Local Review Statement
Flat 6, 139 New Street, Musselburgh, EH21 6DH

Introduction

Houghton Planning Ltd have been instructed by KLE Property Ltd to prepare a local review statement to accompany a local review regarding the refusal of planning application ref: 23/00722/P for *"Change of use of flat to short term holiday let and flat (Retrospective)"* at Flat 6, 139 New Street, Musselburgh, PH22 1RW.

The planning application was refused under delegated powers on 6th October 2023 for the following single reason:

"The holiday let use of the flatted property is incompatible with and harmful to the amenity of the occupants of other flatted properties used as residential dwellings within the residential building of 139 New Street and as such is contrary to part e) of Policy 30 of National Planning Framework 4 and Policy RCA1 of the adopted East Lothian Local Development Plan 2018".

KLE Property Ltd have owned the property since July 2019, and have used the property for short term letting purposes since then. The property is on the valuation role, and has paid non-domestic rates since March 2020.

This statement starts by describing the site, includes details on how the property is managed, and guest rules, but then follows the same format as the Report of Handling.

Site Description

Number 139 New Street, shown below, is a block of apartments that is situated towards the western end, and on the south side, of New Street overlooking the beach and harbour in Musselburgh.

Flat 6 is situated on the third floor of the building, and is accessed from the front via entrance doors into a shared hallway and stairwell. It is one of six flats sharing the stairwell.

The flat itself has three bedrooms, one of which is ensuite, a further bathroom, reception room, and dining kitchen. The reception room, and dining room, are shown below. The property also benefits from a balcony at the front, which overlooks the beach, and which is contained on either side to prevent any overlooking of neighbours.

A floorplan of the property was included with the planning application.

The shared car park, shown below, is accessed from New Street. Flat 6 has one allocated secure car parking space under the building. There are also 42 shared spaces for visitors outside the apartment complex, which are rarely all filled. There are usually at least 15-20 free spaces (often more). In the time the applicant has owned the apartment, parking has never been an issue for visitors, or guests.

General Management of the Property

The applicant retains Evergreen Property https://www.evergreen-property.co.uk who oversee the day-to-day management and maintenance of the holiday let business. They market the property; undertake guest relations; vet any potential guests fully before they are accepted; and are available to respond 24/7 to any queries, or issues, which arise during the guests' stay.

The neighbour at Flat 5 136 New Street has the direct number of the property manager, and can contact them if any disturbance occurs. One other neighbour on the shared stairwell has the applicant's direct line mobile number as well.

To date, and as far as the applicant is aware, no direct complaints to the management company, or them, have been made about any guests staying at the property in relation to noise, littering, or displaying any forms of anti-social behaviour.

The applicant also retains the services of Landlords Little Helper https://landlordslittlehelper.co.uk, an Edinburgh based service that provides turnaround cleaning and property maintenance. As a business, they pride themselves on treating all properties they maintain as they would their own.

Specific Guest Rules

Many of the guests using the property are tourists wishing to visit East Lothian and Edinburgh. Most are on holiday, and the majority stay at the property a week or more.

Some are also work stays. For example, a three month stay for an Executive from Tarmac in Dunbar, operational managers from golf tournaments in Gullane, and from Musselburgh race course, the director of the local pantomime at the Brunton Theatre, and professional golfers taking part in local tournaments, have all stayed in the property recently.

House rules include the following:

- Guests are vetted, as far as possible, by checking previous stays information online, and asking guests to provide, in confidence, some information on themselves, and the purpose of their visit.
- The applicant does not generally allow any single sex groups, nor generally any groups where guests all are under 25. There is a five guest limit and, whilst children are permitted, there is a no pets policy.
- There are no visits allowed of less than three days, and many are for a much longer period than that.
- The applicant provides the guests with a 24-hour emergency phone number provided by the management company. They can also contact the management company via the booking platform and by email.
- The property has a noise monitoring device provided by Minut, which measures noise levels. This allows the management company to contact guests if noise levels exceed a level that has been set to protect the amenity of neighbours.
- Absolutely no parties, or events of any kind, are permitted.
- Guests are requested to be quiet after 10.30pm and before 8am.
- There is a no smoking policy within the property, and including the balcony.
- Check-in times are between 4 pm and 10 pm, and the applicant does not allow any arrivals after 10 pm. Guests must check out by 10am, but are asked not to leave before 8am unless absolutely necessary.
- The management company does regular spot checks of the property, and communal areas, to ensure that all rules are followed, and to ensure that shared facilities, such as the bin shed, stairs, and parking area, are being appropriately used. If there are any issues, or mess found, these are immediately dealt with.

Development Plan

The development plan policies summarised in the Report of Handling are agreed.

Representation

Before addressing the specific representations, it should be stressed that the applicant has had no direct complaints from any neighbours about anti-social behaviour. There was a complaint about the placement of key boxes found outside the apartment albeit hidden in a cupboard, which were being used by builders during the renovations of the property. The neighbours were concerned that guests were using these boxes, but at no time were they used by guests and, once the applicant received the complaint, they immediately brought in a locksmith to remove them. The neighbours said that they preferred any key boxes to be hidden in the communal bin areas, which they currently are. The applicant is, therefore, surprised, to say the least, at various other issues now being raised.

Before addressing these, however, it is only fair that councillors balance what has been said against the reality, which is that the property is professionally managed, well maintained, and is occupied by guests who normally understand their responsibilities, and act accordingly. If there has been an odd guest who has not totally behaved themselves, and acted responsibly, and, to say it again, this is the first the applicant has heard about these issues, then that seems little to go on to justify refusal of planning permission.

To put this in perspective, the applicant considers that the comings and goings from this flat are no different from what would occur were it to have young professional tenants, or students, living there. These types of occupiers may have the same, or a greater degree of, movements than those people staying in the flat on holiday.

Permanent residents can have vastly different movements depending on their student status, employment, leisure interests, family circumstances, health, or just their way of living being a night owl rather than a day person, for example. A doctor or nurse may work shifts coming in at odd times; a family with teenage children might enter and leave the flat many times during the day and night, and can be very noisy; a single person with care needs might be visited by carers several times a day. Users of a self-catering property are, therefore, unlikely to exhibit markedly distinctive characteristics to more permanent residents.

Anti-social behaviour is just as likely in residential use as self-catering use. It is probably more prevalent from permanent residents because they feel more secure in their occupancy whereas a guest can be asked to leave immediately.

Servicing of self-catering accommodation is also not a particular difference because many residential occupiers use cleaners on a regular basis, especially if the occupier is in poor health.

Many tenanted and owner-occupied flats will have deliveries from the likes of Amazon, and takeaways at all times of the day and night, and probably far more than people staying on holiday who will not have the former, and are more likely to eat out spending money in local eateries that desperately need the custom, with the ongoing cost of living crisis.

Councillors also need to bear in mind, in considering the representations, that Police Scotland have been consulted and *"advise that there have been no police incidents at this address (having checked their records from 2020 onwards)"*. The Council's Environmental Health team have noted no issues, and nor has the Council's Antisocial Behaviour Team.

It is also worth noting that the absence of complaints in relation to this property is the norm in East Lothian, with the Council stating in its report in 2022 in relation to the possibility of a Control Area being introduced in all, of parts of, East Lothian that:

"There is little evidence at the moment to show that short term let properties are causing these problems, or that the issue is significant enough for a complaint to be made. Between the 1st January 2018 and October 2021, there were only two complaints received by East Lothian Council relating to Short Term Let (AirBnB) properties. This shows an overall low level of antisocial behaviour problems associated with these properties."

Finally, councillors must consider all representations understanding that there is an 'echo chamber' effect going on where people opposed to short term lets are availing themselves of social media groups that share similar views, using platforms and apps where objections can easily be made to STL applications in local areas and, inevitably, are reading press articles that do not always present a balanced view. The comments that have been made here must, therefore, be treated with extreme caution and, although the applicant has responded below, it is clear that most are unsubstantiated gossip, and the sort of comments that are being submitted across Scotland by people with a certain polarised agenda.

With that in mind, the applicant's specific comments on the summary of representations in the Report of Handling are as follows:

i. *there are a total of 6 flats within block 139 which all share a common entrance and stair* –This is correct. However, people entering and leaving do not need to pass close to the doors of other flats, and noise mitigation within the common stairwell is good because this is a modern building, and noise mitigation was designed in when the property was built.

ii. *it appears as though holiday lets which share communal entrance doors, hallways or stairs with other residential properties are prohibited in East Lothian and this applies to this property* – That is not true. This is an impression that has been given in the press reporting on certain decisions by the Council. The Report of Handling correctly sets out the policies to be considered, and the balance that needs to be struck in determining planning applications.

iii. *the holiday let has resulted in noise, nuisance, police incidents and anti-social behaviour in the internal common stair and within the car parking area which have been reported* – As stated above, no such incidents have been reported to the applicant, or their managing agents, or to the police since starting the holiday let business. If they had, the applicant would have been aware of them, and taken action immediately. The applicant and management company want to have good relations with neighbours, and would take such allegations seriously to maintain those relations. Also, these sorts of comments are easily made, are often attributed to short term let use when it may have had nothing to go with this property, and are seldom accompanied by the evidence. No evidence has been submitted here to support these allegations, as far as the applicant is aware. Therefore, they should be given no weight whatsoever. Indeed, such unsupported allegations should not even be included in a public document like a Report of Handling.

iv. *guests staying at the property press the wrong buzzers, and sometimes try to gain entry into the wrong flats, late at night and early morning* – That is yet another unsubstantiated allegation. No evidence of this has been submitted because it does not happen. Further, it is a strongly enforced rule that guests are not allowed to arrive after 10pm.

v. *the applicant has been approached about the nuisance guests are causing by a neighbouring resident who claims that they were told they shouldn't live in a tenement building if they want peace and quiet* - This is what is called unsubstantiated hearsay. It would have no validity in a court case, and should have none here in what is, itself, a quasi-judicial consideration of a planning application.

vi. *when guests are asked to respect a residential stair they respond with 'we are here to party and are on holiday'* - That is yet another unsubstantiated allegation. This allegation is similar, and could be argued, has been conflated to one made when the applicant's father, who lived there for 20 years prior to 2019. This was when a neighbour complained about noise coming from a different property in the block, and the response was as above.

vii. *the flat has a balcony and music is occasionally played at night* – That has happened on occasion, but is no different to what happens with other flats in the building. The apartment block overlooks the harbour car park, which is notorious for noise and anti-social behaviour. This is evidenced by numerous complaints made to the police and Council about antisocial behaviour caused by vehicles parking up, revving engines, and playing loud music. Occasional noise from a balcony is in keeping with other residential properties.

viii. *people are coming and going at all times of the day and night and concerns are raised relating to security as it is claimed that permanent residents do not know the strangers entering the building and using the stair* – As already explained above, 'strangers' entering a building is common. It is no different in a building that is permanently occupied than one where short term letting is taking place. Many people can live for years in a block, and never know who their neighbours are, or their family members, or tradespeople visiting them, or delivery drivers.

ix. *some arrivals and departures of guests are at unsociable times and suitcases can be heard being trundled up and down the stairs, and outside on the tarmac, which disturbs sleeping residents* – It is a rule that guests are not permitted entry to the apartment after 10pm at night. Further, this happens in any building where people live. If someone is in bed, how can they know where the noise is coming from, and to whom to attribute it? It could simply be a passer-by.

x. *there is irregular comings and goings by strangers which causes distress and disturbance to the elderly residents in the building and which impacts upon their amenity* – The applicant speaks to neighbours regularly when using the property themselves, they have never raised any issues about distress being caused by strangers coming and going. In addition, see point above.

xi. *the level of security, particularly within the stairwells of the building, is being compromised* – Again, an unsubstantiated allegation. No evidence of that has been provide. Further, the stairwell is entered via a door that is locked, keys are provided to the vetted guests to use for the duration of their stay only.

xii. *there has been a number of cleaners and maintenance people arriving and departing on a regular basis as a consequence of short term lets within the apartment complex* – This happens in all blocks of flats, in addition, there are prolonged periods where the property is not being used.

xiii. *guests have not been disposing rubbish correctly* – The applicant is unaware of this. However, can easily be dealt with by the applicant through the management of the property. Also, putting rubbish in the wrong bins is something that is common in every block of flats, and every road, in Scotland. In fact, the applicant's father, who lived at the property for 20 years had to seal the bin with a screw due it being used by other people inappropriately, so this is not an uncommon issue in the apartment building.

Planning Assessment

The applicant is aware of the issues the case officer has raised, which follow a theme across all applications being considered in East Lothian, and can comment as follows:

- Turnover of guests – Unlike many short term lets, the turnover of guests is relatively infrequent at this property. Although there is a three day minimum stay, it is rare that anyone takes the property for only three days, with those stays mostly in winter months and outside of holiday season. From October to April the apartment is more likely to be empty during the week unless there is a work stay whereby the property is let for longer periods. The apartment has three bedrooms and maximum occupancy is five people, therefore the applicant is not over-occupying the rooms in the property. More commonly, people stay in the property for at least a week, and often for much longer periods, as explained above. Therefore, neighbours do not experience an obvious increase in comings and goings to the property, as against what they would experience with owner occupation, or a tenant. Also, what comings and goings there are, tend to be during the day, with any changeover, and cleaning of the property, being during working hours. Although guests can arrive up to 10pm, this is exceedingly rare, and most arrive in the afternoon, and leave mid-morning.

- Luggage – Most people using the property come with a rucksack, or with a small suitcase. Because of the vetting that goes on, and because most guests are seasoned holidaymakers, they are conscious that they need to be quiet using communal areas, and not to make noise by trying to drag their cases up the stairs rather than carrying them. Also, because of the vetting, if a guest is staying longer term, or needs assistance with luggage, then the management company is available to help to move luggage to further ensure that a kerfuffle in the stairwell is avoided.

- Overall visits to the property – It is often stated that with guest turnover, and cleaners visiting a property, that the number of comings and goings per day from a short term let are higher than that for a flat that is owner occupied, or tenanted. That is actually not borne out by the reality, which is that many flats of this size could have a number of young professionals living in them as tenants who all leave the flat, and return, at different times, and may also have cleaners, delivery drivers, friends, and relatives, visiting them at all sorts of times day and night. The overall effect is that there is little noticeable difference between the use of the flat as a short term let, and what could happen if the applicant put in tenants, which is what would happen here if short term letting is not permitted to continue.

As a final thought, if councillors are swithering on the residential amenity issue, then they should be aware that granting a temporary planning permission is available to them as an option to test whether the use can take place without undue impact on neighbours, or whether the sort of comments made in representations, or suggested by the case officer, are, instead, the case. Many other authorities across Scotland have taken this option, including for short term lets. Clearly, the applicant would prefer a permanent planning permission, but a three year temporary consent, in line with a hopefully soon to be granted licence, would allow the use to continue, and for factual evidence to be gathered rather than unsubstantiated allegations as to the impacts.

For these reasons, the proposal complies with part e) i of Policy 30 of NPF4, and with Policy RCA1 of the adopted East Lothian Local Development Plan 2018.

In terms of Policy 30 e) ii, a Council consultation in 2022 on the possibility of Control Areas included some information on the number of short term lets in individual towns. For Musselburgh, the report stated that in 2022 the town had a total of 12,639 dwellings, including flats, 43 of which were being used as short term lets, which is 0.3% of the total. In the town centre, the respective figures were 819 properties, of which 7 were short term lets, or 0.85%. The short term let licence register suggests only four properties in Musselburgh have applied for a licence, although it must be said that a postal town is not included for every property listed thereon. However, that aside, it suggests the number of short term lets is as low, if not lower, than the 2022 report suspected. The town-wide percentage for Musselburgh was stated in the 2022 as being lower than that for Dunbar, North Berwick, and Haddington, although on a par with Gullane. The town centre percentage was lower than all these towns, and significantly lower than for North Berwick and Gullane. More significantly, the percentages for Musselburgh (whole town and town centre only) are lower than the national average of 1.2% (Scottish Government 2019 - Research into the impact of short-term lets on communities across Scotland).

Against that background, the loss of this one flat to the housing supply for the time it is a short term let is negligible, and refusing this application will not in any way help with the ‘constrained housing system’ noted by the Council's Housing Strategy & Development Service. Furthermore, the applicants do not intend to long let the property, and would retain it as a business asset. It would, therefore, remain empty for prolonged periods of time.

Whilst there may be a housing shortage in East Lothian, and Musselburgh, this is not being caused by short term lets. Rather, it is a multifaceted issue that seeking to close short term lets will not solve. It needs a multi-agency approach, including the Council, to kick-start new housebuilding, increase the delivery of affordable housing, and to bring back into use the many empty properties across the local authority area.

As for the economic benefits, councillors only need note the comments of the Council's Economic Development Service Manager who supports this planning application. The reference to this in the Report of handling is worth including in full here.

“The Council's Economic Development Service Manager advises that there are demonstrable local economic benefits delivered by all types of short term holiday lets in East Lothian and that existing provision of this type of accommodation must be retained, protected and supported where there is no demonstrable impact on local amenity, the character of the area or loss of residential accommodation. In the particular circumstances of this case it is stated that (i) the property will provide high quality tourist accommodation attracting visitors to Musselburgh and the surrounding area providing economic benefit; (ii) there is a demonstrable economic benefit to having a wide range of accommodation types in East Lothian with the tourism sector contribution £155m to the local economy in 2021 and supporting 10% of the workforce; (iii) non-serviced accommodation (short term holiday lets) contributes positively to the local economy (£279m in 2019) and the applicant's flat accounts for 5 bedspaces and a potential annual economic impact of £113,635 and 2.5FTE jobs; (iv) there is an increasing number of overnight stays in East Lothian for work purposes (which is expected to increase over the next 10-15 years) such that the loss of short term accommodation is likely to have a significant negative impact on the local tourist economy in monetary and reputational terms. Therefore, the Council's Economic Development Service Manger supports this planning application stating that the change of use of the flat to short term holiday let accommodation supports the

strategic goals and objectives of the Economic Development Strategy 2012-2022 and the intent and outcomes of part e) of Policy 30 of NPF4".

Further information that underlines the importance of tourism is included in the Planning Statement, and was submitted with the planning application.

For these reasons, the proposal complies with part e) ii of Policy 30 of NPF4

Conclusion

For all the above reasons, the proposal is in accordance with the development plan, NPF4 and the LDP, and complies with all relevant policies therein.

It is hoped, therefore, that this application will be supported by councillors in due course, and planning permission will be granted.

East Lothian Council

John Muir House Haddington EH41 3HA Tel: 01620 827 216 Email: planning@eastlothian.gov.uk

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

Thank you for completing this application form:

ONLINE REFERENCE 100633722-001

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

Type of Application

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

☒ Application for planning permission (including changes of use and surface mineral working).

☐ Application for planning permission in principle.

☐ Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)

☐ Application for Approval of Matters specified in conditions.

Description of Proposal

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

Change of use of flat to short term holiday let and flat (Retrospective)

Is this a temporary permission? * ☐ Yes ☒ No

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

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

☐ No ☐ Yes – Started ☒ Yes - Completed

Please state date of completion, or if not completed, the start date (dd/mm/yyyy): * 01/07/2019

Please explain why work has taken place in advance of making this application: * (Max 500 characters)

Started prior to the need for STLs to secure planning permission.

Applicant or Agent Details

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

Agent Details

Please enter Agent details

Company/Organisation:	Houghton Planning Ltd		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Paul	Building Name:	Alloa Business Centre
Last Name: *	Houghton MRTPI	Building Number:	
Telephone Number: *	[redacted]	Address 1 (Street): *	Whins Road
Extension Number:		Address 2:	Alloa
Mobile Number:		Town/City: *	Clacks
Fax Number:		Country: *	Scotland
		Postcode: *	FK10 3RF
Email Address: *	[redacted]		

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

☐ Individual ☒ Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	
First Name: *		Building Number:	20
Last Name: *		Address 1 (Street): *	Woburn Hill
Company/Organisation	KLE Property Ltd	Address 2:	
Telephone Number: *		Town/City: *	Liverpool
Extension Number:		Country: *	England
Mobile Number:		Postcode: *	L13 6RL
Fax Number:			
Email Address: *	[redacted]		

Site Address Details

Planning Authority: East Lothian Council

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

Address 1: FLAT 6

Address 2: 139 NEW STREET

Address 3: FISHERROW

Address 4:

Address 5:

Town/City/Settlement: MUSSELBURGH

Post Code: EH21 6DH

Please identify/describe the location of the site or sites

Northing 672950 Easting 333286

Pre-Application Discussion

Have you discussed your proposal with the planning authority? * ☐ Yes ☒ No

Site Area

Please state the site area: 102.00

Please state the measurement type used: ☐ Hectares (ha) ☒ Square Metres (sq.m)

Existing Use

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

Flat

Access and Parking

Are you proposing a new altered vehicle access to or from a public road? * ☐ Yes ☒ No

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

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

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

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site? 1

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? * 1

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

Water Supply and Drainage Arrangements

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

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

Note:-

Please include details of SUDS arrangements on your plans

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

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

☐ Yes
☐ No, using a private water supply
☒ No connection required

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

Assessment of Flood Risk

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

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

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

Trees

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

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

Waste Storage and Collection

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

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

Shared bin storage.

Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? * ☐ Yes ☒ No

All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? * ☒ Yes ☐ No

All Types of Non Housing Development – Proposed New Floorspace Details

For planning permission in principle applications, if you are unaware of the exact proposed floorspace dimensions please provide an estimate where necessary and provide a fuller explanation in the 'Don't Know' text box below.

Please state the use type and proposed floorspace (or number of rooms if you are proposing a hotel or residential institution): *

Not in a Use Class

Gross (proposed) floorspace (In square meters, sq.m) or number of new (additional) Rooms (If class 7, 8 or 8a): * 102

If Class 1, please give details of internal floorspace:

Net trading spaces: Non-trading space:

Total:

If Class 'Not in a use class' or 'Don't know' is selected, please give more details: (Max 500 characters)

Short term let

Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013 * ☐ Yes ☒ No ☐ Don't Know

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

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

Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? * ☐ Yes ☒ No

Certificates and Notices

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

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

Are you/the applicant the sole owner of ALL the land? * ☒ Yes ☐ No

Is any of the land part of an agricultural holding? * ☐ Yes ☒ No

Certificate Required

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

Certificate A

Land Ownership Certificate

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

Certificate A

I hereby certify that –

(1) - No person other than myself/the applicant was an owner (Any person who, in respect of any part of the land, is the owner or is the lessee under a lease thereof of which not less than 7 years remain unexpired.) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

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

Signed: Paul Houghton MRTPI

On behalf of: KLE Property Ltd

Date: 28/06/2023

☒ Please tick here to certify this Certificate. *

Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

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

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

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? *
☐ Yes ☐ No ☒ Not applicable to this application

b) If this is an application for planning permission or planning permission in principal where there is a crown interest in the land, have you provided a statement to that effect? *
☐ Yes ☐ No ☒ Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? *
☐ Yes ☐ No ☒ Not applicable to this application

Town and Country Planning (Scotland) Act 1997

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

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

☐ Yes ☐ No ☒ Not applicable to this application

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

☐ Yes ☐ No ☒ Not applicable to this application

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

☐ Yes ☐ No ☒ Not applicable to this application

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

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

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

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. *	☐ Yes ☒ N/A
A Design Statement or Design and Access Statement. *	☐ Yes ☒ N/A
A Flood Risk Assessment. *	☐ Yes ☒ N/A
A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). *	☐ Yes ☒ N/A
Drainage/SUDS layout. *	☐ Yes ☒ N/A
A Transport Assessment or Travel Plan	☐ Yes ☒ N/A
Contaminated Land Assessment. *	☐ Yes ☒ N/A
Habitat Survey. *	☐ Yes ☒ N/A
A Processing Agreement. *	☐ Yes ☒ N/A

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

Declare – For Application to Planning Authority

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

Declaration Name: Mr Paul Houghton MRTPI

Declaration Date: 28/06/2023

Payment Details

[redacted]

Created: 28/06/2023 15:08

Planning Statement
Flat 6, 139 New Street, Musselburgh, EH21 6DH

Introduction

Houghton Planning Ltd have been instructed by KLE Property Ltd to submit a planning application for *"Change of use of flat to short term holiday let and flat (Retrospective)"* at Flat 6, 139 New Street, Musselburgh, PH22 1RW.

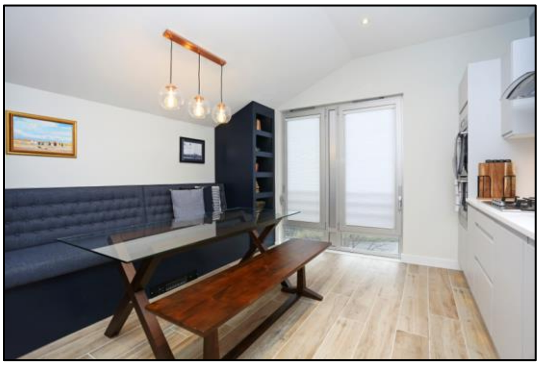
KLE Property Ltd have owned the property since July 2019, and have used the property for short term letting purposes since then. The property is on the valuation role, and has paid non-domestic rates since March 2020.

Site Description

Number 139 New Street, shown below, is a block of apartments that is situated towards the western end, and on the south side, of New Street overlooking the beach and harbour in Musselburgh.

