

Where To Stay Apartments Ltd.
FAO: Ondrej Liska
4
Kelso
TD5 7SD

Decision date: 30 October 2023

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

Change of use to short term let
At PF2 4 Bothwell Street Edinburgh EH7 5PR

Application No: 23/04137/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 4 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 change of use of this property to a short term let (STL) will have an adverse impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity or the loss of residential accommodation.

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

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

Should you have a specific enquiry regarding this decision please contact Benny Buckle directly at benny.buckle@edinburgh.gov.uk.



Chief Planning Officer
PLACE
The City of Edinburgh Council

NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at www.eplanning.scot or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email localreviewbody@edinburgh.gov.uk.

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

∴

Report of Handling

**Application for Planning Permission STL
PF2 4 Bothwell Street, Edinburgh, EH7 5PR**

Proposal: Change of use to short term let

**Item – Local Delegated Decision
Application Number – 23/04137/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 adverse impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity or the loss of residential accommodation.

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

SECTION A – Application Background

Site Description

The application property is a one-bedroom, ground floor flat, within a traditional four-storey tenement at PF2 4 Bothwell Street. The property is accessed via a communal ground floor front door, with access to a shared stair which is used by further residential properties. The property has access to a rear communal garden space. The immediate area is residential in character, with moderate levels of pedestrian footfall. The property is in close proximity to Easter Road.

Description Of The Proposal

The proposal is for the change of use to a short term let.

Relevant Site History

No relevant site history.

Other Relevant Site History

No further relevant site history.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 30 October 2023

Date of Advertisement: Not Applicable

Date of Site Notice: Not Applicable

Number of Contributors: 13

Section B - Assessment

Determining Issues

This report will 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 comply with the development plan?

National Planning Framework 4 (NPF4) was adopted by the Scottish Ministers on 13 February 2023 and forms part of the Council's Development Plan. NPF4 policies supports the planning and delivery of Sustainable Places, Liveable Places and Productive Places and are the key policies against which proposals for development

are assessed. Several policies in the Edinburgh Local Development Plan (LDP) are superseded by equivalent and alternative policies within NPF4. The relevant policies to be considered are:

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

The non-statutory 'Guidance for Businesses' (2023) is a material consideration that is relevant when considering change of use applications.

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 relates 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 is a one-bedroom, ground floor flat, within a traditional four-storey tenement. The property is accessed via a communal ground floor front door, with access to a shared stair which is used by a further 15 residential properties. The property has access to a rear garden space. The immediate area is residential in character, with moderate levels of pedestrian traffic. The property is in close proximity to Easter Road, which is characterised as mixed-use with residential, commercial, retail, bar/restaurant uses and high levels of vehicular and pedestrian movement. Notwithstanding this, as Bothwell Street does not have through-traffic, it enjoys a relatively good level of residential amenity.

The use as a short term let would allow visitors to come and go from the premises for inconsistent periods of time on a regular basis throughout the year in a manner dissimilar to that of a permanent resident. A transient visitor may also have less regard for neighbours' amenity than individuals using the property as a principal home. The properties access to a communal stair and outdoor amenity space creates an

opportunity where by STL users could directly affect neighbouring residential amenity. The use as a short term let is not consistent with the existing neighbouring residential uses.

The proposed use would increase the ambient background noise levels beyond what residents would reasonably expect within the immediate and local area. The increase in frequency of movement to the property at unpredictable hours would damage the amenity of the immediate neighbours and adjacent properties.

A change of use would increase the level of ambient background noise in this context to beyond what is reasonably expected by neighbouring residents and will have a 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 property will only be supported where the economic benefits of the proposals are outweighed by demonstrable local economic benefits.

The current lawful planning use of the property is for residential accommodation. Given the recognised need and demand for housing in Edinburgh it is important to retain this, where appropriate.

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.

However, having the property in residential use would also contribute to the economy, through the use of a variety of local services and employment opportunities across the City. Long term residents also have the ability to make consistent and long-term contributions to the local community.

The proposal would result in the loss of residential accommodation. There is a recognised need and demand for housing in Edinburgh, therefore, it is important to retain the existing supply where appropriate.

Parking Standards

There are no requirement for cycle parking for STLs. Cycles could be parked inside the property. The proposals comply with LDP Policies Tra 2 and Tra 3.

Conclusion in relation to the Development Plan

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the city as a whole from the provision of tourist accommodation in this case it does not outweigh the adverse impact on residential amenity or the loss of residential accommodation. The

proposal does not comply with the Development Plan policy NPF 4 policy 30(e) and LDP policy Hou 7.

b) 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

The application received 13 representations, all objecting. A summary is provided below:

material considerations in objection

- The short term let use would remove a long-term residential property from Edinburgh's housing stock. This has been assessed within section a).

