

[REDACTED]

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3. Economic benefits/ loss of residential accommodation:

NPF4 Policy 30 (e) does not support proposals for the reuse of existing buildings for short term holiday letting where it will result in the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits. In most recent Edinburgh STL cases reference is made to the declared Housing emergency. This has not been raised in all cases, however, many reporters, by virtue of their STL case work experience, will be aware of that declaration. It should be noted that The Highland Council has also declared a Housing Challenge. While there is no definition of demonstrable economic benefits, the recent approach taken in STL PPA cases is that it is wider than a comparison of financial benefits. Policy 30 (e)(ii) aims to ensure that community, environmental and business considerations are fully taken into account. It requires the economic benefits of short-term letting be weighed not only against the economic benefits of continued residential use, but against the loss of residential accommodation more generally. The placemaking and sustainable development benefits of having sufficient housing to meets housing needs and demands, is an important consideration, particularly where the council has declared a housing emergency or challenge. Also relevant are the less tangible benefits of normal residential use, such as community cohesion. In most cases to date, the assessment of financial benefits is lacking in detailed analysis and is an estimate of potential outcomes. Evidence in relation to wider community and societal benefits from normal residential use has been absent or has taken the form of limited assertions. Reporters should consider carefully whether the Biggar Economics report (either the Edinburgh-wide version or one prepared for a specific property, as we often now see) can actually be given much weight in so far as the narrow economic point it tries to argues and given that it appears to also ignore the displacement of guests from hotels, hostels and out of term university accommodation into STL accommodation, meaning the net economic effect may be less positive than suggested.

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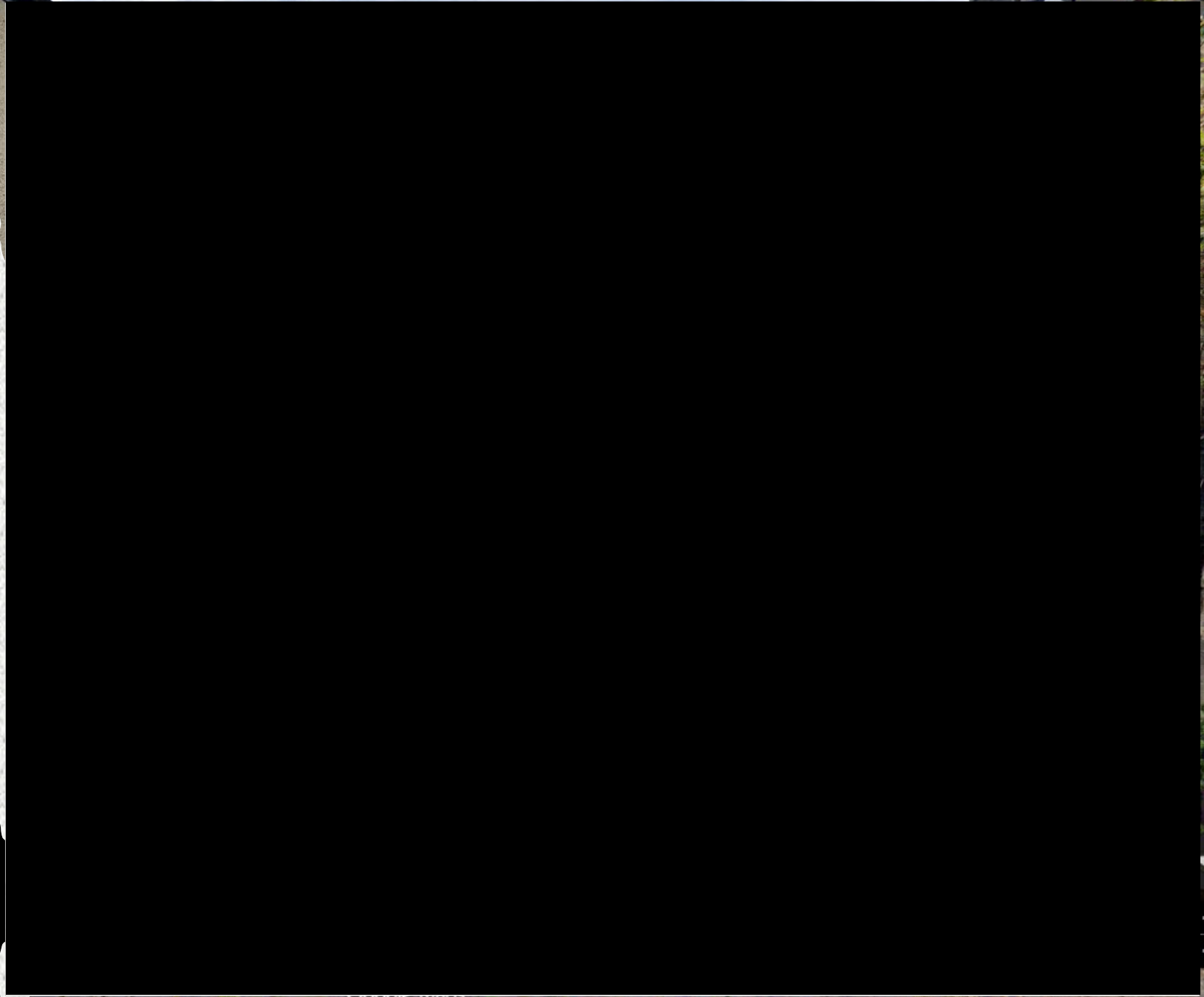
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NPF4 Policy 30 e)