Flat 6 is situated on the third floor of the building, and is accessed from the front, or from the shared car park at the rear, via entrance doors into a shared hallway and stairwell. It is one of six flats sharing the stairwell.

The flat itself has three bedrooms, one of which is ensuite, a further bathroom, reception room, and dining kitchen. The reception room, and dining room, are shown below. The property also benefits from a balcony at the front, which overlooks the beach, and which is contained on either side to prevent any overlooking of neighbours.



A floorplan of the property is included with the planning application.

The shared car park, shown below, is accessed from New Street. Flat 6 has one allocated secure car parking space under the building. There are also 42 shared spaces for visitors outside the apartment complex, which are rarely all filled. There are usually at least 15-20 free spaces (often more). In the time the applicant has owned the apartment, parking has never been an issue for visitors, or guests.

General Management of the Property

The applicant retains Evergreen Property https://www.evergreen-property.co.uk who oversee the day-to-day management and maintenance of the holiday let business. They market the property; undertake guest relations; vet any potential guests fully before they are accepted; and are available to respond 24/7 to any queries, or issues, which arise during the guests' stay.

The neighbour at Flat 5 136 New Street has the direct number of the property manager, and can contact them if any disturbance occurs. Two other neighbours on the shared stairwell have the applicant's direct line mobile number as well.

To date, and as far as the applicant is aware, no direct complaints to the management company, or them, have been made about any guests staying at the property in relation to noise, littering, or displaying any forms of anti-social behaviour.

The applicant also retains the services of Landlords Little Helper https://landlordslittlehelper.co.uk, an Edinburgh based service that provides turnaround cleaning and property maintenance. As a business, they pride themselves on treating all properties they maintain as they would their own.

Relations with Neighbours

As already stated, the applicant has had no direct complaints from any neighbours about anti-social behaviour. There was a complaint about the placement of key boxes found outside the apartment albeit hidden in a cupboard, which were being used by builders during the renovations of the property. The neighbours were concerned that guests were using these boxes, but at no time were they used by guests and, once the applicant received the complaint, they immediately brought in a locksmith to remove them. The neighbours said that they preferred any key boxes to be hidden in the communal bin areas, which they currently are.

Specific Guest Rules

Many of the guests using the property are tourists wishing to visit East Lothian and Edinburgh. Most are on holiday, and the majority stay at the property a week or more. Some are also work stays. For example, a three month stay for an Executive from Tarmac in Dunbar, operational managers from golf tournaments in Gullane, and from Musselburgh race course, the director of the local pantomime at the Brunton Theatre, and professional golfers taking part in local tournaments, have all stayed in the property recently.

House rules include the following:

- Guests are vetted, as far as possible, by checking previous stays information online, and asking guests to provide, in confidence, some information on themselves, and the purpose of their visit.
- The applicant does not generally allow any single sex groups, nor generally any groups where guests all are under 25. There is a five guest limit and, whilst children are permitted, there is a no pets policy.
- There are no visits allowed of less than three days, and many are for a much longer period than that.
- The applicant provides the guests with a 24-hour emergency phone number provided by the management company. They can also contact the management company via the booking platform and by email.
- The property has a noise monitoring device provided by Minut, which measures noise levels. This allows the management company to contact guests if noise levels exceed a level that has been set to protect the amenity of neighbours.
- Absolutely no parties, or events of any kind, are permitted.
- Guests are requested to be quiet after 10.30pm.
- There is a no smoking policy within the property, and including the balcony.
- Check-in times are between 4 pm and 10 pm, and the applicant does not allow any arrivals after 10 pm. Guests have to check out by 10am, but are asked not to leave before 8am unless absolutely necessary.
- The management company does regular spot checks of the property, and communal areas, to ensure that all rules are followed, and to ensure that shared facilities, such as the bin shed, stairs, and parking area, are being appropriately used. If there are any issues, or mess found, these are immediately dealt with.

Planning Assessment

The planning application is seeking the change of use of the property to allow its continued use for short term holiday lets and as a flat. The reason for this is to allow the current short term letting to continue, but to allow the property to revert to a flat, if required in the future, without the need for a further planning permission.

The development plan is the adopted National Planning Framework 4 (NPF4), and the adopted East Lothian Local Development Plan 2018 (LDP).

The most relevant policies in NPF4 are Policy 13 (Sustainable transport) and Policy 30 (Tourism).

Review of recent planning applications in East Lothian suggests that the following LDP policies are usually considered relevant: Policy RCA 1 (Residential Character and Amenity), Policy T1 (Development Location and Accessibility) and Policy T2 (General Transport Impact).

The East Lothian Economic Development Strategy 2012-22 is also often mentioned, which identifies tourism as one of the strengths of the East Lothian economy, and a source of employment opportunities for the local area. This finds its expression in the LDP whereby the Plan supports East Lothian having a range of hotel, guest house, and other tourist accommodation, which can attract visitors, and encourage them to stay, and benefit, the economy of East Lothian.

Dealing with NPF4 policy first, Policy 30e) states that: *"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."

Policy RCA1 (Residential Character and Amenity) in the LDP, in effect, covers the same ground as Policy 30 e) i, and states that development incompatible with the residential character and amenity of an area will not be permitted.

In terms of National Planning Framework Policy 30 e) i, the applicant is unaware of any noise related, or any other anti-social issues, having arisen from the use of the property as a short term let. This is partly a reflection of the site context, and layout of the property itself, and partly the type of guests it attracts, and also the way it is managed.

The applicant is aware of some of the issues planning officers have raised with other properties, and can comment as follows:

- Turnover of guests – Unlike many short term lets, the turnover of guests is relatively infrequent at this property. Although there is a three day minimum stay, it is rare that anyone takes the property for only three days, with those stays mostly in winter months. More commonly, people stay in the property for at least a week, and often for much longer periods, as explained above. Therefore, neighbours do not experience an obvious increase in comings and goings to the property, as against what they would experience with owner occupation, or a tenant. Also, what comings and goings there are tend to be during the day, with any changeover, and cleaning of the property, being during working hours. Although guests can arrive up to 10pm, this is exceedingly rare, and most arrive in the afternoon, and leave mid-morning.

- Luggage – Most people using the property come with a rucksack, or with a small suitcase. Because of the vetting that goes on, and because most guests are seasoned holidaymakers, they are conscious that they need to be quiet using communal areas, and not to make noise by trying to drag their cases up the stairs rather than carrying them. Also, because of the vetting, if a guest is staying longer term, or needs assistance with luggage, then the management company is available to help to move luggage to further ensure that a kerfuffle in the stairwell is avoided.

- Overall visits to the property – It is often stated that with guest turnover, and cleaners visiting a property, that the number of comings and goings per day from a short term let are higher than that for a flat that is owner occupied, or tenanted. That is actually not borne out by the reality, which is that many flats of this size could have a number of young professionals living in them as tenants who all leave the flat, and return, at different times, and may also have cleaners, delivery drivers, friends, and relatives, visiting them at all sorts of times day and night. The overall effect is that there is little noticeable difference between the use of the flat as a short term let, and what could happen if the applicant put in tenants, which is what would happen here if short term letting is not permitted to continue.

It is also worth noting that the absence of complaints in relation to this property is the norm in East Lothian, with the Council stating in its report in 2022 in relation to the possibility of a Control Area being introduced in all, of parts of, East Lothian that:

"there is little evidence at the moment to show that short term let properties are causing these problems, or that the issue is significant enough for a complaint to be made. Between the 1st January 2018 and October 2021, there were only two complaints received by East Lothian Council relating to Short Term Let (AirBnB) properties. This shows an overall low level of antisocial behaviour problems associated with these properties."

For these reasons, the proposal complies with Policy 30 e) i, and also complies with LDP Policy RCA 1.

In terms of Policy 30 e) ii, the same Council consultation in 2022 included some information on the number of short term lets in individual towns. For Musselburgh, the report stated that in 2022 the town had a total of 12,639 dwellings, including flats, 43 of which were being used as short term lets, which is 0.3% of the total. In the town centre, the respective figures were 819 properties, of which 7 were short term lets, or 0.85%. The town-wide percentage for Musselburgh was stated as being lower than that for Dunbar, North Berwick, and Haddington, although on a par with Gullane. The town centre percentage was lower than all these towns, and significantly lower than for North Berwick and Gullane. More significantly, the percentages for Musselburgh (whole town and town centre only) are lower than the national average of 1.2% (Scottish Government 2019 - Research into the impact of short-term lets on communities across Scotland).

Against that background, the loss of this one flat to the housing supply for the time it is a short term let is negligible. Even then, Policy 30 e) ii requires that this issue is weighed against the economic benefits of short term lets of which there are many.

In a recent Report of Handling for a planning application for a short term let in Musselburgh, the case officer quoted the following figures.

- The tourism sector contributed £155m to the local economy in 2021.
- The tourism sector supported 10% of the workforce.

More up-to-date figures for the Lothians can be found in a report produced for the Association of Scotland's Self Caterers, and the Professional Association of Self-Caterers, by Frontline Consultants, and it is also worthwhile considering the VisitScotland factsheet for Edinburgh and the Lothians, both of which are being submitted with the planning application. Both documents underline the significant contribution that tourism plays to the Lothians' economy, and how many jobs it supports.

At the micro-level, recent work undertaken for City of Edinburgh Council suggests that a short term let generates close to £20,000 net annual GVA, and supports just under one FTE job. Much of the spend happens locally, and so a short term let will help the local area by supporting shops, restaurants, and tourist attractions.

For these reasons, the current proposal is considered by comply with NPF4 Policy e) ii.

That just leaves the issue of sustainable transport, and general transport impact. In terms of those, the property is close to the town centre, and so anyone staying there has access to public transport, and walking, and cycling, networks. The applicant makes information available to guests encouraging them to use these methods of transport both to arrive at the property, and for any excursions. If guests do arrive by car, the property has available parking for them.

For the above reasons, the proposal complies with NPF4 policy 13, and LDP policies T1 and T2.

Conclusion

For all the above reasons, the proposal is in accordance with the development plan, NPF4 and the LDP, and complies with Policies 13 and 30 in NPF4, and Policies RCA1, T1 and T2 in the LDP.

It is hoped, therefore, that this application will secure a favourable recommendation in due course, and planning permission will be granted.

Short Term Lets Engagement Exercise

East Lothian Planning Service

February 2022

East Lothian
Council

Background

This Engagement Exercise is being undertaken to gather the views of East Lothian residents on the issue of short-term lets and their impact, positive or negative, on East Lothian's communities.

The reason for engaging in this process at present is due to the Scottish Government introducing legislation that allows Local Authorities to create control areas if there is a particular prevalence of short term lets and it deemed that this is creating undesirable impacts on the local community. Planning legislation allows planning authorities to designate all of their area as a control area or parts of their area as one or more control areas. They are not under a duty to designate control areas and may choose not to do so. If control areas are introduced then within these areas short terms lets would require planning permission and their numbers could be restricted.

This note sets out background information on the issue of short term lets, what they are, their prevalence in the main East Lothian settlements and the types of issues that should be considered when considering the need for control areas.

The Scottish Government has released a Guidance document titled Circular 2/2021 which sets out the types of issues that would be relevant to determining if short terms lets control areas are required. It states they could be brought in:

- to help manage high concentrations of secondary letting (where it affects the availability of residential housing or the character of a neighbourhood);
- to restrict or prevent short-term lets in places or types of building where it is not appropriate; or
- to help local authorities ensure that homes are used to best effect in their areas.

Control areas are a land use planning tool and if these controls are introduced, then it is essential that it is due to relevant planning issues being regularly raised as a problem by residents. Within the context of the three issues set out above, relevant planning considerations would include:

- Changes to the look and feel of a neighbourhood, such as multiple keyboxes on many buildings or structures or wheelie suitcase noise on streets and in stairwells.
- Signs that local services are struggling, such as many instances of overflowing bins.
- Lack of affordable and appropriate housing for local residents, perhaps indicated by a high share of sale volumes to, and high prices paid by, non-residents.
- A significantly higher level of complaints relevant to use of dwellinghouses as short-term lets from neighbours spread across a number of tenements or properties than in a comparable area, within or outside the planning authority area.
- Detrimental impact on local amenity, with some businesses, schools or

other services that serve, and are reliant on, permanent residents closing or relocating.

Ultimately, it will be for the Council to determine whether a control area is required taking all relevant local circumstances into account. Prior to making this decision, we are seeking the views of local residents and organisations as to whether they think any of the issues and planning considerations set out above are prevalent in East Lothian and whether this would merit the introduction of control areas. These views are being gathered through an online survey on the East Lothian Consultation Hub.

This note provides further information on the planning issues relevant to short terms lets and will assist in the completion of an accompanying survey on the East Lothian Consultation Hub. This survey seeks to gather the views of the public and other interested parties on Short Term Letting in East Lothian. The survey is open from the 3rd February 2022 until the 17th March 2022, at which point the views provided will help shape a recommended position on whether short term let control areas are a good idea in East Lothian.

<u>What is a Short Term Let?</u>

Short term lets are letting arrangements are those that cater for peoples circumstances where they do not require accommodation for a long period and are normally aimed at the tourist market and workers with very short temporary contracts. The definition covers properties that are either whole houses or flats and are defined within Regulation 2 of the Control Area Regulations 2021 as:

2.—(1) For the purposes of section 26B of the Act, and subject to section 26B(3) of the Act, a short-term let is provided where all of the following criteria are met—
(a) sleeping accommodation is provided to one or more persons for one or more nights for commercial consideration,
(b) no person to whom sleeping accommodation is provided is an immediate family member of the person by whom the accommodation is being provided,
(c) the accommodation is not provided for the principal purpose of facilitating the provision of work or services to the person by whom the accommodation is being provided or to another member of that person's household,
(d) the accommodation is not provided by an employer to an employee in terms of a contract of employment or for the better performance of the employee's duties, and
(e)the accommodation is not excluded accommodation.

The types of properties excluded from the definition are as follows:

• private residential tenancies under section 1 of the Private Housing (Tenancies) Scotland Act 2016; and
• tenancies of a dwellinghouse or part of it where all or part of the dwelling house is the only or principal home of the landlord or occupier

What Are The Benefits of a Short Term Let?

The Short Term Letting sector has experienced growth in recent years and there are a number of reasons for this.

Tourism

The biggest positive effect of short term lets is on the tourism sector. The availability and choice of property types available as short term lets allows people to visit the area and stay in accommodation which suits their needs. Unlike many hotels and B&Bs or guest houses which are typically located in town or city centres, properties available for Short Term Lets tend to offer greater choice of location. Depending on the type of property, they can also offer certain facilities that hotels may not be able to provide, such as exclusive use of a whole house or flat, access to kitchens and food preparation areas, laundry, gardens etc. This allows families, couples, or groups of friends the ability to all stay in the same location and share facilities. This opens up tourism to a wider part of the population who may otherwise not be able to visit the area.

Additional income for local residents

Existing home owners can, subject to any mortgage restrictions, let out part of their property on platforms such as AirBnB providing them with an additional source of income. This can be very useful both for the property owner and also for the tenant. Property owners may find themselves in circumstances that they did not anticipate when buying the property, such as employment changes, family breakups etc. These situations can create problems for being able to afford mortgage payments and therefore risks owners being forced to sell and find a cheaper property. Short term letting can supplement people's income and potentially help them to remain in their home. For tenants, renting a room in a property means that living costs (such as Council tax, utilities etc.) can be shared rather than them the responsibility of the sole tenant which may be unaffordable. They also have the social benefits of living with someone else, which can be helpful if someone is new to the area.

Seasonality

Seasonality is an issue for Short Term Lets. For most areas in Scotland, there is generally a peak tourism season lasting roughly from April – September. Outside of this peak season, many properties can struggle to find occupiers. They can be left empty and unused for months at a time. With a greater choice of rental types available through the Short Term Let market, there is potential for extending the normal peak tourist season. Certain events held in East Lothian (Scottish Open golf, Scottish Half Marathon, Fringe by the Sea, 3 Harbours Arts Festival etc.) typically contribute to the use of short term let properties in the peak season, but may encourage people to visit again outside of these times if they have a positive experience in the area.

Additionally, with East Lothian's proximity to Edinburgh and excellent transport links into the city, Short Term Lets can take advantage of particular events held in the capital (such as the Fringe Festival, Hogmanay etc.) and others outside of the typical tourist season. The existence of short term lets in East Lothian helps to provide accommodation for those who do not wish (or cannot afford) to stay within the city itself but will be visiting it or attending an event.

The 2021 Regulations

The Scottish Government approved new legislation on the 24th February 2021 called the *Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021*. These Regulations came into force on the 1st April 2021. They introduce new powers for Local Authorities to help them control and manage short term lettings within their areas. This is through both Licensing and Planning.

Prior to the approval of the new legislation, Local Authorities were invited to respond to consultation on the proposed new powers. A response was provided by East Lothian Council which broadly supported the principle of these new powers. To support the new legislation and provide further clarity on how the act will work in practice, the Scottish Government produced Planning Circular *1_21 Establishing A Short-Term Let Control Area.* The Circular provides additional information on how planning applications will be determined, arrangements for how Local Authorities must consult with the public when proposing to establish a control area, and the links with licensing regimes.

What is a Control Area?

Under the new legislation, within a Control Area planning permission would always be required to operate a Short Term Let. When a property is originally used as a dwellinghouse, if it is to be used for Short Term Letting then planning permission for a change of use is required. Outside of Control Areas, planning permission is not required.

Control Areas can be designated for the whole of a county or they can be designated for parts of it. The legislation does not require Councils to designate Control Areas if they do not deem it necessary. The legislation simply introduces powers to designate where Councils have sufficient reasons.

The legislation also introduces a new Licensing Order. It means that all short term let properties are required to obtain a license to operate. This includes those not within any Control Area. Local Authorities, as the Licensing Authority, must establish a Licensing Regime to enable these new provisions to be implemented.

The Licensing Order introduces a number of mandatory conditions that will apply to all short term let licenses, if granted. Councils have the ability to add additional conditions to a license. It is therefore essential for Planning and Licensing Teams to work together and in collaboration with other Services in order to meet the requirements of the new act.

The Scottish Government has given Councils until the 1st October 2022 to establish a regime for Licensing. New operators of short term lets will not be able to take any bookings until they have applied for and been granted a license. Existing operators of short term lets (those operating before 1st October 2022) will have until the 1st April 2023 to apply for a license.

East Lothian Context

At the time of writing, there are 572 listings of Short Term Lets available in East Lothian. The vast majority of these are whole houses (87%), with the remainder being private rooms (e.g. within a flat which is part of a block usually also containing private residential dwellings). The properties are listed on AirBnB (www.airbnb.co.uk) with some also listed on VRBO (www.vrbo.com). Whilst listings exist on other websites or platforms, these are typically duplicate listings of those seen on AirBnB and VRBO. This paper therefore focusses on the listings within those two platforms.

The location of Short Term Let properties in East Lothian is generally concentrated in urban areas, with highest numbers in designated town centres and just beyond. Smaller clusters or sometimes single properties can be found in the smaller villages and hamlets of East Lothian's more rural areas.

The table below provides figures for the total number of Short Term Let properties in five of East Lothian's main towns. It also shows figures for the designated town centres, or local centres for smaller settlements. These are then shown as a percentage of total dwellings or dwellings within town or local centres.

	Dwellings (settlement)	Total STLs	% of STLs (settlement)	Dwellings (TC/LC)	Total STLs in TC/LC	% of STLs (TC/LC)
Dunbar	4,976	42	0.8%	485	18	3.7%
Musselburgh	12,639	43	0.3%	819	7	0.85%
North Berwick	4,261	153	3.59%	315	50	16%
Haddington	5,477	20	0.37%	496	6	1.2%
Gullane	1,533	45	2.94%	80	12	15%

The figures provide here are approximate due to the information available on the exact location of AirBnB properties only being available once a booking is confirmed by the owner/operator. Therefore these figures are only to be used as a guide.

Why is the Legislation required?

Prior to this new legislation, the need to apply for planning permission to operate a Short Term Let was for Councils to decide on a case by case basis. This meant that many properties could and were being used for this purpose without the need for any planning consent, or any planning controls such as conditions.

Therefore Local Authorities had little control over where and how many properties were used for Short Tem Letting purposes. Councils were also only able to exercise control through Police Scotland (where a crime had or was suspected of having been committed) or through Safer Communities Service where there were concerns or complaints raised regarding issues such as noise or antisocial behaviour.

The Scottish Government wanted to provide Local Authorities with the opportunity to have more control over Short Term Lets in their respective areas, in order to help to manage both the effects on local housing needs and stock, and the effects associated with amenity and antisocial behaviour. Whilst the majority of Short Term Lettings operate without any issues, there can be instances where properties are causing problems for neighbouring residents (e.g. noise caused by occupants) or through environmental issues such as excess rubbish.

As well as the environmental issues there are a range of other factors that could be relevant in determining whether any planning controls over short term lets are required. The Circular sets out the issues that would form material planning considerations when assessing an application for planning permission for a short term let. These are detailed below with some local East Lothian context provided where possible.

<u>Changes to the look and feel of a neighbourhood</u>

Under this issue, the Circular gives examples such as keyboxes appearing on multiple buildings, or frequent noise from suitcases being wheeled along pavements or streets.

The most likely location where these issues would be more prevalent are town centres as these typically contain the highest numbers of Short Term Let properties.

The character of an urban area can be gradually changed if for example there are too many external additions to buildings such as keyboxes, signage either attached to a building or within the curtilage, or even through increases in the number of vehicles parked outside buildings.

Another potential issue, although this is not specifically related to Short Term Lets, is for buildings to be maintained to a high standard externally. Repainting of buildings and appropriate management and care for stone or brickwork is important for retaining the character of an area.

Determining whether short term lets are impacting upon the look and feel of an area is something that will need to be monitored over time, and also on each individual planning application for change of use to a short term let. In particular, sensitive locations such as conservation areas will need to be closely monitored.

Although more difficult to quantify, changes to the look and feel of a neighbourhood can be more subtle, but for existing (permanent or long term) residents, they can be just as damaging. Whilst it is not considered to be a significant issue in East Lothian at the moment, the existence of too many short term let properties can affect neighbourhoods through reducing social cohesion. There could be a decline over time in permanent residents who previously knew each other leaving some feeling more isolated. It is possible that a previously quiet neighbourhood could become noisier particularly at night through more frequent movement of people. All these issues can impact upon how safe people feel in their neighbourhood, can make people feel more uncomfortable, or less inclusive.

Again, this will need to be monitored over time and the Council will be seeking people's views on these matters through the dedicated Short Term Lets public consultation. The annual residents' survey could also provide some additional information depending on responses.

Struggling services (e.g. waste and overflowing bins)

There is some evidence at the national level that, in some areas, short term let properties tend to experience issues related to excess rubbish. This can either be related to the hosts not managing their property appropriately, or through the behaviour of guests. The issue may not be directly outside the property but could be seen in the wider street or neighbourhood where for example bins fill up very quickly and start to overflow.

The consultation on Short Term Lets give the opportunity for you to provide comments on any areas you feel are problematic at the moment. The Council will continue to liaise with our own Waste Collection Service regarding any areas that they become aware of such problems or changes over time.

Lack of affordable and appropriate housing for local residents

The existence of short term let properties can negatively impact upon the housing market. This is particularly the case in areas where, for example, affordable housing is limited both in terms of existing stock and in the amount of new stock programmed to be built. Short term let properties are often owned as a private individual's second property (such as a buy-to-let) or they are part of a commercial company's property portfolio where they own multiple properties for letting purposes.

Additionally, short term letting can impact upon the private rental sector. This is because it is often seen as more attractive (and profitable) to rent properties on a short term basis allowing higher rates to be charged and also allowing a wider potential customer base. It is also possible that landlords may decide to increase monthly rental costs on long term rentals if they frequently see short term lets at higher prices. Within the rental sector, a common tenure is a flat share where tenants have their own private bedroom but share other parts of the property (such as a kitchen, bathroom, and living room) with one or more people. This rental type is often very helpful for people who cannot afford to rent an entire flat or house by themselves. Again, it is possible that property owners may wish to offer their spare room/s as a short term let rather than a long term rental due to higher rates.

With home ownership increasingly difficult for people to attain due to rising costs of living and rising property prices, the existence of too many short term let properties in the county could further reduce people's ability to get on the property ladder.

As many of the properties available for short term let are flats, this means that potential buyers, especially first time buyers who may only be able to afford a town centre flat, are not able to purchase a property. People therefore may end up being forced to live in an area that they do not wish or that is not that suitable for their needs e.g. longer commute to place of work. Also, where short term lets exist in rural communities with small housing stocks, there may be an issue for rural economy if there are no properties available for small business owners for example.

Another issue with high numbers of short term lets is through Buy-to-Let. Again, many buy-to-let properties are second properties for the owners, offering properties to let at high prices. Second homes could cause issues for people hoping to secure their own home.

All these factors, together with the relatively small rental market in East Lothian, could potentially limit choice for people, either those wishing to move into the area or those wishing to move elsewhere within the county. Whilst the cost of property and whether it is owned by a local resident or by a professional company, is not a material planning consideration for assessing applications, the Council has a duty to ensure that there is a range of affordable properties available in the area. This is an issue that the current Local Development Plan 2018 and the forthcoming Local Development Plan 2 will address. This is one strategy, together with the Local Housing Strategy and also the draft Poverty Plan, which the Council will use to address these issues.

