



SUPPLEMENTARY PLANNING REVIEW STATEMENT

CLIENTS: PRU WHITWELL

**APPLICATION SITE: FLAT 2, 48 RODNEY STREET,
EDINBURGH**

APPLICATION REFERENCE: 23/05692/FULSTL

LRB REFERENCE: 24/00373/REVREF

Jane Shepherd MRTPI

16 DECEMBER 2024

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SECTION 1: INTRODUCTION

The purpose of this Supplementary Planning Supporting Statement is to demonstrate that this planning application for the use of Flat 2, 48 Rodney Street for short term let purposes should be approved in compliance with national and local planning policies and guidance.

Since submission of this application the Council's City Plan 2030 has been adopted by the Council and further evidence has been published, which unequivocally demonstrates compliance of this application with NPF4 Policy 30.

Both these matters/updates are material considerations.

In particular the Local Review Body will be reviewing the case against the City Plan, which the applicant has not had the opportunity to consider and address in their submissions either pre-or post the Council's decision due to the timing of its adoption.

In the Planning Review Statement, the applicants specifically reserved their rights to respond to any new planning policy or legislation relating to STLs. This was stated in the Planning Review Statement, as follows:

Given the uncertainty regarding the status and exact wording for the finally adopted version of LDP2 City Plan 2030, the client reserves the right to provide further information or assessment. This is of direct relevance should the Council decide to adopt LDP2 prior to or during the conclusion of the review of this case by the Local Review Body.

My client also reserves the right to provide further justification based on the finally adopted wording of policies in LDP2 City Plan 2030, which are not available at the time of writing this Statement.

Therefore, in submitting this Supplementary Planning Review Statement the applicants are exercising those rights. It is only fair and proper that they get the opportunity to do so prior to the review taking place.

As such, this Supplementary Planning Review Statement is intended to support this application and the review decision-making process. It is not intended to supersede the original Planning Supporting Statement or Planning Review Statement (with the exception of updated referencing to the City Plan 2030 policies, over-riding those previous references to the LDP policies)

Therefore, for the avoidance of doubt, the case for planning permission and review, as outlined in those previous Statements remains relevant and valid, notwithstanding any differences between the policy references in the old Local Development Plan and new City Plan 2030.

As such, all the submitted Statements should be read alongside each other as the case for approval.

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SECTION 2: PLANNING CONTEXT

It is a statutory requirement under this Planning Act that all planning applications must be considered on their own merits against the relevant local development plan unless material considerations indicate otherwise.

The primary document for planning application decisions is now the statutory development plan, comprising national and local planning policies.

The decision made by the Council under delegated powers for this planning application was based upon NPF4 and the City of Edinburgh Local Development Plan (LDP).

The decision now being made by the Council's Local Review body must be based upon NPF4 and the newly adopted City Plan 2030.

NPF4

To reiterate and for ease of access when considering the new evidence detailed below, **NPF4 Policy 30**, which is included in the Council's second reason for refusal and relates to the principal of the change of use sought, states as follows:

e) Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:

i. An unacceptable impact on local amenity or the character of a neighbourhood or area; or

ii. The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits.

Table 1: Extract from NPF4

CITY PLAN 2030

Local Development Plans are required to be consistent with the policies set out in national policy. It has been directed by the Scottish Government that if NPF4 post-dates the City Plan policies, the former will take precedence. However, in this case the City Plan has now been adopted 21 months after the adoption of the NPF4. As such the City Plan policies are considered to be up to date and relevant alongside the NPF4.

Policies which may be considered relevant from the City Plan are shown in **Table 2**, being the replacement adopted policies for those LDP policies previously cited by both the applicant in their Planning Supporting Statement and Planning Review Statement, and by the Council in their Officer's Handling Report and Decision Notice.

