

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: planning.support@edinburgh.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100600304-004

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

Applicant or Agent Details

Are you an applicant or an agent? * (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant Agent

Agent Details

Please enter Agent details

Company/Organisation:	Manson Architects + Planners		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Ross	Building Name:	
Last Name: *	Manson	Building Number:	25
Telephone Number: *	0131 225 2958	Address 1 (Street): *	Ainslie Place
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Edinburgh
Fax Number:		Country: *	United Kingdom
		Postcode: *	EH3 6AJ
Email Address: *	ross.manson@mansonplanning.co.uk		

Is the applicant an individual or an organisation/corporate entity? *

Individual Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:	<input type="text" value="Mr"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text"/>
First Name: *	<input type="text" value="Paul"/>	Building Number:	<input type="text" value="4"/>
Last Name: *	<input type="text" value="Merchant"/>	Address 1 (Street): *	<input type="text" value="Cumberland Street North West Lane"/>
Company/Organisation	<input type="text"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="Edinburgh"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="United Kingdom"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="EH3 6RG"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="REDACTED"/>		

Site Address Details

Planning Authority:	<input type="text" value="City of Edinburgh Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="4A CUMBERLAND STREET NORTH WEST LANE"/>
Address 2:	<input type="text" value="STOCKBRIDGE"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="EDINBURGH"/>
Post Code:	<input type="text" value="EH3 6RF"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="674592"/>	Easting	<input type="text" value="325067"/>
----------	-------------------------------------	---------	-------------------------------------

Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: *
(Max 500 characters)

Retrospective change of use from flatted dwelling to short term let at 4A Cumberland Street North West Lane Edinburgh EH3 6RF

Type of Application

What type of application did you submit to the planning authority? *

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? *

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: * (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Appeal Statement provided separately in 'Supporting Documents'.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? *

Yes No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: * (Max 500 characters)

The matter of the Appellant's address is a material consideration in the determination of this application and subsequent appeal. It was available to the Local Authority at the time of determination because it was noted in the application forms. The matter is not strictly new information but the Appellant does not believe the close proximity between the application site and the Appellant's address was given due consideration or weighting in the determination of the application.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: * (Max 500 characters)

Appeal Statement, Supporting Statement, Location Plan, Floor Plan, Decision Notice, Report of Handling.

Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

22/04795/FUL

What date was the application submitted to the planning authority? *

23/09/2022

What date was the decision issued by the planning authority? *

15/12/2022

Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. *

Yes No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? *

Yes No

Is it possible for the site to be accessed safely and without barriers to entry? *

Yes No

Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. *

Yes No

Have you provided the date and reference number of the application which is the subject of this review? *

Yes No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? *

Yes No N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? *

Yes No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review *

Yes No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr Ross Manson

Declaration Date: 15/03/2023

**RETROSPECTIVE CHANGE OF USE FROM
RESIDENTIAL TO SHORT-TERM LET**
*4A CUMBERLAND STREET NORTH WEST LANE
EDINBURGH EH3 6RF*

12 September 2022

Applicant: Mr P Merchant

REF: COU_NWCSL_PS_0922

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET

4A CUMBERLAND STREET NORTH WEST LANE

Contents

Introduction

Purpose

Location and Description

Development Plan

Scottish Planning Policy

Edinburgh LDP 2016 Context

Material Consideration : Guidance for Businesses (November 2021)

Recent Decisions and Appeals

Summary

Conclusion

Appendix A: Site Photographs

Revision:

Date: 12.09.2022

Prepared by: Ross Manson MRTPI

Contact: ross.manson@mansonplanning.co.uk

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET 4A CUMBERLAND STREET NORTH WEST LANE