“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.”

Nb This only applies where there is found to be a loss of residential accommodation, which will not always be the case.

- Need for consistent approach to policy assessment.



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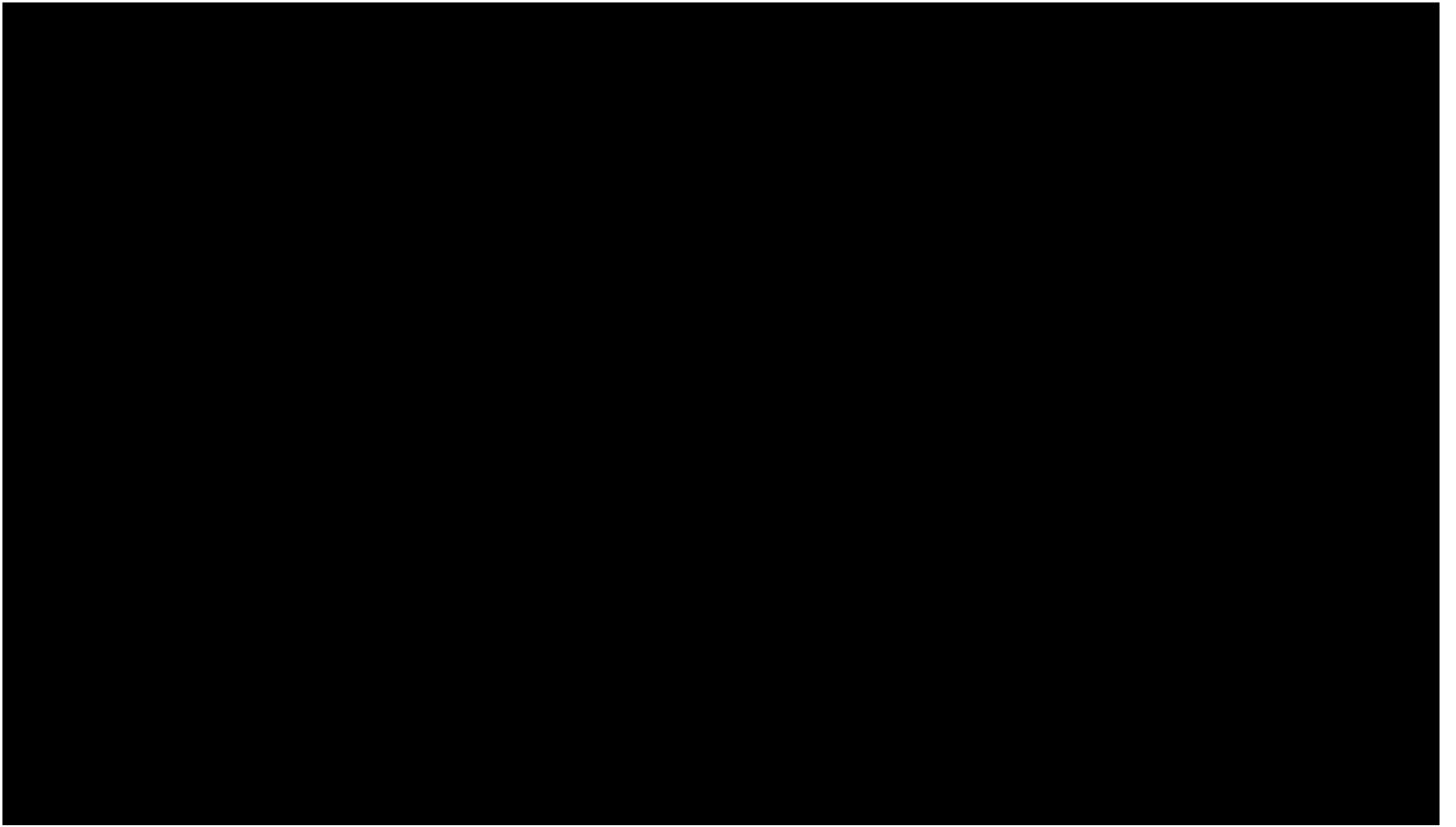


