

For consideration by Perth & Kinross Licensing Committee

Ref: Civic Government (Scotland) Act 1982. Application for Grant of a Short Term Let Licence – Flat 1, Westwood, Station Road, Birnam. PH8 0DS.

Your Ref: **FS-CASE-497070028.**

STL Licensing Committee Meeting date: 29th May, 2023.

Thank you for considering this submission relating to our application for a short-term-let licence for the subject referenced property.

We are a retired married couple living within Perth and Kinross who have holidayed and visited this area all our lives, enjoying its natural, historical, cultural opportunities and resources.

Our property is a 'C' listed one-bedroom flat occupying the whole ground floor of a three-storey flatted building. The flat has direct independent access via a private rear garden entrance door and is also serviced by a main front door that allows access to the ground floor communal hallway and the flat's front door. There is a private rear garden and a private parking space at the front of the property which allows one-step entrance to the property.

As evidenced by Historic Environment Scotland, we understand that many buildings in Station Road including ours were purpose-built for tourism and as such offer very little in the way of storage to facilitate permanent residential living:

'Probably built (1870) for let as lodgings for summer visitors as at Tower Buildings and Murthly Terrace'.

See: <https://portal.historicenvironment.scot/designation/LB11081>

We will use the property ourselves and, realising the continued importance of protecting and encouraging tourism as originally intended, we seek to offer high-quality, safe, legally compliant accommodation to visitors as a base to explore this fantastic area of Perth and Kinross.

'Westwood' is a 3 minute walk from the train station and 2 minute walk to the Inverness to Edinburgh bus stop and is across the street from the Birnam Arts Centre. The walking, cycling and fishing opportunities on our doorstep are such a draw for us and visitors alike.

We have fully complied with all STL mandatory requirements and prior to making this STL licence application we applied to Perth & Kinross Council and have been granted on 7th March 2023 both Planning Permission for change of use to STL (22/02069/FLL) and Listed Building Consent (22/02078/LBC).

We have enjoyed good communication during consultation with the Perth & Kinross Council Conservation Officer to ensure our flat has been repaired and renovated in

line with best practice and we will continue working with our neighbours to carry out necessary repairs and maintenance, playing an active part in upkeep and improvement of not just our property but the building itself so as to protect and preserve the building as part of the local and Scottish heritage.

In relation to the STL licensing process; we have complied with all the mandatory obligations including fire safety, gas safety, electrical safety, water safety – legionella as well as safety and repair standards. We have increased our insurance liability in line with STL requirements.

We have used, and will continue to use, local tradesmen to help with maintenance. If our application is successful, we intend to use a young, local professional management company who will oversee all aspects when the property is let to ensure professional standards, codes of conduct and compliance with 'good guest' procedures. We wish to continue to support the vitality and success of the community.

We understand from Visit Scotland that there is a dearth in the area of ground floor, small sized accommodation for guests with limited mobility or other limiting disabilities. We have endeavoured to give consideration to this - our flat has its private parking space directly outside, with one step to enter the property where the vestibule, communal hall and whole apartment is floored using a single, level run of nonslip flooring. Our toilet is a 'higher' seated loo, the shower is a low-rise walk-in shower with a removable shower stool. Throughout the property all electrical outlets have been elevated. If our application is successful we will continue our efforts to implement further aids and assistance.

We have tried to make our flat as sustainable as possible through energy efficient appliances, energy efficient light bulbs, weatherproofing, smart thermostats, using sustainable household essentials and low or non-toxic biodegradable products. If the application is successful, we will ensure clear recycling instructions, highlight public transport and recommend local businesses such as the post office for farmer's boxes and eggs and the community growing garden 'The Field' for its locally grown produce. We will continue implementing sustainable practices and encourage our guests to do so too.

We will keep up-to-date with changes in standards and legislation and would seek Visit Scotland accreditation.

We have been welcomed into the community by our friendly neighbours and use the local shops, cafés and facilities regularly and again we would actively promote services and encourage guests to do likewise.

With reference to the two letters of objection, both parties, who are not our neighbours but from the wider community, cover the same two points: insufficient housing stock due to growth in numbers of holiday accommodation and the fact that a local person is leaving their rented property and looking for an affordable long term rental property.