1.0 Introduction

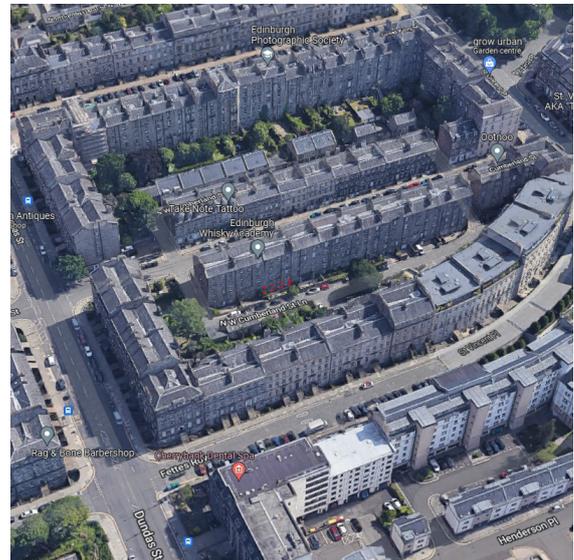
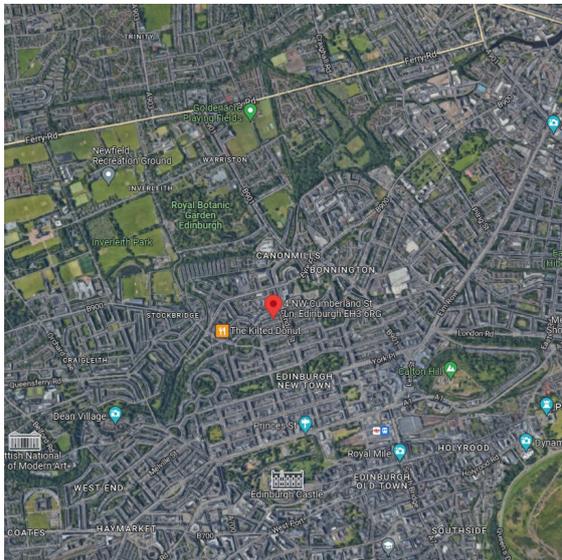
- 1.1 Section 26B(5) of the Town and Country Planning (Scotland) Act 1997, as amended allowed for Scottish Ministers to approve short-term let control areas through new regulations, which in turn enabled Local Authorities to propose and enforce “control areas”.
- 1.2 The Town and Country Planning (Short-Term Let Control Area) (Scotland) Regulations 2021 (“the regulations”) were brought into force on 1st April 2021.
- 1.3 Since the regulations were brought into force, City of Edinburgh Council has designated the entirety of the Local Authority geographic area as a Short-Term Let Control Area. The control area came into force on 5th September 2022, following the approval of Scottish Ministers on 27th July 2022. This means the majority of secondary lettings used for the purposes of short-term letting require planning permission.
- 1.4 A licence to operate a short-term let property was brought into force by the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2021. Planning permission or lawful use of the property as a short-term let is a pre-condition of the licence to operate. Therefore, to be granted a licence and operate a STL lawfully, planning permission must be obtained.
- 1.5 All properties being operated as a short-term let property must be licensed by 1st July 2024, and existing hosts must submit their licence application before 1st April 2023.
- 1.6 This retrospective planning application is for the change of use from a residential flatted dwelling (sui generis) to short-term let use (sui generis) as a result of the regulatory changes described above.

2.0 Purpose

- 2.1 This Supporting Statement has been submitted on behalf of Mr P Merchant (“the Applicant”) to support a planning application to change the use of 4a Cumberland Street North West Lane from residential to short-term let.
- 2.2 The purpose of this application is to retrospectively apply for a change of use from residential (Class 9 / sui generis) to Short-Term Let (sui generis). The document provides information deemed necessary to assess the application, however should additional information be required this should be requested through the Applicant’s agent.

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET 4A CUMBERLAND STREET NORTH WEST LANE

3.0 Location and Description



- 3.1 The property is situated to the north of the city centre boundary, approximately 1.2km north of Edinburgh Waverley Station and 500m from Stockbridge. The property is on the basement floor of a category A-Listed Georgian tenement facing North West Cumberland St Lane.
- 3.2 The application property is in the New Town Conservation Area (Second New Town of Edinburgh).
- 3.3 It is also within the Old Town/New Town World Heritage Site (Northern New Town) and the New Town Gardens Historic Garden/Designed Landscape.
- 3.4 There are no alterations proposed to the interior or exterior of the building.
- 3.5 The property is accessed from Cumberland Street North West Lane at ground level through it's own main door. It has 3 bedrooms; extends to 145sqm, and has capacity for a maximum of 6 guests. The property has a small private garden which is north facing and is primarily used for access.
- 3.6 The building itself is constructed with sandstone and has traditional white sash and case windows and is arranged over 5 storeys.
- 3.7 The property is situated in the inner city with levels of background noise that are not characteristic of a quiet residential setting.
- 3.8 The majority of the parking on the surrounding streets and on Cumberland Street North West Lane is for permit holders only, but given the adjacency to the city centre it is not envisaged that guests would need a vehicle if visiting for business or leisure.

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET 4A CUMBERLAND STREET NORTH WEST LANE

4.0 Development Plan

- 4.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 states, “Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise-” In the case of this planning application the development plan is the Edinburgh Local Development Plan 2016 (“LDP”) and the Strategic Development Plan SESplan 2013.
- 4.2 SESplan has six member authorities in total and is the Strategic Plan that sets out the spatial strategy for growth in the south east of Scotland. The Strategic Plan recognises Edinburgh as the main growth area and driver of the Scottish economy.
- 4.3 Edinburgh is identified as the heart of the ‘regional core’ in the SDP and is the main catalyst of the Scottish economy.
- 4.4 Edinburgh City Centre is the largest centre in SESplan and is positioned at the top of the network of centres. It performs a broad range of regional and national functions including **shopping, office, leisure, culture, tourism and government** and competes with other regional centres in Scotland and the North of England. These functions are supported by visitor accommodation that enables Edinburgh to maintain it’s status as the regional core and attract visitors throughout the year, whether the visit is for business or tourism.
- 4.5 Paragraph 220 of the Edinburgh LDP recognises that tourism is the third biggest employment source in Edinburgh, providing jobs for over 31,000 people. The supply of short-term visitor accommodation therefore supports a large proportion of the Edinburgh job market and there is an economic benefit to maintaining STLs.
- 4.6 The Council does not currently have planning policy that specifically addresses the control of Short Term Lets. The most relevant policy is Hou 7: Inappropriate Uses in Residential Areas and this is primarily used to assess proposals for conversions from houses or flats to houses in multiple occupancy.
- 4.7 Edinburgh Council’s Guidance for Businesses (November 2021), provides some guidance on non-residential uses in residential areas and states that consideration will be given to the character of the wider area, size of the property, pattern of use, and the nature and character of services provided. The guidance goes further to clarify that properties for commercial use will generally only be acceptable where there is a private access from the street.