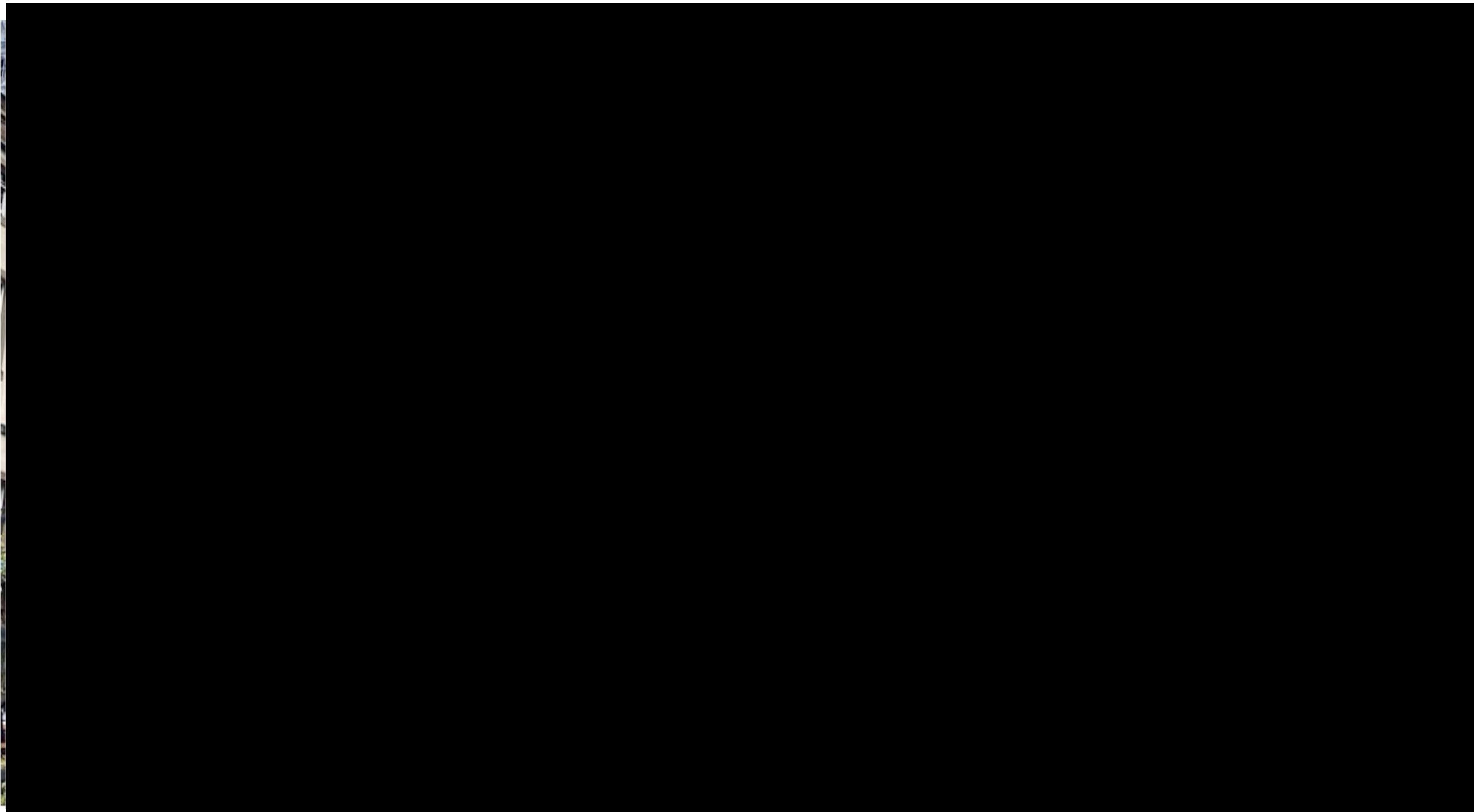
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