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City Plan 2030 Policy	Policy Title
Env 7	Sustainable Developments
Env 33	Amenity
Env 35	Reducing Flood Risk
Hou 6	Inappropriate Uses in Residential Areas
Inf 3	Infrastructure Delivery and Developer Contributions
Inf 4	Provision of Transport Infrastructure
Inf 7	Private Car Parking
Inf 10	Cycle and Footpath Network
Econ 6	Hotel Development

Table 2: City Plan 2030 Policies

In addition to these policies, the Council has adopted various Non-Statutory Guidance papers, which elaborate on the application of the associated policy aims and objectives. This guidance has previously been cited by the applicant and must be read alongside the relevant City Plan 2030 policies.

- [Guidance For Businesses \(January 2024\)](#)

SECTION 3: POLICY ASSESSMENT

This section will include an:

- updated assessment against NPF4 Policy 30 as a result of the newly published evidence from BIGGAR Economics
- updated assessment against the City Plan 2030 policies both in principle and in detail.

NPF4 POLICY 30 ASSESSMENT

Along with the previously cited research/evidence and the material consideration relating to tourism accommodation choices and their impact upon the tourist economy in Edinburgh, there is now further published evidence which directly applies to an assessment against NPF4 Policy 30 paragraph (e)(ii) and the economic benefits of STLs, particularly when compared to a residential use.

The additional evidence which has been published following the submission of this review is as follows and is included alongside this Supplementary Planning Review Statement for the Local Review Body to consider as part of their review:

- [BIGGAR Economics – Economic Impacts of Short-Term Lets in Edinburgh \(October 2024\)](#)
- [BIGGAR Economics – Economic Impacts of Short-Term Lets in Scotland \(December 2024\)](#)

These reports provide evidence to demonstrate both national and local (Edinburgh) economic benefits.

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National Benefits

BIGGAR Economics have researched and published various reports, including the more recent Economic Impacts of Short-term Lets in Scotland (11 December 2024). This is also referenced below under the [Edinburgh](#) heading below with regard to the more detailed local findings. However, in terms of the national picture, from the detailed and comprehensive research, it has been established that:

Summary Finding 1: Short-term lets account for a very small proportion of Scotland's housing stock (1.0%) with Secondary Lets accounting for 0.8% (Figure 1)

Figure 1 shows the secondary lets as a share of total dwellings (%) in October 2024.

- This proportion is minimal compared to the 3.5% vacant properties in the national housing stock.
- This proportion is below the UN's threshold considered to be a 'low density' for Europe.

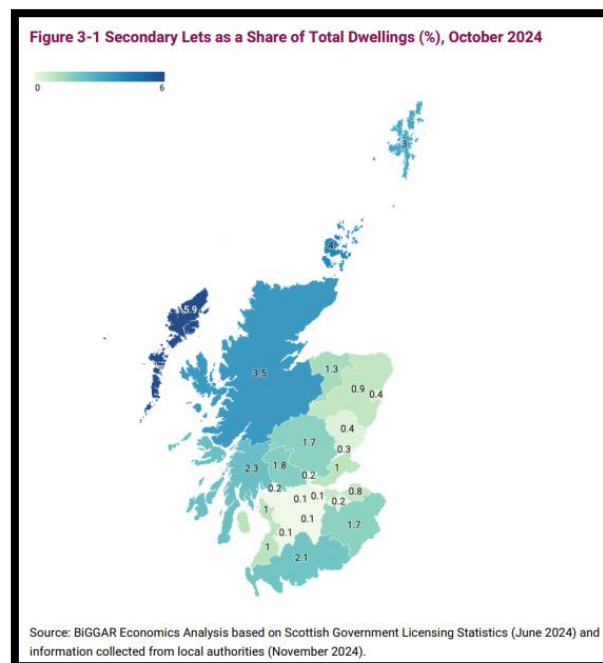


Figure 1: Extract from BIGGAR Economics: Economic Impacts of Short-term Lets in Scotland © BIGGAR Economics

It is concluded in this December 2024 report that secondary letting is highly unlikely to be a significant driver of trends in the housing market (including the level of housing stock) as suggested by those Councils dealing with STL applications.

Instead, the likely influences upon the housing stock as raised in this report are:

- Supply of social housing and homelessness

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- Rising housing costs
- Demographics
- Economic Geography
- Construction Costs
- Land Supply

The conclusion of this report is that a reduction in the number of secondary lets through planning refusals *would have no meaningful impact* on the housing stock and/or rental markets.