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET

4A CUMBERLAND STREET NORTH WEST LANE

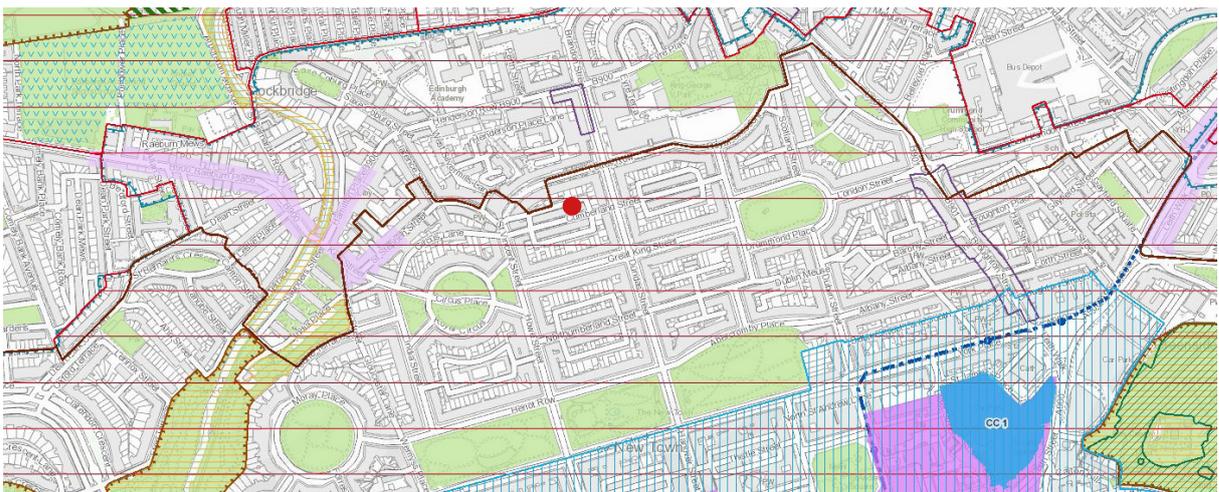
4.8 **The Edinburgh Tourism Strategy 2020 (adopted 2012) set out clear and ambitious plans to develop and promote the tourism economy.** The primary goals of the strategy were; increase tourism visits by one third; increase average visitor expenditure by 10% in real terms; and reduce seasonality by attracting more visitors in the off-season. **Short-term visitor accommodation, particularly in high-quality, controlled environments close to or in the city centre are supporting the vitality and viability of Edinburgh's tourism economy.**

5.0 Scottish Planning Policy

5.1 Scottish Planning Policy 2014 is a statement from the Scottish Government on how land use planning matters should be addressed. SPP introduces a presumption in favour of development that contributes to sustainable development, which must be given due consideration by planning authorities, albeit the development plan should be the starting point for determining planning applications in Scotland.

5.2 Scottish Planning Policy (SPP) is a significant material consideration due to the LDP being over 5 years old. Paragraph 28 of SPP gives a presumption in favour of development which contributes to sustainable development. Paragraph 29 outlines the thirteen principles which should guide the assessment of sustainable development. **The proposal complies with Paragraph 29 of SPP. It will contribute to the local tourism, leisure, and restaurant economy, which is vitally important as local businesses recover from the Covid-19 pandemic.**

6.0 Edinburgh LDP 2016 Context



- World Heritage Sites: Old and New Towns World Heritage Site
- Designated Conservation Area: New Town
- Historic Garden Designed Landscape Inventory Site: New Town Gardens and Dean
- Urban Area

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET 4A CUMBERLAND STREET NORTH WEST LANE

7.0 Material Consideration : Guidance for Businesses (November 2021)

- 7.1 The non-statutory guidance provides some indication of how applications for short-term let properties will be assessed. The guidance states that regard will be given to the following;
- the character of the new use and of the wider area,
 - size of the property,
 - 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.
- 7.2 The guidance continues and elaborates in respect of flatted properties. If flatted properties are proposed for commercial use or in this case, short-term let then a “change of use in flatted properties will generally only be acceptable where there is a private access from the street”.
- 7.3 4A Cumberland Street North West Lane has ground floor main door access and is not accessed through a communal stair, which is considered to result in a greater risk of disturbance to residential neighbours.
- 7.4 The guidance is useful in the assessment of applications and will certainly result in a reduction in the number of STL properties in Edinburgh with the potential to adversely affect the amenity of and setting of residential areas, but in this case none of the reasons why an application would be refused are applicable.

