of community in the area and also the security of neighbouring homes is compromised by repeated turnover of occupants meaning that unwanted strangers are difficult to differentiate from short term guests (and even short terms guests could be anybody at all, with any intention, who arrive and then soon disappear). Homes are needed for singles/couples living and working/studying here. It is unpleasant to see rows and rows of keyboxes on many entrances in Edinburgh. Edinburgh needs to value its residents, and not just tourists and students and others who come and go.