Summary Finding 2: The local economic impacts of short-term let use will tend to exceed that of residential use

- The annual GVA associated with an average owner-occupier or private rented residential household in Scotland is £14,451, supporting *one-tenth of a job* in the Scottish economy
- For a 2-bedroom short-term let in Scotland, the average annual GVA is £50,159, supporting *1.1 jobs* in the Scottish economy (*Table 3* below provides the findings for an Edinburgh flat)

Summary Finding 3: The local fiscal impacts are also substantially greater for short-term lets than for residential use

Summary Finding 4: Guests staying in short-term lets spend more than the average visitor to Scotland, supporting economic activity in sectors associated with tourism and hospitality

- The short-term let accommodation sector is estimated to generate £864M GVA and support 29,324 jobs across Scotland.

Edinburgh Benefits

BIGGAR Economics have researched and published three reports which provide evidence relating to STLs in Edinburgh. These have been published in May 2022, October 2024, and the report cited above under the [National Benefits](#) heading) in December 2024. The May 2022 report was referenced in the previously submitted statements for this application and review and is repeated here for completeness, to allow all the findings to be viewed in one document.

These reports all demonstrate there is no significant impact upon the housing stock in Edinburgh and that there are significant economic benefits from an STL use when compared to residential use.

First, further to the findings in the December 2024 report cited above, it was established, the figures for the percentage of vacant dwellings, second homes and secondary lets as a percentage of total dwellings in the City of Edinburgh are 4%, 0.6% and 0.8% respectively. These are similar to the national figures of 3.4%, 0.9% and 0.8%, respectively.

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This demonstrates that given the minimal percentage of dwellings used as STLs (including secondary lettings), the impact can also only be insignificant upon the housing stock as explained under **Summary Finding 1** above.

With reference to the BIGGAR Economics report in May 2022, a detailed analysis of the economic impact of short-term let licensing on local authorities and the wider tourism sector was carried out.

Their findings show for the Edinburgh area, whilst the tourism economy is recovering it has not returned to pre-COVID levels. It has been forecast that the reduction in Airbnb nights and guest spending would have a significant impact, which is tourism revenue which stays close to where it is spent, supporting local economies, and benefitting communities. The greatest losses would be in Edinburgh as follows:

- A 10% fall in Nights and 3% fall in Guest Spending would result in the loss of £6M GVA and 340 jobs.
- A 25% fall in Nights and 4% fall in Guest Spending would result in the loss of £14M GVA and 740 jobs.
- A 50% fall in Nights and 5% fall in Guest Spending would result in the loss of £26M GVA and 1,390 jobs.

It is of note that these scenarios have not considered the added impact from the STLCA controls and therefore the likely reduction in supply of short-term lets through the historical and ongoing issues relating to planning and licensing. However, in the December 2024 report, the reduction in economic impact/benefits is directly attributed to the STLCA designation: the direct correlation between the reduction in STLs and the economic impact in terms of GVA and employment in the area.

Further to the findings of the 2022 report, BIGGAR Economics researched and published a further report entitled Economic Impacts of Short-term Lets in Edinburgh (October 2024).

Whilst it is impossible to summarise the multiple pages of evidence to support the economic case for short-term lets, some of the points referenced here are repeated from the Executive Summary provided in the report. These findings have since been corroborated by the findings in their later report of December 2024.

- *Secondary lets in Edinburgh account for less than 1% of the city's total housing stock.*
- *By accommodating visitors, short-term lets support economic activity in the city, much more than would be supported by the residential use of those properties.*
- *Guests staying in short-term lets spend more than the average visitor to Edinburgh, supporting economic activity in sectors associated with tourism and hospitality.*
- *Expenditure by visitors tend to be higher than residential household expenditure.*
- *Factored up from one property, the short-term let accommodation sector is estimated to generate £154 million GVA and support 5,580 jobs across Edinburgh.*

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These figures represent a significant economic benefit provided by just one two-bedroom property. The figures, even if adjusted for a one-bedroom flat such as that at 48 Rodney Street would still exceed the GVA and job support for its use as a residential flat.