8.0 Recent Decisions and Appeals

- 8.1 The Council recognise there have been a number of recent decisions, particularly appeals, which have informed the assessment process of short-term let application. These appeals and decisions have also helped the Council to start developing new short-term let guidance. Until such time as the new guidance is formally approved and published, the recent appeals and decisions are material considerations and can form the basis on which new applications can be assessed.
- 8.2 The main determining issues in these cases related to the following:
- The location of the property and, in particular, whether it is part of a common stair shared by residents. Typically, appeals are successful where the property has its own private access;
 - The frequency of movement and likely disturbance for neighbours, and whether this is likely to be more than a full-time tenant occupying the flat. Generally, the smaller the flat the less likelihood of disturbance to neighbours;
 - The impact on the character of the neighbourhood. Again, this often relates to the size of the property and whether anyone renting it for a few days is likely to shop or use local services any differently from a long-term tenant;

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET

4A CUMBERLAND STREET NORTH WEST LANE

- The nature of the locality and whether the property is located within an area of activity such as being on a busy road or near shops and other commercial services. As such, residents would be accustomed to some degree of ambient noise/ disturbance.
- 8.3 In recent decision and appeal cases (PPA-230-2367) a Scottish Government Reporter dismissed claims made by the Council that an inner city street was characterised as a quiet residential areas. When compared the Edinburgh's sub-urban areas such as Blackhall, The Grange, or Cramond, the city centre and inner city areas have a higher level of ambient noise and disturbance is generally expected. It should therefore not be assumed that a mixed or predominantly residential area is quiet.
- 8.4 The property at 4a Cumberland Street North West Lane benefits from main door access, and both the Council and Scottish Government Reporters have recognised that short-term lets without main door access are generally not supported.
- 8.5 By virtue of the property location, size, character of the surrounding area, and access arrangements, it is considered to be suitable for a change of use from residential to short-term let and complies with LDP policy Hou 7 and the Guidance for Businesses.

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET *4A CUMBERLAND STREET NORTH WEST LANE*

9.0 Summary

Is the flat accessed through a communal entrance?

No, the flat is access from through a main door at ground floor.

How long has the property been in continuous use as a short term let as of the submission?

27 months

Has the Applicant or letting agent received complaints regarding the use from third parties?

No

Has City of Edinburgh Council taken enforcement action against the current property owner?

No

What size is the property?

3 bedrooms

145sqm Gross floor area

Guest capacity is 6

Do guests have access to a garden

Yes. Small private garden primarily used for access to the property.

Are there restricted hours of arrival / departure to the property as a STL?

Arrival between 3pm and 10pm. Departure before 11am

Minimum stay period

2 nights

Are there any proposed alterations to the property

No

Is the property professional managed as a short-term let i.e letting agency?

Yes

Is the property in a quiet residential area?

No

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET *4A CUMBERLAND STREET NORTH WEST LANE*

10.0 Conclusion

- 10.1 The application for a change of use complies with the provisions of the local development plan and guidance. There are no concerns relating to neighbouring amenity by virtue of the central location and main door access.
- 10.2 The proposal does not include any internal or external alterations to the property and therefore has no adverse impact on the character and setting of listed buildings or conservation areas.
- 10.3 In determining the planning application it should be assessed against the local plan. There are no compelling material considerations that would suggest the application should be refused.

RETROSPECTIVE CHANGE OF USE FROM RESIDENTIAL TO SHORT-TERM LET 4A CUMBERLAND STREET NORTH WEST LANE

Appendix A: Site Photographs



Main door entrance

Gate access through private garden

Dear sirs,

With reference to the above application for a change of use, we wish to log a formal appeal to decline the application for the change of use to a short term let.

The reasons for declining the application were as I read are shown briefly below;

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

We feel it entirely reasonable to challenge these comments for the reasons outlined below.

When we purchased the property, we rented the property out on a short assured tenancy, which worked well. Since changing to the private residential tenancy we have experienced tenants who have not paid the rent and fail to maintain the external appearance of communal areas. Upkeep of algae on stones, missing bin days leading to rats etc.

Numerous occasions of multiple months of rent arrears, without the ability to help tenants to pay their rent on time. This has led to late mortgage payments and fines, whilst with interest rates rising, I have been unable to cover the cost of increases. Without the need to upgrade or refurbish or to move in myself, I was left with the only option to sell something that I had worked my entire life to purchase.

Short term rentals came as an option to look after the property, the upkeep externally and to offer accommodation to businesses and occasional tourists, also supporting the local independent businesses I recommend.

