

Mr Kaya.
1F2 4 Thistle Place
Edinburgh
EH11 1JH

Decision date: 19 January 2024

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

Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

At PF1 10 Drumdryan Street Edinburgh EH3 9LA

Application No: 23/04506/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 5 October 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 proposals are contrary to NPF4 policy 16 criterion g) and LDP policy 12 as the proposals will have a detrimental impact on the appearance of the surrounding area in terms of the proposals' design.
2. 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.

3. 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 that 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:

Whilst the proposed physical works have due regard to global climate and nature crisis, are of an acceptable scale and form, and do not result in an unreasonable loss of neighbouring amenity, they are of an unacceptable design and are incompatible with the appearance of the surrounding area.

The change of use of this property to a short term let (STL) will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity.

The proposal does not comply with Development Plan policy NPF4 policy 16g)i), NPF4 policy 30(e), LDP Policy Des 12a) and LDP plan policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

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

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



Chief Planning Officer
PLACE
The City of Edinburgh Council

NOTES

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

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

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Report of Handling

**Application for Planning Permission STL
PF1 10 Drumdryan Street, Edinburgh, EH3 9LA**

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

**Item – Local Delegated Decision
Application Number – 23/04506/FULSTL
Ward – B11 - City Centre**

Recommendation

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

Summary

Whilst the proposed physical works have due regard to global climate and nature crisis, are of an acceptable scale and form, and do not result in an unreasonable loss of neighbouring amenity, they are of an unacceptable design and are incompatible with the appearance of the surrounding area.

The change of use of this property to a short term let (STL) will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity.

The proposal does not comply with Development Plan policy NPF4 policy 16g)i), NPF4 policy 30(e), LDP Policy Des 12a) and LDP plan policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

SECTION A – Application Background

Site Description

The application site is a ground floor three bedroom flat located on the eastern side of Drumdryan Street. The property shares its access to the street with other residential properties via a communal stairwell.

Drumdryan Street is of predominantly residential character, though the wider area is of mixed character featuring a mix of commercial uses as well as residential properties. Bus links are highly accessible from the site. The immediate area surrounding the application property features a low to moderate level of activity, peaking during the day, but significantly reducing at night. The immediate section of the street that the property is located within features fenestration and doors of uniform proportions, which whilst disrupted in places, remains characteristic of the street, contributing to the street's appearance.

Description Of The Proposal

The application is for the retrospective change of use of the property from residential to short term let (sui generis) (STL) and alterations to a window at the front of the property, changing the window's proportions in order to form a door. The applicant indicates in the supplementary information provided that the property has been operating as a short term let since 2015.

Supporting Information

Supporting Statement

Photos 1-8

House rules

Evidence of historic operation as an STL 1

Evidence of historic operation as an STL 2

Relevant Site History

23/00470/FULSTL

PF2 10 Drumdryan Street

Edinburgh

EH3 9LA

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

Refused

2 June 2023

Other Relevant Site History

No other relevant site history was identified.

Consultation Engagement

No consultations.

Publicity and Public Engagement

Date of Neighbour Notification: 19 October 2023

Date of Advertisement: Not Applicable

Date of Site Notice: Not Applicable

Number of Contributors: 7

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

The application has been submitted in retrospect. The applicant indicates in the supplementary information submitted that the operation of the property as a short stay let commenced in 2015. This is before the 5 September 2022, which is when the Edinburgh short-term let control designation came into effect. As the designation does not have a retrospective effect it is necessary to consider whether the use of the property as a commercial short stay let is a material change of use.

On the basis of the application form, the description of development, drawings and supporting information it is considered that the proposals constitute a material change of use under Section 26 of the Town and Country Planning (Scotland) Act 1997.

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 Tackling the climate and nature crises Policy 1.
- NPF4 Quality Homes Policy 16g

- NPF4 Productive Places Tourism Policy 30
- LDP Design Policy Des 12
- Local Development Plan Housing Policy, Hou 7
- Local Development Plan Transport Policy, Tra 2 and Tra 3

The non-statutory Guidance for Householders, Guidance for Businesses, and the Edinburgh Design Guidance are relevant material considerations when considering the application.