The same basic figure for a one-bedroom property on an occupancy rate of 50% (averaging 1.8 guests per night per room) and a price of £38.15 per guest, would result in an annual GVA of £22,944 and 0.6 jobs.

With direct reference to the policy requirements in NPF4 **Policy 30 (e)**, it has been found that the *local economic impacts of short-term let use will tend to exceed that of a residential use* as follows:

- The annual Gross Value Added (GVA) associated with an average owner-occupier or private rented residential household in Edinburgh is £13,266, supporting one-tenth of a job in the city economy.
- For a 2-bedroom short-term let, the average annual GVA is at least £45,818 GVA, supporting 1.2 jobs in the city economy.
- For many short-term let premises, the economic impacts will be considerably greater than this.

A direct comparison to demonstrate these findings for a two-bedroom property is shown in **Table 3** below:

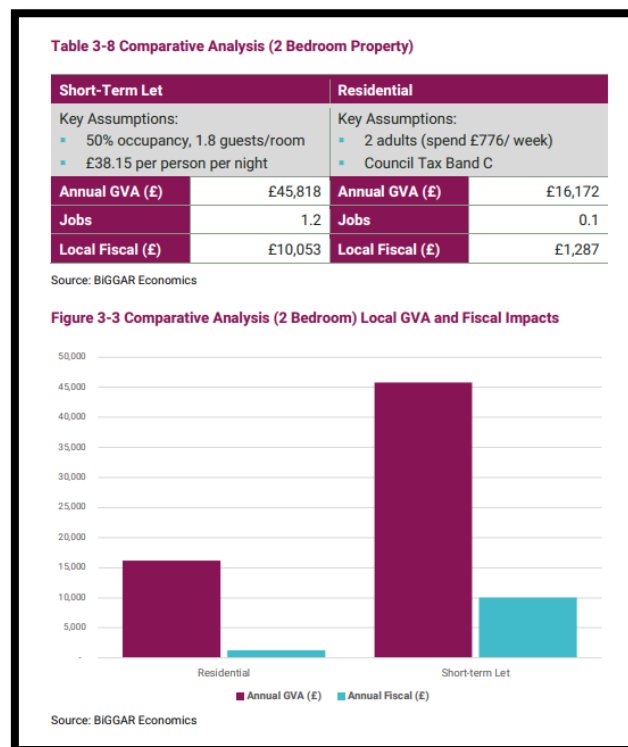


Table 3: Comparative Analysis for use of a two-bedroom property in Edinburgh
 © BIGGAR Economics (October 2024)

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It is of note that whilst strong demonstrable evidence has been submitted in support of this application/review, to date there has been no evidence presented by the Council to rebut these robustly researched studies.

Reference has previously been made in Edinburgh City Council officer handling reports to an economic study undertaken by the Council relating to STLs. However, by the Council's own admission, this document does not merit any weight being afforded to it in the planning decision making process. By contrast the research undertaken at a national and regional level by BIGGAR Economics is strong and should be given considerable weight.

Finally, it is worth stating that Housing and Economic Benefits are two key planning issues which are important in Edinburgh and across Scotland. They should not be opposing in their presentation but instead supported alongside each other as suggested in text associated with City Plan **Policy Hou 6** below in **Table 4**. As recommended by this policy, it should not be a case of supporting one use over the other but a balanced approach. The current approach by the Council is not balanced. It repeatedly gives significantly greater weight to the need for housing over the need to protect the tourism industry and the local economy (businesses, employment etc) without having researched the consequences or the individual specific merits of the STL uses, such as this one at Flat 2, 48 Rodney Street.

The serious future consequences of this continued stance by the Council to their local economy are clearly demonstrated by all the reports cited above. A reduction in STLs will have a significant and detrimental impact upon the local and national economy.