I am the neighbour directly above and to the side of the property. The main impact of any additional footfall is on myself. Being on the adjoining walls, I can easily tackle any issues.

I have hosted a range of families travelling on business, tenants needing re housed for insurance works, theatre artists working on Lion King and a wonderful selection of people coming to the City to enjoy Edinburgh.

We comply with all safety requirements, we have installed heat, moisture and noise alarms for disturbances (which there has been not one).

There is a significant number of short lets on the Street, both above and to the side which have not been taken into account and for which you will have applications in for. These must be considered, as well as the shops on Cumberland Street, pubs at each end and garages to the rear.

Since retiring, the income from the property has allowed my disabled wife and I to 'work' locally on the upkeep of the property and still make an income to survive.

I understand that there has been no neighbour objection to the application and the reason for the refusal looks like a blanket reason for all applications in the area without full consideration of each property. As such it seems an unreasonable fee to take from each property owner for each property and disproportionate to the time spent on the consideration.

Yours sincerely

A thick black horizontal bar redacting the signature of the sender.

Further comments to be added regarding 44A Cumberland Street Edinburgh EH3 6RG

We understand that you class this area as solely residential, however please find listed below a list of the many commercial establishments operating in adjacent streets that are between 2 and 5 minutes walk from the above properties:

Cumberland Street North West Lane:

12 commercial parking bays

120 commercial under ground parking

11 main door flats in the street with 3 owned, 4 airnb and 4 rental properties

Cumberland Street:

Designer dressmaker

Chiropodist

Dog groomer

Property consultancy

Printers

Tattoo Shop

Architect

St Vincent Street

Playfair Church used for training purposes, dance, theatre and all types of further education

St Vincent Bar

Opticians

Architects

Supermarket

Café and plant shop

Cumberland South West Lane

Property management car park for 8 vehicles

Parking for 8 vehicles – various businesses

Dundas Street

Vet

Locksmith

2 x Bridal shop

3 x restaurants

2 x Antique shop

Alteration shop

Massage and beauty salon
4 x Art galleries
2 x Property letting agents
Bakery
2 x Wine bar
Local supermarket
2 x Cafes
3 x Hair dressers
Pasta shop
3 x Take aways
Charity shop
Tesco supermarket
Yoga shop

Also adjacent within these streets, we also have:

Howe Street

Paint shop
Upholstery shop
3 x Property agencies
Design shop
Estate agency
Restaurant

Eyre Place

Chemist
Kitchen design shop
2 x Restaurants
1 Chemist
Doctors surgery

Henderson Row

2 x Take aways
Cake making shop
Royal London HO
Edinburgh Academy
Dentist

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: planning.support@edinburgh.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100600304-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

Type of Application

What is this application for? Please select one of the following: *

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

Description of Proposal

Please describe the proposal including any change of use: * (Max 500 characters)

Retrospective change of use from flatted dwelling to short term let.

Is this a temporary permission? *

Yes No

If a change of use is to be included in the proposal has it already taken place?
(Answer 'No' if there is no change of use.) *

Yes No

Has the work already been started and/or completed? *

No Yes – Started Yes - Completed

Applicant or Agent Details

Are you an applicant or an agent? * (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant Agent

Agent Details

Please enter Agent details

Company/Organisation:

Ref. Number:

You must enter a Building Name or Number, or both: *

First Name: *

Ross

Building Name:

Last Name: *

Manson

Building Number:

25

Telephone Number: *

0131 225 2958

Address 1
(Street): *

Ainslie Place

Extension Number:

Address 2:

Mobile Number:

Town/City: *

Edinburgh

Fax Number:

Country: *

United Kingdom

Postcode: *

EH3 6AJ

Email Address: *

ross.manson@mansonplanning.co.uk

Is the applicant an individual or an organisation/corporate entity? *

Individual Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:

Mr

You must enter a Building Name or Number, or both: *

Other Title:

Building Name:

First Name: *

Paul

Building Number:

4

Last Name: *

Marchant

Address 1
(Street): *

Cumberland Street North West Lane

Company/Organisation

Address 2:

Telephone Number: *

Town/City: *

Edinburgh

Extension Number:

Country: *

United Kingdom

Mobile Number:

Postcode: *

EH3 6RG

Fax Number:

Email Address: *

Site Address Details

Planning Authority:

City of Edinburgh Council

Full postal address of the site (including postcode where available):

Address 1:

4A CUMBERLAND STREET NORTH WEST LANE

Address 2:

STOCKBRIDGE

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

EDINBURGH

Post Code:

EH3 6RF

Please identify/describe the location of the site or sites

Northing

674592

Easting

325067

Pre-Application Discussion

Have you discussed your proposal with the planning authority? *

Yes No

Site Area

Please state the site area:

145.00

Please state the measurement type used:

Hectares (ha) Square Metres (sq.m)

Existing Use

Please describe the current or most recent use: * (Max 500 characters)

Short term let

Access and Parking

Are you proposing a new altered vehicle access to or from a public road? *

Yes No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? * Yes No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? *

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? * Yes No

Do your proposals make provision for sustainable drainage of surface water?? * Yes No
(e.g. SUDS arrangements) *

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? *

Yes

No, using a private water supply

No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

Assessment of Flood Risk

Is the site within an area of known risk of flooding? * Yes No Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? * Yes No Don't Know

Trees

Are there any trees on or adjacent to the application site? * Yes No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? * Yes No

If Yes or No, please provide further details: * (Max 500 characters)

Public on street collection.

Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? *

Yes No

All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? *

Yes No

Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013 *

Yes No Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? *

Yes No

Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? *

Yes No

Is any of the land part of an agricultural holding? *

Yes No

Are you able to identify and give appropriate notice to ALL the other owners? *

Yes No

Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate B

Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that

(1) - No person other than myself/the applicant was an owner [Note 4] of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application;

or –

(1) - I have/The Applicant has served notice on every person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application was owner [Note 4] of any part of the land to which the application relates.

Name:

Ms Susie Doherty

Address:

4, Cumberland Street North West Lane, Edinburgh, United Kingdom, EH3 6RG

Date of Service of Notice: *

20/09/2022

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;

or –

(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:

Name:

Address:

Date of Service of Notice: *

Signed: Ross Manson

On behalf of: Mr Paul Marchant

Date: 20/09/2022

Please tick here to certify this Certificate. *

Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? *

Yes No Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? *

Yes No Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? *

Yes No Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? *

Yes No Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? *

Yes No Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? *

Yes No Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- Site Layout Plan or Block plan.
- Elevations.
- Floor plans.
- Cross sections.
- Roof plan.
- Master Plan/Framework Plan.
- Landscape plan.
- Photographs and/or photomontages.
- Other.

If Other, please specify: * (Max 500 characters)

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. *

Yes N/A

A Design Statement or Design and Access Statement. *

Yes N/A

A Flood Risk Assessment. *

Yes N/A

A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). *

Yes N/A

Drainage/SUDS layout. *

Yes N/A

A Transport Assessment or Travel Plan

Yes N/A

Contaminated Land Assessment. *

Yes N/A

Habitat Survey. *

Yes N/A

A Processing Agreement. *

Yes N/A

Other Statements (please specify). (Max 500 characters)

Supporting Statement

Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Ross Manson

Declaration Date: 22/09/2022

Payment Details

Manson Planning.
FAO: Ross Manson
25 Ainslie Place
Edinburgh
EH3 6AJ

Mr Marchant
4 Cumberland Street North West
Lane
Edinburgh
EH3 6RG

Decision date: 15 December 2022

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

Retrospective change of use from flatted dwelling to short term let.
At 4A Cumberland Street North West Lane Edinburgh EH3 6RF

Application No: 22/04795/FUL

DECISION NOTICE

With reference to your application for Planning Permission registered on 23 September 2022, 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 Policy Hou 7 of the adopted Edinburgh Local Development Plan, in respect of Inappropriate Uses in Residential Areas. The use of the property as a short stay let will have a materially detrimental effect on the living conditions and amenity of nearby residents.

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 is acceptable with regard to Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will not harm the listed building or its setting and it will preserve or enhance the character or appearance of the conservation area.

However, the proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents. It does not comply with 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

4A Cumberland Street North West Lane, Edinburgh, EH3 6RF

Proposal: Retrospective change of use from flatted dwelling to short term let.

Item – Local Delegated Decision

Application Number – 22/04795/FUL

Ward – B11 - City Centre

Recommendation

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

Summary

The proposal is acceptable with regard to Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as it will not harm the listed building or its setting and it will preserve or enhance the character or appearance of the conservation area.

However, the proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents. It does not comply with LDP Policy Hou 7. There are no material considerations that outweigh this conclusion.

SECTION A – Application Background

Site Description

The application site relates to a three-bedroom flat at 4A Cumberland Street North West Lane. Fronting Cumberland Street North West Lane on the ground floor level. Access is gained via a private entrance from Cumberland Street North West Lane. The property also has access via a shared communal access.

The flat is within an A listed building (28614), listed on 1/1/2003.

The property is located within the New Town conservation area and the New Town Edinburgh World Heritage Site

Description Of The Proposal

The application is for retrospective planning permission for the change of use from residential to short term let.

Supporting Information

Planning Statement

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: 7 October 2022

Date of Advertisement: 14 October 2022

Date of Site Notice: 14 October 2022

Number of Contributors: 0

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 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

If the proposal is in accordance with the development plan the determination should be to grant planning permission unless material considerations indicate otherwise?

If the proposal is not in accordance with the development plan the determination should be refuse planning permission unless material considerations indicate otherwise?

In the assessment of material considerations this report will consider:

- the Scottish Planning Policy presumption in favour of sustainable development, which is a significant material consideration due to the development plan being over 5 years old;
- equalities and human rights;
- public representations; and
- any other identified material considerations.

