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Mr Long.
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Decision date: 16 May 2024

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

Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.
At GF 24 Coates Gardens Edinburgh EH12 5LE

Application No: 23/04542/FULSTL

DECISION NOTICE

With reference to your application for Planning Permission STL registered on 18 September 2023, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

Reason for Refusal:-

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

2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of local amenity and loss of residential accommodation, as the use of this property as a short term let will result in an 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:

The proposal complies with 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.

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

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

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



Chief Planning Officer
PLACE
The City of Edinburgh Council

NOTES

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

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

Report of Handling

**Application for Planning Permission STL
GF 24 Coates Gardens, Edinburgh, EH12 5LE**

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

**Item – Local Delegated Decision
Application Number – 23/04542/FULSTL
Ward – B11 - City Centre**

Recommendation

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

Summary

The proposal complies with Sections 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.

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

SECTION A – Application Background

Site Description

The application property is a ground floor one-bedroom flat, which forms part of a two-storey, attic and basement, converted terrace townhouse, on the east side of Coates Gardens. The property is capable of providing accommodation for up to four people with a sofa bed being provided within the living room. This property is the typical form of development of Coates Gardens with terrace style townhouses lining both elevations.

Access to the property is via a shared main door, that is used by two further residential properties.

The surrounding character of the application property is residential. Coates Gardens has low levels pedestrian and vehicular traffic. Neighbouring residential properties can expect a strong level of residential amenity.

The property is a category 'B' listed building (28567) designated on the 25/02/1965 and located within the New Town Conservation Area.

Description Of The Proposal

The proposal is for the retrospective change of use from residential to STL.

Supporting Information

- Site Photos

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: 16 May 2024

Date of Advertisement: 6 October 2023

Date of Site Notice: 6 October 2023

Number of Contributors: 5

Section B - Assessment

Determining Issues

Due to the proposals relating to a listed building(s) and being within a conservation area, this report will first consider the proposals in terms of Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the "1997 Heritage Act"):

- a) Is there a strong presumption against granting planning permission due to the proposals:
 - (i) harming the listed building or its setting? or
 - (ii) conflicting with the objective of preserving or enhancing the character or appearance of the conservation area?

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

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

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

Do the proposals comply with the development plan?

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

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

In the assessment of material considerations this report will consider:

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

Assessment

The application is in retrospect. The applicant stated within the application form that the use of the property as a STL commenced in 2017. This is prior to the 5 September 2022, when the Edinburgh STL control area 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 harm the listed building or its setting?

The following HES guidance is relevant in the determination of this application:

- Managing Change in the Historic Environment: Interim Guidance on the principles of listed building consent.
- 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 either the listed building or its setting. It is therefore acceptable with regard to Sections 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

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

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

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

The New Town Conservation Area Character Appraisal states *"that the area is typified by the formal plan layout, spacious stone built terraces, broad streets and an overall classical elegance. The buildings are of a generally consistent three storey and basement scale, with some four storey corner and central pavilions."*

There are no external changes proposed. 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 proposal does not harm the character or appearance of the conservation area. It is therefore acceptable with regard to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

c) The proposals comply with the development plan?

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

The relevant NPF4 and LDP 2016 policies to be considered are:

- NPF4 Sustainable Places Tackling the climate and nature crises Policy 1.
- NPF4 Productive Places Tourism Policy 30.

- NPF4 Historic Assets and Places Policy 7.
- Local Development Plan Housing Policy, Hou 7.
- Local Development Plan Transport Policies, Tra 2 and Tra 3

The non-statutory Listed Building and Conservation Area Guidance is a material consideration when considering NPF 4 Policy 7.

The non-statutory Guidance for Business (2024) is a material consideration that is relevant when considering LDP Policy Hou 7 and NPF4 policy 30.

The Edinburgh Design Guidance is a material consideration when considering LDP Policies Tra 2 and Tra 3.

Listed Buildings, Conservation Area and World Heritage Site

There are no external or internal works proposed and as such there will not be a significant impact on historic assets and places. The proposal complies with NPF 4 Policy 7.

Proposed Use

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

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

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

The non-statutory Guidance for Businesses (2024) states that an assessment of a change of use of dwellings to a short term let will have regard to:

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

Amenity

Coates Gardens is located close to the transport interchange of Haymarket with its associated commercial activity. The level of activity within Coates Gardens is typical of a city centre residential street. It should also be acknowledged that there are existing guest houses/ small hotels located along the street. However, the overall character of this wide street is of a residential street.

The use of the property as a short term let would allow visitors to come and go from the premises for inconsistent periods of time on a regular basis throughout the year in a manner dissimilar to that of a permanent resident. A transient visitor may also have less

regard for neighbours' amenity than individuals using the property as a principal home. The use as a short term let is not consistent with the existing neighbouring residential uses.

The properties communal access and immediate proximity to neighbouring residential properties further increases the likelihood that STL users could have a detrimental impact on neighbouring residential amenity. The use as a STL is not consistent with the internal residential neighbours and would have a detrimental effect to their residential amenity.

Additional servicing is required for a STL which would likely result in an increase in disturbance, further impacting on neighbouring amenity. However, this would be of lesser impact as it is likely that servicing would be conducted during the daytime.

The use of the property as a STL would be significantly different from the ambient background noise that neighbouring residents might reasonably expect, and consequently will have a significantly detrimental effect on their living conditions and amenity. 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.

The proposed change of use to a STL 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 where appropriate.

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

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.

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).