Global climate and nature crisis

Policy 1 of NPF4 prioritises the climate and nature crisis in all decisions. It has been applied together with other policies in NPF4 and the overall intended outcome of NPF4. The proposal will have a neutral impact on sustainability and the environment. On balance, the proposed development does not conflict with the intended outcomes of NPF4 and thus, complies with NPF4 Policy 1.

Proposed use

NPF4 Policy 30 seeks to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with our net zero and nature commitments, and inspires people to visit Scotland. Criterion 30 (e) specifically relate to STL proposals.

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

Amenity impacts of the change of use

The use of the property as an STL would result in an increased frequency of movement to the property enabling a pattern of movement that would be dissimilar to that of permanent residents. A transient visitor may also have less regard for neighbours' amenity than individuals using the property as a principal home, with resultant negative amenity impacts, particularly at night. There could also be a negative impact on community cohesion and residents' safety.

Whilst the proposed conversion of the window to a door would help mitigate the impact of the change of use to residents within the shared stair, as the primary entrance to the property would no longer be via the shared stair, access to the shared stair is maintained, which combined with the three bedroom size of the property amplifies the likely amenity impacts of the proposed use. Further, the installation of the door does not address the amenity impacts of the proposed use to those living nearby that do not result from the property sharing its access.

However, it is recognised that the amenity impacts of the application are to a degree mitigated as there is a high likelihood that the additional servicing of the property necessitated by the change of use would be conducted during the daytime.

On balance, the proposed change of use would increase the level of ambient background noise beyond what might be reasonably expected by neighbouring residents, and have a significant detrimental effect on the living conditions and amenity of nearby residents. The proposal does not comply with NPF 4 policy 30(e) part (i) and LDP policy Hou 7.

Loss of residential accommodation

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

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

It is important to recognise that having the property within residential use also contributes to the economy, using local services and fulfilling employment opportunities across the City. Long term residents can also make consistent and long-term contributions to the local community.

The proposed change of use would result in a loss of residential accommodation. As there is a recognised need and demand for housing in Edinburgh, it is critical to retain the existing supply of residential accommodation where appropriate. In this instance, it has not been sufficiently demonstrated that the loss of the residential accommodation is outweighed by demonstrable local economic benefits. As such, the proposal does not comply with NPF 4 30(e) part (ii).

Scale, form, design and neighbourhood character

Whilst the proposals are acceptable with regards to their scale and form, they are unacceptable in terms of their design and compatibility with the surrounding area as the double fanlight design of the door is out of keeping with doors elsewhere in the surrounding area, resulting in disruption to the proportions of a window that contributes to the character and appearance of the street. The proposal does not comply with NPF 4 policy 16g)i) and LDP Policy Des 12a).

Parking Standards

No new parking is proposed. This is acceptable as there are no parking requirements for STLs.

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

Conclusion in relation to the Development Plan

Whilst the proposed physical works have due regard to global climate and nature crisis, are of an acceptable scale and form, and do not result in an unreasonable loss of

neighbouring amenity, they are of an unacceptable design and are incompatible with the appearance of the surrounding area.

The change of use of this property to a short term let will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity.

The proposal does not comply with Development Plan policy NPF4 policy 16g)i), NPF4 policy 30(e), LDP Policy Des 12a) and LDP plan 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

On 30 November 2022 the Planning Committee approved the Schedule 4 summaries and responses to Representations on the Proposed City Plan 2030 and its supporting documents. These documents have now been submitted 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 City Plan 2030 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

Seven objections were received regarding the application. A summary of the issues raised is provided below:

material considerations

- Negative impact to neighbouring amenity (general). Assessed in section a.
- Negative impact to neighbouring amenity (noise). Assessed in section a.
- Loss of residential accommodation. Assessed in section a.
- Negative impact to the local community. Assessed in section a.
- The property has an access to a shared stairwell. Assessed in section a.
- The loss of residential accommodation is not outweighed by local economic benefits. Assessed in section a.
- The physical works are not in keeping with the local area. Assessed in section a.
- Concentration of short term lets in the local area. The change of use of one property to a short term let will not have a significant impact on the concentration of short term lets in the local area.

