

LRB-2023-46

23/01362/FLL – Change of use of flat to form short-term let accommodation unit (in retrospect) at 2 Jubilee Place, Pitlochry, PH16 5GA

PLANNING DECISION NOTICE

REPORT OF HANDLING

REFERENCE DOCUMENTS (part included in applicant's submission, pages 161-163)



Mr and Mrs Ian Lewis c/o Ian Lewis Design Ian Lewis 2 St Colmans Moulin Pitlochry PH16 5HF

Pullar House 35 Kinnoull Street PERTH PH1 5GD

Date of Notice: 17th October 2023

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT

Application Reference: 23/01362/FLL

I am directed by the Planning Authority under the Town and Country Planning (Scotland) Acts currently in force, to refuse your application registered on 21st August 2023 for Planning Permission for Change of use of flat to form short-term let accommodation unit (in retrospect) at 2 Jubilee Place Pitlochry PH16 5GA

David Littlejohn Head of Planning and Development

Reasons for Refusal

- 1 The proposed retrospective change of use is contrary to Policy 30, Tourism e) of National Planning Framework 4 (2023) as the proposal will result in:
 - i) An unacceptable impact on local amenity and character of the area, and
 - ii) The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits.
- 2 The proposal is contrary to National Planning Framework 4 (2023) Policy 14c): Design, Quality and Place and Perth and Kinross Local Development Plan 2 (2019), Policies 1A and 1B: Placemaking and Policy 17 d) Residential Areas as the short-term let accommodation would adversely impact on the amenity of residents of the flats and the short-term let use is not compatible with the amenity and character of the existing private, quiet, enclosed residential development.

Justification

The proposal is not in accordance with the Development Plan and there are no material reasons which justify departing from the Development Plan.

Infomatives

1 The applicant is advised that the use of the property as a short term let should cease immediately to avoid formal enforcement action being considered.

The plans and documents relating to this decision are listed below and are displayed on Perth and Kinross Council's website at www.pkc.gov.uk "Online Planning Applications" page.

REPORT OF HANDLING

DELEGATED REPORT

Ref No	23/01362/FLL	
Ward No	P4- Highland	
Due Determination Date	20th October 2023	
Draft Report Date	17th October 2023	
Report Issued by	JF	Date 17.10.23

PROPOSAL: Change of use of flat to form short-term let

accommodation unit (in retrospect)

LOCATION: 2 Jubilee Place Pitlochry PH16 5GA

SUMMARY:

This report recommends **refusal** of the application as the development is considered to be contrary to the relevant provisions of the Development Plan and there are no material considerations apparent which justify setting aside the Development Plan.

BACKGROUND AND DESCRIPTION OF PROPOSAL

The application is for a change of use of a flat to short term let accommodation. The flat is located within a residential area of Pitlochry built circa 2015 forming part of the redevelopment of the former curling rink. The wider site comprises of 22 flats which are a mix of affordable and private ownership.

The property is a first floor flat and comprises two bedrooms, one en-suite, bathroom, sitting room and kitchen. It has its own direct access to the street and a parking space.

The application form states the property has been used as an STL since 2015. The application site has been visited so that an assessment of the wider character of the area could be made.

SITE HISTORY

09/00585/FUL Erection of 29 flats 22 July 2009 Application Withdrawn

09/01280/FLL Erection of 22 flats (revision to block 3/4) 15 April 2011 Application Approved

PRE-APPLICATION CONSULTATION

Pre application Reference: N/A

DEVELOPMENT PLAN

The Development Plan for the area comprises National Planning Framework 4 (NPF4) and the Perth and Kinross Local Development Plan 2 (2019) (LDP2).

National Planning Framework 4

The National Planning Framework 4 (NPF4) is the Scottish Government's long-term spatial strategy with a comprehensive set of national planning policies. This strategy sets out how to improve people's lives by making sustainable, liveable and productive spaces.

NPF4 was adopted on 13 February 2023. NPF4 has an increased status over previous NPFs and comprises part of the statutory development plan.

The Council's assessment of this application has considered the following policies of NPF4:

Policy 14: Design, Quality and Place

Policy 30: Tourism

Perth and Kinross Local Development Plan 2 – Adopted November 2019

The Local Development Plan 2 (LDP2) is the most recent statement of Council policy and is augmented by Supplementary Guidance.

The principal policies are:

Policy 1A: Placemaking
Policy 1B: Placemaking
Policy 17: Residential Areas

Policy 60B: Transport Standards and Accessibility Requirements: New Development

Proposals

Statutory Supplementary Guidance

• Supplementary Guidance - Placemaking (adopted in 2020)

OTHER POLICIES

Non Statutory Guidance

Draft Planning Guidance Proposed Short-Term Let Control Area (Consultation ended 18th August 2023)

NATIONAL GUIDANCE

The Scottish Government expresses its planning policies through The National Planning Framework, Planning Advice Notes, Creating Places, Designing Streets, National Roads Development Guide and a series of Circulars.