Transport

Permit and paid parking is available on street. This is acceptable as there are no parking requirements for STLs. The proposed change of use will not result in a significant impact to traffic congestion in the local area.

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

Conclusion in relation to the Development Plan

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

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

The following material planning considerations have been identified:

Emerging policy context

On 5 April 2024 the Planning and Environmental Appeals Division published its report into the examination of the Proposed City Plan 2030 and supporting documents in terms of Section 19 of the Town and Country Planning (Scotland) Act 1997. The Council is currently considering the recommendations and modifications required to the Proposed City Plan 2030. It is the intention that the modifications will be considered by the Council before the end of June 2024. At this time in the context of the consideration of this particular application limited weight can be given to the relevant policies of City Plan 2030 until the proposed modifications have been fully considered.

Independent economic impact assessment

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

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

Equalities and human rights

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

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

Public representations

The application received five public objections. A summary is provided below:

material considerations in objection

- The proposed change of use would reduce the residential housing stock of Edinburgh. Assessed in section c).
- The proposed change of use would have a negative impact to neighbouring amenity. Assessed in section c).
- The proposed change of use would have a negative effect to the listed buildings, conservation area and world heritage site. Assessed in section a), b) and c).

non-material considerations

- The proposed change of use would have a negative effect to parking in the immediate vicinity.

Conclusion in relation to identified material considerations

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

Overall conclusion

The proposal complies with Sections 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.

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

Section C - Conditions/Reasons/Informatives

The recommendation is subject to the following;

Reason for Refusal

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

2. The proposal is contrary to National Planning Framework Policy 30(e) in respect of local amenity and loss of residential accommodation, as the use of this property as a short term let will result in an 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: 18 September 2023

Drawing Numbers/Scheme

01 - 02

Scheme 1

David Givan
Chief Planning Officer
PLACE
The City of Edinburgh Council

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

Appendix 1

Consultations

No consultations undertaken.

Appendix 2

Application Certification Record

Case Officer

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

Case Officer: Benny Buckle

Date: 16 May 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: 16 May 2024

Comments for Planning Application 23/04542/FULSTL

Application Summary

Application Number: 23/04542/FULSTL

Address: GF 24 Coates Gardens Edinburgh EH12 5LE

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

Case Officer: Improvement Team

Customer Details

Name: Mr Jack Nevin

Address: 2F 21 Coates Gardens Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this granting of a short term let planning permission. I am a neighbour and there are already six hotels on this street and more than ten in the immediate area - thus no shortage of 'short term let' style accommodation to serve tourists or any other in need of such lodging. Housing should be for residents and there is no surplus of one bedroom accommodation in Edinburgh.

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

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

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

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

believe that granting this application will exacerbate the hardship faced by tenants in the community, and therefore is not in keeping with the City Plan.

The Scottish Government's National Planning Framework 4 states:

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

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

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

Comments for Planning Application 23/04542/FULSTL

Application Summary

Application Number: 23/04542/FULSTL

Address: GF 24 Coates Gardens Edinburgh EH12 5LE

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

Case Officer: Benny Buckle

Customer Details

Name: Mr Harvey David Frew

Address: 23A Coates Gardens Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Application number 23/04542/FULSTL

I object to the application for a short term let in Coates Gardens. as this is outwith the character and nature of the area. The properties are largely inhabited by families and a short term let is detrimental to the quality of life and amenity of the residents. This is based on previous experience of short term lets in the vicinity of this application.

Comments for Planning Application 23/04542/FULSTL

Application Summary

Application Number: 23/04542/FULSTL

Address: GF 24 Coates Gardens Edinburgh EH12 5LE

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

Case Officer: Benny Buckle

Customer Details

Name: Dr Sonja Gallhofer

Address: 23/2 Coates Gardens Edinburgh

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the application for a short term let in Coates Gardens because short term lets are not suitable for the nature and character of the area.

The flat for which the application is made is in a converted Victorian townhouse which still has a more communal and private feel (e.g. hallway, stairs, often no secure place for the mail of the individual flats). Families live largely in these properties and a short term let would negatively impact on the quality of life, the safety and wellbeing of the residents and their amenities.

In my view, which is based on previous experience of short term lets in close proximity to the property, a short term let is not suitable for this type of property.

Comments for Planning Application 23/04542/FULSTL

Application Summary

Application Number: 23/04542/FULSTL

Address: GF 24 Coates Gardens Edinburgh EH12 5LE

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

Case Officer: Benny Buckle

Customer Details

Name: Mr ANTONY MATHESON

Address: GF 23 COATES GARDENS EDINBURGH

Comment Details

Commenter Type: Neighbour-Residential

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:it will impact on parking and noise also short term lets tend to treat it as a hotel they also think that because they stay there they are residents they are not to reside means to dwell and they are not dwellers

Comments for Planning Application 23/04542/FULSTL

Application Summary

Application Number: 23/04542/FULSTL

Address: GF 24 Coates Gardens Edinburgh EH12 5LE

Proposal: Use of flat for short term let use (Sui Generis) and residential flat (in retrospect). This property is available for letting all year.

Case Officer: Benny Buckle

Customer Details

Name: Dr The Architectural Heritage Society of Scotland

Address: 15 Rutland Square, Edinburgh EH1 2BE

Comment Details

Commenter Type: Amenity Body

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The AHSS Forth & Borders Cases Panel has examined the proposals for the change of use to short-term let in a B-listed subdivided townhouse by John Chesser, 1871-1876, which lies within the New Town Conservation Area and World Heritage Site, and objects.

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

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

residential accommodation. We therefore object to the application.