Assessment

To address these determining issues, it needs to be considered whether:

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 appraisal states *"The New Town, constructed between 1767 and 1890 on the glacial plain to the north of the Old Town, contains an outstanding concentration of planned ensembles of ashlar-faced, world-class, neo-*

classical buildings, associated with renowned architects, including John and Robert Adam, Sir William Chambers, and William Playfair. Contained and integrated with the townscape are gardens, designed to take full advantage of the topography, while forming an extensive system of private and public open spaces. It covers a very large area, is consistent to an unrivalled degree, survives virtually intact and constitutes the most extensive surviving example of neo-classical town planning in the world. The Conservation Area ranks as one of the most important in the United Kingdom, in terms of both its architectural, urban planning and historic interest. Its significance is reflected in the extensive number of Statutory Listed Buildings, the number of tourists that visit the area, and its international recognition as part of the UNESCO designated Old and New Towns of Edinburgh World Heritage Site"

There are no external alterations and the development preserves both the character and appearance of the conservation area. The change of use from a residential premises to a short-term let will not have any material impact on the character of the conservation area. The change of use would preserve the appearance of the conservation area.

Conclusion in relation to the conservation area

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

c) The proposals comply with the development plan?

The development plan comprises the Strategic and Local Development Plans. The relevant policies of the adopted Edinburgh Local Development Plan (LDP) to be considered are:

- Local Development Plan Environment Policies, Env 1, Env3 and Env 6.
- Local Development Plan Housing Policy, Hou 7.
- Local Development Plan Transport Policies, Tra 2 and Tra 3
- Local Development Plan Delivering the Strategy Policy Del 2

The non-statutory Listed Building and Conservation Area Guidance is a material consideration when considering LDP policies Env 3 and Env 6.

The non-statutory Guidance for Business 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 Building and Setting

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.

The proposal complies with the objectives of LDP Policy Env 3.

Conservation Area

The impact on the character and appearance of the conservation area has been considered above in b). It was concluded that the change of use would not have any material impact on the character of the conservation area and would preserve the appearance of the conservation area.

The proposal complies with LDP Policy Env 6.

World Heritage Site

The proposed change of use as a short stay let does not affect the reasons for the inscription of the World Heritage Site.

The proposal complies with LDP Policy Env 1.

Principle of development

The application site is situated in the Urban Area and City Centre Retail Core, as defined in the LDP.

The main policy that is applicable to the assessment of short term lets is LDP Policy Hou 7 (Inappropriate Uses in Residential Areas), which seeks to protect residential amenity.

The non-statutory Guidance for Businesses states that an assessment of a change of use of dwellings to STCVA 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.

Paragraph 220 of the LDP acknowledges that tourism is the biggest source of employment in Edinburgh, providing jobs for over 31,000 people. Whilst there is not a specific LDP policy relating to the jobs created through the required care, maintenance and upkeep of STL properties, the economic benefits are a material planning consideration.

The application property is located on Cumberland Street North West Lane. The character of the immediate area is entirely residential, with the level of amenity reflecting this character.

The use of the property as an STL would introduce an increased frequency of movement to the flat. The proposed short stay 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. 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 disturbances, further impacting on neighbouring amenity.

The property's primary access is via a private entrance. A private access does mitigate some of the negative effects that are associated with STLs towards local residential amenity. However, this proposal is introducing an inappropriate use within a residential area contrary to Local Development Plan. The activity associated with STL is likely to have a material impact on neighbouring amenity. The immediate proximity to neighbouring residential flats, creates a situation where such a use would bring additional noise and disturbance beyond what would be acceptable within a residential area.

The proposal will have a materially detrimental effect on the living conditions and amenity of nearby residents. Therefore, it does not comply with LDP policy Hou 7.

Parking standards

There is no off street car parking available within the site and no immediate on street parking available nearby. The site is accessible by public transport via tram, train and bus.

The proposals comply with the LDP Policies Tra 2 and Tra 3.

Conclusion in relation to the Development Plan

The proposal does not comply with LDP Policy Hou 7 as the change of use of this property to a short-term visitor let would materially harm neighbouring amenity.

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

The following material planning considerations have been identified:

SPP - Sustainable development

Scottish Planning Policy (SPP) is a significant material consideration due to the LDP being over 5 years old. Paragraph 28 of SPP gives a presumption in favour of development which contributes to sustainable development. Paragraph 29 outlines the thirteen principles which should guide the assessment of sustainable development.

The proposal complies with all thirteen principles outlined within paragraph 29 of the SPP. The proposal will therefore contribute to sustainable development.

Emerging policy context

The Revised Draft National Planning Framework 4 was laid before the Scottish Parliament on 08 November 2022 for approval. As it has not completed its parliamentary process, only limited weight can be attached to it as a material consideration in the determination of this application.

