

PLANNING APPEAL SUPPORTING STATEMENT

Change of Use From Flat to Short Term Let

Attic Floor Flat 440 Auchmill Road | Aberdeen | AB21 9NN

24th December 2025

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1. INTRODUCTION

1.1

This Planning Appeal Statement has been prepared by Richard Dingwall Architects in support of an appeal, by Sparks Homes Aberdeen Ltd, against Aberdeen City Council's refusal of planning application 250701/DPP in respect of the change of use of the property at AFF 440 Auchmill Road, Aberdeen, for use as short term let accommodation.

1.2

Application 250701/DPP was validated on 7th July 2025, with the decision notice to refuse the application issued on 26th September 2025.

1.3

The reasons noted within the decision notice for refusing planning permission were as follows:

- i) The change of use of the property from a residential flat to short term let accommodation would have a significant adverse impact on the amenity of the occupants of the neighbouring residential flats. This is because the occupants of the neighbouring flats would have to share the communal entrance and vestibule solely with frequently changing transient guests and cleaners of the short term let accommodation unit, who would be unknown to them. Taking into account the small size of the vestibule, close proximity of the private entrances of each property and the small size of those flats relative to the application property, with consideration for the prioritisation of protecting women's safety, this would result in a significant adverse impact on the sense of security, safety and privacy, whether actual or perceived, of the residents of the neighbouring flats. The comings and goings of a group of up to four adults and cleaners traversing through the building and using the property would likely increase noise disturbance compared to the existing use as a mainstream residential flat. The relative size of the four-bedroom flat compared to the neighbouring flats would result in the proposed short-term let use impacting on the quiet residential character of the building and worsening the amenity impacts experienced by the occupants of the neighbouring flats, in conflict with Policies 14 (Design, Quality and Place) of National Planning Framework 4 (NPF4) and Policies D1 (Quality Placemaking) and H1 (Residential Areas) of the Aberdeen Local Development Plan 2023 (ALDP).
- ii) The property is located in a residential area and does not offer accommodation within or close to the city centre, with the nearest tourist hotspot being TECA, located 3 kilometres to the northwest. It thus conflicts with the aims of Policy VC2 (Tourism and Culture) of the Aberdeen Local Development Plan 2023 in that it would undermine the sequential spatial strategy to direct visitor facilities into the city centre. As such, the local economic benefits to the tourism and hospitality sectors are not considered sufficient to outweigh the loss of amenity to neighbouring residents. The proposed use is therefore contrary to Policy 30 (Tourism) of NPF4.

1.4

This statement represents the grounds of appeal and invites the Local Review Body to conclude that the appeal should be allowed and planning permission for the use of the flat as a short term let be granted having regard to local and national planning policy and all other material considerations.

1.5

It is proposed by the applicant to use the property full time as a short term let. The property would be let for stays with a minimum of 3 nights to a maximum of 4 occupants.

2. PROPERTY DETAILS

2.1

The appeal property is a four bedroom flat within a 2.5-storey tenement building on the corner of the junction of Auchmill Road, Manor Drive, Great Northern Road and the Haudagain Bypass.

2.2

The appeal property is located within the Bucksburn area of the city, on its boundary with the area of Middlefield.

2.3

The appeal property is located on the second (attic) floor and has a floor area of circa 80m², consisting of a living room, kitchen, 4 bedrooms, and a bathroom. The property has access to a shared rear garden space as well as use of the parking space within a garage.

2.4

There are 3 flats within the building at 440 Auchmill Road, all of which share a communal door and staircase accessed from the rear of the building. There is a separate ground floor flat (438) which is accessed through its own external communal door at the front of the building.

2.5

The application property is located circa 270m west of the Haudagain Roundabout. The area surrounding the property is busy and mixed use in character. To the west is residential properties which continue along Auchmill Road. Immediately to the south is the former Manor Park Caravan Park which is now derelict and overgrown. Beyond that, circa 100m to the south, is the residential blocks on Manor Drive. Circa 30m to the north and north east are a number of business units, containing Majestic Wines, the Salvation Army, Pizza Hut, Indigo Sun, and Porcelanosa. Immediately to the east is the Haudagain Bypass. The site fronts onto the dual carriageway which makes up the A96. Due to this and the surrounding context there is at times a higher degree of on-street activity and ambient noise in the immediate vicinity of the property during the day and into the evening.