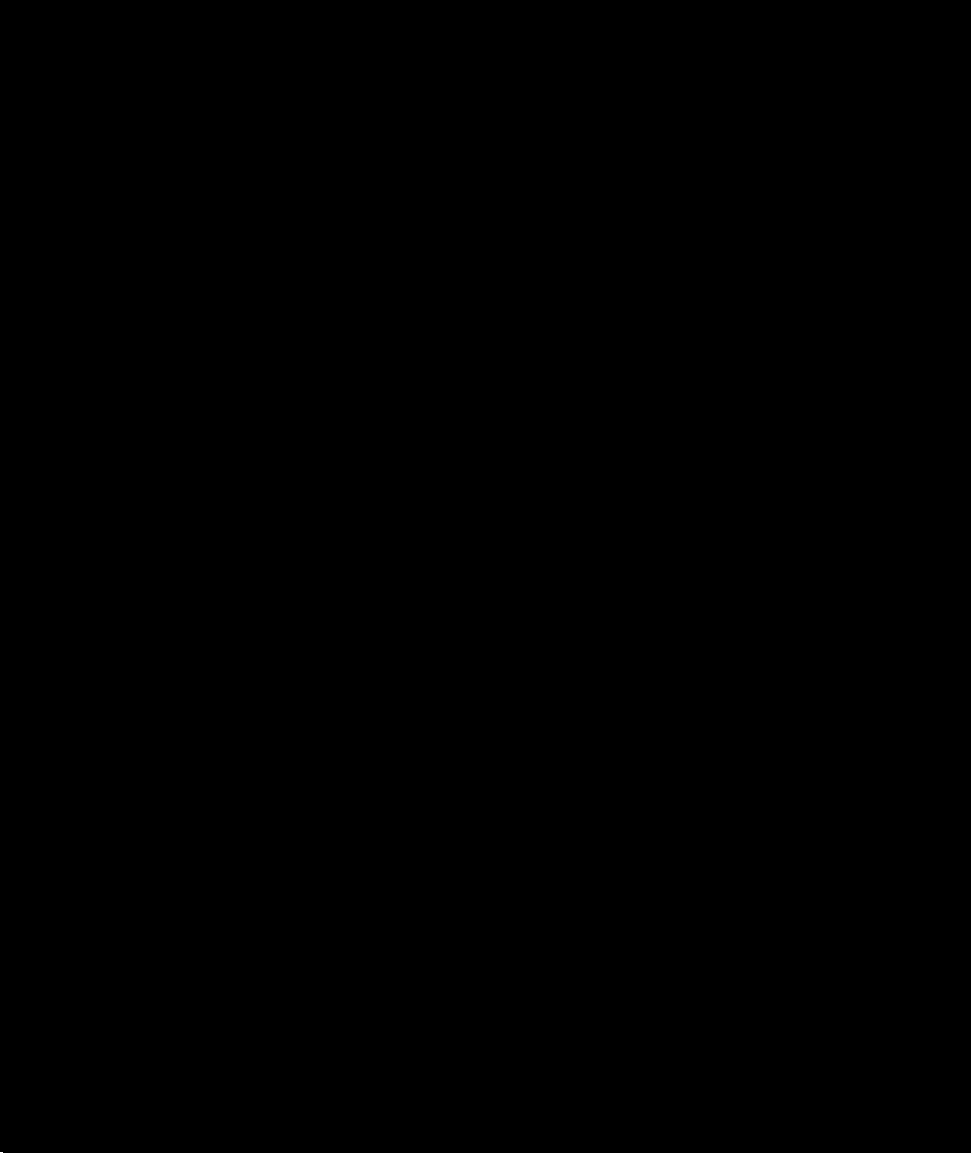
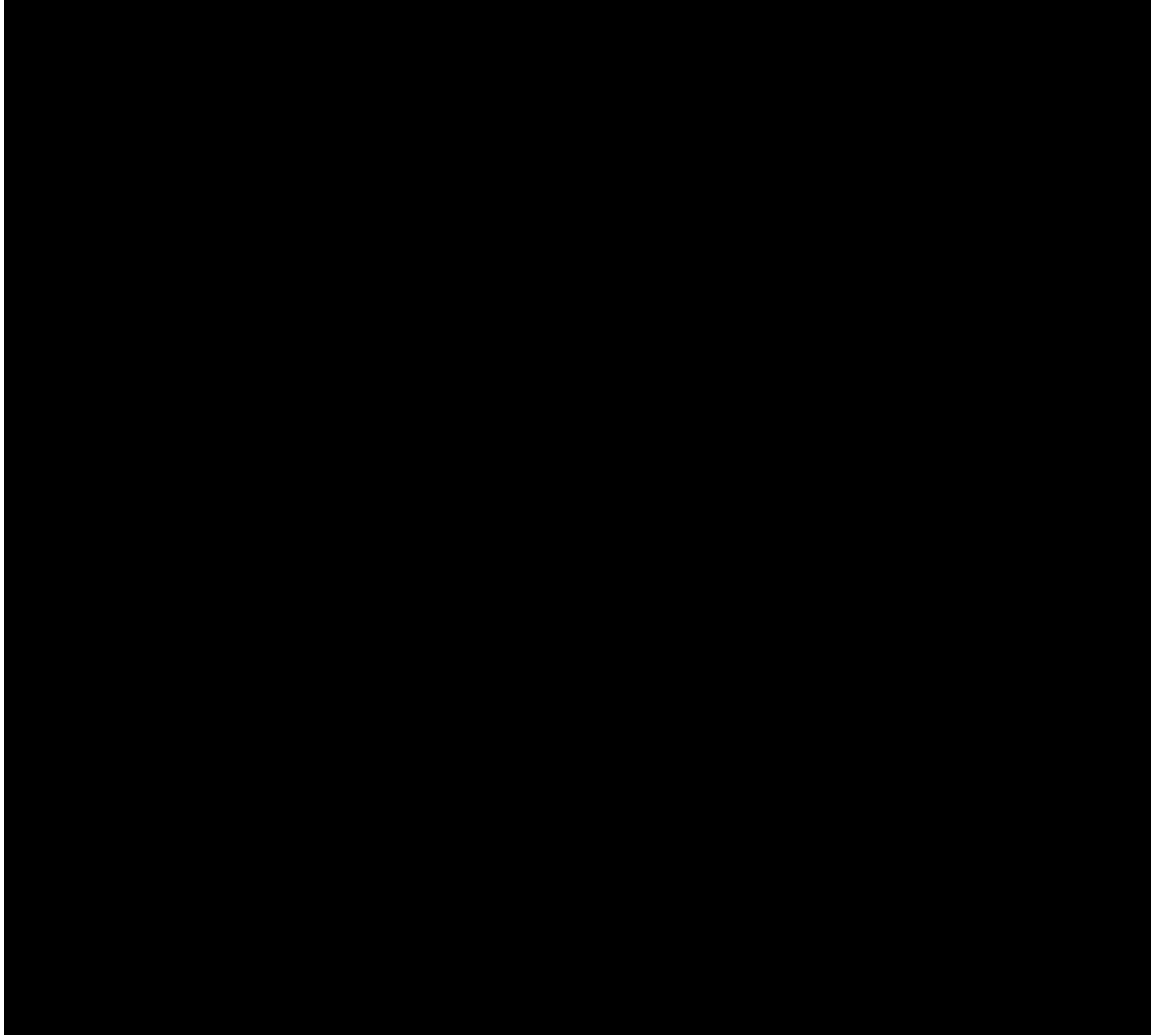
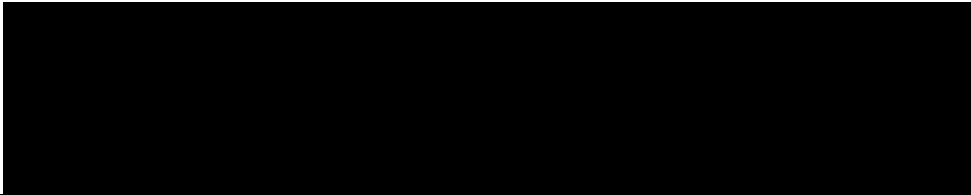