Neither petitioner appears to make a complaint pertaining to the grounds for licensing refusal, as per the Legal Position part of the Report to this committee by the Head of Legal and Governance Services.

As a former local authority Area Housing Manager I am aware, as you no doubt are too, that the serious question of housing provision in Scotland and indeed the nation, in the 21st century is challenging and multifaceted. Our housing problems include the level of demand, demographic changes, changes in household structures, housing stock levels not keeping a pace due to insufficient home building programmes, lack of infrastructure, and empty houses. In January 2023 there were 42,865 empty houses in Scotland (ASSC 2023, Association of Scotland's Self Caterers).

Likewise, many factors impact affordable housing and there are concerns about the number of private landlords leaving the sector due to rising costs / mortgage rates and the rate of return on investment proving unsustainable. Social providers and housing organisations face similar challenges.

Government, local authorities and social enterprises are considering how best to address these difficult and emotive situations via strategies, policies and legislation whilst balancing the needs and pressures of the economy in the modern world and especially during this extended cost of living crisis.

The Scottish Government has introduced, via various Housing (Scotland) Acts, protection for private residential tenants and limits the grounds on which eviction orders can be acted on, in fact there is a current moratorium on evictions for all but a few reasons. Likewise, there are restrictions on rent increases and there are also proposals for rent control areas. Therefore tenants 'having to leave' properties is also a complex and emotive subject.

These discussions need to have an evidence-based approach and not be based on anecdotal comments - it is more complex than it all being the fault of holiday properties.

The ASSC states the self-catering industry delivers multiple benefits for local communities 'providing a £867 million annual boost to the Scottish economy, generating 2.4 million visitor nights and supporting 23,979 jobs'. (ASSC 2023). The area of Birnam and Dunkeld is strongly reliant for its economic viability on tourism and its associated revenue streams.

Our small accommodation property, as detailed by Historic Environment Scotland, was constructed for holiday visitor use and it is perfect for purpose as it was intended - as a place for people to visit and enjoy whilst also contributing to the local community and local economy.

We hope you will give positive consideration to our application and we thank you for your time reading this submission.

Thank you.

Susan & Alistair Malcolm.

Civic Licensing

From: Civic Licensing
Sent: 22 May 2023 11:17
To: Civic Licensing
Subject: FW: Short Term Let License Application - Flat 1, Westwood, Station Road, Birnam, Dunkeld, PH8 0DS
Attachments: Senior Market .pptx

From: Marina DiDuca [REDACTED]
Sent: Monday, May 15, 2023 6:11 PM
To: Malcolm Family [REDACTED]
Subject: RE: Flat 1, Westwood, Station Road, Birnam. - Photos.

Hi Alistair,

Thank you for sharing images of your property with me. Although the property would not be suitable for full-time wheelchair users as your door would need to be a minimum 800 mm, **I can see that you are looking to make the property more accessible for people with limited mobility and properties who cater for this market are definitely in demand.**

I have forwarded on some statistics which should help with you with your licensing application.

Please do keep in touch and let me know how things progress.

Best regards
Marina

Marina Di Duca
Inclusive Tourism Manager
VisitScotland
Mobile: [REDACTED]

VALUE OF THE seniors market

In Scotland, 55 years old and over :

- 36% of domestic trips & spend are from the over 55's (4.3 million trips and £1 billion)
- 30% of international visitors are over 55 (1.2 million)
- Spend 20% more than average consumer on leisure and hospitality
- In the last 12 years, 21% increase in domestic trips & spend up by 45%

“86% of seniors will make a return visit compared with 18-34 year olds” (Source: Barclay’s Ageing Population Report)



DISABLED VISITORS, FRIENDS & FAMILY

- £249 billion annual spending
- 1/5 people are disabled
- 70% of disabilities are invisible
- 8% wheelchair users
- 1 in 3 people over 60 have hearing loss

“75% of disabled people have deserted a business because of poor disability awareness or understanding”



3 reasons to engage with this market



Growth potential

(The market is set to increase as the UK's population ages. The benefits for businesses and destinations catering for inclusive tourism are also growing)



Loyal, repeat customers

(Inclusive businesses have higher occupancy rates. 86% of this market will make a return visit, more loyal compared with 18-34 years)



Spend more

(disabled and senior travellers spend significantly more on holiday than other groups)