2.6

The application site has close access to a range of amenities. Restaurants: Pizza Hut - 100m; KFC - 400m; Mikes Famous Fish and Chips - 470m; as well as a number of takeaways to the east along Great Northern Road, and to the west along Auchmill Road. Within 300m to the east next to the Haudagain Roundabout is a petrol station and convenience store, a post office, and a car rental business. There is a Farmfoods supermarket within a short walk of the site, as well as the Tesco Extra store at Danestone being only a 4min. drive away.

2.7

Being located on Auchmill Road the application site has a bus stop within 70m and therefore has easy access to a broad number of bus services, including: 17, 64, 172, 220, 727, N17, and X20 routes, as well as the Ember service between Aberdeen and Inverness. The site is also only a 10min. drive from Dyce Train Station.

2.8

The application property is ideally located for easy access to the wider city and into Aberdeenshire and beyond. Auchmill Road leads to the A96 towards Inverness, as well as the A947 into Dyce. This provides easy access to TECA, Aberdeen Airport, ABZ Business Park, Kirkhill Industrial Estate, and to the businesses around Wellheads, Kirkton, and Pitmeddan Road. While the A96 leads out to Blackburn, Kintore, Inverurie, and beyond.

2.9

The Craibstone junction is located only 3miles from the site, providing access to the AWPR, giving visitors easy access to the west and south areas of the city, to Kingswells and Westhill, and out into Deeside. Whilst the site has quick access onto the Parkway, leading through Bridge of Don, and onto the A92 towards Ellon, Peterhead, and Fraserburgh.

2.10

Anderson Drive connects the application site to numerous areas of the city, including key locations such as ARI, the Bridge of Dee, and RGU. Aberdeen city centre is only a 3.5mile drive from the application site, with access along the way to Aberdeen University, and connections onto King Street and the beach area.

3. RELEVANT SITE HISTORY

3.1

The report of handling notes no relevant planning history and states “there are no properties in the building (or this post code) licensed as either a short-term let or a house in multiple occupation”.

3.2

Whilst the above is true, looking at the wider area we wish to note the below planning application.

241299/DPP - Flat 4 Society Court, Society Lane, Aberdeen, AB24 4DE

Application Granted for the Change of use of flat to Short Term Let accommodation (sui generis) with maximum occupancy of 4 people.

3.2

This was a flat for 4 persons located within a 8 unit residential block to the east of the appeal property on Great Northern Road, in a similar area to the appeal property, which was granted planning permission to operate as a short term let.

3.3

In the report of handling for approval 241299/DPP the officer noted “*Acknowledging the small scale of the proposal (accommodating up to four occupants at any one time) and the current few properties in and/or proposed to be in STL use in the area, on balance, the proposed STL use would be compliant with the aims of Policy VC2 (Tourism and Culture) of the ALDP in that it would not undermine the sequential spatial strategy to direct visitor facilities into the city centre by any significant degree*”.

3.4

In addition there have been a number of short term let licences granted for properties located along the A96 and the surrounding context of the appeal property. For example there are:

- 5 licences granted for Great Northern Road;
- 3 licences on Clifton Road; and
- 5 on North Anderson Drive between the Haudagain Roundabout and Hilton Road.

3.5

The above list of licences is not exhaustive of the immediate area, with a search on booking.com illustrating that there are also short term let properties operating on:

- Goodhope Gardens;
- Goodhope Park;
- Westerton Place;
- Cummings Park Drive;
- Hilton Road;
- Middlefield Place;
- Persley Den Grove;
- Gladstone Place;
- Church Street;
- Inverurie Road;
- Cloverdale Court; and
- Netherhills Avenue.

3.6

The STL licence scheme allows the Council to impose a number of conditions, including which condition 18 puts emphasis on the licence holder and operators to protect residential amenity, and provide the council with the basis to enforce compliance where required. In particular the following is noted:

“The licence holder must take reasonable steps to manage the premises in such a way as to seek to prevent and deal effectively with any antisocial behaviour by guests to anyone else in the short-term let and in the locality of the short-term let.

The licence holder must take reasonable steps to:

- ensure that no disturbance or nuisance arises within or from the premises, for example by explaining the house rules to the guests;*
- deal effectively with any disturbance or nuisance arising within or from the premises, as soon as reasonably practicable after the licence holder is made aware of it; and*
- ensure any vehicles belonging to guests are parked lawfully, for example explaining where any designated parking spaces are to be found and highlighting any local rules.”*

4. REPRESENTATIONS

4.1

There were no letters of representation submitted as part of the consultation process for the planning application, neither from the other properties located within the building, nor from the surrounding properties in the immediate area.