CITY PLAN 2030 ASSESSMENT

The format within this Statement for assessing the proposed development for compliance with the above cited policies in the City Plan, both in principle and detail, for consistency with the previously submitted Statements, is set out as follows:

- **Relevant Policy Requirements** – setting out the policy 'tests' for compliance.
- **Relevant Application Details & Policy Assessment** – setting out the details/facts of the application and assessing these against the Relevant Policy Requirements.
- **Conclusion** – providing the outcome of the Policy Assessment.

The main issues that will or could potentially arise from this application relating to the above policies are:

- **Principle of the Development**
- **Transport**
- **Sustainable Development and Environment**
- **Amenity**

PRINCIPLE OF THE DEVELOPMENT

In the first instance, as outlined in the assessment against the previous LDP, consideration must be given to the principle of the proposed development in land use planning terms. As already demonstrated in all the Statements submitted to date, the development complies

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with national planning policy (**NPF4**) in terms of all the relevant principle and detailed planning policies.

Relevant Local Planning Policy Requirements

The specific policies within the adopted City Plan relating to land use and land use designations are detailed in **Table 4** below.

Policy Number	Policy Title	Relevant Policy Requirements and Commentary	City Plan 2030 Outcomes
Env 7	Sustainable Developments	All proposals must incorporate all reasonably practicable measures to address climate emergency and contribute to sustainable living, with this being demonstrated through a Sustainability Statement addressing measures to mitigate and futureproof the building and providing details how the proposals encourage all forms of active travel and shall be accessible by those of all ages and levels of mobilities, including those with disabilities.	Edinburgh needs to be resilient, adaptable and address the impacts of climate change. Edinburgh. We also want Edinburgh to be sustainable and healthy city which protects and enhances its natural, historical and community assets
Hou 6	Inappropriate Uses in Residential Areas	Developments, including change of use, which would have a materially detrimental effect on the living conditions of nearby residents, will not be permitted. In the supporting text of this policy, it is stated: The retention of existing dwellings is important as a means of meeting housing need. Over the last decade, Edinburgh has witnessed a significant increase in the use of residential properties for short-term lets, reducing the number of homes available. In some areas, this has resulted	Aim to ensure that everyone has access to a range of amenities in their area with a range of housing types and other buildings that are adaptable and can meet the changing needs of communities and individuals. Aim to provide land for all types of businesses – big and small – if they are as part of mixed-use development. The strength of the economy is based on a

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		<p>in the dilution of the resident population. Over and above that, any change of use of residential properties to commercial uses can have a detrimental impact on the amenity of residents, particularly where there is a high density of people occupying one building with communal areas.</p>	<p>range of key sectors, for example tourism.</p> <p>Edinburgh has experienced a steep rise in the number of properties being used for short-term letting, impacting on the availability of homes for traditional housing need. The plan aims to balance the quality of life of our residents with the demands of visitors to the city.</p>
Econ 6	Hotel Development	<p>Hotel development will be permitted in specified areas.</p> <p>Of relevance, the supporting text states:</p> <p>Tourism is the third biggest source of employment in Edinburgh, providing jobs for over 31,000 people. Maintaining and developing this key sector in the city's economy relies upon sufficient provision of high-quality tourist accommodation.</p> <p>It is further acknowledged as a finding of a Council commissioned Edinburgh Commercial Needs Study that as a result of the impact of COVID-19 and the reduction in visitors particularly those passing through Edinburgh Airport there has been an impact on tourism and hospitality.</p>	<p>The strength of Edinburgh's economy is based on a range of key sectors, for example tourism.</p>

Table 4: City Plan 2030 Policy relating to the Principle of the Development.

The relevant and previously cited non-statutory guidance relating to the principle of this development is set out in:

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- [Guidance For Businesses \(January 2024\)](#)

This guidance has the status of being a material planning consideration when determining planning applications, including those which are being reviewed by the Local Review Body.

[Guidance For Businesses \(January 2024\)](#)

Regarding STL accommodation, reference is made to the previous LDP policy Hou 7; albeit as stated above, this has now been replaced with a similarly worded policy **Hou 6** in the City Plan 2030.

The following matters are of general relevance to the consideration of this planning application:

- [Amenity](#) – assessment in terms of the likely impact on neighbouring residential properties. Factors such as background noise in the area and proximity to nearby residents will be considered.
- [Road Safety](#) – parking provision and traffic generation as well as any potential impact on vulnerable road users (cyclists and pedestrians) will be considered.