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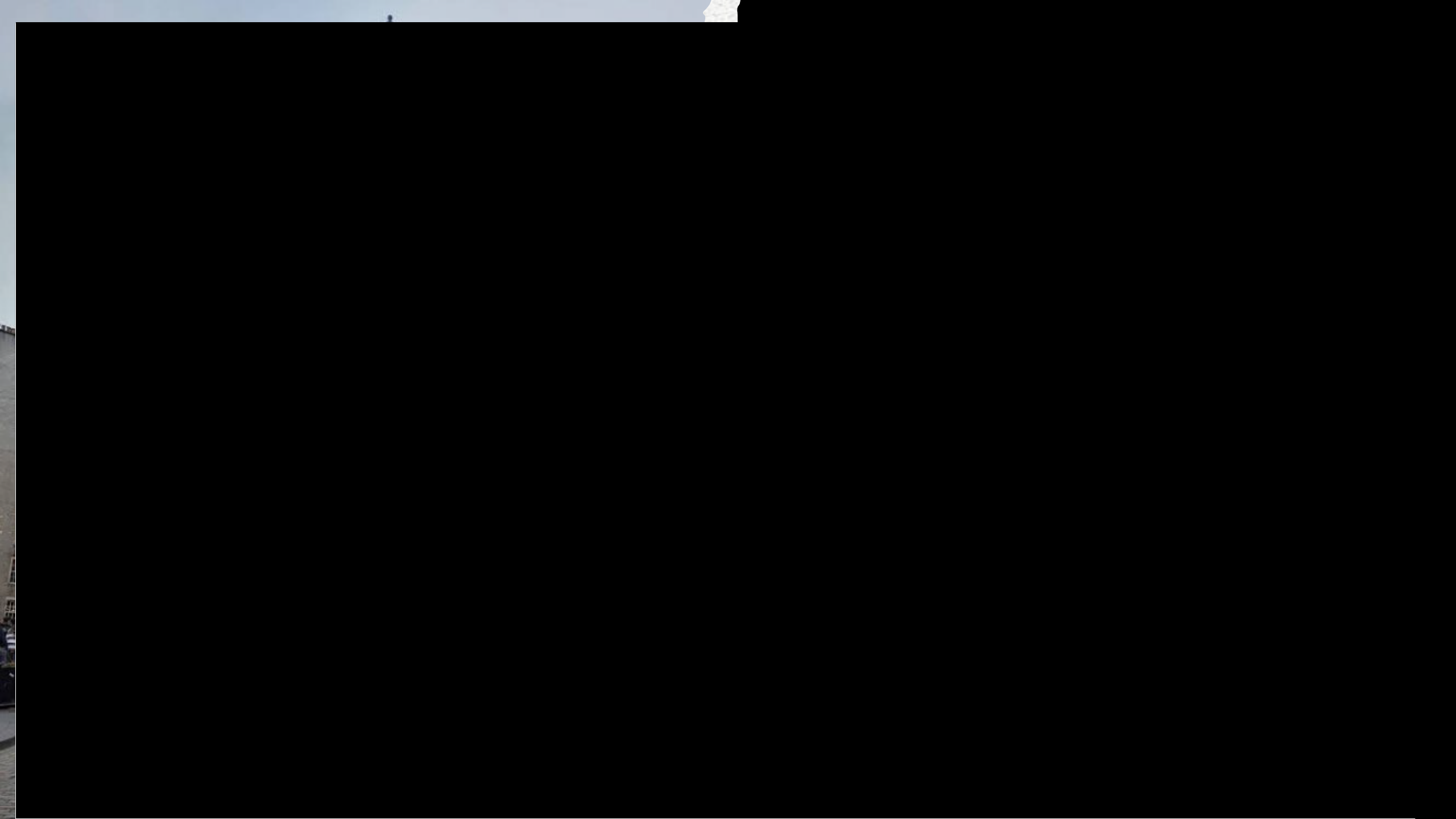