With specific reference to the new Short Term Let legislation and planning requirements, the Council will work closely with the Housing Strategy team to monitor changes over time, and help to inform decisions on whether control areas may be required. The online consultation provides an opportunity to provide comments on whether you believe short term lets are causing a problem for finding suitable affordable accommodation.

Complaints

Prior to the introduction of the new Short Term Let legislation, the use of the complaints system was one of the few methods of monitoring short term let properties. The nature of complaints is typically related to litter, noise and/or antisocial behaviour. The Planning Circular 1/21 stipulates that the number of complaints should be used when assessing applications for short term lets as a material consideration. This will require continued liaison with a number of ELC teams in order to obtain up to date information to inform decisions.

However, for East Lothian, there is little evidence at the moment to show that short term let properties are causing these problems, or that the issue is significant enough for a complaint to be made. Between the 1st January 2018 and October 2021, there were only two complaints received by East Lothian Council relating to Short Term Let (AirBnB) properties. This shows an overall low level of antisocial behaviour problems associated with these properties.

Whilst it could be argued that there are more cases going unreported, and that the covid-19 pandemic has led to fewer complaints with tourism not operating for much of 2020 and 2021, the timeframe includes 2018 and 2019 when tourism was still at the normal pre-pandemic levels. This will continue to be monitored both in terms of overall numbers of complaints but also the location of the problems. Significant increases in complaints within a particular area could mean that intervention, in the form of a control area, is required.

The Licensing regime and planning process will allow greater control over how STLs operate, and should any complaints arise, then these can be dealt with through a joined-up approach.

<u>Local amenity (economy – e.g. businesses or other services closing/relocating where they rely on permanent residents in an area)</u>

The existence of Short Term Lets arguably helps to support the tourism sector both through the accommodation in which people stay but also through spending in the local area at shops, restaurants and tourist attractions.

There is however potential for short term lets, if they become too prevalent, to impact on local services in a negative way. Services that depend upon local people (or more permanent residents) such as libraries, solicitors etc. or those that rely upon regular and relatively fixed sales e.g. hair salons, pet shops etc. could experience significant reduction in profit if there are not enough local people living in an area that need them. These services are typically not going to be used by occupants of short term let properties, as they are (generally speaking) mostly used for tourism, business trips, or visiting family or friends. Services could therefore be forced to close and/or relocate. This in turn has a negative impact upon the local area, becoming less vibrant and also means that remaining residents have poorer access to services that they need.

As with any tourist accommodation, short term lets can easily be used by guests simply as a base, with travel for example into Edinburgh where spending occurs.

Many of the properties available for short term let provide guests with additional facilities not usually available at hotels, such as kitchens or food preparation areas. This could encourage greater use of self-catering and less spending on local cafes and restaurants.

It is therefore necessary to monitor over a longer period of time to see whether there is in fact a correlation between the increases in short term let properties in an area and the gradual loss of local businesses. It is expected that monitoring could be done through close working with the Economic Development and Tourism sectors of East Lothian Council. The online short term lets consultation seeks views on whether there have been changes to the level of services within given areas and the reasons for this to ascertain whether short term lets are having an impact.

Why we are consulting

East Lothian Council commissioned a study in 2019 to ascertain the impacts of Short Term Lets on the tourism sector. This was carried out by Avison Young and involved a survey sent out to various owners/operators of Short Term Let properties. Based on the results of the study, it was determined that the impacts of the new legislation on East Lothian's tourism sector would be minimal.

However, the study did not consider in depth the impacts of Short Term Lets on local housing, including home ownership and the private rental sector.

We are now conducting this public consultation inviting everyone from our communities to respond. The purpose of the consultation is to gather opinions and evidence to determine whether it is in the best interests of East Lothian and the public to designate any Control Areas or not. One of the most effective ways of gathering local information is to seek the views of the people who live in the communities and have direct day to day experience of living in the areas in which Short Term Let properties exist.

A number of Planning Authorities are already proposing to designate all or part of their areas as Control Areas. Should East Lothian Council determine that there is a need to establish one or more Control Areas, we will be required to prepare a Statement of Reasons for the designation, including a boundary. There would then be a public consultation on the proposed designation with opportunities for anyone to comment or object. More information on the designation process can be found in Planning Circular 1_21.

Proposed consultation arrangements

The Planning Service are running the public consultation for 8 weeks and this will involve an online survey published on the Consultation Hub between the 14th February and 11th April 2022. The availability of the consultation will be widely advertised on the East Lothian Council website, social media pages, newspaper notice, and also by direct email or letter notification to particular organisations or interested parties.

The survey is designed as a multiple choice response with an extra space per question for additional comments to be included by the respondent. Included with the consultation is an Information Sheet, similar to this Briefing Note, a copy of the Short-term let Control Area Regulations 2021, and a copy of Planning Circular 1_21: Establishing a Short-term Let Control Area. It is also proposed to include a map indicating concentrations of Short Term Lets in East Lothian. This is currently still in the development stage and will be confirmed nearer the time.

What will happen after the consultation?

Following the closing of the public consultation, we will analyse all the information gathered through the responses and a report will be taken to East Lothian Council detailing the findings. This will also provide recommendations as to the next steps. The findings will also help to inform the approach taken within the next Local Development Plan (LDP2).

Reference List

Scottish Government - *Research into the impact of short-term lets on communities across Scotland* (2019) People, Communities and Places – Social Research https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2019/10/research-impact-short-term-lets-communities-scotland/documents/people-communities-places-research-impact-short-term-lets-communities-scotland/people-communities-places-research-impact-short-term-lets-communities-scotland/govscot%3Adocument/people-communities-places-research-impact-short-term-lets-communities-scotland.pdf

Far More Than Just Houses: The Benefits of the Short-Term Rental Sector to Scotland – Association of Scotland's Self-Caterers (2018) https://www.assc.co.uk/wp-content/uploads/2018/06/MoreThanJustHouses.pdf

Home or hotel? A contemporary challenge in the use of housing stock (2021) - Tom Simcock Housing Studies. Routledge: Taylor & Francis Group

Short Term Letting and the Housing Crisis – Association of Scotland's Self-Caterers (2020)

Short-term Lets Registration White Paper – AirBnB and the University of Brighton https://www.airbnb.co.uk/d/ukwhitepaper

https://www.airdna.co/

https://www.visiteastlothian.org/home

Insight Department: Edinburgh and Lothians Factsheet | 2019

Published: December 2020

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Introduction
Background Information and Aim

This report provides a summary of statistics on tourism in Scotland's Edinburgh and Lothians region. It gathers information from a suite of tourism monitors managed by VisitScotland's Insight Department, and other national statistics and commissioned research.

Most of the statistics are produced from surveys. The primary surveys used are:

- **The Great Britain Tourism Survey** (GBTS) that provides data for overnight visitors resident in Scotland, England and Wales. The survey is conducted through face-to-face interviews and is jointly commissioned by VisitScotland, VisitEngland and VisitWales. More information about the survey can be found on visitbritain.org.
- **The International Passenger Survey** (IPS) which is run by the Office for National Statistics (ONS). This survey provides data for overseas visitors. Details about the survey and methodology used can be found on the ONS website and the VisitBritain website.
  Please note: In 2020, the methodology of IPS was revised to represent more accurately international visitors and all data was recalculated back to 2009. As a result, international figures in this report might differ from, and supersede, previously published IPS data.
- **The Great Britain Day Visits Survey** (GBDVS) that provides data for tourism day visitors resident in Scotland, England and Wales. More information about the survey can be found on visitbritain.org.
- **The Scottish Accommodation Occupancy Survey** (SAOS) that provides data on occupancy in Scotland's tourist accommodation sectors.

While results from these surveys can give good precision at national level, at regional level they can be less reliable because they can be based on a relatively small sample size. This incurs a larger margin of statistical error reducing data reliability. Therefore results should be treated with caution. To reduce error margins, it is sometimes useful to take an average over three years to provide a larger sample size. In this report, 3-year average figures have been calculated to provide a more robust basis for analysis of detailed data such as purpose of travel, seasonality and average duration of trips.

There are some differences between regions as identified by the GBTS and GBDVS, IPS, and SAOS. Both international and domestic visitor figures are reported at Edinburgh and Lothians regional level to allow for summing of figures and comparative analysis. Domestic figures are also available at local authority level, and these have been provided in addition where sample size allows. International data is only available for Edinburgh and Lothians as a whole, and partially for the Lothians combined (East Lothian, Midlothian and West Lothian) and the City of Edinburgh.

This report starts with an **overall** evaluation of Edinburgh and Lothians tourism performance in 2019. It then looks in more detail into the **international** and **domestic** overnight visitors to the region and, if figures allow, provides sub-regional or council area breakdown. Lastly, the report focuses on tourism day visits and the historical trend of tourism performance in the region since 2013.

Sources

- Great Britain Tourism Survey (GBTS) 2019
- International Passenger Survey (IPS) 2019
- Great Britain Day Visits Survey (GBDVS) 2019
- Scottish Accommodation Occupancy Survey (SAOS) 2019
- Moffat Centre Visitor Attraction Monitor (VAM) 2019
- Scottish Annual Business Statistics (SABS): Sustainable Tourism by Local Authority Area 2018

I. Tourism in Edinburgh & Lothians
Latest Figures

Overall Tourism Summary:
Visits, Nights and Spend in Edinburgh and Lothians, 2019

VISITS BREAKDOWN	Visits		Nights		Spend	
	000s	% Change 2018/19	000s	% Change 2018/19	£m	% Change 2018/19
Europe	1,150	-22%	5,356	-16%	453	-22%
North America	534	+10%	2,482	+15%	407	+67%
Rest of World	605	-4%	4,993	+55%	388	+4%
Total International Overnight	**2,289**	**-12%**	**12,831**	**+9%**	**1,249**	**+4%**
Scotland	1,191	+25%	2,566	+43%	232	+41%
Rest of Great Britain	1,869	-1%	5,321	-1%	499	-14%
Total Domestic Overnight	**3,059**	**+8%**	**7,887**	**+10%**	**731**	**-2%**
Total Overnight Tourism	**5,348**	**-1%**	**20,718**	**+9%**	**1,980**	**+2%**
Total Day Tourism	**24,786**	**-16%**	**N/A**	**N/A**	**1,306**	**-18%**
Grand Total	**30,134**	**-14%**	**20,718**	**+9%**	**3,286**	**-7%**

Sources: IPS/GBTS/GBDVS, 2019. Figures may not sum up due to rounding.
National figures are available in the *Key Facts on Tourism in Scotland 2019* report published on visitscotland.org.

Visitors to Edinburgh & Lothians
Tourism Performance | 2019

In 2019, Edinburgh and Lothians was the **most popular** Scottish region to visit for both domestic and international travellers. It accounted for **31% of all overnight visits** and **34% of the total overnight tourism expenditure** on national level.

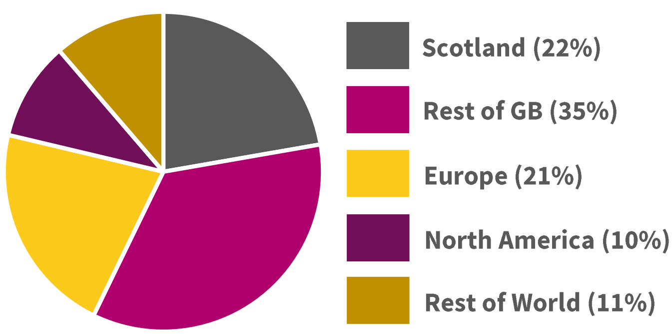
At 5.3 million, overnight trips were 1% fewer than in 2018. Yet, total overnight spend (£2 billion) and the number of bednights (20.7 million) both grew in 2019, by 2% and 9%, respectively.

The rise in overnight spend was driven by **international visitors** who spent roughly £50 million more in Edinburgh and Lothians in 2019. Indeed, overseas residents remained essential for the region's tourism performance, accounting for 43% of all overnight trips and 63% of all overnight spend – the **highest shares among all of Scotland's regions**. Nevertheless, the importance of the domestic market for Edinburgh and Lothians continued to grow in 2019. In particular, there were notable increases in **Scotland residents'** overnight trips (+25%) and spend (+41%) in the region which reached record-high levels.

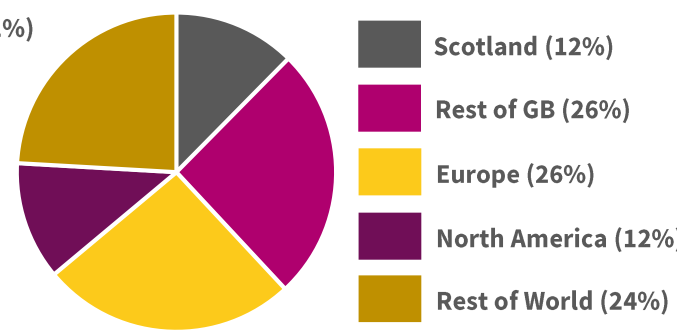
2019 witnessed some changes to Edinburgh and Lothians' visitor mix, with **Scottish** and **North American** visitors increasing, and Continental Europe residents decreasing in numbers. Trips by English and Welsh travellers remained largely unchanged.

Figures indicate a roughly one-sixth **decrease in domestic day tourism** to Edinburgh and Lothians from 2018. Despite this, day tourism spend was the second highest between 2015 and 2019.

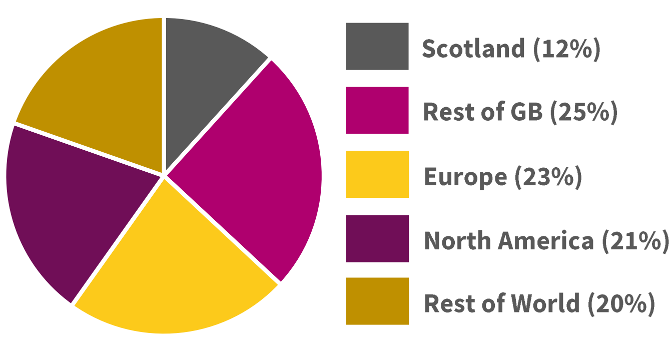
Overnight Visits



Nights



Overnight Spend



Sources: GBTS/IPS, 2019. Figures may not sum up due to rounding.

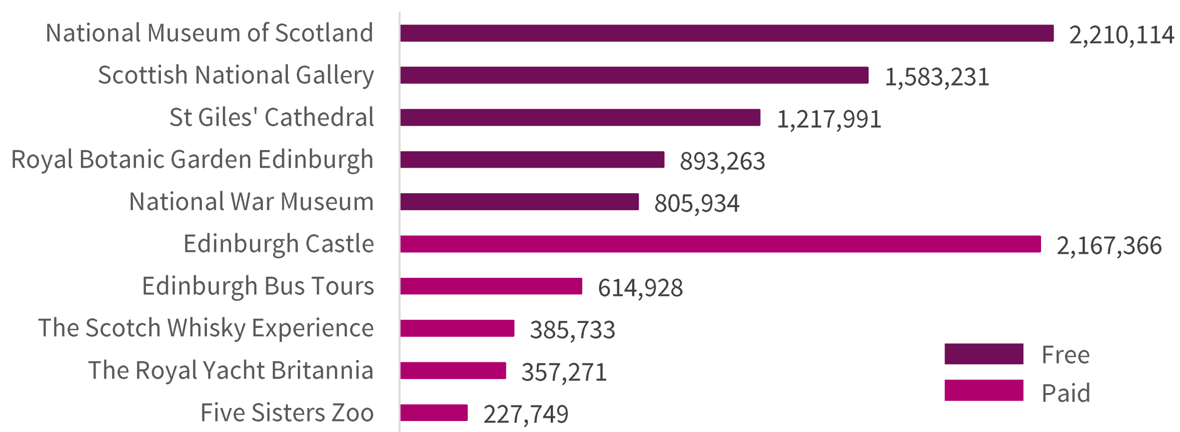
Regional Tourism Performance
Local Statistics

Regional Sustainable Tourism* – Business Units, Employment and Gross Value Added, 2018

Local Authority/ Region	Units		Employment		GVA	
	Number	% Change 2017/18	(000s)	% Change 2017/18	(£m)	% Change 2017/18
City of Edinburgh	2,415	+4%	36.3	+9%	815.8	+13%
East Lothian	294	+4%	3.7	+9%	51.4	-38%
Midlothian	207	0%	2.0	+11%	26.0	-43%
West Lothian	377	+1%	3.8	+6%	54.6	-24%
Edinburgh and Lothians	**3,293**	**+4%**	**45.8**	**+9%**	**947.8**	**+3%**

Source: SABS, 2018. Figures may not sum up due to rounding. For more information, visit visitscotland.org.
*The Scottish Government defines sustainable tourism as a growth sector including a number of business types detailed on their website. Latest statistics were published on 24th June 2020 and cover the period up to 2018.

Top Five Free and Paid Visitor Attractions in Edinburgh & Lothians (with Visitor Numbers), 2019



Source: Moffat Centre Visitor Attraction Monitor, Glasgow Caledonian University, 2019.
VAM is solely owned and distributed by Glasgow Caledonian University Moffat Centre. If you are interested in participating in the accompanying survey or subscribing to the publication, please contact info@moffatcentre.com.

Edinburgh and Lothians Occupancy Rates by Accommodation Type and Month, 2019

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Hotel (Room Occ.)	45%	60%	69%	75%	80%	87%	88%	85%	87%	76%	69%	70%	**74%**
Guest House/B&B (Room Occ.)	89%	71%	73%	89%	77%	65%	74%	96%	98%	69%	94%	95%	**82%**
Self-Catering (Unit Occ.)	16%	22%	21%	41%	45%	54%	53%	61%	35%	35%	30%	29%	**37%**
Hostel (Bed Occ.)	26%	45%	56%	67%	78%	87%	90%	75%	68%	65%	40%	34%	**72%**

Source: SAOS, 2019.

II. International Visitors to Edinburgh & Lothians

Overnight Tourism

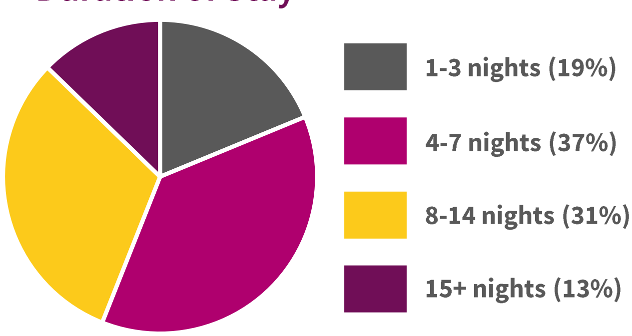
International travellers visited Edinburgh and Lothians **2.3 million** times in 2019, which means that the region was either the main destination or part of a wider journey for **two in three** international visits to Scotland. While trips were 12% down from 2018, international **bednights and spend** in the region were the **highest on record**. This was result of a 23% increase in the average length of stay that also led to an 18% rise in the average spend per trip. Overseas residents prefer to visit Edinburgh and Lothians in the warmer months; still, the biggest increase in travel was observed between October and December. **Holidaying** remained the main reason to visit the region, while VFR trips dropped by a third from 2018.

National and Regional International Tourism Performance, 2019

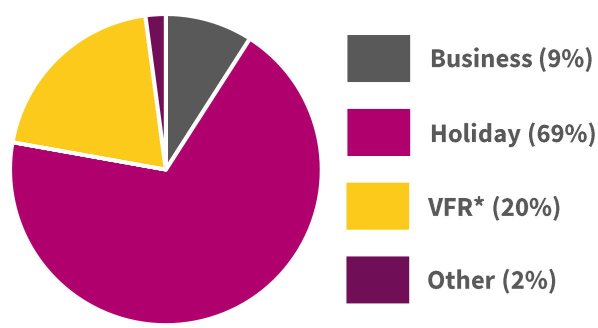
Indicators	Scotland		Edinburgh & Lothians		Edinburgh		Lothians*	
	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19
Visits (000s)	3,460	-7%	2,289	-12%	2,206	-12%	88	+14%
Spend (£M)	2,538	+7%	1,249	+4%	1,191	+1%	58	+117%
Nights (000s)	27,385	+8%	12,831	+9%	12,412	+10%	419	-17%
Average length of stay	7.9 nights	+16%	5.6 nights	+23%	5.6 nights	+25%	4.8 nights	-28%
Average spend per day	£93	0%	£97	-5%	£96	-8%	£138	+162%
Average spend per visit	£734	+15%	£545	+18%	£540	+16%	£656	+90%

Source: IPS, 2019. *Lothians figures are based on relatively low sample sizes.

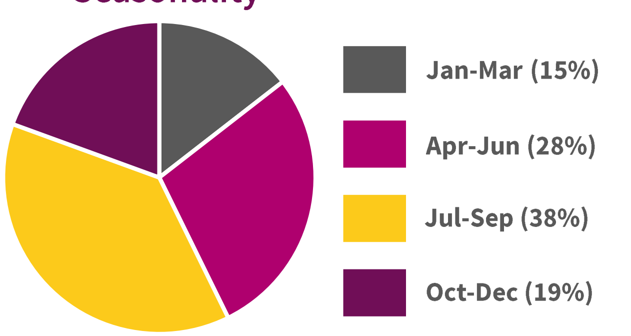
Duration of Stay



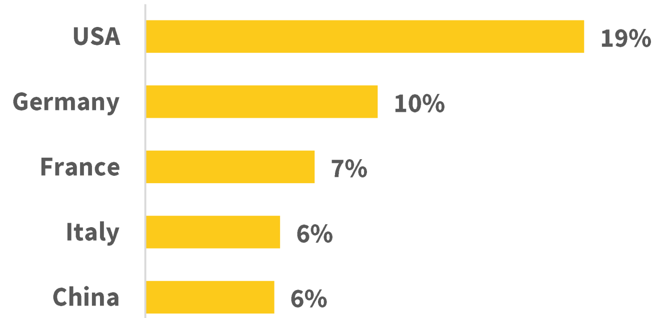
Purpose of Travel



Seasonality



Top 5 Overseas Markets



Source: IPS. All charts are based on 3-year average data (2017-2019) on visitors to Edinburgh and Lothians.
VFR = Visiting friends or relatives.

III. Domestic Visitors to Edinburgh & Lothians

Overnight Tourism

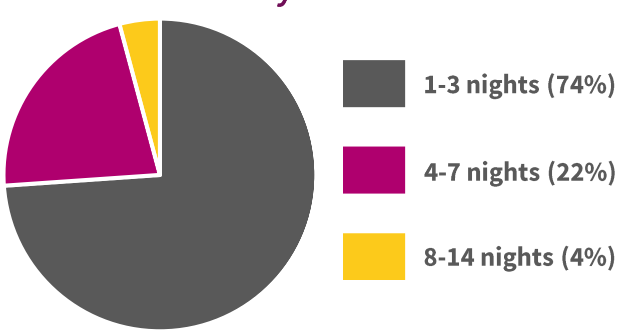
In 2019, British residents made **3.1 million** overnight trips to Edinburgh and Lothians, spending 7.9 million nights and £731 million. While the number of **visits and bednights** both **increased** from 2018, the rise in domestic tourism to the region did not match the notable growth observed on national level. This was mostly due to the high proportion of English travellers – undertaking 59% of the domestic visits to Edinburgh and Lothians – who made slightly more trips but spent less money in 2019. Nevertheless, Edinburgh and Lothians attracted **22% of the visits** and **23% of the total domestic overnight spend in Scotland**.

Domestic Overnight Tourism, 2019

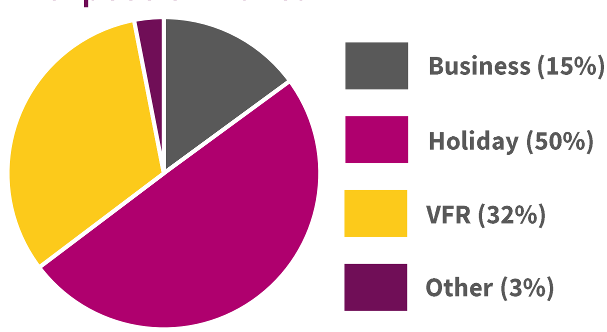
Indicators	Scotland		Edinburgh & Lothians		Edinburgh		Lothians	
	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19	Key Facts in 2019	% Change 2018/19
Visits (000s)	13,810	+17%	3,059	+8%	2,697	+7%	362	+11%
Spend (£M)	3,200	+16%	731	-2%	674	-1%	57	-11%
Nights (000s)	46,413	+15%	7,887	+10%	6,837	+8%	1,049	+22%
Average length of stay	3.4 nights	-2%	2.6 nights	+2%	2.5 nights	+1%	2.9 nights	+10%
Average spend per day	£69	+1%	£93	-11%	£99	-8%	£54	-27%
Average spend per visit	£232	-1%	£239	-9%	£250	-8%	£157	-20%

Source: GBTS, 2019.