5. Residential Amenity

5.1

The first reason for refusal for planning application 250701/DPP was stated in the decision notice as being:

“The relative size of the four-bedroom flat compared to the neighbouring flats would result in the proposed short-term let use impacting on the quiet residential character of the building and worsening the amenity impacts experienced by the occupants of the neighbouring flats, in conflict with Policies 14 (Design, Quality and Place) of National Planning Framework 4 (NPF4) and Policies D1 (Quality Placemaking) and H1 (Residential Areas) of the Aberdeen Local Development Plan 2023 (ALDP).”

5.2

Policy 30 (Tourism), paragraph (e) of National Planning Framework 4 (NPF4) states:

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

- An unacceptable impact on local amenity or the character of a neighbourhood or area.”*

5.3

Policy 14 (Design, Quality and Place) of NPF4 notes that “development proposals will be supported where they are consistent with the six qualities of successful places”: including developments which are designed to be healthy, through “supporting the prioritisation of women’s safety and improving physical and mental health”.

5.4

Policy D1 (Quality Placemaking) of the ALDP sets out six qualities of successful placemaking, including, ensuring development is safe and pleasant. The policy states development should “avoid unacceptable impacts on adjoining uses, including noise, smell, vibration, dust, air quality, invasion of privacy and overshadowing”.

5.5

Policy H1 (Residential Areas) of the ALDP notes the following:

“Within existing residential areas, proposals for non-residential uses will be supported if:

- they are considered complementary to residential use; or*
- it can be demonstrated that the use would cause no conflict with, or any nuisance to, the enjoyment of existing residential amenity”.*

5.6

In the report of handling the officer notes “given that the character of the area comprises a mix of uses and the extent of residential properties in the vicinity, the use of this application property as an STL, would not have a significant impact on the character of the wider area”.

5.7

Instead it is the officer’s opinion that “The main consideration for the determination of this application is thus the amenity impact on the immediate neighbouring properties sharing a communal entrance and access with the application property”, confirming that the concerns in relation to residential amenity apply only to the residential properties within the appeal properties block, and not that of the neighbouring properties to the wider street and neighbourhood.

5.8

Analysis in relation to amenity in terms of noise and disturbance is subjective and differs across planning authorities and even between officers. However, when reviewing short term let planning applications the Council has consistently regarded the nature of occupancy by short term let guests as different to that of permanent residents.

5.9

Local Development Plan Policy D1 notes that development should “*avoid unacceptable impacts on adjoining uses, including noise, smell, vibration, dust, air quality, invasion of privacy and overshadowing*”. Similarly NPF 4 policy 30(e) part (i) states “*that 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*”. It is therefore implied in policy that there can some change in the amenity of the building which would be acceptable, and it would only be in conflict with policy when that change became detrimental, i.e. causes harm.

5.10

Within the report of handling the officer notes the following in relation to amenity:

“In general, it is considered that the change of use of properties to STL accommodation within residential flatted buildings could result in increased harm to the amenity of neighbouring properties, beyond that which would typically be expected from a property in mainstream residential use, particularly due to the following:

- the potential for noise from increased coming and goings via the communal entrance and stairwell due to frequent customer turnovers (check-ins and check-outs) and cleaning between occupancies;*
- the potential for noise from customer activities within the property, particularly in the quieter, more sensitive late evening and early morning periods – especially if used as a ‘party flat’;*
- the potential for the disturbance of privacy and the impact on safety, whether actual or perceived, resulting from the use of communal areas (including gardens) by transient persons unknown to permanent residents”.*

5.11

In regards the first bullet point in relation to noise from increased coming and goings, the report of handling notes that the “*additional comings and goings from a group of up to four adults and cleaners would exacerbate the amenity impacts experienced for these smaller properties*” (the 2 smaller flats below).

5.12

The appeal properties maximum occupancy align with the characteristics as if it was used a mainstream residential unit. There is a total of 4 bedrooms, and if it was to be used as a mainstream residential unit it could reasonably be expected that there could be 4 or 5 residents in the property, for instance by a couple with 3 children. The proposed maximum occupancy of the short term let would be 4 occupants, 1 per bedroom, so the proposed change of use would not result in additional occupants in the building, nor additional users of the communal stairwell.

