

## **Planning Officer comments**

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

Since the original refusal decision was made, Non-statutory Planning Guidance for the Change of Use of Residential Property to Short-Term Let (STL Guidance) has been produced due to concerns expressed over the impact of STLs on services, local business staffing and expansion, as well as housing affordability. The STL Guidance was formally adopted by the Council on 1 November 2023 following consultation during Summer 2023.

The STL Guidance 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, affordable housing in particular, and the potential for adverse impacts on residential amenity where an increased proportion of the housing stock becomes short-term lets.

Six considerations have been outlined within the STL Guidance to assist in the application of the policy framework set out in NPF4. The considerations include location, larger residential properties, refurbishment of long-term empty properties, local amenity and character, business diversification, and the relationship between loss of residential accommodation and local economic benefits. The location consideration contains reference to three area types: city and town centres; mixed-use areas within settlements; and predominantly residential areas.

The adopted STL Guidance forms the most up-to-date indication of Council policy intent on the matter, and as such is a material consideration in addition to other policy factors and supplementary guidance in the assessment of the proposals.

In this instance, the application site is within an area zoned for residential and compatible uses. The application site also lies within a wider flatted development served by a communal courtyard carpark with wider areas of shared amenity space. The wider development is part social housing with the remaining flats originally offered for first sale at an affordable rate (this requirement did not remain for subsequent sales). The effect of the proposal on local amenity and character of this area should therefore be considered, in addition to the loss of residential accommodation and local economic benefits which may accrue from the proposal. In this case the benefits of providing holiday accommodation are not seen to outweigh the impacts on the residential character of the area and the loss of affordable housing.

The consideration of this proposal did acknowledge and address the STL Guidance. If this proposal been considered after the guidance was adopted in November 2023, the recommendation would not have changed and the proposal would have been recommended for refusal for the same reasons.

## **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.
- 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, Policy 17 d) Residential Areas and the Change of Use of Residential Property to Short-term Let Planning Guidance 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 residential development.

Kind regards,

**Joanne Ferguson**  
**Planning Officer**