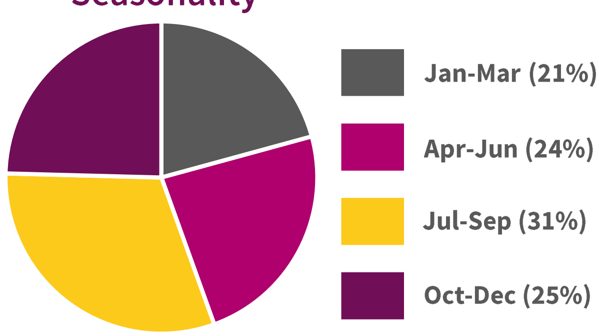
Duration of Stay



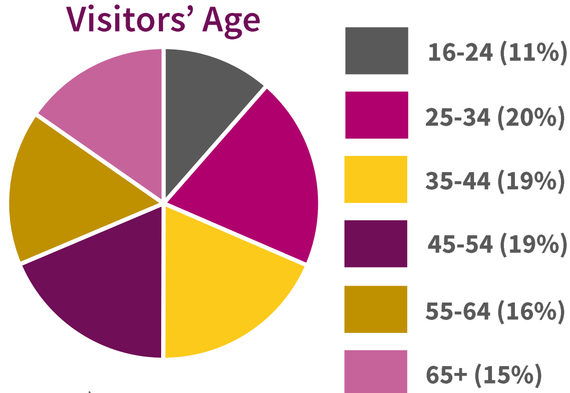
Purpose of Travel



Seasonality



Visitors' Age



Source: IPS. All charts are based on 3-year average data (2017-2019) on visitors to Edinburgh and Lothians. Figures may not sum up due to rounding.

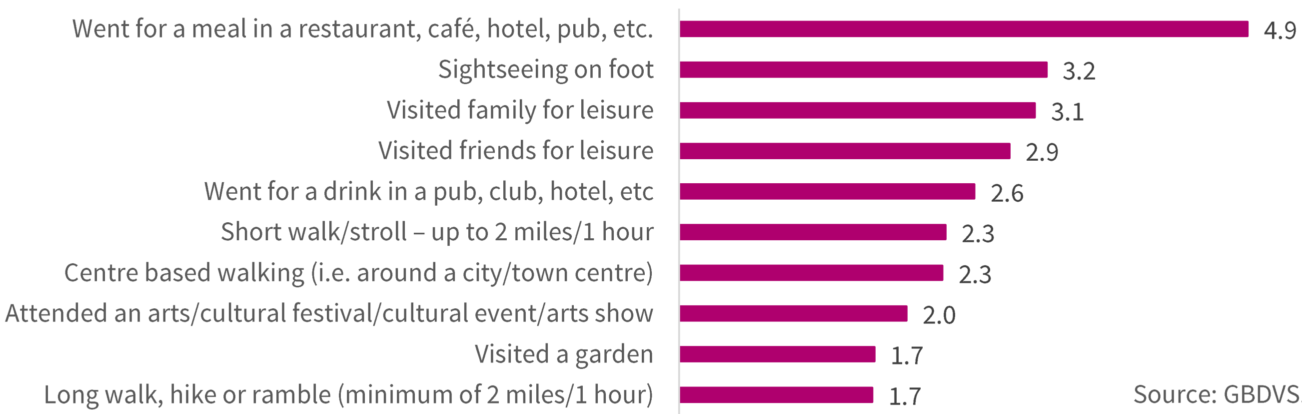
Domestic Day Visits to Edinburgh & Lothians
Tourism Performance and Activities

National and Regional Domestic Day Visit Tourism Performance, 2017-2019 Average Figures

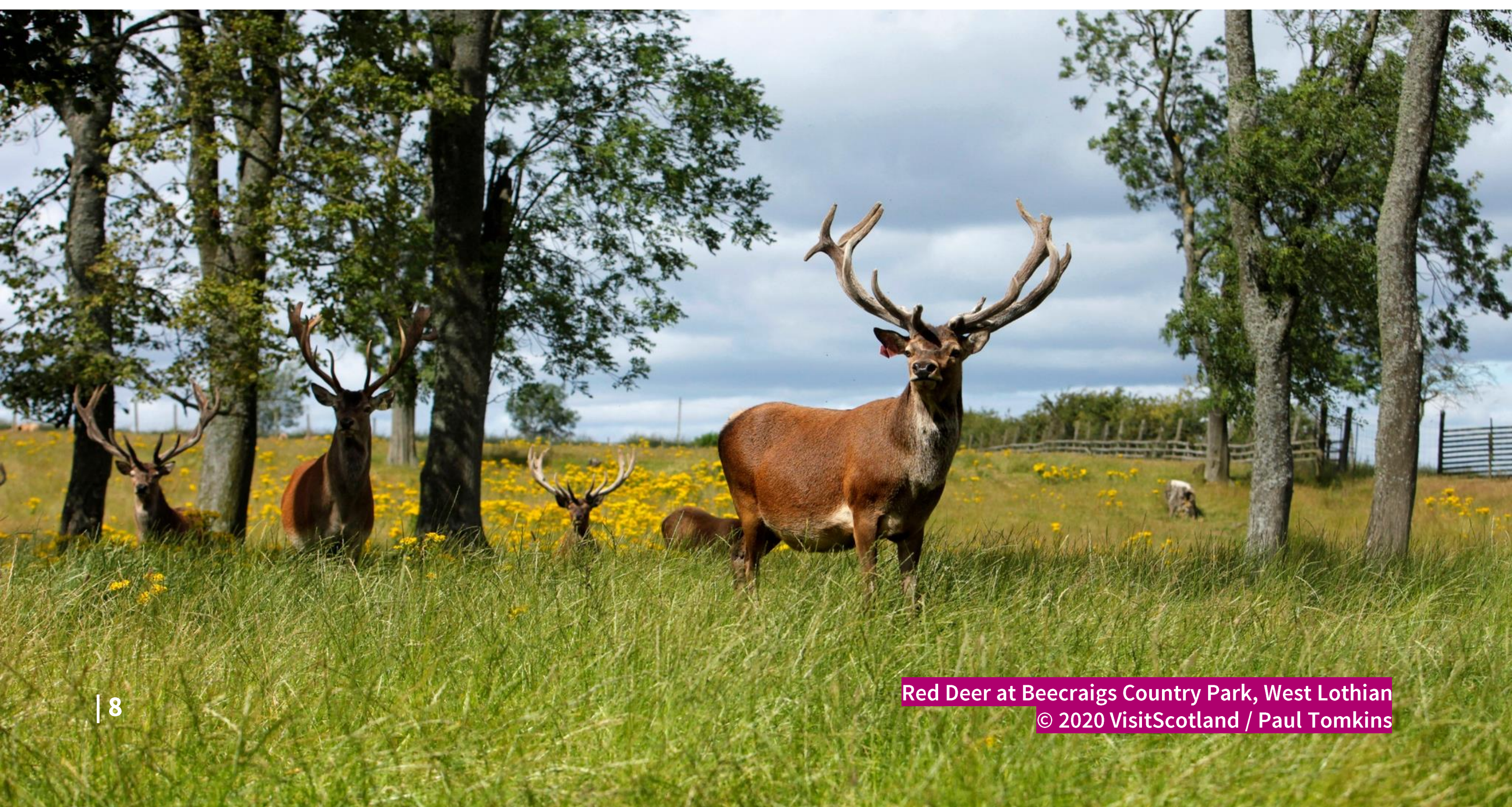
	Visits		Spend	
	2017-19 Average (million)	% Change 2016-18/ 2017-19	2017-19 Average (£ million)	% Change 2016-18/ 2017-19
Scotland	140.8	-2%	5,749	+5%
Edinburgh and Lothians	27.9	-4%	1,351	+3%
Edinburgh	19.7	-5%	1,168	+3%
Lothians	8.2	-1%	183	+7%

Source: GBDVS. Figures may not sum up due to rounding.

Most Popular Activities Undertaken as Part of a Day Trip, Edinburgh and Lothians: 2016-18 Average Annual Figures (Number of Day Trips in Millions)



Source: GBDVS.



Red Deer at Beecraigs Country Park, West Lothian
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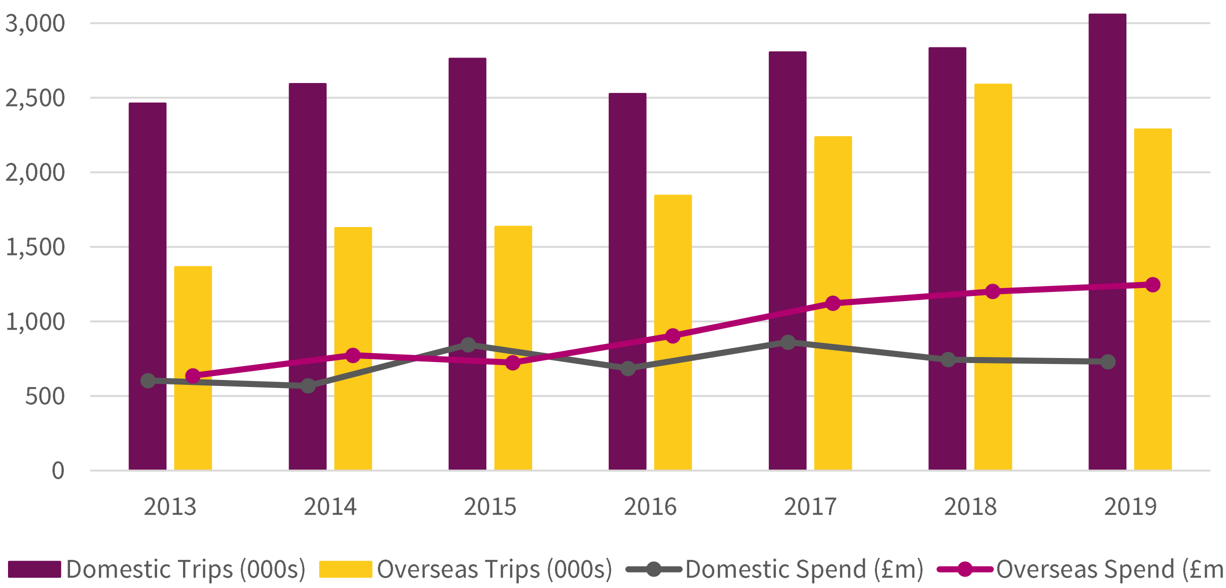
Visitors to Edinburgh & Lothians
Historical Trend Information | 2013 - 2019

In 2019, the total **overnight number of trips and tourism expenditure** in Edinburgh and Lothians were the **second highest on record**. The significance of international tourism in the region is great and in recent years the rise of overseas visitors has exceeded the growth of the domestic market. However, British residents also show increased interest in travelling to Edinburgh and the Lothians, with domestic trips **increasing by 10%** from 2014-2016 to 2017-2019. International visits **rose by 39%** over the same period, yet 2019 was the first year in which international travel declined since 2012.

Domestic and International Overnight Tourism, 2013-2019



Sources: GBTS, IPS.

Domestic and International Overnight Visits, 2013-2019

	2013	2014	2015	2016	2017	2018	2019
Domestic (000s)	2,463	2,594	2,762	2,527	2,805	2,833	3,059
International (000s)	1,366	1,627	1,635	1,844	2,236	2,588	2,289
Total Overnight (000s)	3,829	4,221	4,397	4,371	5,041	5,421	5,348

Sources: GBTS, IPS.

Domestic and International Overnight Spend, 2013-2019

	2013	2014	2015	2016	2017	2018	2019
Domestic (£m)	604	569	845	686	862	745	731
International (£m)	637	774	724	904	1,123	1,201	1,249
Total Overnight (£m)	1,241	1,343	1,569	1,590	1,985	1,946	1,980

Sources: GBTS, IPS.

Appendix

USING AND INTERPRETING STATISTICAL DATA
Sources: Data is sourced from the Office for National Statistics' International Passenger Survey (IPS), The Great Britain Tourism Survey (GBTS), The Great Britain Day Visits Survey (GBDVS), Scottish Accommodation Occupancy Survey (SAOS), Moffat Centre's Scottish Visitor Attraction Monitor (VAM) and ONS' Scottish Annual Business Survey (SABS).

SAMPLE SIZES
Analysis of sub-groups, such as trips by purpose or demographic group, relies on smaller sample sizes that can be unreliable. Where this is a particular issue, methods to aggregate data, such as using a 3-year average instead of single-year data, have been used. Before using the data, it is important to recognise the limitations of using a small sample size. Further information, including methodology and sample sizes, can be found on the VisitBritain website www.visitbritain.org (Insights & Statistics section).

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Published: December 2020

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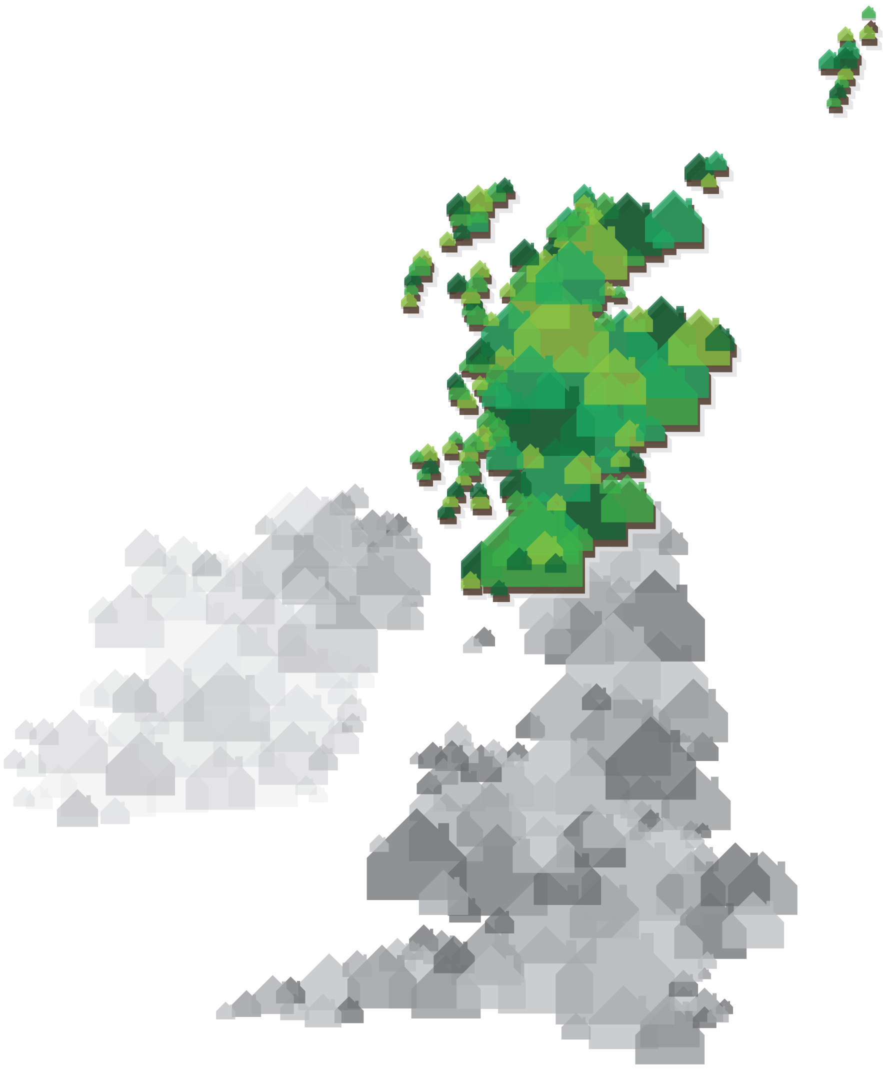
Economic Impact of Self-Catering Sector to the Scottish Economy



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and the Professional Association of Self-Caterers

August 2021

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Supporting self-catering in Scotland

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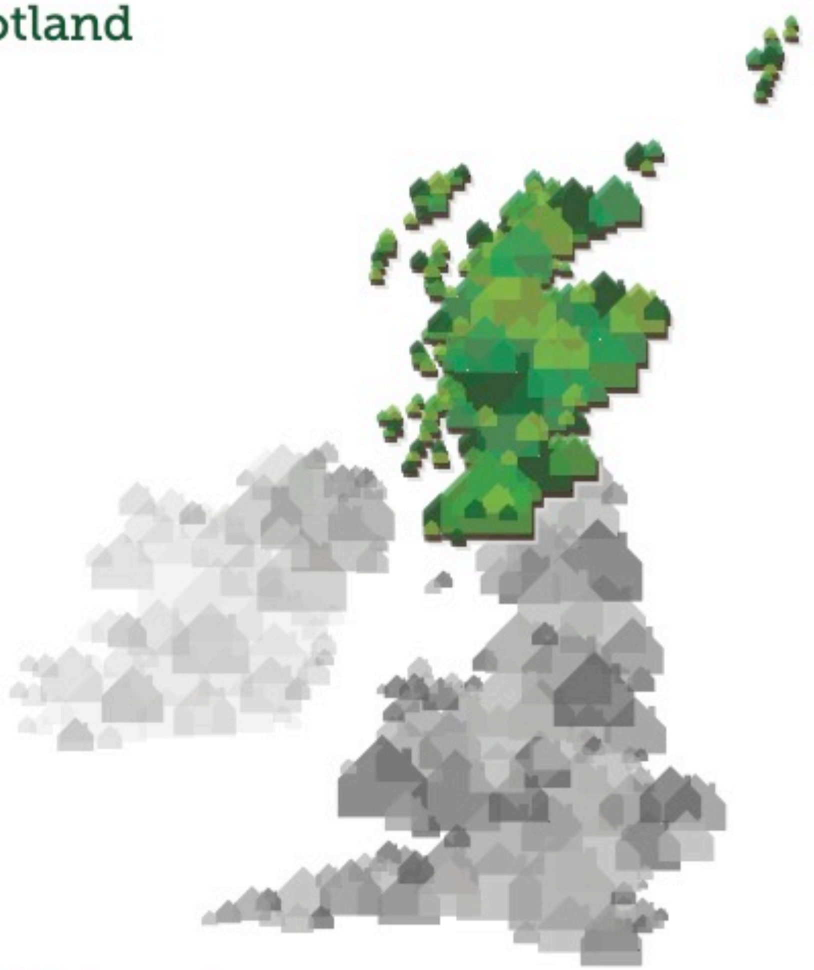
This economic impact assessment was sponsored by SuperControl

1 Executive Summary

Scotland

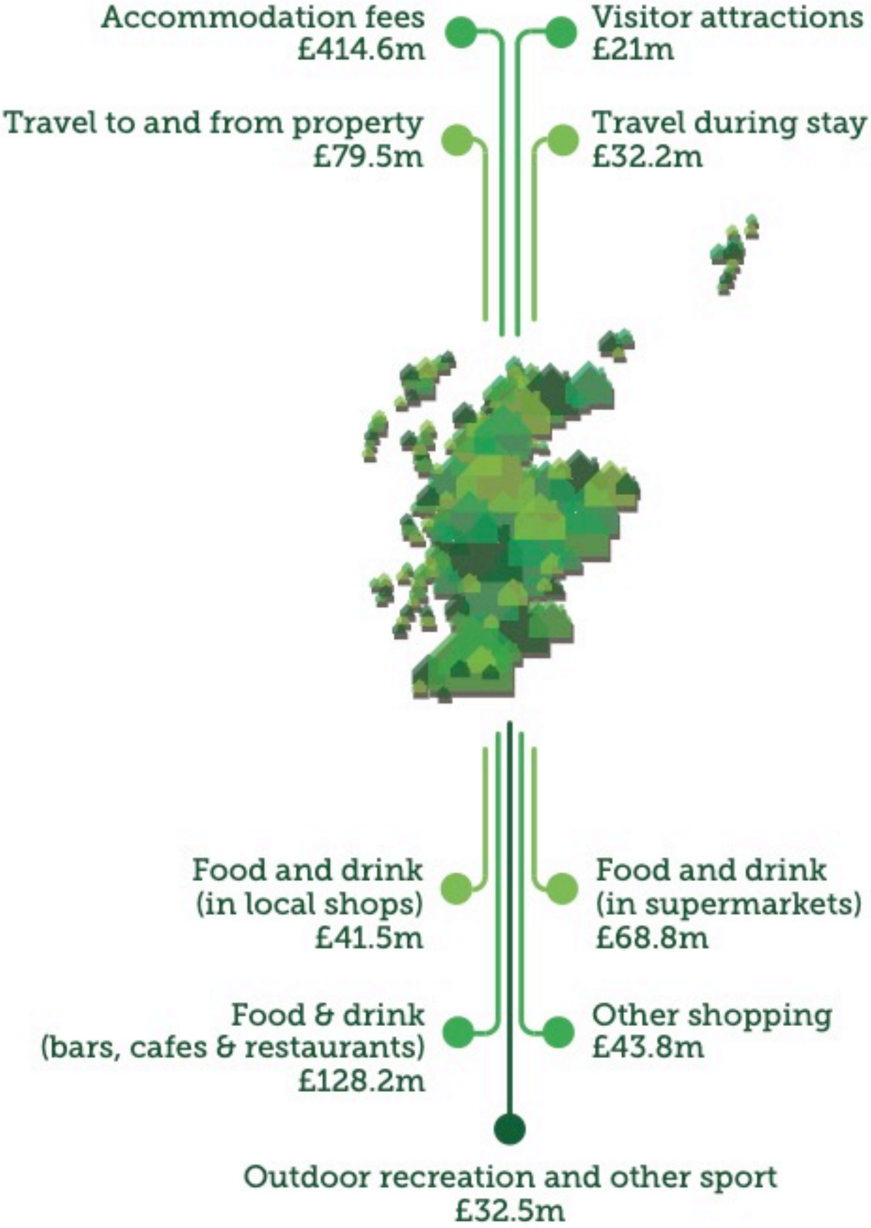


- 17,794 properties
- 2.4 million visitor nights per year
- £867.1 million total visitor spend
- Supports 23,979 FTE jobs
- £672.3 million Contribution to the Scottish economy

Areas with the greatest number of properties

1. Highland & Western Isles (5,580)
2. Dunbartonshire / Argyll & Bute (2,343)
3. Lothian (1,870)
4. Tayside (1,432)
5. Dumfries & Galloway (1,386)

Gross Visitor Spend by Item (Scotland)



2 Introduction

Since 2010 tourism has been the fastest growing sector in the UK in employment terms[1]. By 2025, Britain aims to have a tourism industry worth over £257bn, supporting 3.8 million jobs. This is equivalent to almost 10% of UK GDP and around 11% of the total UK jobs[2].

The sector is predicted to grow at an annual rate of 3.8% through to 2025 – faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail[3].

The Deloitte *Tourism: Jobs and Growth Report*[4] found that the marginal revenue required to create a job in UK tourism is estimated to be around £54,000. For every 1% increase in total expenditure in UK tourism, it might be expected that full-time equivalent employment will increase by 0.9%.

Self-catering is an important component of the tourism industry. In order to fully understand its contribution, the Association of Scotland's Self-Caterers (ASSC) and the Professional Association of Self-Caterers UK (PASC UK) commissioned Frontline Consultants (Frontline) to carry out an independent Economic Impact Assessment of the self-catering industry in the UK. This includes an overall UK-wide report, providing headline findings for the UK and its four countries; plus detailed individual country reports for England, Scotland, Wales and Northern Ireland.

This report is for Scotland.

2.1 Research objectives

The **objectives of the economic impact assessment** were to:

- assess expenditure by property-owners and managers, and visitors in the local economy
- provide an independent, evidence-based, understanding of the direct and indirect economic impact/contribution of the self-catering sector in Scotland
- estimate the full-time equivalent jobs supported by the sector
- assess the impact of Covid-19 – presenting feedback from 2019 and 2020

2.2 Methodology

The UK self-catering sector is diverse and made up of a number of small businesses. It is inherently difficult to gather a complete data set on the sector. In order to develop the economic model an 8-month data gathering exercise was undertaken to understand the number and make-up of self-catering properties across the UK.

The **number of self-catering properties** in each country was determined as follows:

- England and Wales – VOA registrations
- Scotland – NDR registrations
- Northern Ireland – Local Authority registrations

[1] https://www.visitbritain.org/visitor-economy-facts
[2] https://www.visitbritain.org/visitor-economy-facts
[3] https://www.visitbritain.org/visitor-economy-facts
[4] https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/Tourism_Jobs_and_Growth_2013.pdf

The **make-up of those self-catering properties** was based on a review of 1,000,724 transaction records provided to us by SuperControl to understand:

- property size
- occupancy levels for each property on each day of the year

The model includes over a million separate economic impact calculations, which were then reaggregated to produce as accurate as possible an estimate of the true economic impact of the sector.

This is a comprehensive approach that avoids any double counting and uses only verified data.

While these datasets are not 100% of the UK market, they are substantial, and provide the most comprehensive assessment of the sector to date. Findings therefore provide a conservative estimate of the scale of the self-catering sector.

3 Operators Survey

This section provides evidence from an e-survey of self-catering operators across Scotland. The survey was open from February-April 2021 and distributed by key partners.

3.1 Composition of the overall Scotland self-catering industry

Based on the information provided by NDR registrations and data provided by SuperControl, in **2020 there were 17,794 self-catering properties operating in Scotland**. **The majority of these were three bedroom or less properties.** Table 2.1 provides a breakdown of these by region and number of bedrooms.

Table 2.1: Composition of the industry

Location	Total number of bedrooms					Total Number of properties
	0-1	2	3	4	5+	
Ayrshire	16%	50%	16%	10%	9%	840
Central Scotland	14%	34%	26%	14%	11%	621
Dumfries & Galloway	13%	34%	34%	9%	11%	1,386
Dunbartonshire / Argyll & Bute	14%	32%	27%	13%	14%	2,343
Fife	8%	34%	31%	11%	16%	704
Glasgow City	22%	34%	22%	13%	10%	200
Grampian	17%	39%	28%	10%	7%	1,153
Highland & Western Isles	17%	39%	27%	9%	8%	5,580
Lanarkshire	11%	61%	11%	11%	6%	123
Lothian	20%	38%	28%	5%	9%	1,870
Orkney & Shetland	7%	57%	29%	0%	7%	672
Renfrewshire	30%	30%	20%	0%	20%	78
Scottish Borders	14%	38%	23%	13%	12%	792
Tayside	20%	20%	20%	20%	20%	1,432
Total	**16%**	**37%**	**27%**	**10%**	**11%**	**17,794**

(Source: ASSC[5])

3.2 Sampling methodology and geographic locations

Self-catering properties across Scotland were invited to participate in the research. This was done by the various sponsor groups reaching out to operators, encouraging them to complete an e-survey.