- No justification has been provided for changing the window to a door. Assessed in section a.
- Changing the window to a door will have an unacceptable design impact and impact the character of the street. Assessed in section a.
- Changing the window to a door would result in additional amenity impacts for neighbours. Assessed in section a.

non-material considerations

- Contrary to Scottish Government housing policy.
- Contrary to the Scottish Planning Policy. This has now been superseded by NPF4 and is not relevant in the determination of this application.
- Impact to house and rental prices.
- The proposal will result in anti-social behaviour.
- Impact on building maintenance of short term lets in the street.
- Impact on the listed building. The application property is not a listed building.
- The motivations of the applicant.
- Impact to the character and appearance of a conservation area. The application property is not located within a conservation area.

Conclusion in relation to identified material considerations

The proposals do not raise any issues in relation to other material considerations identified.

Overall conclusion

Whilst the proposed physical works have due regard to global climate and nature crisis, are of an acceptable scale and form, and do not result in an unreasonable loss of neighbouring amenity, they are of an unacceptable design and are incompatible with the appearance of the surrounding area.

The change of use of this property to a short term let will result in a loss of the residential accommodation and a negative impact to neighbouring amenity. Whilst it is recognised that there is an economic benefit to the City as a whole from the provision of visitor accommodation in this case it does not outweigh the loss of residential accommodation or the impact to neighbouring amenity.

The proposal does not comply with Development Plan policy NPF4 policy 16g), NPF4 policy 30(e), LDP Policy Des 12 and LDP plan policy Hou 7. There are no material considerations that outweigh this conclusion. The proposal is unacceptable.

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reason for Refusal

1. The proposals are contrary to NPF4 policy 16 criterion g) and LDP policy 12 as the proposals will have a detrimental impact on the appearance of the surrounding area in terms of the proposals' design.
2. 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.
3. 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 that 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: 5 October 2023

Drawing Numbers/Scheme

01, 02

Scheme 1

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

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

Appendix 1

Consultations

No consultations undertaken.

Appendix 2

Application Certification Record

Case Officer

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

Case Officer: James Armstrong

Date: 16 January 2024

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): Elaine Campbell

Date: 19 January 2024

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Anna Boyer

Address: 55/7 Home Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this application on the following grounds:

- 1). The development is contrary to the Scottish Government Housing policy on More Homes - "everyone has a quality home that they can afford and that meets their needs"
- 2). The development is contrary to Scottish Planning Policy on "socially sustainable places" and "supporting delivery of accessible housing".
- 3). The development would have unacceptable impacts on neighbourhood amenity.

I am concerned about the impact of this short-term let on availability of affordable homes for residents of my local area. Locally housing supply is scarce, rents have risen drastically in the past few years and it has become very difficult to secure a rental. Diverting existing housing stock to short-term lets will only make this crisis worse. The fact that over 12% of housing stock in the City Centre now consists of short-term rentals (according to a report on the matter commissioned by the Scottish Government) must also necessarily cause loss of a sense of local community. I am also concerned about impact on neighbours in terms of noise from frequent turnovers of guests and potential antisocial behaviour and feel that short term lets are unsuitable for tenements due to this risk. I do not feel that there are any benefits to the local community from accepting this proposal that would be sufficient to counterbalance these clear harms and therefore believe that this application should be rejected.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Mr Michael Williamson

Address: 55/12 Home Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The property is in a shared stairwell and is therefore unsuitable to be an STL. It is in a quiet residential area and is therefore unsuitable to be an STL. It is a loss of residential accommodation and is not outweighed by economic benefit, and so is not in line with planning policy.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Mrs Jane Davis