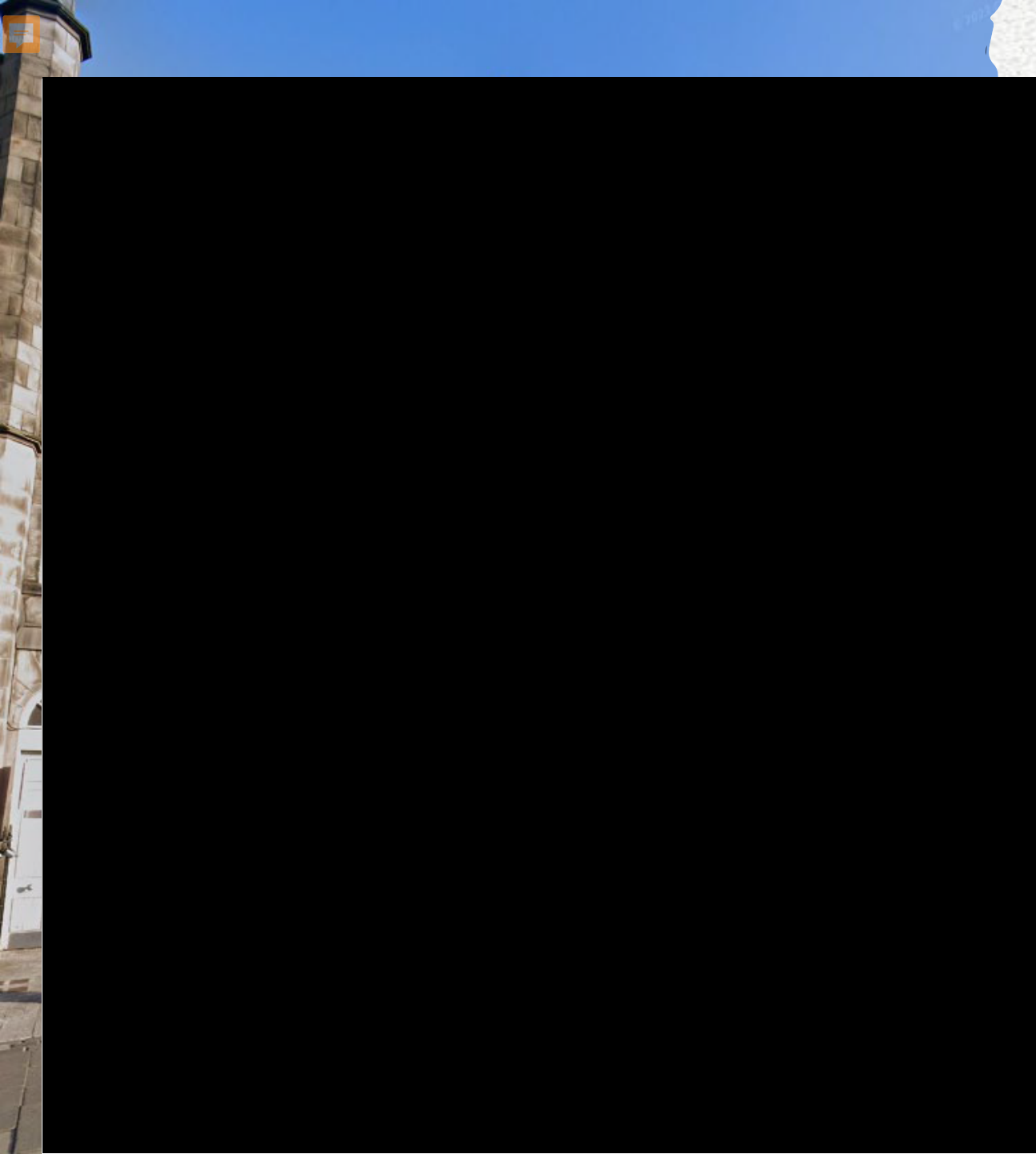


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