The Steering Group and Frontline came together at various stages throughout the project to review the response rates, identifying which geographic areas were under-represented and those were targeted accordingly.

945 operators running a total of 2,173 properties across Scotland responded to the survey, giving a 99% confidence +/- 3% margin of error. This means that there is a 99% probability that the sample accurately reflects the wider population and is therefore representative of the self-catering sector in Scotland.

[5] ASSC provided data on the total number of self-catering properties in Scotland based on units on non-domestic business rates (NDR). The breakdown by number of bedrooms is based on data provided by SuperControl

The geographic location of the surveyed self-catering operators was broadly representative of the sector as a whole with most regions having a minimum of 10% response rate with the exception of Glasgow City, Lothian and Renfrewshire.

Table 2.2: Location of surveyed self-catering operators

Location	Surveyed operators		Total number of properties across Scotland	Percentage of properties consulted
	Number of operators	Number of properties[6]		
Ayrshire	48	110	840	13%
Central Scotland	27	62	621	10%
Dumfries & Galloway	58	133	1,386	10%
Dunbartonshire / Argyll & Bute	103	237	2,343	10%
Fife	49	113	704	16%
Glasgow City	7	16	200	8%
Grampian	56	129	1,153	11%
Highland & Western Isles	239	550	5,580	10%
Lanarkshire	10	23	123	19%
Lothian	57	129	1,870	7%
Orkney & Shetland	25	58	672	10%
Renfrewshire	2	5	78	6%
Scottish Borders	43	99	792	13%
Tayside	205	472	1,432	33%
Unknown	16	37	-	
Total	**945**	**2,173**	**17,794**	12%

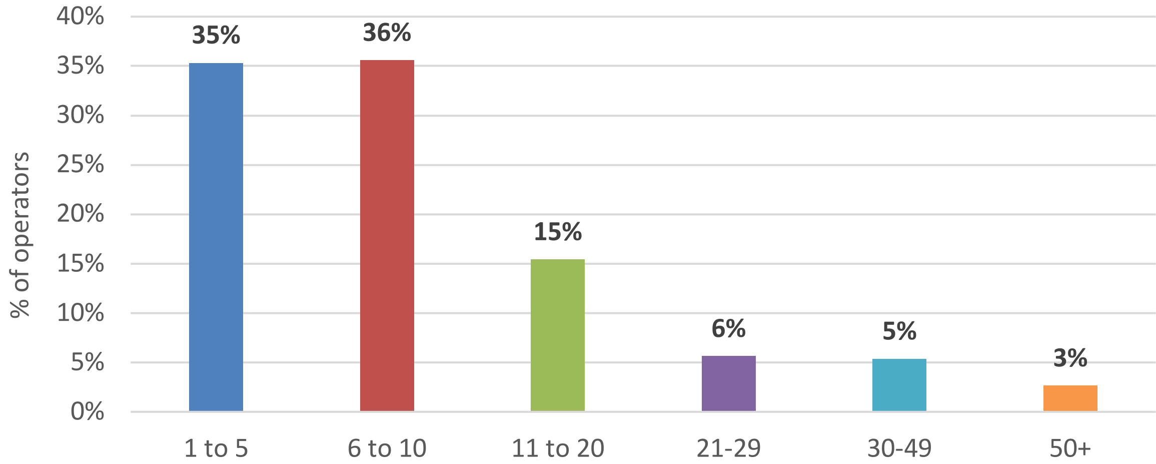
Source: Frontline Self-Catering Operator Survey, 2021

3.3 Property summary

Operators ran or owned, on average, 2.3 properties. Properties owned, ranged from one to 60 with 60% owning just one.

Over two-thirds (71%) of properties have capacity for up to ten people.

Figure 2.1: Number of Guests



N=337

[6] We only had a response from 329 operators on number of properties owned/run and have therefore used the average (2.3) and factored this up to total operators responding

3.4 Length of season and occupancy rates

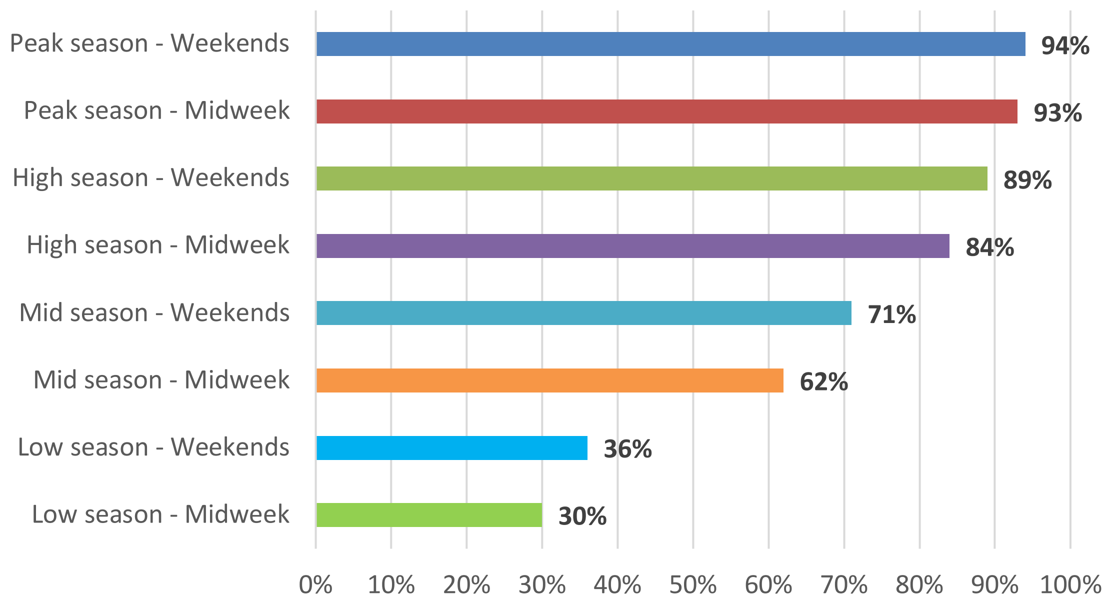
In 2019 the majority of self-catering properties (93%, 202[7]) operated all year round. In 2020 this reduced, with only 75% (142) operating all year; this was due to Covid-19 lockdown restrictions.

Surveyed operators were asked what they considered to be their peak, high, mid and low seasons during a standard operating year. Generally their responses were:

- peak = July, August, Christmas and New Year
- high = May, June and September
- mid = April and October
- low = January, February, March, November and December

Operators were also asked to report their typical occupancy rates for the following:

Figure 2.2: Average occupancy rates of self-catering properties



N=184

At peak, occupancy levels reached an average of 94% at the weekend and 93% midweek. During high season occupancy was 89% at the weekend and 84% during the week. Mid-season occupancy levels were 71% at the weekend and 62% mid-week with low season dropping to 36% at the weekend and 30% mid-week.

Operators were also asked about their average weekly occupancy level between 3 July and 30 September 2020 and the same period in 2019.

Table 2.4: Average weekly occupancy level between 3 July and 30 September (2019 and 2020)

	Under 10%		11-25%		26-50%		51-75%		76-90%		91% or above	
	2019	***2020***	***2019***	***2020***	***2019***	***2020***	***2019***	***2020***	***2019***	***2020***	***2019***	***2020***
Scotland	12% (23)	1% (2)	7% (13)	1% (2)	14% (26)	3% (5)	18% (34)	9% (16)	19% (37)	25% (44)	30% (58)	61% (110)

[7] The response rate is lower for this question as many respondents opted for us to use the data held by SuperControl.

The same was asked for the period of the 1 October and 30 November 2020 and 2019 as shown below.

Table 2.5: Average weekly occupancy level between 1 October and 30 November (2019 and 2020)

	Under 10%		11-25%		26-50%		51-75%		76-90%		91% or above	
	2019	*2020*	*2019*	*2020*	*2019*	*2020*	*2019*	*2020*	*2019*	*2020*	*2019*	*2020*
Scotland	38% (72)	3% (6)	17% (32)	6% (11)	23% (44)	22% (40)	10% (19)	30% (54)	7% (13)	23% (41)	6% (11)	15% (26)

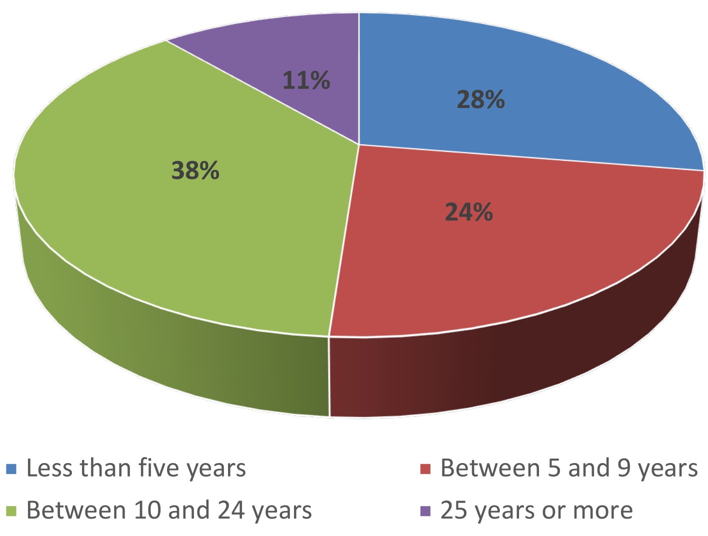
Occupancy levels provided by operators completing the survey were significantly higher than the occupancy levels derived from SuperControl data. The SuperControl data was based on 4,594 properties in Scotland and therefore this data was used to calculate the economic impact. Occupancy data from SuperControl can be seen in Appendix 1 and is more in line with general tourism occupancy figures.

92% (199) of operators had a minimal length of stay. This was, on average, 3.6 nights.

3.5 Property ownership and financial data

In just under half of cases, operators saw their self-catering properties as long-term investments, with 49% (317) of operators noting that they had owned and operated their properties for more than ten years.

Figure 2.3: Length of time survey participants have owned/operated their self-catering property



N=649

The vast majority of respondents (88%, 589) paid business rates for their properties.

Operators were asked to provide details of their turnover across 2017, 2018, 2019 and 2020. Table 2.6 shows the averages as well as total turnover across surveyed operators. This demonstrates that until 2020, average operator turnover was increasing (15% from 2017 through to 2019). **Not surprisingly the turnover drop in 2020 was significant, with a fall of 45% compared to 2019.**

Table 2.6: Operator turnover

	2017	2018	2019	2020
Number of respondents	204	224	253	256
Average turnover	£41,037	£43,379	£47,318	£26,114
Total turnover	£8,371,632	£9,716,897	£11,971,447	£6,685,061

When asked about their property portfolio, **80% (259) said it remained the same during 2020** with a further 13% (43) saying it decreased and 7% (22) saying it increased. **During 2021, 77% (250) expect it to stay the same,** 13% (4) expect it to decrease while 10% (32) expect it to increase.

3.6 Cancellation policy

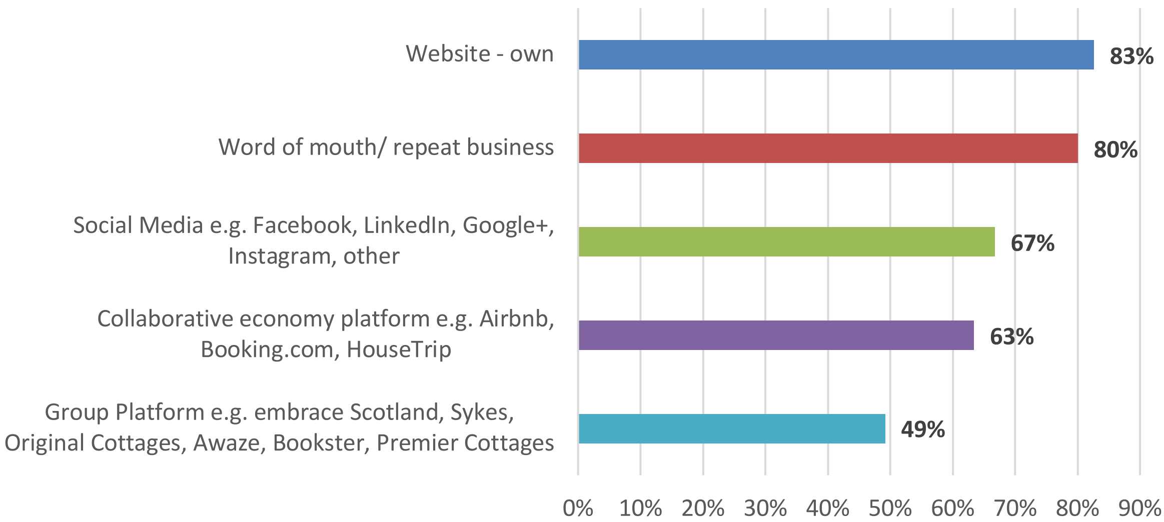
The majority (85%, 528) of operators stated that their cancellation policies became more flexible during Covid-19 with 12% (77) saying they stayed the same and just 3% (17) said their policy got stricter. Operators responded as follows about their cancellation policy:

- **38%** (235) had bookings **fully refundable up to a certain number of days** prior to arrival
- **25%** (155) provided a **partial refund depending on how close to arrival** they cancel
- **24%** (151) had **fully flexible bookings and would refund up to the day** of arrival
- **7%** (42) stated that **anything paid by the guest at the point of cancellation is non-refundable**
- **6%** (37) had **non-refundable bookings unless guests re-book** the dates

3.7 Property promotion

Operators were asked how they promote and market their properties. Results are shown in Figure 2.4. Operators were asked to tick all that applied. **Website (83%)** and **word of mouth (80%)** were the most popular used methods of promotion.

Figure 2.4: Routes to promote and market rental properties



N=661

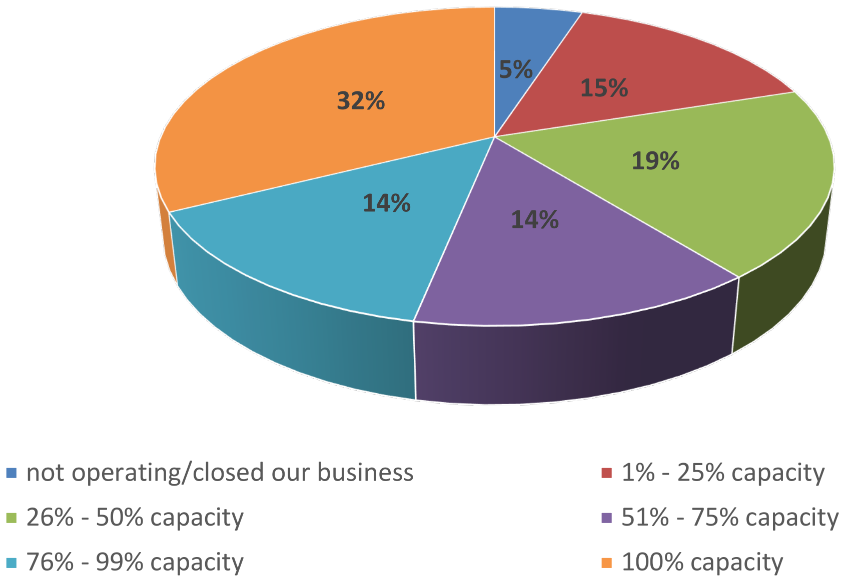
When looking at social media platforms in more detail, operators noted using the following:

- Facebook 95% (515)
- Instagram 52% (280)
- LinkedIn 13% (70)

3.8 Visitors and tourist season

Operators were asked what was the average capacity that their business was open during 2020 (this excludes periods of lockdown or when properties were in the highest tiers and could not open). Findings were as follows:

Figure 2.5: Average capacity during Covid-19



N=660

5% (33) were not operating at all while 32% (214) were at 100% capacity.

3.9 Accessibility, community integration and environment

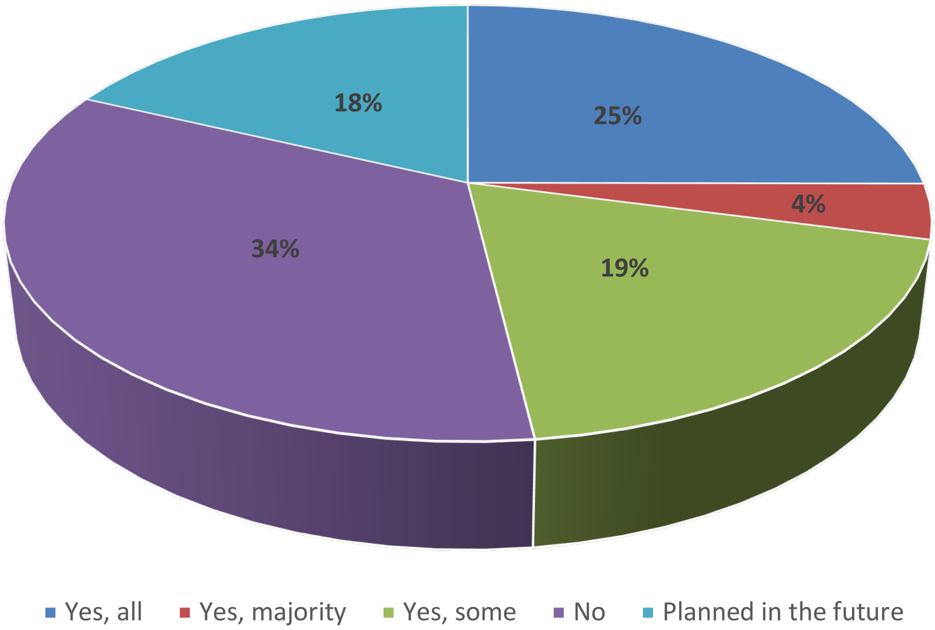
37% (202) of operators have properties that have accessibility features with a further 13% (27) planning for these in the future.

Some of the most common accessibility features included:

- no stairs or steps to enter (87%, 175)
- step-free path to entrance (79%, 169)
- wide entrance for guests (67%, 136)
- well-lit path to entrance (64%, 130)
- wide hallways (56%, 113)
- step-free shower (47%, 96)
- handheld shower head (42%, 85)

Operators were asked if their properties have green credentials. Just under half (48%, 259) said yes to some degree with a further 18% (95) planning for such credentials in the future.

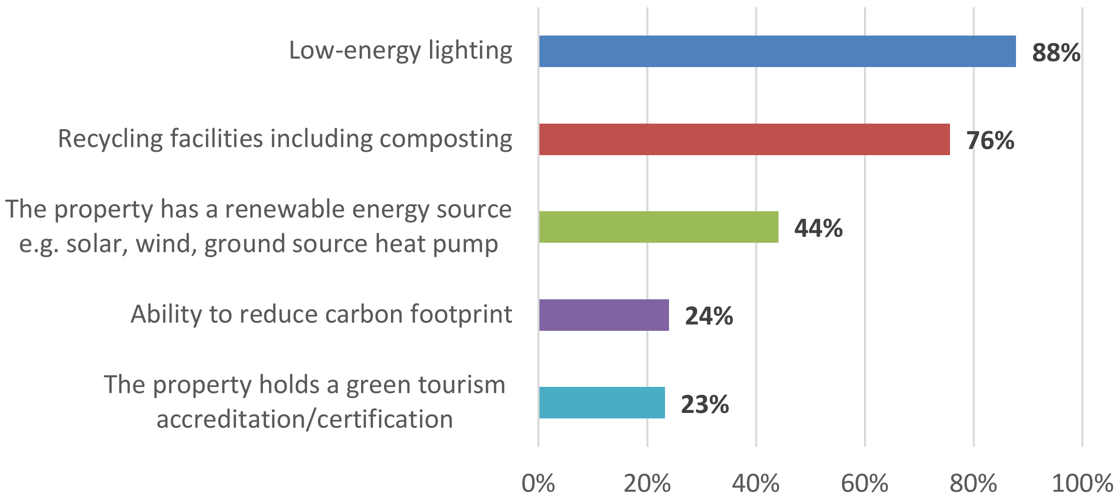
Figure 2.6: Properties with green credentials



N=537

Green credentials are highlighted in Figure 2.7. 88% of operators had low-energy lighting, 76% recycling facilities and 44% had a renewable energy source.

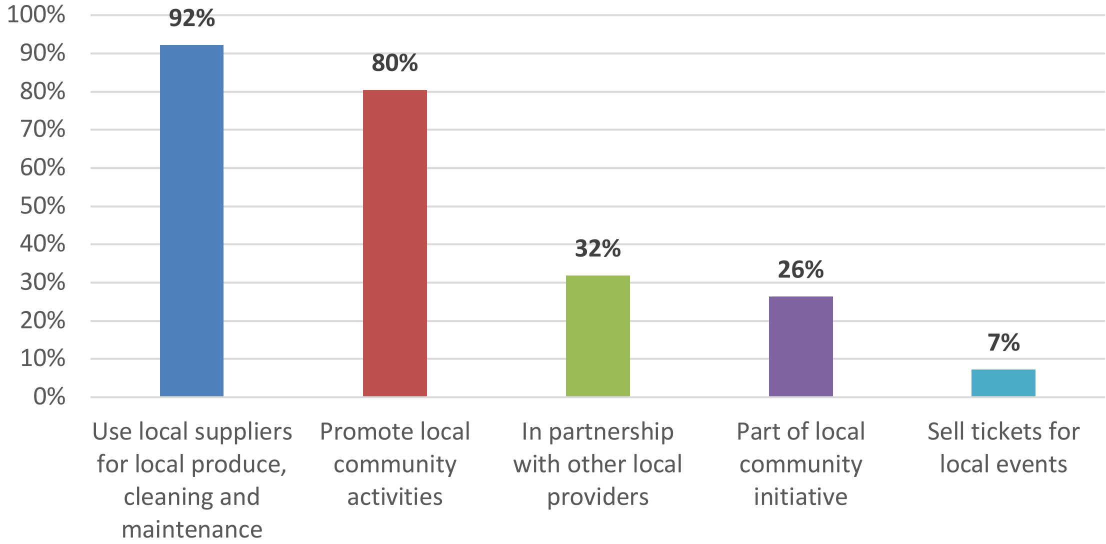
Figure 2.7: Green credentials held



N=263

Operators noted the following ways in which their business integrates with the local community.

Figure 2.8: Integration with local community



N=515

3.10 Staffing and expenditure

Surveyed operators were asked about staff numbers in part and full-time roles (Table 2.7). Results show that **during high season operators employed, on average, 1.5 staff fulltime and 3.3 part time (paid staff)**. **During low season, fulltime staff dropped to 0.6 while part time staff reduced to 2.2**. Unpaid staff dropped from 2.1 fulltime in high season to 0.8 in low season. While part time went from 4.1 in high season to 6.7 in low season.

Table 2.7: Average number of staff in employment 2019

	High season				Low season			
	Paid employment		*Unpaid employment*		*Paid employment*		*Unpaid employment*	
	Total	**Avg. per operator**	**Total**	**Avg. per operator**	**Total**	**Avg. per operator**	**Total**	**Avg. per operator**
Full time (35 hours per week or more)	163	1.5	269	2.1	55	0.6	83	0.8
Part time (25-35 hours per week)	30	0.4	56	0.6	13	0.2	157	1.3
Part time (15-25 hours per week)	38	0.4	75	0.8	33	0.5	296	1.5
Part time (5-15 hours per week)	92	0.8	219	1.3	55	0.6	260	1.8
Part time (0-5 hours per week)	164	1.7	213	1.4	82	0.9	82	2.1

Surveyed operators were asked to provide details of their expenditure, for a range of areas in the last full financial year (2019) and then future expenditure in 2020. The total expenditure for each is presented in Tables 2.8 and 2.9. Findings show that current and or future spend is almost half of spend in 2019.

Table 2.8: Spend in 2019[8]

	2019	
	Total expenditure	Avg. per operator
Wages and salaries (including cleaning staff)	£4,218,798	£13,293
Capital expenditure on your property (including extensions and property maintenance)	£5,783,930	£18,245
Agency and OTA fees	£820,829	£2,589
Painting and decorating	£848,202	£1,527
Food and drink, welcome pack consumables	£269,142	£849
Furnishings	£538,984	£1,700
Laundry	£566,346	£1,786
Business services (e.g. accountancy, web design and booking systems)	£511,911	£1,630
Cleaning and cleaning products & equipment (excluding staff salaries)	£300,156	£953
Maintenance (gardening, window cleaning, plumber)	£399,347	£1,260
Marketing (online, printed)	£236,849	£1,031
Accessibility features	£8,440	£27
Green credentials	£45,969	£146
Other (specify what)	£409,456	£1,296
Total expenditure	**£14,137,530**	**£46,332**

N=318

Table 2.9: Current or future spend in 2020[9]

	2020		
	Total expenditure	Avg. per operator	Change since 2019
Wages and salaries (including cleaning staff)	£2,283,985	£7,228	-46%
Capital expenditure on your property (including extensions and property maintenance)	£2,364,821	£7,507	-59%
Agency and OTA fees	£428,568	£1,352	-48%
Painting and decorating	£291,647	£920	-66%
Food and drink, welcome pack consumables	£138,499	£437	-49%
Furnishings	£349,985	£1,104	-35%
Laundry	£393,150	£1,240	-31%
Business services (e.g. accountancy, web design and booking systems)	£399,904	£1,261	-22%
Cleaning and cleaning products & equipment (excluding staff salaries)	£218,298	£691	-27%
Maintenance (gardening, window cleaning, plumber)	£422,535	£1,333	+6%
Marketing (online, printed)	£243,537	£768	+3%
Accessibility features	£2,790	£8	-67%
Green credentials	£13,294	£42	-71%
Other (specify what)	£30,800	£109	-92%
Total expenditure	**£7,581,813**	**£24,000**	**-49%**

N=318

[8] Reporting where the majority of the financial year was in 2019.
[9] Reporting where the majority of the financial year was in 2020.