- The short term let use would have a detrimental effect on neighbouring residential amenity. This has been addressed within section a).
- Access to the short term let would allow further disruption to neighbouring residential properties. This has been addressed within a).

non-material considerations in objection

- Concern that a change of use to short term let use would increase litter.

Conclusion in relation to identified material considerations

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

Overall conclusion

The change of use of this property to an STL will have an unacceptable impact on neighbouring amenity. The loss of the residential accommodation has not been justified. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of tourist accommodation, in this case it does not outweigh the adverse impact on residential amenity or the loss of residential accommodation.

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

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reason for Refusal

1. The proposal is contrary to Local Development Plan Policy Hou 7 in respect of Inappropriate Uses in Residential Areas, as the use of this dwelling as a short term let will have a materially detrimental effect on the living conditions and amenity of nearby residents.
2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of Local Amenity and Loss of Residential Accommodation, as the use of this dwelling as a short term let will result in an adverse impact on local amenity and the loss of a residential property has not been justified.

Background Reading/External References

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

Further Information - [Local Development Plan](#)

Date Registered: 4 September 2023

Drawing Numbers/Scheme

01 - 02

Scheme 1

**David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council**

Contact: Benny Buckle, Assistant Planning Officer
E-mail: benny.buckle@edinburgh.gov.uk

Appendix 1

Consultations

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: Benny Buckle

Date: 30 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): Damian McAfee

Date: 30 October 2023

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Ms Tyana Priya

Address: 4/5 Bothwell street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I do not wish for this application to be approved. Converting a long term let to short term only aggravates the rental crisis in Edinburgh. Furthermore, in my experience, short term lets create a lot of noise and litter. I feel that this property should be used to provide housing for someone who wants to live in the area.

Please consider my comments and deny this application.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Mr Calum MacLeod

Address: 2/22 Bothwell House Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Short-term lets are a plague on the city of Edinburgh.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Miss Patricia McKinlay

Address: 2-24 Bothwell House Bothwell Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I have been approached a number of times in recent months by people looking for lock boxes in Bothwell Street. I have been told that they have rented a property in Bothwell Street via companies such as Air BnB. My internal buzzer has been pressed in the early hours of the morning and I have been stopped late in the evening when I have been returning home, sometimes by a group of people. I have also been sworn at because I was 'unhelpful'. The properties in Bothwell Street are residential properties. I do not feel safe being approached by complete strangers looking for a property that they say they have rented and then being verbally abused when I am not able to direct them.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Dr Takeshi Fujisawa

Address: 8/4 Bothwell Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Short-term let will bring uncertainty regarding when the property will be occupied and by whom and will add certain security and quality of life around the neighbourhood. Seeing the current rent-property crisis, we should keep the long-term residential to-let rather than permitting short-term let properties.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Rachel Stockton

Address: PF1 Bothwell St Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I have no issues with AirBnB as it was originally intended i.e. where the host is a private individual looking for ways to meet like minded folk and pay their bills (e.g. the letting of a room within their home/letting their flat while on holiday). Under this model responsible hosts vet potential guests and make it clear what is expected re noise etc and in the event that the guest is anti-social, neighbours at least have some form of redress.

I would object to a Commercial AirBnB purely because neither guests nor absentee "hosts" have the same relationship with/responsibility to their neighbours, as compared to a person who actually resides in the building or close by.

The gardens on this side of Bothwell St are off set, meaning that the Garden for number 4 is directly outside my bedroom window at number 6. I would be concerned that by making that a Commercial rather than Private space it would disrupt what is still a lovely quiet neighbourhood - I have no issues with my actual neighbours making a noise out there once in a while - that is city life. My concern is Where to Stay Apartments will turn PF2 4 Bothwell into a party flat without any consideration for others. A friend and neighbour who lives at number 4 advises me there have already been issues.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Elsa van der Wal

Address: 4/4 Bothwell Street Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We noticed the previous tenant in this flat on the ground floor suddenly left at the start of the year, and the landlord began renovating the property. We suspect it was this renovation that left a substantial amount of building debris in the stairwell, which has still not been cleared. They did not consult any of the neighbours in our stair about mounting two lock boxes outside either. We were able to find the listing on Airbnb and discovered that this host has a number of flats like this across the city- exactly the kind of monopoly we should all object to in the current housing crisis. I cannot state firmly enough how much I object to this flat remaining a short term let property.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Mr Gordon Neil Harrower

Address: 6/10 Bothwell street White/Caucasian

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Not keen to see Airbnb on the street if that is managed by a corporate business, I feel there would be a lack of control on the behaviour of the potential guests

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Steven Travers

Address: 4/12 Bothwell Street Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a strong community stairwell and a short term let does not feel in keeping with that. It seems to me that short term lets do not encourage those living in them for a short period of time to invest in the community, get to know neighbours and support each other whilst staying in the building.

