

LRB-2023-54

23/01311/FLL – Change of use of flat to form short-term let accommodation unit, 4 Kirk View Apartments, Bonnethill Road, Pitlochry, PH16 5FP

REPRESENTATIONS

Comments to the Development Quality Manager on a Planning Application

Planning Application ref.	23/01311/FLL	Comments provided by	Stephanie Durning
Service/Section	Housing Strategy	Contact Details	Planning and Policy Officer [REDACTED]
Description of Proposal	Change of use of flat to form a short-term let accommodation unit (in retrospect).		
Address of site	4 Kirk View Apartments Bonnethill Road, Pitlochry, PH16 5FP		
Comments on the proposal	<p>The proposal is for the change of use from residential flatted dwelling to short-term let accommodation in an area with a mix of residential and accommodation businesses in Pitlochry.</p> <p>Relevant NPF4 Policy 30: states that <i>Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:</i></p> <ul style="list-style-type: none"> i. <i>An unacceptable impact on local amenity or the character of a neighbourhood or area; or</i> ii. <i>The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits</i> <p>The Local Housing Strategy 2022-27 includes an action to develop planning policy through the Local Development Plan 3 where appropriate for STL Control Areas. The postcode district level of saturation of potential short-term lets for PH16 is 12.0% and above the level at which it may be considered appropriate to introduce a control area in order to help manage high concentrations of Short-Term Lets where it affects the availability of residential housing or the character of a neighbourhood.</p>		
Recommended planning condition(s)			
Recommended informative(s) for applicant			
Date comments returned	30.08.2023		

Memorandum

To Development Management & Building
Standards Service Manager

From Regulatory Services Manager

Your ref 23/01311/FLL

Our ref DAT

Date 11 September 2023

Tel No 01738 476481

Communities

Pullar House, 35 Kinnoull Street, Perth PH1 5GD

Consultation on an Application for Planning Permission

23/01311/FLL RE: Change of use of flat to form short term let accommodation unit 4 Kirk View Apartments Bonnethill Road Pitlochry PH16 5FP

I refer to your letter dated 05 September 2023 in connection with the above application and have the following comments to make.

Environmental Health

Recommendation

I have no objections to the application but recommend the undernoted informative be included in any given consent.

Comments

This application is for the change of use of a first-floor flatted dwelling at 4 Kirk View Apartments, Bonnethill Road, Pitlochry into a short term let accommodation unit.

Holiday Accommodation

As the development is for a holiday accommodation unit, there is the potential for noise from the users of the properties to affect neighbouring residential properties, however due to the introduction of Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022, these will be required to be licensed and noise conditions will form part of the licence.

Therefore, whilst I have no objections to the application, I would recommend the following informative be attached to any given consent.

Informative

Short Term Let

The applicant is advised that under The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022, a licence is required to operate a short-term let. More information can be found at <https://www.pkc.gov.uk/shorttermlets>



Dr Colin Walls (Objects)

Comment submitted date: Fri 15 Sep 2023

Background:

Kirk View Apartments consists of five flats. When these were first put on the market, each was priced at a level which could be classed as "affordable", and should therefore have increased the housing stock for those who wished to live and work in the town. However, only one of the flats is permanently lived in. The other four flats were purchased as "holiday homes" and are now used very infrequently, the majority of the time the flats are empty.

Flat 4 is currently offered on Airbnb, which is always extremely short-term letting.

Objection

We object to this planning application in the strongest terms, because it provides no benefit to the town, and will actually be detrimental. We give our reasons for this in the following section

Impact on the Town

The town is currently short of staff in a number of key areas. This is not restricted to retail and hospitality, but also includes such vital areas as the medical centre, community hospital, pharmacies, the high school and theatre.

At least part of these staffing issues is due to the scarcity and high cost of rental accommodation in the town. While those with cars can find accommodation outside the town, those who are reliant on public transport may not have this option, or may be restricted in the hours that they can work because of the public transport timetables.

The application does not provide any redress for the above problem, in actuality it exacerbates it, since it brings more visitors into the town without providing accommodation for those who either do work here, or would like to work here.

Penalising potential employers by restricting the availability of accommodation does nothing for the prosperity of the town, especially as these employers would provide skills development for the workforce in general and for younger people in particular.

Data from other areas within the UK would indicate that short-term lets do little for local prosperity, firstly because those who take up such accommodation tend to bring what they need with them, rather than spending in the area and its surroundings. Secondly, there is a further reduction to income in the area if the rental properties are not locally owned. This planning application is being made by a company based in England.

The short-term lets will be seasonal in nature, and will provide no income for the town out of season.

Such short-term letting adds nothing to the prosperity of the town. What is required is long-term letting, preferably for a minimum term that covers the tourist season.