Per property, expenditure was £20,144 in 2019 reducing to £10,435 in 2020. This is based on operators owning, on average, 2.3 properties.

Grossing that spend up to the total population (17,794 self-catering properties across Scotland), operators spent a total of **£358.4m in 2019** reducing to **£185.7m in 2020**. Table 2.10 shows grossed total expenditure.

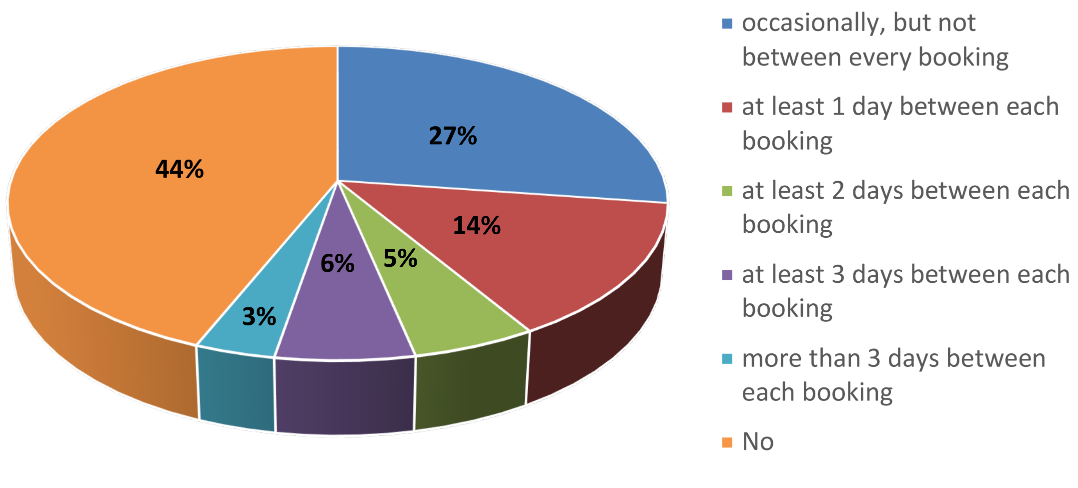
Table 2.10: Grossed current or future spend on each of the following

2019				2020			
Total expenditure	Avg. per operator	Avg. per property	Grossed to total population	Total expenditure	Avg. per operator	Avg. per property	Grossed to total population
£14,679,442	£46,332	£20,144	£358.4	£7,581,813	£24,000	£10,435	£185.7m

12% (49) of operators stated that they had taken on additional staff (full time or part-time) to assist with the government endorsed cleaning protocols and reopening guidelines. **On average operators employed an additional 1.5 cleaning staff.**

Furthermore, 87% (322) noted that **cleaning costs increased as a result of Covid-19.** Over half (56%) said that they were blocking days between bookings for additional cleaning as shown in Figure 2.9. Over one quarter (27%) said they occasionally blocked for cleaning, but not between every booking while 28% had between 1-3 days blocked for cleaning between each booking. 44% did not block for cleaning.

Figure 2.9: Additional cleaning days



N=319

Thinking about now and in the future, operators were asked how much they have or will have invested in their properties last year, this year and next year. Table 2.11 summarises the investment.

Table 2.11: Operator investment

	Last financial year (2019/20)	This financial year (2020/21)	Next financial year (2021/22)
Less than £10k	61% (212)	81% (261)	85% (247)
£11k to £25k	25% (87)	16% (52)	12% (36)
£26k up to £50k	8% (28)	2% (8)	2% (5)
Over £51k	6% (22)	3% (11)	1.5% (4)

4 Visitors Survey

An online visitor survey was open from March - May 2021. The survey was disseminated widely by sponsors and stakeholders. **718 visitors completed the survey.** Table 3.1 shows the spread of visitors across the Scottish regions. Visitors were asked to tell us about a visit in 2020 i.e., during Covid-19 **(Visit 1)** and during 2019 **(Visit 2).**

Table 3.1: Location of holiday self-catering properties visited

Location	Visitors	
	Visit during 1 (2020)	Visit during 2 (2019)
Ayrshire	62	79
Central Scotland	33	26
Dumfries & Galloway	48	40
Dunbartonshire / Argyll & Bute	68	72
Fife	26	32
Glasgow City	3	10
Grampian	32	25
Highland & Western Isles	256	223
Lanarkshire	-	2
Lothian	38	48
Orkney & Shetland	12	10
Renfrewshire	1	1
Scottish Borders	26	25
Tayside	113	88
Total consulted	**718**	**681**

Source: Frontline Self-Catering Visitor Survey, 2021

4.1 Visitor origin and number of trips

The majority of survey participants lived in Scotland (60%) with 37% from England. 1% were from Wales and 0.1% from Northern Ireland. 2% came from outside the UK.

Table 3.2: Visitor home country

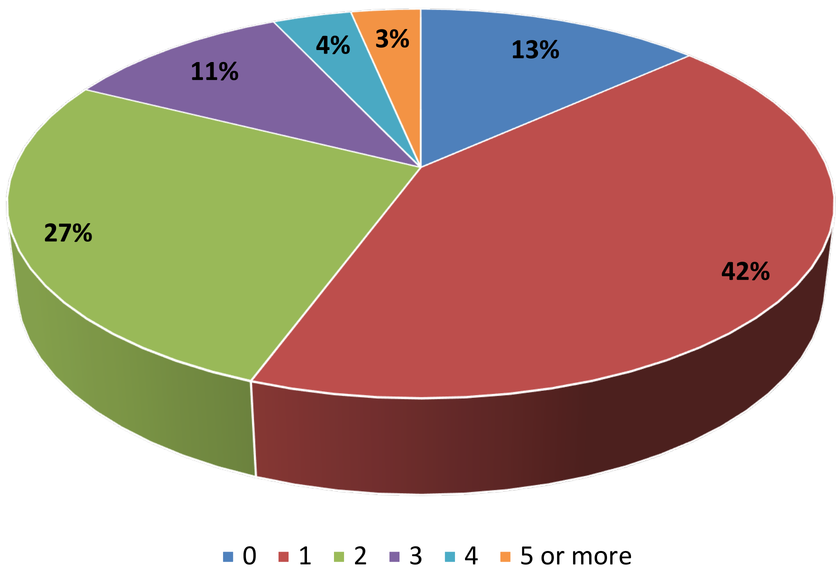
Location	Visitors
Scotland	60% (433)
England	37% (266)
Wales	1% (5)
Northern Ireland	0.1% (1)
Outside the UK[10]	2% (13)

Source: Frontline Self-Catering Visitor Survey, 2021 N=718

[10] This is an underrepresentation of actual overseas numbers and is a result of difficulty in engaging this group to participate in the study.

13% of respondents had not stayed in a self-catering property in the UK during the last 12 months (up until November 2020) with a further 42% staying only once. 27% stayed twice.

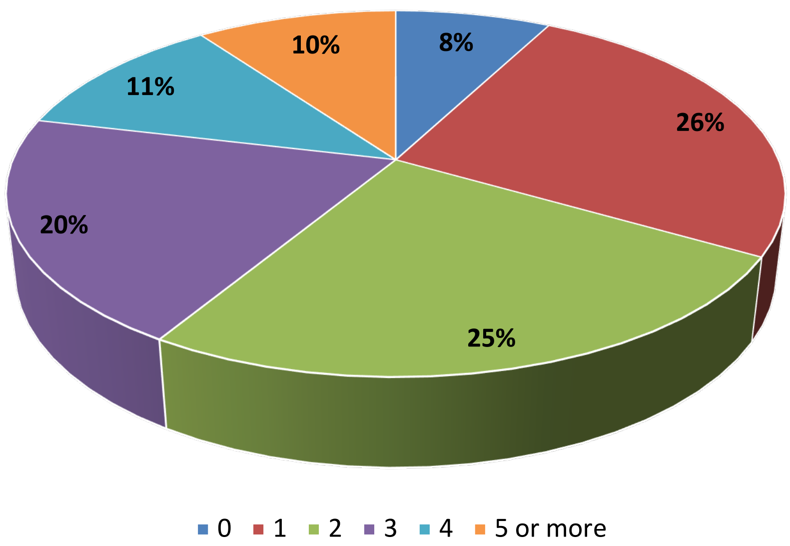
Figure 3.1: Number of visits to self-catering properties in the past 12 months (up to and including November 2020)



Source: Frontline Self-Catering Visitor Survey, 2021 *N=705*

Looking at the year before (up to November 2019), just over half of respondents (51%) had stayed in a self-catering property once or twice. A further 41% stayed three or more times with just 8% saying they did not stay in a self-catering property during this time.

Figure 3.2: Number of visits to self-catering properties in the past 12 months (up to and including November 2019)



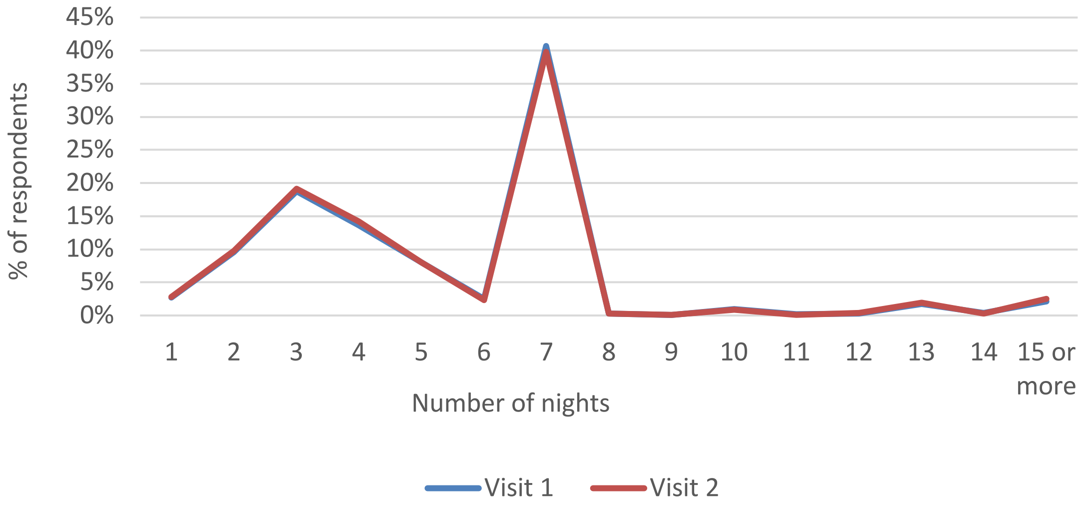
Source: Frontline Self-Catering Visitor Survey, 2021 N=714

Covid-19 was the main reason for the decrease in stays during 2020.

4.2 Visitor characteristics

This section looks at findings from visitors for up to two visits to a self-catering property. Visit 1 is the most recent visit i.e., 2020 and visit 2 is pre-Covid-19 i.e. 2019. On average visitors spent 6.2 nights during visit 1 and 6.3 nights in visit 2. The distribution of responses is shown in Figure 3.3 and demonstrates a very consistent trend between visit 1 and 2.

Figure 3.3: Number of nights stayed per visit

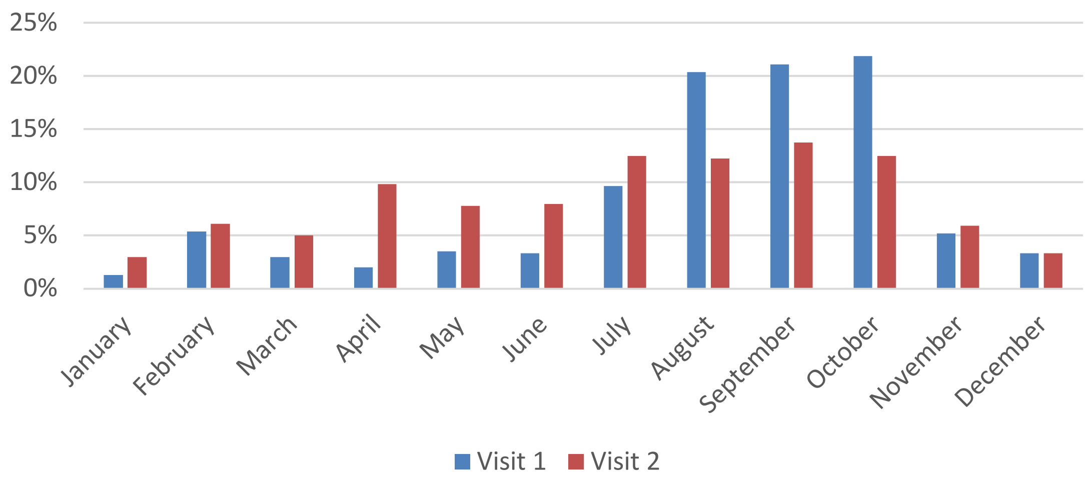


Source: Frontline Self-Catering Visitor Survey, 2021 N=567

Figure 3.4 shows the month in which the visits began. For visit 1 (2020) August, September and October were the most popular with significantly fewer visiting in March – June (compared with visit 2 (2019)). This was due to the lockdown measures imposed in March last year followed by the easing over the summer.

Looking at visit 2 (2019) there is a more even distribution across the months with a slight peak over July to October.

Figure 3.4: Month during which visit began



Source: Frontline Self-Catering Visitor Survey, 2021 N= 540

Tables 3.3 and 3.4 shows the number of adults, children and pets in each party for visit 1 (2020) and visit 2 (2019).

During visit 1 (2020), the average adult group size was 2.7 and 29% of groups included children. Where parties were travelling with children, the average number of children in each group was 2. 37% of groups brought a pet.

Table 3.3: Number of adults, children and pets in each group during visit 1 (2020)

	Number of adults	Number of children	Number of pets
1	3%	28%	67%
2	65%	50%	26%
3	11%	15%	7%
4	12%	5%	
5	3%	1%	
6	3%	0%	
7	1%	0%	
8	1%	0%	
9	0%	0%	
10+	1%	0%	
Average	**2.7**	**2**	**1.3**

Source: Frontline Self-Catering Visitor Survey, 2021

When looking at visit 2 (2019), the average adult group size was 3.1, and 26% of all groups included children. Where parties were travelling with children, the average number of children in each group was 2.3. 34% of groups brought a pet and no groups brought more than 3 pets.

Table 3.4: Number of adults, children and pets in each group during visit 2 (2019)

	Number of adults	Number of children	Number of pets
1	1%	27%	59%
2	49%	41%	31%
3	12%	14%	10%
4	19%	8%	
5	6%	6%	
6	6%	2%	
7	2%	0%	
8	2%	1%	
9	1%	0%	
10+	3%	0%	
Average	**3.1**	**2.3**	**1.3**

Source: Frontline Self-Catering Visitor Survey, 2021

4.3 Visitor expenditure

Visitors who stayed in self-catering property **(during visit 2, 2019),** spent, on average, **£2,264** during their visit**.** This reduced to **£2,107 for visit 1 (2020).**

Table 3.5: Average visitor spend per party

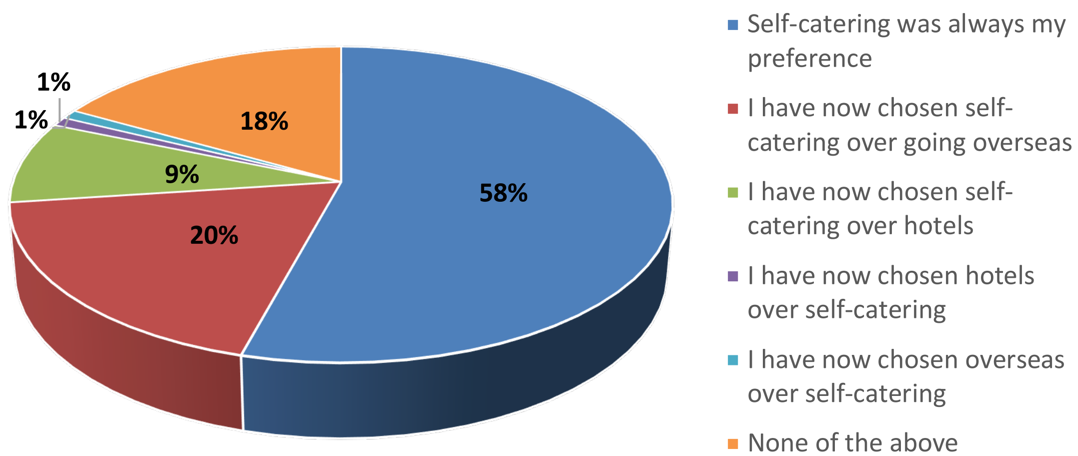
Area of expenditure	**Average spend per party**		
	Visit 1 (2020)	**Visit 2 (2019)**	**Change since 2019**
Transport to and from the property	£173	£208	-17%
Travel during stay	£96	£84	14%
Accommodation fees	£1,024	£1,082	-5%
Food and drink (in supermarkets)	£194	£180	8%
Food and drink (in local shops and farmers markets)	£103	£108	-5%
Food and drink (in bars, cafes, pubs and restaurants)	£295	£335	-12%
Other shopping (e.g. gifts, clothes, souvenirs)	£111	£114	-3%
Outdoor recreation (e.g. sailing, surfing, cycling, horse riding)	£46	£58	-21%
Visitor attractions (e.g. heritage sites, theme parks, gardens)	£39	£55	-28%
Outdoor sports (shooting, fishing)	£27	£40	-33%
Total	**£2,107**	**£2,264**	**-7%**

Source: Frontline Self-Catering Visitor Survey, 2021

4.4 Impacts of Covid-19

Respondents were asked, as a result of Covid-19, which statement best applies:

Figure 3.7: As a result of Covid-19

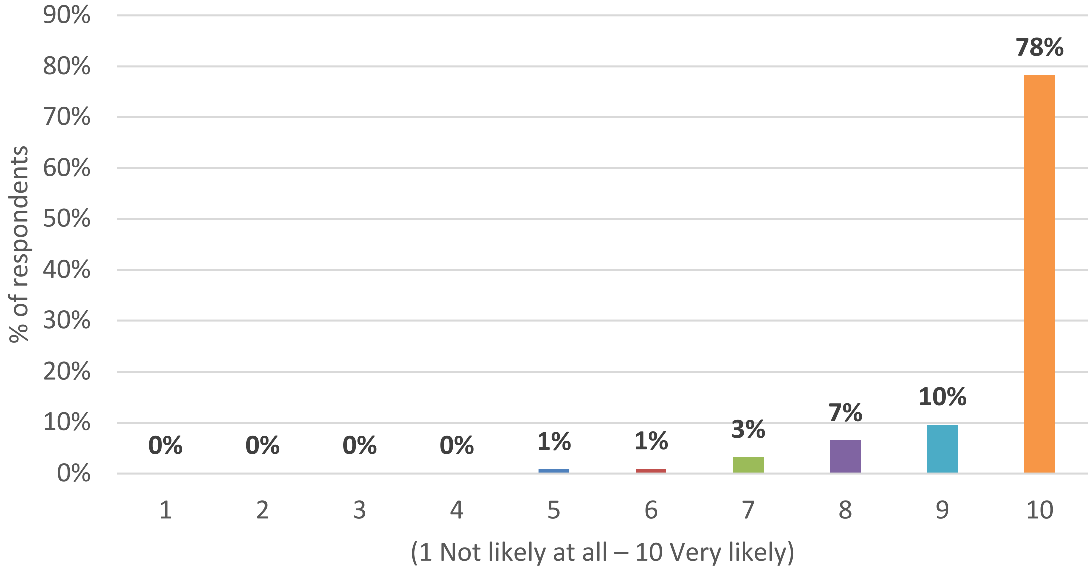


N=717

58% said self-catering in the UK was always my preference followed by 18% now choosing self-catering over going overseas.

On a scale of 1 (not likely at all) to 10 (very likely), visitors were asked to what extent they were likely to continue using self-catering in the future. **95% rated their likeliness to stay in self-catering in the future as 7 or more out of 10, with 78% rating 10.**

Figure 3.8: Extent to which visitors were likely to use self-catering in the future

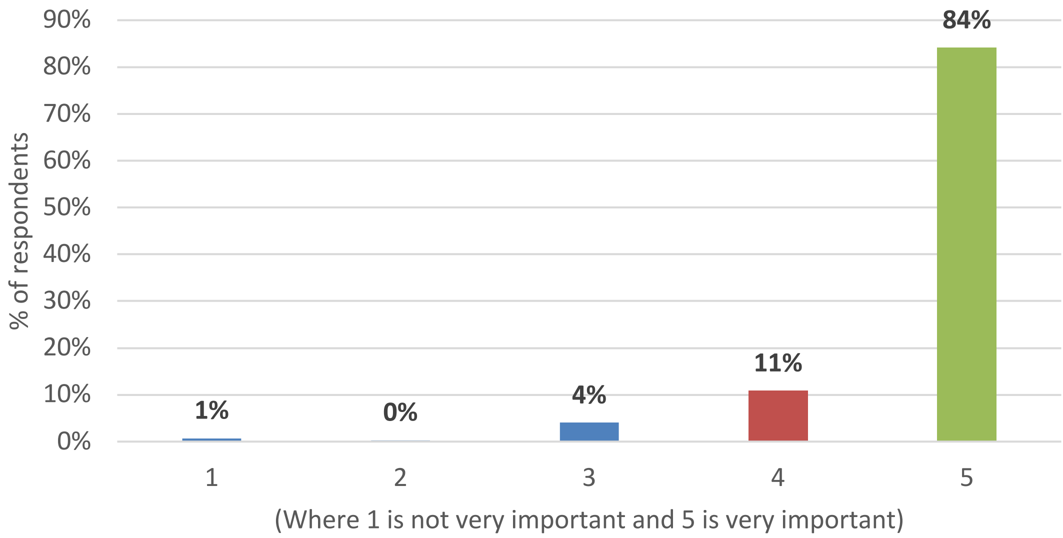


N= 717

Over two-thirds (74%, 406) of respondents said that they have had to cancel plans to holiday with people from outside of their household due to Covid-19.

On a scale of 1 (not very important) to 5 (very important), visitors were asked, as a direct result of Covid-19, how important the cleaning standards are in their choice of self-catering accommodation. **Almost all (99%) rated this 3 or more, with 84% saying very important.**

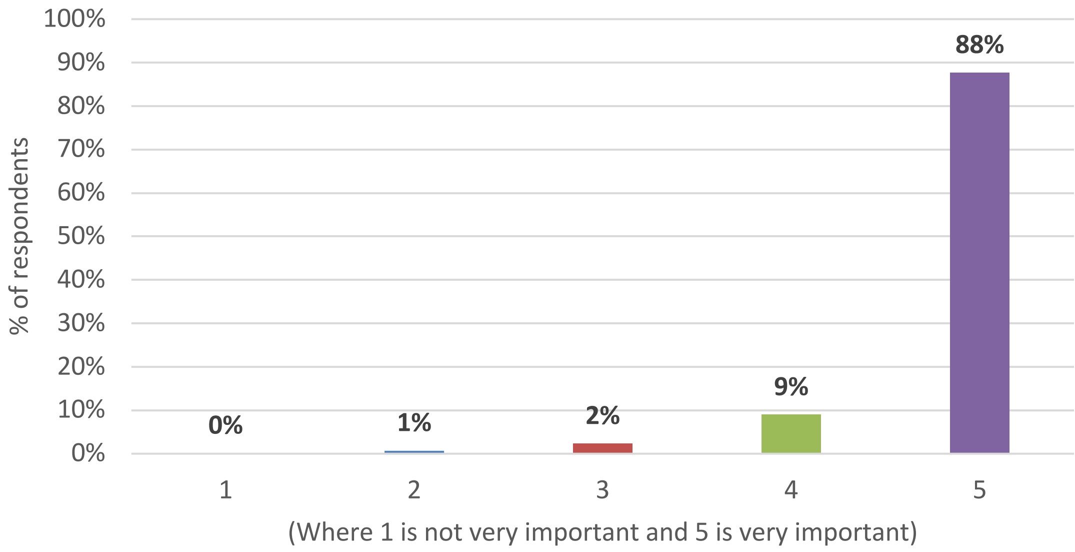
Figure 3.9: Importance of cleaning standards in choice of self-catering accommodation



N=718

Using the same rating scale of 1 (not very important) to 5 (very important), visitors were then asked, how important is having flexible cancellation terms due to Covid-19. **Almost all rated this 3 or above (99%) and 88% said very important.**

Figure 3.10: How important is having flexible cancellation terms due to Covid-19



N=717

Key features of flexible cancellation terms included:

- a full refund (73%, 518)
- ability to rebook with the same terms and conditions (69%, 497)
- refundable deposit (48%, 342)

5 Findings from Economic Impact Assessment

This section highlights the economic impacts that have occurred as a result of visitors use of self-catering properties in the UK in 2019 and 2020. This assessment was conducted in accordance with HM Treasury *Green Book* appraisal and evaluation guidance.