5.13

Regardless if the property is in mainstream residential use or used as a short term let there is going to be more people staying in the application property in comparison to the 2 smaller flats below. So if the view is held that having a greater number of people staying in that property in comparison to the neighbouring properties will have an impact on residential amenity, those issues exist in either use case. Therefore when determining if the use as a short term let will adversely impact the residential amenity of the neighbouring flats we must consider if the behaviours of short term let guests are so different from that of permanent residents that they adversely impact the residential amenity of the block to a greater extent.

5.14

Short stay occupation involves people living in the property, just for shorter periods. However, we argue that that does not necessarily mean the nature of the occupation is different. There are not necessarily greater movements of people, or different times of movement or activities. It is reasonable to expect that tourists are likely to be out of the property for the majority of the day and returning in the evening, while business travellers are likely to adopt a typical day-to-day residential routine, that is, leaving the property in the morning and returning in the early evening.

5.15

In comparison, permanent residents can have vastly different movements and activities depending on their employment, leisure interests, family circumstances, health, etc. For example, someone working back shift might return from work at 11pm; a family with teenage children might enter and leave the house many times during the day and night; a person with care needs might be visited by carers several times a day. Users of a short term let property, which use the property for a variety of purposes including short term residential needs for work purposes, are therefore unlikely to exhibit markedly different characteristics to more permanent residents.

5.16

In our view, there would not be a noticeable difference in the average daily number of occupants', nor their movements in and out of the property between the lawful use and the proposed use, and as such the likelihood of disturbance arising from guests whether inside, or outside the flat, is significantly reduced in comparison to that view held by the officer.

5.17

In regards to the second point in relation to amenity risks from guest activity within the flat, the officer notes in the report of handling that *"there is additionally the risk, given its overall size and the proposed number of occupants visiting on a non-residential basis, that it could be used by larger groups and the greater likelihood of parties being hosted in the property, compared to its use as a mainstream residential flat of four persons related to each other (i.e. a family)"*.

5.18

It is generally held that larger properties can have a greater capacity for guests, and where there are greater numbers of guests, there is increased potential for noise and disturbance, most commonly with parties.

5.19

However, the above analysis by the officer is contrary to the planning application which was made by the applicant. Given that the property has 4 bedrooms the applicant could have made an application for a maximum occupancy of 6 or even 8 occupants. However, with their planning application they have sought to restrict the maximum occupancy to 4, 1 occupant per bedroom, to help prevent the risk of the property being used as a party flat, and to reduce the risk of other amenity issues associated with a larger occupancy.

5.20

Therefore, given the smaller maximum occupancy size of the property it is not attractive to those looking to book properties for such parties.

5.21

In any case, as noted earlier in Section 3.6 of this document, Condition 18 of the council STL licensing conditions ensures that the licence holder must take reasonable steps to manage the premises in such a way as to seek to prevent and deal effectively with any antisocial behaviour by guests to anyone else in the short-term let.

5.22

In this case this would be managed through a strict noise management plan for guests to ensure a peaceful environment for both guests and neighbours, to minimise disturbances, protect residential amenity, and to comply with local regulations regarding noise levels. Guests will be provided with clear guidelines regarding acceptable noise levels during their stay. These guidelines will be included within the welcome pack when the guests check in and prominently displayed within the property at key locations, such as to the main entrance door, and in the main living spaces. This includes quiet hours to be enforced between 10pm and 8am every day, where guests are expected to keep noise levels to a minimum to avoid disturbing neighbours. Use of the rear garden will be restricted with guests advised to not undertake activities which cause noise to disturbance to neighbouring properties. There are no hot tubs, summer houses, or other facilities for use by the guests located within the garden.

5.23

During the booking process guests are advised that there is to be strictly no parties, either in the property or within the garden space. Breach of this would be addressed as set out in the complaint handling procedure noted below.

5.24

The management company who would operate the STL on behalf of the applicant will provide a 24/7 guest support service. The guest support service can be contacted by telephone or via text through WhatsApp, and allows guests to report any maintenance issues, other problems, or ask any queries to the management company during their stay. Contact information for the management companies guest support service is also provided to the neighbouring properties adjacent to the short term let. This allows the neighbours to report any noise disturbance or other issue easily and without having to speak to the guests. When any concerns are reported the neighbour will be assured by the agent that their complaints will be taken seriously and addressed promptly.