On 30 November 2022 the Planning Committee approved the Schedule 4 summaries and responses to Representations made, to be submitted with the Proposed Cityplan 2030 and its supporting documents for Examination in terms of Section 19 of the Town and Country Planning (Scotland) Act 1997. At this time little 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

The application received no public representations.

Overall conclusion

The proposal does not comply with the relevant policy of the development plan as it would have a materially detrimental effect on the living conditions and amenity of nearby residents. It does not comply with the objectives of SPP, as it will not contribute towards sustainable development and a sustainable community. There are no material considerations that outweigh this conclusion.

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reason for Refusal

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

Background Reading/External References

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

Further Information - [Local Development Plan](#)

Date Registered: 23 September 2022

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

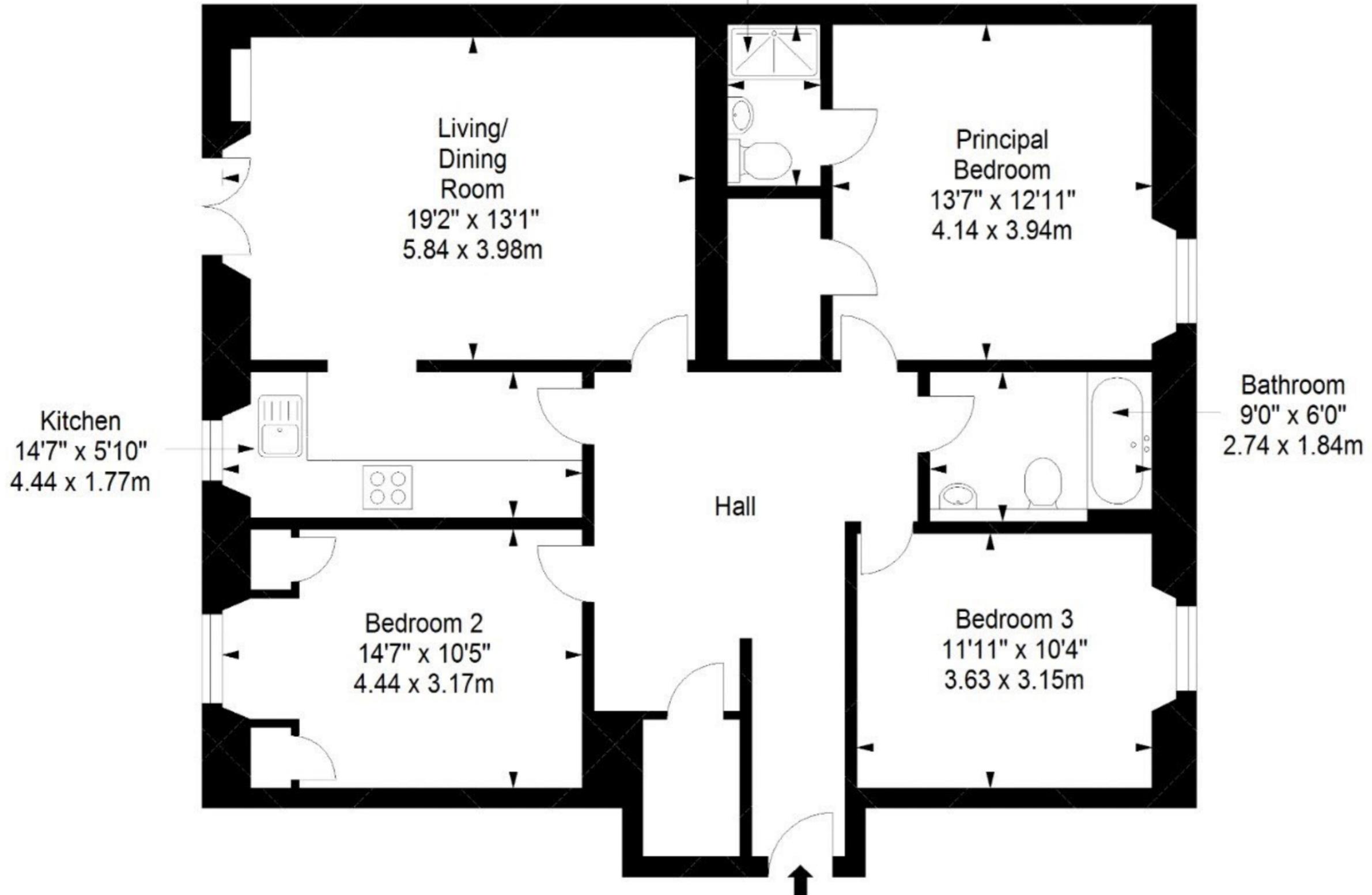
Consultations

No consultations undertaken.

Lower Ground Floor
Approx. 111.1 sq. metres (1195.9 sq. feet)



En-suite
6'7" x 3'9"
2.00 x 1.15m



Total area: approx. 111.1 sq. metres (1195.9 sq. feet)

4A Cumberland Street North West Lane
Edinburgh EH3 6RG