As part of this analysis, we measured the economic value of the sector, using the following five key indicators:

1. **Number of properties:** the number of self-catering properties that are available in Scotland, using data supplied to us by the ASSC.
2. **Visitor nights per year:** the total number of overnight stays that took place in self-catering properties in Scotland over the course of 2019 and 2020, based on a review of transaction records provided to us by SuperControl (see Appendix 1 for occupancy breakdown).
3. **Total visitor spend:** the total combined value of all expenditure made by visitors to the country during the course of 2019 and 2020, including the money that they spent on accommodation fees, travel to and from the properties, travel during their stay, food and drink (in shops, supermarkets pubs and bars), other shopping, outdoor recreation and trips to visitor attractions, based on evidence of visitor spending patterns acquired through our survey of visitors to Scottish self-catering properties**.**
4. **Total full time equivalent (FTE) jobs supported:** the total number of full-time equivalent jobs that the self-catering sector support in the local economy, through money spent in Scotland by visitors to self-catering properties. A full-time equivalent job can be defined as the number of full time (35 hour per week) permanent (52 week per year) jobs that this expenditure supports[11].
5. **Total economic contribution:** the total amount of Gross Value Added (GVA) in each area that can be attributed to expenditure by visitors to self-catering properties. The term GVA can be defined as the total amount of extra value that visitor expenditure contributes to the economy. This is broadly equivalent to either wages plus profit (i.e. the proportion of value added that goes to the company's employees and the proportion that goes to the company's owners) or to turnover minus cost of sale. For example, if a company were to buy enough coffee beans to make 100 cups of coffee for £40, and sell each cup for £1 each, the turnover impact of these transactions would be £100, the cost of sale would be £40, and the value added would be £60.

In the case of FTE jobs supported, and total economic contribution, the analysis includes indirect and induced expenditure that has occurred as a result of the multiplier effect, such as money spent by the employees of self-catering businesses, and by the business itself in the local economy.

Detailed results tables are provided in Appendix 2, a glossary of technical terms in Appendix 3, and a description of the economic impact calculation methodology in Appendix 4.

This section presents a summary of the visitor expenditure, GVA and full-time equivalent (FTE) employment impacts of the self-catering sector in Scotland, broken down by region.

[11] As some people work part time or seasonally, and as some workers spend part of their time providing services to tourist visitors and some of their time providing services to local residents, the total number of workers who jobs are at least partially dependent on self-catering visitors will be higher than this figure.

5.1 Impact by Scottish region

It is estimated that in **2019** visitors to Scottish self-catering properties spent **a total of £867.1m in the economy**. This visitor expenditure **supports 23,979 FTE jobs and contributed £489.3m of GVA to the Scottish economy**. This resulted in a **total economic contribution of £672.3m**.

In **2020** visitors spent **a total of £614.8m in the economy**. This visitor expenditure **supports 17,002 FTE jobs and contributed £346.9m of GVA to the Scottish economy**. This resulted in a **total economic contribution of £476.7m**. **This was a 29% reduction to the previous year.** Tables 5.1 and 5.2 summarise the impact at a regional level in 2019 and 2020. The section that follows provides an infographic summary of impact findings for Scotland for 2019 as this was a more 'typical year'.

Table 5.1: Economic impacts by Scottish region 2019

	Total visitor nights	Total visitor spend (£m)	Total GVA impact (£m)	Total FTE employment	Total economic contribution (£m)
Ayrshire	114,084	41.0	23.1	1,134	31.8
Central Scotland	84,340	30.3	17.1	838	23.5
Dumfries & Galloway	188,238	67.7	38.2	1,871	52.5
Dunbartonshire / Argyll & Bute	318,212	114.4	64.5	3,163	88.7
Fife	91,325	32.8	18.5	908	25.5
Glasgow City	27,163	9.8	5.5	270	7.6
Grampian	156,593	56.3	31.8	1,557	43.6
Highland & Western Isles	757,841	272.4	153.7	7,533	211.2
Lanarkshire	16,705	6.0	3.4	166	4.7
Lothian	253,972	91.3	51.5	2,524	70.8
Orkney & Shetland	91,267	32.8	18.5	907	25.4
Renfrewshire	10,593	3.8	2.1	105	3.0
Scottish Borders	107,564	38.7	21.8	1,069	30.0
Tayside	194,485	69.9	39.4	1,933	54.2
Scotland total	**2,412,382**	**867.1**	**489.3**	**23,979**	**672.3**

Source: Frontline, 2021

Table 5.2: Economic impacts by Scottish region 2020

	Total visitor nights	Total visitor spend (£m)	Total GVA impact (£m)	Total FTE employment	Total economic contribution (£m)
Ayrshire	85,703	29.1	16.4	804	22.5
Central Scotland	63,359	21.5	12.1	594	16.7
Dumfries & Galloway	141,410	48.0	27.1	1,327	37.2
Dunbartonshire / Argyll & Bute	239,050	81.1	45.8	2,243	62.9
Fife	68,606	23.3	13.1	644	18.0
Glasgow City	20,405	6.9	3.9	191	5.4
Grampian	117,637	39.9	22.5	1,104	30.9
Highland & Western Isles	569,311	193.1	109.0	5,341	149.8
Lanarkshire	12,549	4.3	2.4	118	3.3
Lothian	190,791	64.7	36.5	1,790	50.2
Orkney & Shetland	68,562	23.3	13.1	643	18.0
Renfrewshire	7,958	2.7	1.5	75	2.1
Scottish Borders	80,805	27.4	15.5	758	21.3
Tayside	146,103	49.6	28.0	1,371	38.4
Scotland total	**1,812,250**	**614.8**	**346.9**	**17,002**	**476.7**

Source: Frontline, 2021

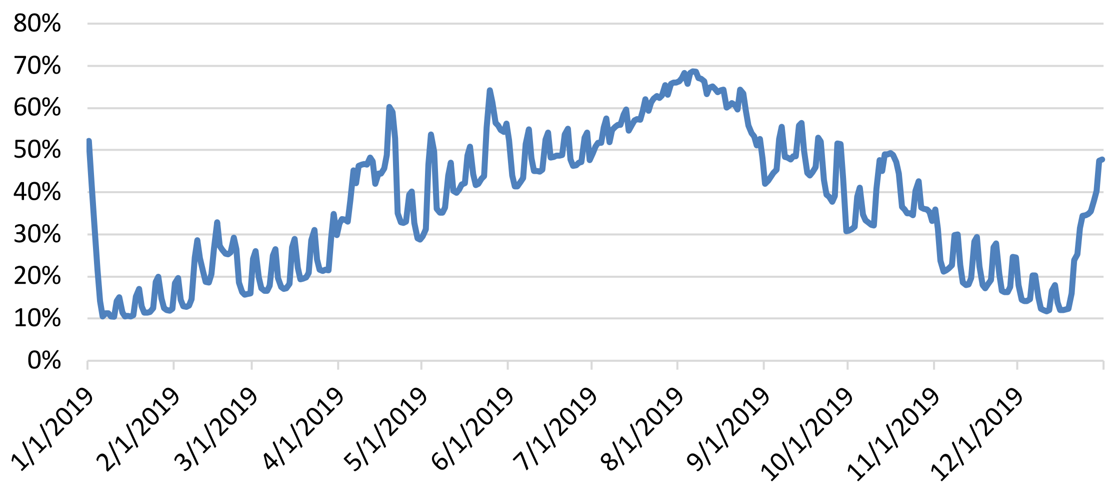
Appendix 1 – SuperControl Occupancy Data

Occupancy figures are likely to underestimate the true occupancy rate as:

- there were some days in 2020 when each property was not available for occupancy due to Covid-19 restrictions (though some of the unfulfilled bookings for these nights will still be in the database)
- some properties may have been available for booking through a range of different platforms, and therefore there may be some bookings that are not captured in this database
- some owners may have only made their properties available for booking some of the time, and either occupied them themselves, rented them on a tenancy basis, or closed them for maintenance or for the off-season at other times of the year

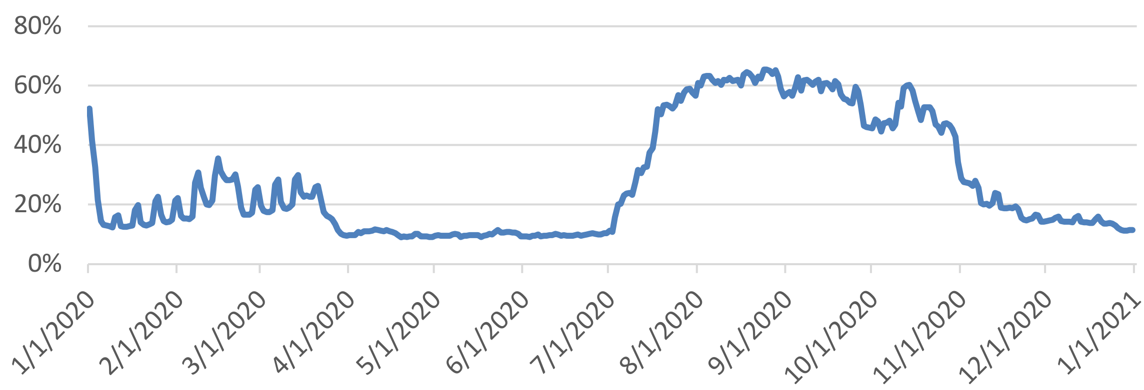
Scotland

Occupancy rates, 1st January 2019 to 31st December 2019



N= 4,594 properties

Occupancy rates, 1st January 2020 to 31st December 2020



N= 4,867 properties

Appendix 2 – Detailed Impact Findings

Total Visitor Nights

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	17,703	57,042	17,703	11,802	9,835	**114,084**
Central Scotland	12,049	28,917	21,688	12,049	9,639	**84,340**
Dumfries & Galloway	24,010	63,386	63,386	17,287	20,168	**188,238**
Dunbartonshire / Argyll & Bute	45,459	101,020	85,867	40,408	45,459	**318,212**
Fife	7,718	32,157	30,013	10,719	10,719	**91,325**
Glasgow City	5,891	9,163	5,891	3,600	2,618	**27,163**
Grampian	26,413	60,373	43,393	15,093	11,320	**156,593**
Highland & Western Isles	126,564	294,802	208,368	69,456	58,652	**757,841**
Lanarkshire	1,856	10,209	1,856	1,856	928	**16,705**
Lothian	49,907	97,596	70,979	12,200	23,290	**253,972**
Orkney & Shetland	6,519	52,152	26,076	0	6,519	**91,267**
Renfrewshire	3,178	3,178	2,119	0	2,119	**10,593**
Scottish Borders	14,703	41,014	24,763	13,929	13,155	**107,564**
Tayside	38,897	38,897	38,897	38,897	38,897	**194,485**
Scotland total	**380,866**	**889,905**	**640,998**	**247,295**	**253,318**	**2,412,382**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	13,299	42,851	13,299	8,866	7,388	**85,703**
Central Scotland	9,051	21,723	16,292	9,051	7,241	**63,359**
Dumfries & Galloway	18,037	47,618	47,618	12,987	15,151	**141,410**
Dunbartonshire / Argyll & Bute	34,150	75,889	64,505	30,355	34,150	**239,050**
Fife	5,798	24,157	22,547	8,052	8,052	**68,606**
Glasgow City	4,425	6,884	4,425	2,704	1,967	**20,405**
Grampian	19,842	45,354	32,598	11,339	8,504	**117,637**
Highland & Western Isles	95,078	221,463	156,532	52,177	44,061	**569,311**
Lanarkshire	1,394	7,669	1,394	1,394	697	**12,549**
Lothian	37,492	73,317	53,321	9,165	17,496	**190,791**
Orkney & Shetland	4,897	39,178	19,589	0	4,897	**68,562**
Renfrewshire	2,387	2,387	1,592	0	1,592	**7,958**
Scottish Borders	11,045	30,811	18,603	10,464	9,883	**80,805**
Tayside	29,221	29,221	29,221	29,221	29,221	**146,103**
Scotland total	**286,117**	**668,522**	**481,536**	**185,775**	**190,299**	**1,812,250**

Total Visitor Spend (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	6.4	20.5	6.4	4.2	3.5	**41.0**
Central Scotland	4.3	10.4	7.8	4.3	3.5	**30.3**
Dumfries & Galloway	8.6	22.8	22.8	6.2	7.2	**67.7**
Dunbartonshire/Argyll & Bute	16.3	36.3	30.9	14.5	16.3	**114.4**
Fife	2.8	11.6	10.8	3.9	3.9	**32.8**
Glasgow City	2.1	3.3	2.1	1.3	0.9	**9.8**
Grampian	9.5	21.7	15.6	5.4	4.1	**56.3**
Highland & Western Isles	45.5	106.0	74.9	25.0	21.1	**272.4**
Lanarkshire	0.7	3.7	0.7	0.7	0.3	**6.0**
Lothian	17.9	35.1	25.5	4.4	8.4	**91.3**
Orkney & Shetland	2.3	18.7	9.4	0.0	2.3	**32.8**
Renfrewshire	1.1	1.1	0.8	0.0	0.8	**3.8**
Scottish Borders	5.3	14.7	8.9	5.0	4.7	**38.7**
Tayside	14.0	14.0	14.0	14.0	14.0	**69.9**
Scotland total	**136.9**	**319.9**	**230.4**	**88.9**	**91.1**	**867.1**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	4.5	14.5	4.5	3.0	2.5	**29.1**
Central Scotland	3.1	7.4	5.5	3.1	2.5	**21.5**
Dumfries & Galloway	6.1	16.2	16.2	4.4	5.1	**48.0**
Dunbartonshire/Argyll & Bute	11.6	25.7	21.9	10.3	11.6	**81.1**
Fife	2.0	8.2	7.6	2.7	2.7	**23.3**
Glasgow City	1.5	2.3	1.5	0.9	0.7	**6.9**
Grampian	6.7	15.4	11.1	3.8	2.9	**39.9**
Highland & Western Isles	32.3	75.1	53.1	17.7	14.9	**193.1**
Lanarkshire	0.5	2.6	0.5	0.5	0.2	**4.3**
Lothian	12.7	24.9	18.1	3.1	5.9	**64.7**
Orkney & Shetland	1.7	13.3	6.6	0.0	1.7	**23.3**
Renfrewshire	0.8	0.8	0.5	0.0	0.5	**2.7**
Scottish Borders	3.7	10.5	6.3	3.6	3.4	**27.4**
Tayside	9.9	9.9	9.9	9.9	9.9	**49.6**
Scotland total	**97.1**	**226.8**	**163.4**	**63.0**	**64.6**	**614.8**

Direct GVA (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	3.6	11.6	3.6	2.4	2.0	**23.1**
Central Scotland	2.4	5.9	4.4	2.4	2.0	**17.1**
Dumfries & Galloway	4.9	12.9	12.9	3.5	4.1	**38.2**
Dunbartonshire / Argyll & Bute	9.2	20.5	17.4	8.2	9.2	**64.5**
Fife	1.6	6.5	6.1	2.2	2.2	**18.5**
Glasgow City	1.2	1.9	1.2	0.7	0.5	**5.5**
Grampian	5.4	12.2	8.8	3.1	2.3	**31.8**
Highland & Western Isles	25.7	59.8	42.3	14.1	11.9	**153.7**
Lanarkshire	0.4	2.1	0.4	0.4	0.2	**3.4**
Lothian	10.1	19.8	14.4	2.5	4.7	**51.5**
Orkney & Shetland	1.3	10.6	5.3	0.0	1.3	**18.5**
Renfrewshire	0.6	0.6	0.4	0.0	0.4	**2.1**
Scottish Borders	3.0	8.3	5.0	2.8	2.7	**21.8**
Tayside	7.9	7.9	7.9	7.9	7.9	**39.4**
Scotland total	**77.3**	**180.5**	**130.0**	**50.2**	**51.4**	**489.3**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	2.5	8.2	2.5	1.7	1.4	**16.4**
Central Scotland	1.7	4.2	3.1	1.7	1.4	**12.1**
Dumfries & Galloway	3.5	9.1	9.1	2.5	2.9	**27.1**
Dunbartonshire/Argyll & Bute	6.5	14.5	12.3	5.8	6.5	**45.8**
Fife	1.1	4.6	4.3	1.5	1.5	**13.1**
Glasgow City	0.8	1.3	0.8	0.5	0.4	**3.9**
Grampian	3.8	8.7	6.2	2.2	1.6	**22.5**
Highland & Western Isles	18.2	42.4	30.0	10.0	8.4	**109.0**
Lanarkshire	0.3	1.5	0.3	0.3	0.1	**2.4**
Lothian	7.2	14.0	10.2	1.8	3.3	**36.5**
Orkney & Shetland	0.9	7.5	3.8	0.0	0.9	**13.1**
Renfrewshire	0.5	0.5	0.3	0.0	0.3	**1.5**
Scottish Borders	2.1	5.9	3.6	2.0	1.9	**15.5**
Tayside	5.6	5.6	5.6	5.6	5.6	**28.0**
Scotland total	**54.8**	**128.0**	**92.2**	**35.6**	**36.4**	**346.9**

Direct Multiplier

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	1.3	4.3	1.3	0.9	0.7	**8.7**
Central Scotland	0.9	2.2	1.6	0.9	0.7	**6.4**
Dumfries & Galloway	1.8	4.8	4.8	1.3	1.5	**14.3**
Dunbartonshire / Argyll & Bute	3.4	7.7	6.5	3.1	3.4	**24.1**
Fife	0.6	2.4	2.3	0.8	0.8	**6.9**
Glasgow City	0.4	0.7	0.4	0.3	0.2	**2.1**
Grampian	2.0	4.6	3.3	1.1	0.9	**11.9**
Highland & Western Isles	9.6	22.4	15.8	5.3	4.4	**57.5**
Lanarkshire	0.1	0.8	0.1	0.1	0.1	**1.3**
Lothian	3.8	7.4	5.4	0.9	1.8	**19.3**
Orkney & Shetland	0.5	4.0	2.0	0.0	0.5	**6.9**
Renfrewshire	0.2	0.2	0.2	0.0	0.2	**0.8**
Scottish Borders	1.1	3.1	1.9	1.1	1.0	**8.2**
Tayside	3.0	3.0	3.0	3.0	3.0	**14.8**
Scotland total	**28.9**	**67.5**	**48.6**	**18.8**	**19.2**	**183.0**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	1.0	3.1	1.0	0.6	0.5	**6.1**
Central Scotland	0.6	1.6	1.2	0.6	0.5	**4.5**
Dumfries & Galloway	1.3	3.4	3.4	0.9	1.1	**10.1**
Dunbartonshire/Argyll & Bute	2.4	5.4	4.6	2.2	2.4	**17.1**
Fife	0.4	1.7	1.6	0.6	0.6	**4.9**
Glasgow City	0.3	0.5	0.3	0.2	0.1	**1.5**
Grampian	1.4	3.2	2.3	0.8	0.6	**8.4**
Highland & Western Isles	6.8	15.9	11.2	3.7	3.2	**40.8**
Lanarkshire	0.1	0.5	0.1	0.1	0.0	**0.9**
Lothian	2.7	5.2	3.8	0.7	1.3	**13.7**
Orkney & Shetland	0.4	2.8	1.4	0.0	0.4	**4.9**
Renfrewshire	0.2	0.2	0.1	0.0	0.1	**0.6**
Scottish Borders	0.8	2.2	1.3	0.7	0.7	**5.8**
Tayside	2.1	2.1	2.1	2.1	2.1	**10.5**
Scotland total	**20.5**	**47.9**	**34.5**	**13.3**	**13.6**	**129.8**

Total Economic Contribution – Direct, indirect and Induced GVA (£m)

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	4.9	15.9	4.9	3.3	2.7	**31.8**
Central Scotland	3.4	8.1	6.0	3.4	2.7	**23.5**
Dumfries & Galloway	6.7	17.7	17.7	4.8	5.6	**52.5**
Dunbartonshire/Argyll & Bute	12.7	28.2	23.9	11.3	12.7	**88.7**
Fife	2.2	9.0	8.4	3.0	3.0	**25.5**
Glasgow City	1.6	2.6	1.6	1.0	0.7	**7.6**
Grampian	7.4	16.8	12.1	4.2	3.2	**43.6**
Highland & Western Isles	35.3	82.2	58.1	19.4	16.3	**211.2**
Lanarkshire	0.5	2.8	0.5	0.5	0.3	**4.7**
Lothian	13.9	27.2	19.8	3.4	6.5	**70.8**
Orkney & Shetland	1.8	14.5	7.3	0.0	1.8	**25.4**
Renfrewshire	0.9	0.9	0.6	0.0	0.6	**3.0**
Scottish Borders	4.1	11.4	6.9	3.9	3.7	**30.0**
Tayside	10.8	10.8	10.8	10.8	10.8	**54.2**
Scotland total	**106.1**	**248.0**	**178.6**	**68.9**	**70.6**	**672.3**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	3.5	11.3	3.5	2.3	1.9	**22.5**
Central Scotland	2.4	5.7	4.3	2.4	1.9	**16.7**
Dumfries & Galloway	4.7	12.5	12.5	3.4	4.0	**37.2**
Dunbartonshire / Argyll & Bute	9.0	20.0	17.0	8.0	9.0	**62.9**
Fife	1.5	6.4	5.9	2.1	2.1	**18.0**
Glasgow City	1.2	1.8	1.2	0.7	0.5	**5.4**
Grampian	5.2	11.9	8.6	3.0	2.2	**30.9**
Highland & Western Isles	25.0	58.3	41.2	13.7	11.6	**149.8**
Lanarkshire	0.4	2.0	0.4	0.4	0.2	**3.3**
Lothian	9.9	19.3	14.0	2.4	4.6	**50.2**
Orkney & Shetland	1.3	10.3	5.2	0.0	1.3	**18.0**
Renfrewshire	0.6	0.6	0.4	0.0	0.4	**2.1**
Scottish Borders	2.9	8.1	4.9	2.8	2.6	**21.3**
Tayside	7.7	7.7	7.7	7.7	7.7	**38.4**
Scotland total	**75.3**	**175.8**	**126.7**	**48.9**	**50.1**	**476.7**

Direct full time equivalent employment

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	176	567	176	117	98	**1,134**
Central Scotland	120	287	216	120	96	**838**
Dumfries & Galloway	239	630	630	172	200	**1,871**
Dunbartonshire / Argyll & Bute	452	1,004	854	402	452	**3,163**
Fife	77	320	298	107	107	**908**
Glasgow City	59	91	59	36	26	**270**
Grampian	263	600	431	150	113	**1,557**
Highland & Western Isles	1,258	2,930	2,071	690	583	**7,533**
Lanarkshire	18	101	18	18	9	**166**
Lothian	496	970	706	121	232	**2,524**
Orkney & Shetland	65	518	259	0	65	**907**
Renfrewshire	32	32	21	0	21	**105**
Scottish Borders	146	408	246	138	131	**1,069**
Tayside	387	387	387	387	387	**1,933**
Scotland total	**3,786**	**8,846**	**6,371**	**2,458**	**2,518**	**23,979**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	125	402	125	83	69	**804**
Central Scotland	85	204	153	85	68	**594**
Dumfries & Galloway	169	447	447	122	142	**1,327**
Dunbartonshire / Argyll & Bute	320	712	605	285	320	**2,243**
Fife	54	227	212	76	76	**644**
Glasgow City	42	65	42	25	18	**191**
Grampian	186	426	306	106	80	**1,104**
Highland & Western Isles	892	2,078	1,469	490	413	**5,341**
Lanarkshire	13	72	13	13	7	**118**
Lothian	352	688	500	86	164	**1,790**
Orkney & Shetland	46	368	184	0	46	**643**
Renfrewshire	22	22	15	0	15	**75**
Scottish Borders	104	289	175	98	93	**758**
Tayside	274	274	274	274	274	**1,371**
Scotland total	**2,684**	**6,272**	**4,518**	**1,743**	**1,785**	**17,002**

FTE employment multiplier

2019

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	66	212	66	44	37	**424**
Central Scotland	45	107	81	45	36	**314**
Dumfries & Galloway	89	236	236	64	75	**700**
Dunbartonshire/Argyll & Bute	169	376	319	150	169	**1,183**
Fife	29	120	112	40	40	**340**
Glasgow City	22	34	22	13	10	**101**
Grampian	98	224	161	56	42	**582**
Highland & Western Isles	471	1,096	775	258	218	**2,817**
Lanarkshire	7	38	7	7	3	**62**
Lothian	186	363	264	45	87	**944**
Orkney & Shetland	24	194	97	0	24	**339**
Renfrewshire	12	12	8	0	8	**39**
Scottish Borders	55	152	92	52	49	**400**
Tayside	145	145	145	145	145	**723**
Scotland total	**1,416**	**3,308**	**2,383**	**919**	**942**	**8,968**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	47	150	47	31	26	**301**
Central Scotland	32	76	57	32	25	**222**
Dumfries & Galloway	63	167	167	46	53	**496**
Dunbartonshire/Argyll & Bute	120	266	226	107	120	**839**
Fife	20	85	79	28	28	**241**
Glasgow City	16	24	16	9	7	**72**
Grampian	70	159	114	40	30	**413**
Highland & Western Isles	334	777	549	183	155	**1,998**
Lanarkshire	5	27	5	5	2	**44**
Lothian	132	257	187	32	61	**669**
Orkney & Shetland	17	137	69	0	17	**241**
Renfrewshire	8	8	6	0	6	**28**
Scottish Borders	39	108	65	37	35	**284**
Tayside	103	103	103	103	103	**513**
Scotland total	**1,004**	**2,346**	**1,690**	**652**	**668**	**6,359**

Direct, indirect and induced FTE employment impact

2019

Property size	**1 bedroom**	**2 bedrooms**	**3 bedrooms**	**4 bedrooms**	**5+ bedrooms**	**Total**
Ayrshire	242	779	242	161	134	**1,558**
Central Scotland	165	395	296	165	132	**1,152**
Dumfries & Galloway	328	866	866	236	275	**2,571**
Dunbartonshire/Argyll & Bute	621	1,380	1,173	552	621	**4,346**
Fife	105	439	410	146	146	**1,247**
Glasgow City	80	125	80	49	36	**371**
Grampian	361	825	593	206	155	**2,139**
Highland & Western Isles	1,729	4,026	2,846	949	801	**10,350**
Lanarkshire	25	139	25	25	13	**228**
Lothian	682	1,333	969	167	318	**3,469**
Orkney & Shetland	89	712	356	0	89	**1,246**
Renfrewshire	43	43	29	0	29	**145**
Scottish Borders	201	560	338	190	180	**1,469**
Tayside	531	531	531	531	531	**2,656**
Scotland total	**5,202**	**12,154**	**8,754**	**3,377**	**3,460**	**32,947**

2020

Property size	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5+ bedrooms	Total
Ayrshire	171	552	171	114	95	**1,105**
Central Scotland	117	280	210	117	93	**817**
Dumfries & Galloway	233	614	614	167	195	**1,823**
Dunbartonshire/Argyll & Bute	440	978	832	391	440	**3,081**
Fife	75	311	291	104	104	**884**
Glasgow City	57	89	57	35	25	**263**
Grampian	256	585	420	146	110	**1,516**
Highland & Western Isles	1,226	2,855	2,018	673	568	**7,339**
Lanarkshire	18	99	18	18	9	**162**
Lothian	483	945	687	118	226	**2,459**
Orkney & Shetland	63	505	253	0	63	**884**
Renfrewshire	31	31	21	0	21	**103**
Scottish Borders	142	397	240	135	127	**1,042**
Tayside	377	377	377	377	377	**1,883**
Scotland total	**3,688**	**8,618**	**6,207**	**2,395**	**2,453**	**23,361**

Appendix 3 – Glossary of Technical Terms

Total visitor spend: money spent by visitors to the area (this does not include any money spent further down the supply chain through multiplier effects).