Specifically, regarding Short-Term Let Accommodation, the following additional aspects are considered and assessed:

- [The Character of the New Use and of the Wider Area](#), e.g., (b) Where the location is mixed in character (residential/commercial) regard will be had to the nature of surrounding uses and the proximity of the proposal site to residential properties. ***Where there is likely to be a further deterioration on residential amenity in such mixed areas, it is unlikely that short term let proposals will be supported.***
- [The Size of the Property](#) Larger properties can have a greater capacity for guests. Where there are greater numbers of guests, there is an increased potential for noise and disturbance. Both the number and size of rooms will be taken into account.
- [The Pattern of Activity associated with the Use including Numbers of Occupants, the Period of Use, Issues of Noise, Disturbance, and Parking Demand](#)
- [The Nature and Character of any Services Provided](#) Where there is access to a communal garden or the STL's private garden would be in close proximity to residential gardens, STLS will generally not be supported. Where parking is provided this will be considered in the context of the Council's parking policies and guidance.

Relevant Application Details & Policy Assessment

Full application details regarding the development have previously been provided and are not repeated here. Reference should therefore be made to the previous Statements.

Within this Statement, this proposal has also been comprehensively assessed and found to be compliant in terms of land use issues against NPF4 Policy 30, particularly in light of the new evidence cited above. The full assessment against the same material planning matters is not repeated here. Reference should be made to the previously submitted Statements for the full assessment against all relevant policies in the NPF4.

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The change of use of Flat 2, 48 Rodney Street to a short term let is also in full compliance with all the new City Plan 2030 policies cited in *Tables 2 & 4* in this Statement and the associated non-statutory guidance.

Notwithstanding this, with regard to Policies **Hou 6** and **Econ 6**, the following is relevant to this review case.

Hou 6

This application has been previously assessed against the LDP Policy Hou 7 and found to be acceptable and compliant. The wording of Hou 7 (LDP) and Hou 6 (City Plan 2030) is similar and not so fundamentally or materially different such that a different conclusion would be presented by the applicant in this review.

Flat 2, 48 Rodney Street has been shown to be located within a busy, mixed-use area in the city. Full details of the adjacent and surrounding buildings and land uses has previously been provided.

It has also been robustly demonstrated that the living conditions of nearby residents are not and will not be impacted upon by the continued use of this flat as an STL. The development has no impact upon any residential amenities

Whilst in this policy, the Council asserts there has been a significant increase in STLs which has been to the detriment of existing residents, it also refers to the economic benefit of tourists to the city. Given this conflicting position, it is of note that this STL use, which has operated for many years without issue demonstrates there is no potential for any future adverse impact. No objections have been received following neighbour notification of this planning application or as part of the review process.

The BIGGAR Economics report clearly also demonstrates that STLs are not a key driver or responsible for the reduction in housing stock in Edinburgh.

As stated, the outcome of the City Plan 2030 is to *balance the quality of life of our residents with the demands of visitors to the city* and in this case given the circumstances and context which are material planning considerations, the balance should be in favour of the needs of visitors to the city, particularly since there is no impact upon the quality of live to existing residents.

Econ 6

Whilst it is acknowledged this policy directly relates to hotel development and not STLs, it is evident from the wording of this policy that the Council consider the tourism economy is significant to Edinburgh. It is also clear from the wording that tourism accommodation in the city has been negatively impacted upon in the last few years and it is therefore important that the industry is supported. This should not just be through the provision of hotels but by providing a variety of types and sizes of tourism accommodation to meet the needs of all types of visitors.

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Visits/visitors are varied and arrive from international, national and local locations. They include short breaks, longer stays, holiday makers, academics/students, researchers, families visiting students, businesspeople, temporary workers, e.g., hospitality and entertainment (festival related), hospital patients, visitors to hospitals etc. All of these people have different needs and hotels are not always the right option or fit in terms of the type and affordability required or for practical reasons. STLs provide a flexible option as a 'home from home', with additional facilities (cooking and laundry) at a more affordable price, thereby meeting many of those visitor-types' (as listed) needs.