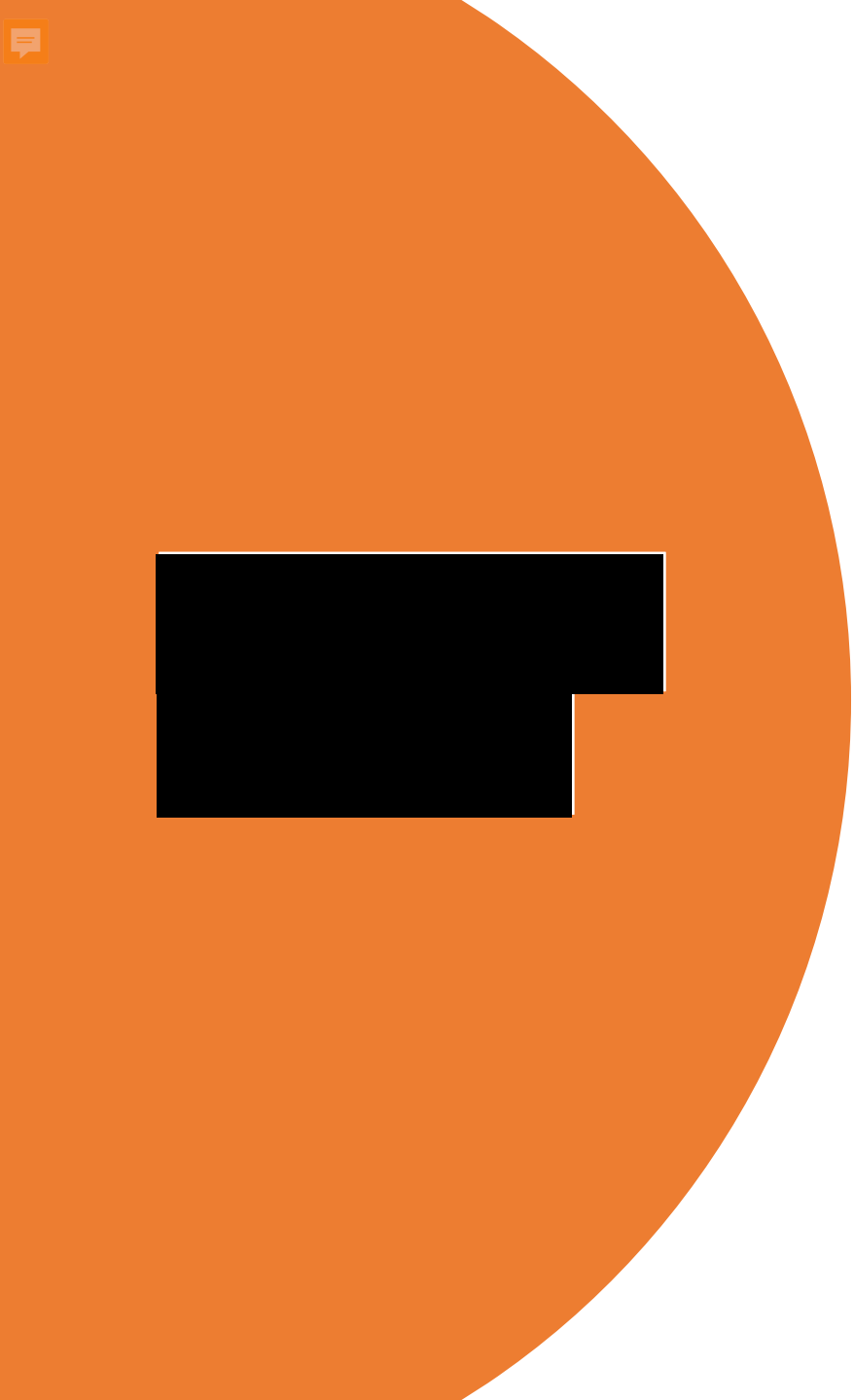