Address: 12 Drumdryan Street Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Door is not in keeping with the neighborhood. To many short term let's in this area already.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Mr Kenneth Curtis

Address: 3f3 13 Drumdryan street Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I fundamentally object to the number of short term lets in my street. These are destroying any sense of community and leaving resident owners managing all the repairs etc. In light of the homelessness figures, short term holiday lets are denying people and families the chance of living in our city in the interests of short term let speculators who see more profit in such lets rather than long term rented accommodation and creating a community of neighbours. In addition, there is no justification for changing a window into a door. Planning regulations even prevent changing sash windows into inappropriate replacements.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Ms Dorothy Barbour

Address: Sandholm 7 Lorne Square North Berwick

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: No comment to make on the short-term lets issue. It seems to be working effectively. But I flatly disagree with the claim that this "will preserve the special architectural and historical interests of the listed building". It will not. Converting a window into a door will disrupt the continuity of style throughout Drumdryan Street. Drumdryan Street is not a commercial location itself but a residential one and its interest is the style of residences. No windows are now doors- there are tenement doors which No 10 is and the pattern of windows around the main door is similar for all main tenement doors. This proposal would break the continuity of design and style and would initiate a process of hotch potch adjustments and alterations to the facade of the buildings. Ultimately the street would become a DIY horror with a whole range of doors , windows losing every asset of symmetry. These buildings belong to a period in Edinburgh's history and are on both sides an example of Victorian crafting and provision with their gardens , all hidden, and good size windows. Something to be proud of, not just to start messing them about with doors where windows are expected, and not just doors but key boxes. The inner door has worked well. It should continue. I suspect this new arrangement would be more noisy and disruptive. But it may be that both doors could be used and a sharing arrangement of kitchen /toilet might bring in more cash. No interest in architectural preservation but income!. A door leading from the street directly into a bedroom.. well Amsterdam has that arrangement... Not an outcome wished for Drumdryan. If the Local Development Plan does accord with this , as is claimed . Well it needs adjusting. The character and appearance of conservation area will not be preserved as is claimed but downgraded and spoiled in a fundamental way by negligently just failing to appreciate what does mark the quality of the street and its architecture. IT is not a 1950s might benefit from some changes in facade.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Miss Amy Atkinson

Address: 5 Drumdryan Street Edinburgh

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This work has been carried out totally inappropriately and without any respect to the character of the street.

Comments for Planning Application 23/04506/FULSTL

Application Summary

Application Number: 23/04506/FULSTL

Address: PF1 10 Drumdryan Street Edinburgh EH3 9LA

Proposal: Change of use from residential to short term let, (in retrospect), and to alter an existing window to form a new entrance door.

Case Officer: Improvement Team

Customer Details

Name: Mr Wilf Harness

Address: 7/7 Drumdryan Street 3f1 Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am writing to formally oppose the planning application for the proposed Short-Term Let at Number 10, Drumdryan Street. I have specific concerns about the impact of this proposed Short-Term Let on our community, and I kindly request that you reject this planning application.

My primary concerns revolve around the misuse of communal bins and the loss of affordable housing options in the city centre. Short-Term Lets often lead to disruptions in waste collection and contribute to the housing crisis in our neighbourhood. I would also like to highlight some general points regarding Short-Term Lets in our historic city center:

1. Preservation of heritage: Historic city centres, like ours, are cultural treasures. The presence of Short-Term Lets can disrupt the residential character of these areas and potentially lead to a loss of the local heritage.
2. Quality of life: A concentration of Short-Term Lets can result in a transient environment, which may erode the sense of community that is vital to our city centre's appeal.
3. Noise and disturbance: Short-Term Let guests may not always be aware of or sensitive to local norms and regulations, potentially leading to noise and disturbances that affect the quality of life for long-term residents.

In conclusion, I urge you to reject this planning application, as it does not align with the best interests of our community and the preservation of our historic city centre.

Thank you for your attention to this matter.