For the reasons set out in the Material Planning Considerations section of the previously submitted Planning Supporting Statement, hotels are also not the accommodation of choice for visitors to Scotland. The trend and preference for visitors is to stay at STLs rather than hotels. There should therefore be a balance and variety of accommodation provision to meet those needs rather than the focus on one type as asserted by Policy Econ 6.

The national and city economic benefits of STL uses in Edinburgh and across Scotland have been comprehensively demonstrated in this Statement through robust, well-researched reports from reputable sources.

Furthermore, as also fully demonstrated in this Statement, this short-term holiday let provides high quality tourism accommodation, which is sustainably located near local services, facilities, and attractions. This flat provides alternative and affordable option for visitors alongside the range already provided in the city area. It supports the local economy through the employment of local staff, trades and companies for the management, servicing and maintenance of the property. Through guest use, there is also a substantial and quantifiable economic benefit through their spend in the local area; shops, restaurants, services, and attractions, which would not otherwise be generated to the same level by a resident of this property. This comparative economic benefit of an STL relating to a minimally larger flat (two bedrooms) has been corroborated by the BIGGAR Economic reports.

Guidance For Businesses (January 2024)

An assessment against the associated Guidance for Businesses is provided below in the context of the City Plan 2030 policies.

Amenity There would be no associated noise impact upon neighbouring residential properties.

Road Safety There would be no additional traffic generated.

The Character of the New Use and of the Wider Area The flat is located in a block of flats, in a context whereby the adjacent and surrounding buildings are in mixed use. As such, as stated, the proposal is more likely to be supported by the Council compared to an exclusively residential area.

The Size of the Property This is a small one-bedroom property, which would not have any potential for noise and disturbance given its location.

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The Pattern of Activity associated with the Use including Numbers of Occupants, the Period of Use, Issues of Noise, Disturbance, and Parking Demand Full details of the development have been provided previously demonstrating the nature of this STL. The pattern of activity and movement in this context is such that there would be no issues of noise or disturbance or additional parking demand when compared to a residential use of the same flat.

The Nature and Character of any Services Provided Details of the access and route to the flat demonstrate there is no impact. There is no communal garden area which is accessible for guests.

Conclusion

The ongoing use of Flat 2, 48 Rodney Street as a short term let is in full compliance with the Policies Hou 6 and Econ 6 of the City Plan 2030. The development is also in compliance with the associated non-statutory guidance. As such the development should be approved in principle.

DETAILED POLICES AND OTHER MATERIAL PLANNING CONSIDERATIONS

Many of the issues below have already been covered in the assessment of this development (relevant to its principle in land use terms) as outlined above and in the previously submitted Statements. As such, whilst the detailed policies are considered below, where possible the case is not repeated, and it is briefly reaffirmed the development complies with each of the cited detailed policy requirements.

Transport

Relevant Policy Requirements

Inf 3 This policy seeks to ensure there is sufficient infrastructure capacity for the proposed development. Where found to be insufficient, these must be delivered as relevant to mitigate any negative impacts.

Inf 4 This policy similarly seeks to ensure that where a development would generate a significant number of trips it must be demonstrated through a statement and mitigation there would be no impact or these could be overcome.

Inf 7 This policy seeks to support development where the private car is not needed and encourages private car parking free or low car parking developments.

Inf 10 This policy seeks to ensure connections are made to adjacent segregated active travel infrastructure and/or off-road cycle and footpath network

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Relevant Application Details & Policy Assessment

The context of Flat 2, 48 Rodney Street is fully set out in previously submitted Statements. The property is in an extremely sustainable location in city area, as comprehensively demonstrated. It supports the stance taken by the Council of car parking fee developments (Inf 7)

The use of this flat as a short-term holiday let ensures the most efficient use of this property throughout the year, whilst supporting the local economy without any impact upon transport infrastructure.

The development would not involve any additional or significant traffic generation. Most guests will arrive by public transport or taxi.

