

## Objection to Change of use from residential to short term visitor accommodation

We object to this development:

- 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”<sup>1</sup>**
- 2). **The development is contrary to Scottish Planning Policy on “socially sustainable places” and “supporting delivery of accessible housing”.<sup>2</sup>**
- 3). **The development would have unacceptable impacts on neighbourhood amenity.**

Applications for short term visitor accommodation (Airbnb type rentals) are usually rejected on amenity grounds (3). PLACE believes Scottish Government Policy already exists to reject applications on the basis of the impact on housing availability (1), plus community cohesion and accessible housing grounds (2).

Scottish Government Policy is listed as a material consideration under “*Planning Circular 3/2013: Development management procedures, possible material considerations*”.<sup>3</sup>

Edinburgh has a housing crisis, and accessible housing crisis<sup>4</sup>. The Strategic Housing Investment Plan states the rapid growth in short term lets is creating further pressure on supply, rent levels and house prices in some areas as properties are purchased for short term let rather than long term rent or owner occupation.<sup>5</sup>

To demonstrate the scale of the problem, independent research for the Scottish Government finds 12.78% of all City Centre dwellings are listed as entire-property short-term lets on Airbnb alone.<sup>6</sup> In the Old Town, one in four properties are listed on Airbnb.<sup>7</sup> Very few have planning authorisation. Short-term letting affects the ability of the area to function as a “socially sustainable place”.

It has been concluded at thirty-three (and rising) DPEA planning appeals, that short-term lets have a materially detrimental impact on the living conditions for close neighbours<sup>8</sup>, such as in this case.

Significant impacts on neighbours include: increased antisocial behaviour, noise, disruption, intrusion by a frequent turnover of strangers, loss of community, loss of security and impacts on bins and parking.<sup>8</sup>

[Main door properties only] - Main door properties have been found unacceptable for short-term letting when they are close to other residential properties and / or share communal spaces,<sup>9,10,11,12,13,14</sup>. Furthermore, the demand for main door housing in Edinburgh is so great that, incentivising any main door housing for short-term holiday lets is contrary to Scottish Planning Policy on “supporting delivery of accessible housing”.

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<sup>1</sup> <https://www.gov.scot/policies/more-homes/>

<sup>2</sup> <https://www2.gov.scot/Resource/0045/00453827.pdf>

<sup>3</sup> <https://www.gov.scot/publications/planning-series-circular-3-2013-development-management-procedures/pages/12/>

<sup>4</sup> <https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-scotlands-hidden-crisis>

<sup>5</sup> <https://democracy.edinburgh.gov.uk/mqConvert2PDF.aspx?ID=10135>

<sup>6</sup> <https://www.gov.scot/publications/short-term-lets-consultation-regulatory-framework-scotland-analysis-consultation-responses/>

<sup>7</sup> <https://www.theguardian.com/technology/2020/feb/20/revealed-the-areas-in-the-uk-with-one-airbnb-for-every-four-homes>

<sup>8</sup> <https://docs.google.com/document/d/1MV0-bfYx8B3bkCjF0r16ksV9QytfUmpP4RGEvRAXEP8/edit>

<sup>9</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=120999>

<sup>10</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=120857>

<sup>11</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=120050>

<sup>12</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=120492>

<sup>13</sup> <http://dpea.scotland.gov.uk/CaseDetails.aspx?ID=120047>

<sup>14</sup> <https://www.russell-cooke.co.uk/media/1039650/2012-ewca-civ-1202.pdf>