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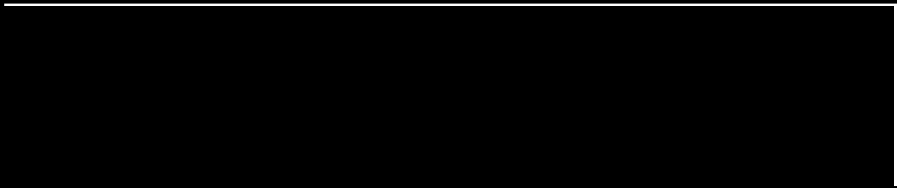
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Applicable policies are NPF4 30 e) and any relevant & non-conflicting LDP policies.

NPF4 Policy 30 e):

“Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:

[REDACTED]

[REDACTED]

ii. The **loss of residential accommodation** where such loss is **not outweighed by demonstrable local economic benefits.**”]

No guidance is presently available on assessing “demonstrable economic benefits”. Reporters will need to judge each case on its merits but needs to be a **consistent approach**.

Please refer to **recent cases, economic benefits are acknowledged to be broader than a strict comparison of GVA & fiscal benefits.**)

Nb Consideration of economic benefits **only applies where there is found to be a loss of residential accommodation**, which will **not always** be the case.

Consistency in approach:

Can you conclude property is unsuitable for residential use?

Economic benefits need to be demonstrated to outweigh loss of residential property. Mostly the economic information is not a detailed analysis

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Loss of residential accommodation/Housing emergency

NPF4 policy 30 (e) sets a high bar in terms of the loss of residential accommodation being outweighed by economic benefits. Recent PPA decisions reflect that position and only in very specific circumstances has the loss of residential accommodation been found to be justified.

There is no policy requirement for a property to be demonstrated to be unsuitable for use as residential accommodation. However, very poor levels of residential amenity can be a consideration in balancing the loss of residential accommodation and economic benefits.

In most instances the economic information submitted by parties has been a limited fiscal comparison of short-term let and residential use of a property and has not addressed wider economic effects of loss of residential accommodation. Recent appeal decisions have addressed such shortcomings.

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: PPA-320-2696 Wes Bow - approach to STL policy assessment
Date: 26 February 2026 12:21:50
Attachments: [image001.jpg](#)

[REDACTED]

[REDACTED] approach to using NPF4 policy 30 e in assessing this short term let i.e. if it fails on part ii then don't need to consider part i. [REDACTED] should also consider impact on local amenity [REDACTED]
[REDACTED]

We are required to assess the proposal against development plan as a whole. If I were to find that a proposal is acceptable in terms of local amenity then it would accord with part of NPF4 policy 30 e and LDP policy Hou 6. Therefore even if it doesn't meet part ii of policy NPF4 30 e, I could potentially conclude that it accords overall with the development plan. Or even if not in overall accordance, the fact that it meets the local amenity part of NPF4 policy 30 e could be relevant in considering whether material considerations outweigh the development plan position.

In summary, I think it is risky approach to not assess the proposal against both criteria. There is nothing in NPF4 policy 30 e to indicate that one criteria is more important than the other.

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Policy 30(e)(ii) provides that reuse of existing buildings for short-term holiday letting will not be supported where the proposals will result in loss of residential accommodation if such loss is not outweighed by demonstrable local economic benefits

In decision PPA-230-2412 (paragraph 14) the reporter considered, in respect of this policy, that it was not sufficient to identify generic economic benefits, such as boosting the tourism supply chain and increasing custom for the city's theatres and restaurants. There would equally be benefits from continued use as a dwelling. He considered that demonstrable local benefits resulting from the proposal should be identified.

In decision PPA-230-2438, the reporter approved change of use to short-term holiday letting of a house formed in a former dovecot, near a farm. Given its location, there was no adverse effect on the amenity of Dalmeny, the closest settlement. It had not been occupied as a house for five years at the time of the decision, despite being advertised for lease. The reporter found that the loss of residential accommodation involved would be balanced out because the house had not made a contribution to the residential market over recent years. The minor local economic benefits were sufficient to meet the policy.

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