Once guests have arrived, without access to a car and in light of the traffic levels and the costs and lack of availability of parking in the city, it is extremely likely guests would use public transport as a more sustainable travel mode during their stay, particularly given the close proximity of bus and tram stops and train stations.

The traffic generation by car relating to this STL would be less than if in residential use, particularly if residential occupiers used their car for local trips to work, education and health services. As such there would be no need for any mitigation.

Public transport links are available to and from the property by bus, tram and train. As concluded, the property is ideally located allowing guests to arrive/depart by public transport but also (if they arrive by car) they can easily access services, facilities, leisure activities and tourist attractions without the need to travel by car during their stay, which are all promoted by the applicants.

Flat 2, 48 Rodney Street is also within safe walking, wheeling and cycling distance of local shops, restaurants and services.

Active travel is also promoted by the applicants. There are nearby cycle routes allowing guests to travel into and around the city without using a car or by public transport, if necessary/required. For recreational purposes, there are nearby open spaces for guest use, as demonstrated in previously submitted Statements. The details of these are provided by the applicant to guests.

Conclusion

The ongoing use of Flat 2, 48 Rodney Street as a short-term let is in full compliance with Policies Inf 3, Inf 4, Inf 7 and Inf 10 of the City Plan 2030. As such the development should be approved.

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Sustainable Development and Environment

Relevant Policy Requirements

Env 35 This policy states that planning permission will not be granted for development that would increase flood risk

Relevant Application Details & Policy Assessment

Flat 2, 48 Rodney Street is not located in any area of flood risk as shown by the SEPA flood map previously provided.

The change of use will not result in any additional flood risk at the property for the building or occupants. The occupancy of this first floor flat by guests will have no impact upon flood risk for others or other property.

Conclusion

The ongoing use of Flat 2, 48 Rodney Street as a short-term let is in full compliance with Policy Env 35 of the City Plan 2030. As such the development should be approved.

Amenity

Relevant Policy Requirements

Env 33 This policy seeks the protection of the amenity of neighbours, including minimisation of disturbance caused by access to the site.

Relevant Application Details & Policy Assessment

Flat 2, 48 Rodney Street provides a good standard of accommodation for guests as detailed in the previously submitted Statements.

The development does not involve any physical development: external alterations or works such that would impact upon residential amenities.

However, notwithstanding this, the applicant takes the matter of residential amenities seriously to ensure the protection of their guests and neighbours. There are house rules including no parties in place. The guests are vetted.

There has been no cause for any complaints during the many years this property has been used as an STL. No objections have been received by any neighbouring properties as a result of notification of this application. It is also assumed no responses have been received from third parties as a result of this review request.

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Conclusion

The ongoing use of Flat 2, 48 Rodney Street as a short-term let is in full compliance with Policy Env 33 of the City Plan 2030. As such the development should be approved.

SECTION 3: CONCLUSION

This Statement incorporating an assessment against the new City Plan 2030 policies using newly published research, together with the original Statements and submitted plans, reaffirm the strong case set out in the previous Statements.

These Statements (including this Supplementary Planning Review Statement) have unequivocally demonstrated that the merits of this planning application for the ongoing use of this property for short-term holiday let purposes significantly outweigh any perceived or potential impacts upon housing and the economy. The short-term holiday let use of this property supports the local tourism economy and beyond. The submitted evidential based reports demonstrate there would be no impact upon the housing stock in Edinburgh and there is a strong impact upon the local economy from the STL use of such properties.

No research or subsequent evidence demonstrating any impacts upon the economy have been undertaken or published by the Council. The Council therefore have no factual or evidential grounds to refuse this planning application.

It is therefore requested that the Local Review Body approve this planning application, through this review process considering this robust and detailed new evidence, which demonstrates that this development can be delivered in full compliance with the newly adopted City Plan 2030, national planning legislation, policies (NPF4) as well as all the newly cited relevant planning policies in the City Plan 2030 and associated guidance adopted by the Council.

The applicants again reserve the right to respond to any updated national or local planning policy or guidance relevant to short-term lets, should these emerge or be adopted during the consideration of this planning application through the review process.

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