CONSULTATION RESPONSES

Communities Housing Strategy Saturation levels of STLs highlighted

Environmental Health (Noise Odour) No objection

REPRESENTATIONS

No representations were received

Additional Statements Received:

Screening Opinion	EIA Not Required
Environmental Impact Assessment (EIA): Environmental Report	Not applicable
Appropriate Assessment under Habitats Regulations	Habitats Regulations AA Not Required
Design Statement or Design and Access Statement	Submitted
Report on Impact or Potential Impact eg Flood Risk Assessment	Not Required

APPRAISAL

Sections 25 and 37 (2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan comprises NPF4 and the Perth and Kinross Local Development Plan 2019. The relevant policy considerations are outlined in the policy section above and are considered in more detail below. In terms of other material considerations, involving considerations of the Council's other approved policies and supplementary guidance, these are discussed below only where relevant.

The determining issues in this case are whether; the proposal complies with development plan policy; or if there are any other material considerations which justify a departure from policy.

Policy Appraisal

The proposal seeks to change the use of an existing flat in Pitlochry settlement to a short term let.

The primary policy in this instance is NPF4 Policy 30(e): Tourism, as there is no specific LDP2 policies relating to Short-Term Let accommodation, particularly where changes of use of existing properties are concerned.

Placemaking considerations (policies 1A and 1B) are relevant in so far as they seek to guide development to the right location to avoid adverse impacts.

NPF4 Policy 30(e): Tourism 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.

Consultees have advised that the application site is situated within a postcode district (PH16), which has a higher-than-average provision of short term lets, which is at a level at which it may be considered appropriate to introduce a control area, in order to help manage high concentrations of STLs where it affects the availability of residential housing or the character of a neighbourhood.

Draft planning guidance on short term lets has recently been produced due to concerns expressed over the impact of STL's on services, local business staffing and expansion as well as housing affordability. The consultative draft acknowledges that while short-term lets can bring economic benefits to the host and local areas, this must be balanced against the impact the loss of that residential property has on the availability of housing for local people, and in particular access to affordable housing.

In respect of criterion (i) of NPF4 Policy 30(e), the proposed use of the property as a short term let would not be significantly different from a flat in terms of its physical appearance, the extent of guest footfall or noise emanating from the property, so long as good management practices are in place.

However, the expected high turnover of guests has the potential to increase disturbance to neighbouring residents. In addition, the proposal would contribute to a cumulative adverse impact on the residential character of the flatted development with communal/shared areas of a central parking courtyard.

In respect of criterion (ii) of NPF4 Policy 30(e), the proposal would result in the loss of a flat to short term let accommodation in the PH16 postcode area which is already subject to a proliferation of holiday accommodation. This in turn would adversely impact the availability of residential accommodation locally. There are undoubtedly economic benefits associated with the proposal, not least to the applicants themselves and to local businesses who benefit from the custom of guests, but these do not necessarily outweigh the loss of residential accommodation in this instance.

The proposal therefore conflicts with NPF4 Policy 30(e) Tourism, and the intent of LDP2 Policy 1A: Placemaking. The principle is therefore unacceptable.

Residential Amenity

NPF4 Policy 14 Design, Quality and Place and LDP2 Placemaking Policies 1A and 1B and Policy 17: Residential Areas support proposals which are compatible with the amenity and character of the surrounding area.

The flat forms the southwest block of the wider flatted development forming a courtyard of 22 flats. The arrangement of the buildings provides for a quiet, private, enclosed development with a central parking area.

Through the use of the flat as a short term let there is the potential for noise from the users of the properties to affect neighbouring residential properties. The introduction of Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022 requires these to be licensed and noise conditions will form part of the licence.

The use of the property as a short-term let is considered to be incompatible with the character of the residential flatted development. The intensification of use and movements would adversely impact the amenity of neighbouring residents and would alter the existing private, quiet, residential character of the courtyard.

As the proposal would not be compatible with the amenity and character of the surrounding area, it also fails to satisfy national and local placemaking policies (NPF4 Policy 14 and LDP2 Policies 1A and 1B) as well as LDP2 Policy 17 Residential Areas.

Roads and Access

One parking space is allocated to the 2-bedroom property. It would not be inconceivable for more than one car to be used by guests. As the principle of development is not supported it has not been investigated what other parking would be available in the locale.