Comments for Planning Application 23/04137/FULSTL

Application Summary

Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details

Name: Mr Richard Parker

Address: 1/38 Bothwell Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Madam/Sir,

I'm writing to lodge my objections to this planning application for a change of use for apartment PF2 to a short-term-let on the grounds of noise.

Best wishes,

Richard

From: [Planning](#)
To: [Planning Improvement](#)
Subject: FW: Objecting to STL application 23/04137/FULSTL
Date: 30 September 2023 12:11:19
Attachments: [external.png](#)

From: Matthew Wagstaff <[REDACTED]>
Sent: Friday, September 29, 2023 8:14 PM
To: Planning <planning@edinburgh.gov.uk>
Cc: Jack Caldwell <[REDACTED]>; James Dalgleish <[REDACTED]>; Amy McNeese-Mechan <[REDACTED]>; Susan Rae <[REDACTED]>
Subject: Objecting to STL application 23/04137/FULSTL

[External](#)

To whom it may concern,

I am writing to comment in opposition to application reference number 23/04137/FULSTL at PF2 4 Bothwell Street Edinburgh EH7 5PR.

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.”

From: [Planning](#)
To: [Planning Improvement](#)
Subject: FW: Objecting to STL application 23/04137/FULSTL
Date: 02 October 2023 17:47:08
Attachments: [external.png](#)

From: Ros Hunter <[REDACTED]>
Sent: Monday, October 2, 2023 5:29 PM
To: Planning <planning@edinburgh.gov.uk>
Cc: Jack Caldwell <[REDACTED]>; James Dalgleish
<[REDACTED]>; Amy McNeese-Mechan
<[REDACTED]>; Susan Rae <[REDACTED]>
Subject: Objecting to STL application 23/04137/FULSTL

[External](#)

To whom it may concern,

I am writing to comment in opposition to application reference number 23/04137/FULSTL at PF2 4 Bothwell Street Edinburgh EH7 5PR.

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

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

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

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

The Scottish Government's National Planning Framework 4 states:

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

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

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

Regards,

Ròs Hunter



Sent from my iPhone

From: [Planning](#)
To: [Planning Improvement](#)
Subject: FW: Objecting to STL application 23/04137/FULSTL
Date: 03 October 2023 08:44:56
Attachments: [external.png](#)

From: Calum Cooper <[REDACTED]>
Sent: Tuesday, October 3, 2023 12:53 AM
To: Planning <planning@edinburgh.gov.uk>
Cc: Jack Caldwell <[REDACTED]>; James Dalgleish <[REDACTED]>; Amy McNeese-Mechan <[REDACTED]>; Susan Rae <[REDACTED]>

Subject: Objecting to STL application 23/04137/FULSTL

[External](#)

To whom it may concern,

I am writing to comment in opposition to application reference number 23/04137/FULSTL at PF2 4 Bothwell Street Edinburgh EH7 5PR.

I work for Edinburgh council, I spend every day out in the community in service of the council and the folk who live here, but I can't afford to live here and never will thanks to these Airbnbs. I firmly believe that homes should be for housing folk who work or study in the area, who will form part of the community.

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

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

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

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

The Scottish Government's National Planning Framework 4 states:

“Development proposals for the reuse of existing buildings for short term holiday letting should

not be supported if it would result in:

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

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

Regards,
Calum Cooper



Comments for Planning Application 23/04137/FULSTL

Application Summary

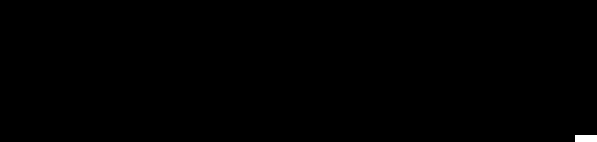
Application Number: 23/04137/FULSTL

Address: PF2 4 Bothwell Street Edinburgh EH7 5PR

Proposal: Change of use to short term let

Case Officer: Improvement Team

Customer Details



Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Leith area is already home to a significant amount of short-term rentals, which essentially pushes residents out of the area in an already competitive market. There is a severe shortage of rentals in Edinburgh. We had to compete with 10 other households who were searching for housing when renting our current flat (6/8 Bothwell Street). In one year, rentals in Edinburgh have increased by 25% - the highest across the UK. By changing this flat to a short-term let, it will only contribute to the shortage and thus drive rents even higher.

Short-term lets also affect the character of the neighbourhood by reducing the number of long-term residents. Leith is known for its sense of community and this would have a negative impact on its culture.

Please consider blocking this request from Where to Stay Apartments. With more than 40 properties on its books already, I have no doubt they will continue to profit without this acquisition but can't be so sure that Leith and the Edinburgh community will recover if we continue to allow vital housing to be changed to short-term rental use.

Thank you,