Full time equivalent (FTE) employment impacts: the number of full time (35 hour per week) permanent (52 week per year) jobs that this expenditure supports. Note that as some people work part time or seasonally, and as some workers spend part of their time providing services to tourist visitors and some of their time providing services to local residents, the total number of workers who jobs are at least partially dependent on self-catering visitors will be higher than this figure.

Gross value added (GVA): the total amount of extra value that visitor spend contributes to the economy. This is broadly equivalent to either wages plus profit (i.e. the proportion of value added that goes to the company's employees and the proportion that goes to the company's owners) or to turnover minus cost of sale. For example, if a company were to buy enough coffee beans to make 100 cups of coffee for £40, and sell each cup for £1 each, the turnover impact of these transactions would be £100, the cost of sale would be £40, and the value added would be £60.

Indirect multiplier (or Type I multiplier): additional knock-on benefits that take place as a result of payments made further down the supply chain. Examples may include money that the owner pays to a local accountant to do produce their accounts, or to a local tradesperson to fix any plumbing or electrical problems that might occur in the property.

Induced multiplier: additional knock on benefits caused by the expenditure of salaries by property owners and staff. An example may include the expenditure of people who work at the property in a local shop.

(the) Multiplier effect (or Type II multiplier): this term relates to the combined impacts of the indirect and induced multipliers.

Occupancy rate: the proportion off properties that have a paying visitor staying in them on any particular day of the year.

Turnover: the total value of all sales made by a business.

Appendix 4 – Economic Impact Methodology

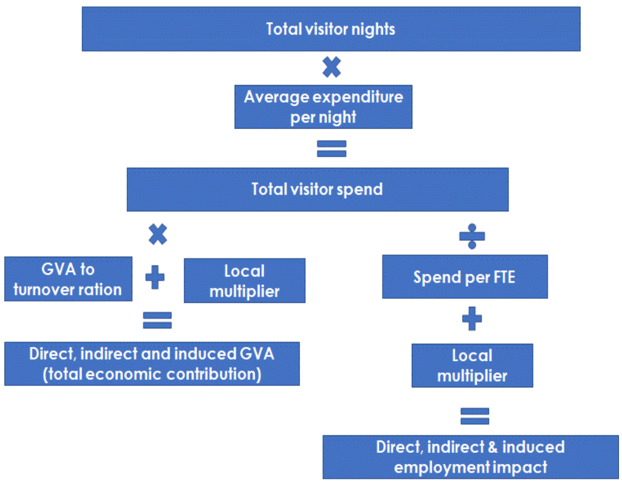
As part of the economic impact model, a net economic impact figure was calculated for every possible combination of:

- **day of the year**: we applied different occupancy rate assumptions to each of the days in 2019 and 2020, based on evidence from our analysis of SuperControl data

In other words, the model includes over a separate economic impact calculation, which were then reaggregated to produce as accurate as possible an estimate of the true economic impact of the sector.

For each of these combinations of date, we calculate our impact based on the following equation:

Economic impact calculation summary



OFFICER REPORT

27th September 2023

App No. **23/00722/P**

Application registered on **21st August 2023**
Target Date **20th October 2023**

Proposal	**Change of use of flat to short term holiday let and flat (Retrospective)**	SDELL	Y
		CDEL	N
Location	**Flat 6** **139 New Street** **Musselburgh** **EH21 6DH**	Bad Neighbour Development	N

APPLICANT: **KLE Property Ltd**

Is this application to be approved as a departure from structure/local plan? N

c/o Houghton Planning Ltd
Per Paul Houghton MRTPI
Alloa Business Centre
Whins Road
Alloa
Clacks
FK10 3RF

DECISION TYPE: **Application Refused**

REPORT OF HANDLING

PROPOSAL

The property to which this application relates is a top floor flat within a two and a half storey flatted building situated on the north side of, and at the western end of, New Street in Musselburgh. The flatted building is located within a predominantly residential area as defined by Policy RCA1 of the adopted East Lothian Local Development Plan 2018.

The flatted building is bounded to the north by a public car park with the Promenade and Fisherrow Sands beyond, to the east and west by neighbouring residential properties and to the south by a public car park.

Planning permission is retrospectively sought for the change of use of the residential top floor flat of Flat 6, 139 New Street, Musselburgh as a three bedroom unit of short term self-catering holiday let accommodation.

No alterations have been undertaken to the flat, either internally or externally, to facilitate the retrospective change of use.

Subsequent to the registration of this application the applicant's agent has confirmed in writing that (i) the flat has been marketed/used for short term lets since December 2019; (ii) the minimum length of stay is 3 days and the most common length of stay is between 5-10 days; (iii) the maximum number of visitors in one booking is 5 guests; (iv) recycling and/or bins are emptied every week by ELC waste management services and the flat is cleaned after each stay by a cleaning company; (v) the property is managed by a letting agency who oversee the day-to-day management of the property; (vi) there is a key box provided for guests to collect and drop off keys; (vi) there are 6 flats within the building (2 flats per floor) and that the applicant's flat, the subject of this retrospective planning application, is accessed via a shared front and rear entrance door, a shared hallway and a communal stairwell; and (vii) the flat benefits from an allocated private underground car parking space and that there are also 42 shared parking spaces for visitors outside the apartment complex.

DEVELOPMENT PLAN

Section 25 of the Town and Country Planning (Scotland) Act 1997 requires that the application be determined in accordance with the development plan, unless material considerations indicate otherwise.

The development plan is National Planning Framework 4 (NPF4) and the adopted East Lothian Local Development Plan 2018.

Policies 13 (Sustainable transport) and 30 (Tourism) of NPF4 are relevant to the determination of this application. Policies RCA1 (Residential Character and Amenity), T1 (Development Location and Accessibility) and T2 (General Transport Impact) of the adopted East Lothian Local Development Plan 2018 are relevant to the determination of this application.

REPRESENTATION

Five objections to this application have been received. The main grounds of objection are:

(i) there are a total of 6 flats within block 139 which all share a common entrance and stair;
(ii) it appears as though holiday lets which share communal entrance doors, hallways or stairs with other residential properties are prohibited in East Lothian and this applies to this property;
(iii) the holiday let has resulted in noise, nuisance, police incidents and anti-social behaviour in the internal common stair and within the car parking area which have been reported;
(iv) guests staying at the property press the wrong buzzers, and sometimes try to gain entry into the wrong flats, late at night and early morning;
(v) the applicant has been approached about the nuisance guests are causing by a neighbouring resident who claims that they were told they shouldn't live in a tenement building if they want peace and quiet;
(vi) when guests are asked to respect a residential stair they respond with 'we are here to party and are on holiday';
(vii) the flat has a balcony and music is occasionally played at night;
(viii) people are coming and going at all times of the day and night and concerns are raised relating to security as it is claimed that permanent residents do not know the strangers entering the building and using the stair;

(ix) some arrivals and departures of guests are at unsociable times and suitcases can be heard being trundled up and down the stairs, and outside on the tarmac, which disturbs sleeping residents;
(x) there is irregular comings and goings by strangers which causes distress and disturbance to the elderly residents in the building and which impacts upon their amenity;
(xi) the level of security, particularly within the stairwells of the building, is being compromised;
(xii) there has been a number of cleaners and maintenance people arriving and departing on a regular basis as a consequence of short term lets within the apartment complex; and
(xiii) guests have not been disposing rubbish correctly.

COMMUNITY COUNCIL COMMENTS

None.

PLANNING ASSESSMENT

This application seeks retrospective planning permission for the change of use of a three bedroom top floor flat to a three bedroom unit of holiday let accommodation. The holiday let comprises of three bedrooms (one of which has an en-suite), a bathroom and a large open plan living/kitchen area. The applicant's flat is capable of accommodating/sleeping 5 people.

The East Lothian Economic Development Strategy 2012-22 identifies tourism as one of the strengths of the East Lothian economy and a source of employment opportunities in the future and the adopted East Lothian Local Development Plan 2018 states that a range of hotel, guest house and other accommodation attracts visitors and encourages them to stay and benefit the economy of East Lothian. The adopted East Lothian Local Development Plan 2018 states that all leisure and tourism related development proposals, including visitor attractions, hotels and holiday accommodation, will be assessed against all relevant Local Development Plan policies.

The change of use of the residential flat to a holiday let provides holiday accommodation within Musselburgh that attracts visitors and encourages them to stay in East Lothian, which supports the existing long established business and benefits the wider economy of East Lothian.

The adopted East Lothian Local Development Plan 2018 does not contain a specific policy on the change of use of flats to holiday lets. However, part e) of Policy 30 (Tourism) of NPF4 states that:

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.

Policy RCA1 (Residential Character and Amenity) of the adopted East Lothian Local Development Plan 2018 states that the predominantly residential character and amenity of existing or proposed housing areas will be safeguarded from the adverse impacts of uses other than housing. Development incompatible with the residential character and amenity of an area will not be permitted.

In the determination of this application it is necessary to assess the impact of the change of use on the amenity of the existing residential properties contained within the residential flatted building to which the applicant's flat forms a part.

The Council's Senior Environmental Health Officer advises that whilst the normal use of a property would not result in loss of amenity to neighbours, the use of properties for short term holiday lets can result in future guests misusing and abusing the property in a manner that is antisocial and can result in a significant impact upon amenity of neighbours. However, it is stated that the Council's Environmental Health Service cannot assume that antisocial behaviour issues will arise and thus cannot impose any enforceable conditions to protect the amenity of neighbours.

The Council's Antisocial Behaviour Team advise that Fisherrow car park, which is nearby, is a locus of anti-social behaviour. However, they advise that there are no records of any incidents relating to any antisocial behaviour matters at this address and thus they raise no objection to this retrospective planning application.

Police Scotland advise that there have been no police incidents at this address (having checked their records from 2020 onwards) and thus they raise no objection to this retrospective planning application.

The Council's Road Services raise no objection to this retrospective application and note that the supporting statement submitted with this application confirms that no internal changes are proposed. They state that whilst there may be some increase in the number of vehicles during the peak tourist season compared to residential use, this increase is likely to even out throughout the year resulting in no noticeable difference in overall car parking demand. Accordingly, the proposals do not conflict with Policy 13 of NPF4 or with Policies T1 and T2 of the adopted East Lothian Local Development Plan 2018.

The applicant's property is a three bedroom flat located at third floor level within the three storey residential flatted building of 139 New Street which contains a total of 6 residential properties (2 flats per floor). The property the subject of this retrospective application shares a communal front and rear entrance door with five other residential properties within the flatted building and an internal communal stair with three other residential properties within the flatted building. The existing hallway serving the applicant's third floor flat also serves one other top floor flat within the building.

The use of the application property as a holiday let enables it to be let out for short stays resulting in a turnover of people over short time periods with a significant proportion of occupants likely to be visitors. Such a regular turnover of users/occupants would change the nature of comings and goings not only to the application property itself but also within the communal entrances, internal stair and hallway of the residential building. Most users/occupants of the holiday let would have a degree of luggage or other property to take through the communal entrances, stair and hallway which in itself would lead to a level of disturbance and nuisance not associated with the permanent/long term residential use of the property. This is harmful to the amenity of the occupants of the residential properties within the residential flatted building of 139 New Street, Musselburgh. It is accepted that permanent residents may also make noise but they tend to keep their luggage in their homes and do not move them with the same frequency as regularly changing guests who arrive and depart sometimes at unsociable hours, and this differs from typical residential circumstances.

Along with the extra comings and goings of users of the holiday let at check in/check out there is also an additional level of activity not only at the application property but also within the communal entrances, stair and hallway as a result of people regularly accessing both the main building of 139 New Street and the application property itself to service/clean it and remove waste and recycling material after each guests stay. This level of additional activity is evidently different to that expected with the permanent/long term use of the flat as a private residence again which is harmful to the amenity of the occupants of the residential properties within the residential flatted building of 139 New Street, Musselburgh.

Moreover, allowing frequently changing guests unfettered access to otherwise secure shared areas changes the actual and perceived level of security for the existing permanent residents. Whilst the permanent residents are likely to have visitors of their own from time to time, those permanent residents would remain in control of security to communal areas. The introduction of frequently changing guests regularly into these secure areas, independent of the owner, would therefore differ from typical residential circumstances.

Given the specific circumstances and location of the application property within the residential building of 139 New Street, Musselburgh which contains a number of permanent/long term residences and which shares a communal front and rear entrance, stair and hallway, the retrospective change of use of the applicant's third floor flat as a three bedroom unit of short term self-catering holiday let accommodation is incompatible with and harmful to the amenity of the occupiers of the residential properties within the residential building of 139 New Street, Musselburgh. By having an unacceptable impact on local amenity, the proposal is contrary to part e) of Policy 30 of NPF4 and with Policy RCA1 of the adopted East Lothian Local Development Plan 2018.

It is now necessary to assess the impact of the change of use on the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits as is stated in part e) of Policy 30 of NPF4.

The Council's Housing Strategy & Development Service state that the change in use of this property from a long term residential dwelling to a short term let is considered a significant loss because (i) Musselburgh is part of a constrained housing system and the housing need outstrips the supply; (ii) there is an existing concentration of short term lets within the area; and (iii) the property is not an established short term let. Accordingly, the Council's Housing Strategy & Development Service object to this retrospective planning application.

The Council's Economic Development Service Manager advises that there are demonstrable local economic benefits delivered by all types of short term holiday lets in East Lothian and that existing provision of this type of accommodation must be retained, protected and supported where there is no demonstrable impact on local amenity, the character of the area or loss of residential accommodation. In the particular circumstances of this case it is stated that (i) the property will provide high quality tourist accommodation attracting visitors to Musselburgh and the surrounding area providing economic benefit; (ii) there is a demonstrable economic benefit to having a wide range of accommodation types in East Lothian with the tourism sector contribution £155m to the local economy in 2021 and supporting 10% of the workforce; (iii) non-serviced accommodation (short term holiday lets) contributes positively to the local economy (£279m in 2019) and the applicant's flat accounts for 5 bedspaces and a potential annual economic impact of £113,635 and 2.5FTE jobs; (iv) there is an increasing number of overnight stays in East Lothian for work purposes (which is expected to increase over the next 10-15 years) such that the loss of short term accommodation is likely to have a significant negative impact on the local tourist economy in monetary and reputational terms. Therefore, the Council's Economic Development Service Manger supports this planning application stating that the change of use of the flat to short term holiday let accommodation supports the strategic goals and objectives of the Economic Development Strategy 2012-2022 and the intent and outcomes of part e) of Policy 30 of NPF4.

However the local economic benefits associated with the use of the applicant's flat operating as a three bedroom unit of short term self-catering holiday let accommodation does not outweigh the unacceptable impact on local amenity. Therefore, the change of use is not in accordance with the Development Plan and there are no material planning considerations that outweigh the fact that the change of use is not in accordance with the Development Plan.

The application property of Flat 6, 139 New Street, Musselburgh as a holiday let is unauthorised and a breach of planning control. Enforcement action will be taken to ensure the cessation of the holiday let use with the period for compliance with the enforcement notice being three months.

REASON FOR REFUSAL:

1 The holiday let use of the flatted property is incompatible with and harmful to the amenity of the occupants of other flatted properties used as residential dwellings within the residential building of 139 New Street and as such is contrary to part e) of Policy 30 of National Planning Framework 4 and Policy RCA1 of the adopted East Lothian Local Development Plan 2018.

LETTERS FROM

[redacted]

[redacted]

[redacted]

27th September 2023

App No. 23/00722/P

EAST LOTHIAN COUNCIL
DECISION NOTICE

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATIONS 2013

KLE Property Ltd
c/o Houghton Planning Ltd
Per Paul Houghton MRTPI
Alloa Business Centre
Whins Road
Alloa
Clacks
FK10 3RF

APPLICANT: KLE Property Ltd

With reference to your application registered on 21st August 2023 for planning permission under the above mentioned Acts and Regulations for the following development, viz:-

Change of use of flat to short term holiday let and flat (Retrospective)
at
Flat 6
139 New Street
Musselburgh
EH21 6DH

East Lothian Council as the Planning Authority in exercise of their powers under the above-mentioned Acts and Regulations hereby **REFUSE PLANNING PERMISSION** for the said development.

The reasons for the Council's refusal of planning permission are:-

1 The holiday let use of the flatted property is incompatible with and harmful to the amenity of the occupants of other flatted properties used as residential dwellings within the residential building of 139 New Street and as such is contrary to part e) of Policy 30 of National Planning Framework 4 and Policy RCA1 of the adopted East Lothian Local Development Plan 2018.

The report on this application is attached to this Decision Notice and its terms shall be deemed to be incorporated in full in this Decision Notice.

Details of the following are given in the application report:

- the terms on which the Planning Authority based this decision;

- details of any variations made to the application in terms of Section 32A of the Town and Country Planning (Scotland) Act 1997.

The plans to which this decision relate are as follows:

Drawing No.	Revision No.	Date Received
NS-MUSS-01	-	29.06.2023
DWG 01	-	23.08.2023

6th October 2023

[redacted]

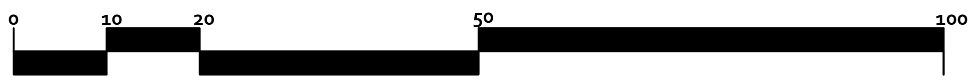
Keith Dingwall
Service Manager - Planning

NOTES

If the applicant is aggrieved by the decision to refuse permission for the proposed development, 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 from the date of this notice. The notice of review should be addressed to the Clerk to the Local Review Body, Committee Team, Communications and Democratic Services, John Muir House, Haddington, East Lothian EH41 3HA.

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 the 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 in accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

EAST LOTHIAN COUNCIL
Plan/Drawing listed on the Decision Notice of refusing a grant of planning permission 23/00722/P
06/10/2023



Legend

Site boundary

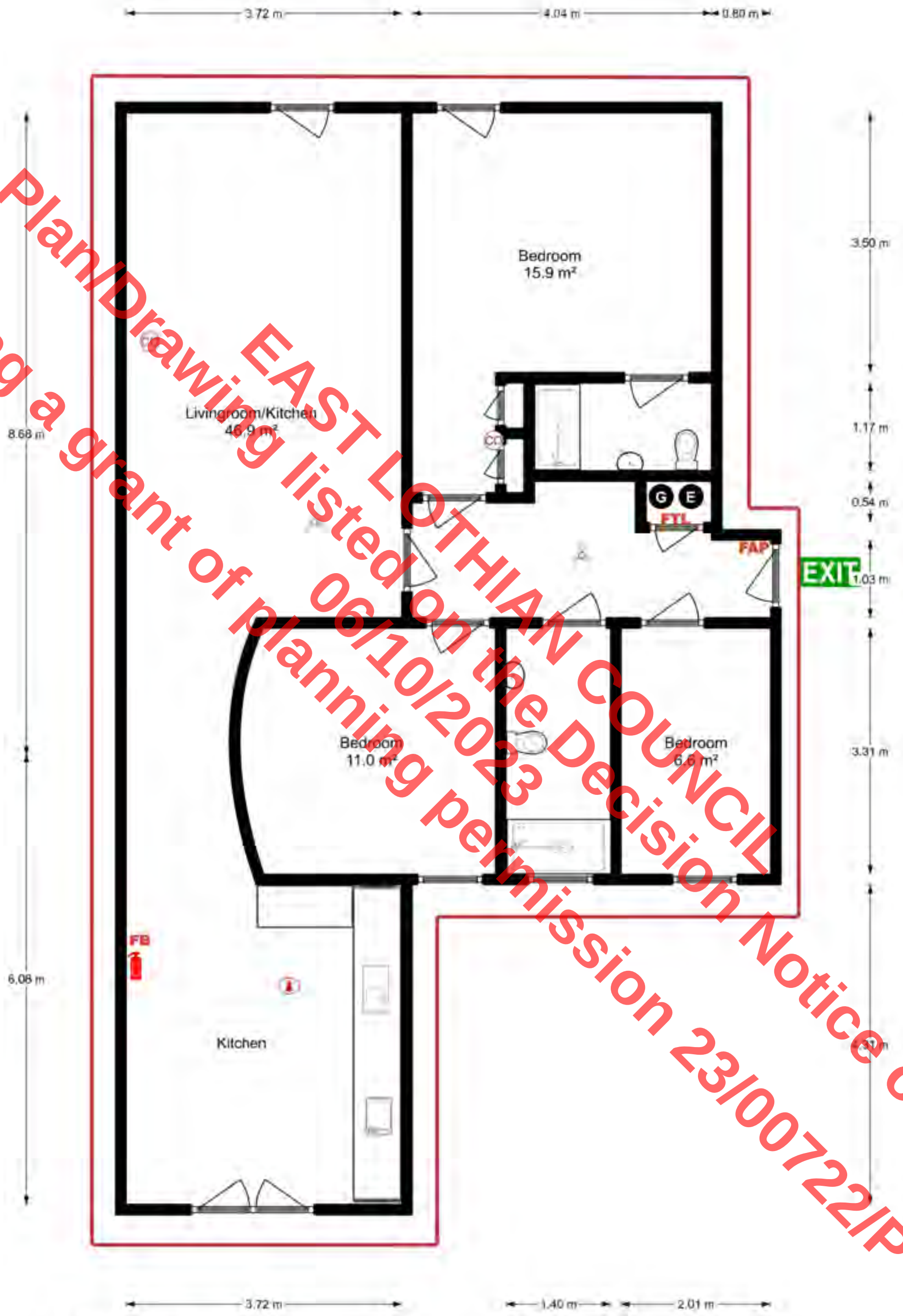
Project: 139 New Street, Musselburgh	Client: KLE Property Ltd
Drawing Title: Site Plan	
Scale: 1:1,250@ A3	Date: 28 / 06 / 2023
Drawing No: NS - MUSS - 01	Status: Planning
Drawn by: L Houghton	Checked by: P Houghton

t: 07780 117708 e: houghtonplanning.co.uk

HOUGHTON
PLANNING

139 F6 NEW STREET, MUSSELBURGH, EH21 6DH

Smoke detector		Max occupancy	5
Heat detector		Gas meter	G
Fire extinguisher		Electric meter	E
Carbon monoxide	CO	Fire escape	EXIT
Fire blanket	FB		
Emergency lights	EL		
Fire Action Plan	FAP		
Fire Test Log	FTL		



Certificate of Lawfulness
Application for short term let
Approx Gross internal area 95.8sm

LANDLORDS COMPLIANCE

0m 5m

THE INFORMATION PROVIDED HERIN IS BEING SUPPLIED IN GOOD FAITH BASED