Other Material Considerations - Proposed Short-Term Let Control Area and Draft Planning Guidance

This document is a material consideration for this planning application. The draft document was approved by elected members for consultation on 31 May 2023. The public consultation started on 2 June 2023 and closed on 18 August 2023. The document notes that the planning guidance (draft) will be used to assess planning applications. It should be highlighted that the planning guidance is in draft form, and as a result of the consultation process its contents may change.

The guidance states that the benefits offered from short term lets must be balanced against the impact the loss of that residential property has on the availability of housing for local people, and in particular access to affordable housing.

At this stage little weight is given to this guidance but the recommendation in this case does not raise any issues.

Developer Contributions

The Developer Contributions Guidance is not applicable to this application and therefore no contributions are required in this instance.

Economic Impact

The economic impact of the proposal is likely to be small scale related to local spending.

VARIATION OF APPLICATION UNDER SECTION 32A

This application was not varied prior to determination.

PLANNING OBLIGATIONS AND LEGAL AGREEMENTS

None required.

DIRECTION BY SCOTTISH MINISTERS

None applicable to this proposal.

CONCLUSION AND REASONS FOR DECISION

To conclude, the application must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this respect, the proposal is considered to be contrary to the Development Plan. Account has been taken of the relevant material considerations and none has been found that would justify overriding the Development Plan.

Accordingly the proposal is refused on the grounds identified below.

Conditions and Reasons

- 1 The proposed retrospective change of use is contrary to Policy 30, Tourism e) of National Planning Framework 4 (2023) as the proposal will result in:
- i) An unacceptable impact on local amenity and character of the area, and
- ii) The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits.
- The proposal is contrary to National Planning Framework 4 (2023) Policy 14c): Design, Quality and Place and Perth and Kinross Local Development Plan 2 (2019), Policies 1A and 1B: Placemaking and Policy 17 d) Residential Areas as the short-term let accommodation would adversely impact on the amenity of residents of the flats and the short-term let use is not compatible with the amenity and character of the existing private, quiet, enclosed residential development.

Justification

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Informatives

The applicant is advised that the use of the property as a short term let should cease immediately to avoid formal enforcement action being considered.

Procedural Notes

Not Applicable.

PLANS AND DOCUMENTS RELATING TO THIS DECISION

01

02

03

04



Pullar House 35 Kinnoull Street Perth PH1 5GD Tel: 01738 475300 Fax: 01738 475310 Email: onlineapps@pkc.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

100638001-001

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 from Residential to Short Term Letting [note: property is and has been used for STL since 2015] No structural alterations involved.		
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		
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:	Ian Lewis Design			
Ref. Number:		You must enter a Bo	uilding Name or Number, or both: *	
First Name: *	lan	Building Name:		
Last Name: *	Lewis	Building Number:	2	
Telephone Number: *		Address 1 (Street): *	St Colmans	
Extension Number:		Address 2:	Moulin	
Mobile Number:		Town/City: *	Pitlochry	
Fax Number:		Country: *	UK	
		Postcode: *	PH16 5HF	
Email Address: *				
Is the applicant an individ	lual or an organisation/corporate entity? *			
Applicant Det	ails			
Please enter Applicant de				
Title:	Other	You must enter a Bo	uilding Name or Number, or both: *	
Other Title:	Mr and Mrs	Building Name:		
First Name: *	lan	Building Number:		
Last Name: *	Lewis	Address 1 (Street): *		
Company/Organisation	IR and A Lewis	Address 2:		
Telephone Number: *		Town/City: *		
Extension Number:		Country: *		
Mobile Number:		Postcode: *		
Fax Number:				
Email Address: *				

Site Address Details				
Planning Authority:	Perth and Kinross Council			
Full postal address of the	site (including postcode where available	е):	_	
Address 1:	2 JUBILEE PLACE			
Address 2:				
Address 3:				
Address 4:				
Address 5:				
Town/City/Settlement:	PITLOCHRY			
Post Code:	PH16 5GA			
Please identify/describe th	ne location of the site or sites			
_		·		
Northing	758161	Easting	294245	
Pre-Application	on Discussion			
Have you discussed your	proposal with the planning authority? *		X Yes □ No	
Pre-Application	on Discussion Details	Cont.		
In what format was the fee	edback given? *			
☐ Meeting ☒ T	elephone	Email		
Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) * (max 500 characters)				
Consulted David Rennie who clarified Planning situation surrounding STLs				
Title:		Other title:		
First Name:		Last Name:		
Correspondence Reference Number:	ce	Date (dd/mm/yyyy):		
	eement involves setting out the key stag d from whom and setting timescales for			

		_		
Site Area				
Please state the site area: 80.00				
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)				
Self-catering holiday accommodation with occasional use by ownere				
Access and Parking		_		
Are you proposing a new altered vehicle access to or from a public road? * If Yes please describe and show on your drawings the position of any existing. Altered or ryou propose to make. You should also show existing footpaths and note if there will be any				
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 appli Site?	lication 1			
How many vehicle parking spaces (garaging and open parking) do you propose on the site Total of existing and any new spaces or a reduced number of spaces)? *	e (i.e. the			
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 I	legislation.			
Are you proposing to connect to the public water supply network? *				
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? *	es 🗵 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? *	es No Don't Know		
Trees			
Are there any trees on or adjacent to the application site? *	Yes X No		
If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the any are to be cut back or felled.	proposal site and indicate if		
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)			
Existing waste bin areas on site to be retained and used.			
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		
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 *	es 🗵 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 notes before contacting your planning authority.	he Help Text and Guidance		
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 X No		

Certificat	es and Notices			
CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013				
	nust be completed and submitted along with the application form. This is most usually Certificate C or Certificate E.	ite A, Form 1,		
Are you/the appli	cant the sole owner of ALL the land? *	Yes No		
Is any of the land	part of an agricultural holding? *	☐ Yes ☒ No		
Are you able to id	dentify and give appropriate notice to ALL the other owners?*	X Yes ☐ No		
Certificat	e Required			
The following Lar	nd Ownership Certificate is required to complete this section of the proposal:			
Certificate B				
Land Ow	nership Certificate			
Certificate and No Regulations 2013	otice under Regulation 15 of the Town and Country Planning (Development Management Prod 3	cedure) (Scotland)		
I hereby certify th	at			
	ther than myself/the applicant was an owner [Note 4] of any part of the land to which the appli period of 21 days ending with the date of the accompanying application;	cation relates at the		
or –				
	applicant has served notice on every person other than myself/the applicant who, at the beginn the date of the accompanying application was owner [Note 4] of any part of the land to which	7 P. C.		
Name:	Mr and Mrs Brian Quail			
Address:	2, Jubilee Place, Pitlochry, Scotland, PH16 5GA			
Date of Service of	of Notice: * 07/08/2023			

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;
or –
(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:
Name:
Address:
Date of Service of Notice: *
Signed: Ian Lewis
On behalf of: Mr and Mrs Ian Lewis
Date: 07/08/2023
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 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 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

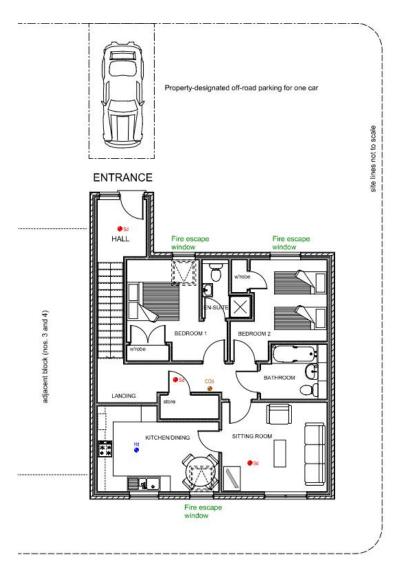
Town and Country Planning (Scotland) Act 1997			
The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013			
d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments 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 (su to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Desi Statement? * Yes No No Not applicable to this application	ubject ign		
f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provid ICNIRP Declaration? * Yes No Not applicable to this application	ded an		
g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specific conditions or an application for mineral development, have you provided any other plans or drawings as necessary:	d in		
☒ 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. *			
A Design Statement or Design and Access Statement. *			
A Flood Risk Assessment. *			
A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). *			
Drainage/SUDS layout. *			
A Transport Assessment or Travel Plan			
Contaminated Land Assessment. *			
Habitat Survey. * ☐ Yes ☒ N/A			
A Processing Agreement. *	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 Ian Lewis

Declaration Date: 09/08/2023





Floor plan

Scale 1:100/A3

Car parking area owned by applicant shown as red shaded area Smoke detector To comply with BS EN1 4604:2005

Block/location plan

Ian Lewis design

Scale 1:1000/A3

2 St Colmans, Moulin, Pitlochry, PH16 5HF tel: 01796 482722 e-mail: irl@pooldesign.co.uk

Self-catering flat

2 Jubilee Place, Pitlochry, PH16 5GA

IR & A Lewis

Floor plan and block/location plan

Drawing no: as shown 2JP 01

Carbon monoxide detector To comply with BS EN 50291-1 Note: all smoke and heat detectors powered by internal

lithium-ion batteries having a guaranteed lifespan of ten years and fully interlinked by RF

Expiry date of detectors2032

To comply with BS 5446-2:2003

Heat detector

JUBILEE PLACE

Issue B 17.08.23 Modified site outline to include car parking space and direct access to Jubilee Pace