5.25

Any noise complaints received from neighbours will be addressed promptly and professionally. Guests causing disturbances will be contacted immediately and reminded of the noise guidelines and asked to lower their noise levels. Follow up inspections of the property will be conducted to ensure compliance with the noise management plan following the complaint. In case of repeated noise violations, guests may be asked to leave the property without refund.

5.26

Additionally any disruptive or antisocial behaviour is just as likely in residential use as short term let use. There is no published evidence that there are higher levels of anti social behaviour associated with short term lets in comparison to properties in mainstream residential use.

5.27

Further to the officers analysis in relation to the impact on residential amenity due to customer activity within the flat, they note in the report of handling: *“the application property comprises a large flat in the context of the tenement building, spanning the entirety of the second floor and comprises four bedrooms and a c. 21sqm living/ kitchen area which would form the main social space for guests staying at the property. There is thus potential for increased noise from the use of this space by up to four adults compared to how it could be expected to be used as a permanent residence. Due to the top-floor location, when the property is in use, noise transmission would very likely be heard in the two flats below, impacting on the amenity of both remaining flats in the block”*.

5.28

This risk of noise transmission through the floor exists whether the property is used as a short term let or as the mainstream residential property that exists on site already. The conclusion by the officer is not substantiated by evidence, but instead again falls into the view that the nature of occupancy by short term let guests as different to that of permanent residents. As noted already in this statement the applicant has taken steps to restrict the occupancy of the flat to that which would be similar to that if it was in mainstream residential use and to greatly reduce the risk of parties occurring. Therefore the activity within the living space would fall within the range of effects that can reasonably be expected in the existing flatted residential accommodation and would therefore not be detrimental to the amenity of the smaller flat below.

5.29

And in relation to the last bullet point regarding the potential for the disturbance of privacy and the impact on safety, whether actual or perceived, resulting from the use of communal areas, the report of handling notes: *“The full-time STL would be occupied solely by transient non-residents, in addition to cleaners occupying the spaces after each visit, thus presenting activity and comings and goings by frequently changing people unknown to the residents in the neighbouring flats, compared to if it were to revert to mainstream residential use. The internal communal vestibule leads from the external stairs and comprises a small area adjacent to the private doors to the neighbouring flats, with internal stairs leading up to the application property, resulting in guests passing through the building for access. As such, a larger group of up to four, frequently changing, transient persons staying on a non-residential basis would introduce an adverse impact on the amenity of this space, particularly on the sense of safety and security for the neighbouring residents”*.

5.30

The report of handling goes on to note: “prioritisation for women’s safety should be considered where, in a case such as this, women could be living alone in one of the small properties, for whom the presence of a group of four unknown guests could introduce a greater impact on their sense of safety”.

5.31

The report of handling makes reference to “transient non-residents”, implying that frequently changing guests affects the sense of safety and security of the building. However this assumes that all bookings are for short periods.

5.32

Short term lets help the city provide a varied range of accommodation for both leisure and business visitors, catering for a wide range of different preferences and budgets. They can provide a more home like experience, providing a safe and comfortable base for business visitors to return to while working in the city for several weeks, or providing families with more space and facilities compared to a hotel room during their break away. They therefore play a key role in the cities visitor accommodation needs.

5.33

Short term let operators, including the applicant, specifically target workers visiting the city on business. These type of guests tend to stay for longer periods of time, providing operators with longer term security with bookings and reducing cleaning and servicing visits and costs, and are therefore far more attractive to operators in comparison to shorter term stays.

5.34

Importantly, by targeting longer term business visitors they greatly reduce turnover in guests. Based on their other properties, over 70% of their bookings are professionals, with the average stay being between 4 - 8 weeks, with some stays up to 3 months. Additionally, business guests frequently revisit the property multiple times a year as their works requires.

5.35

Therefore while still shorter than the length of a traditional tenancy, guests are likely to stay in the property for considerably longer than anticipated in the report of handling, and as such the neighbouring properties are likely to become familiar with the guests and reduce any detrimental impact on their sense of safety and security.

5.36

Regardless of whether the property is a short term let or in permanent residential occupation there will be human activity coming to and going from the appeal property by unknown persons.

5.37

Permanent residents will have postal, parcel, food, and other deliveries at different times of the day, servicing and maintenance staff to do repairs, cleaning, etc., and their own family and friends visiting the property. Therefore it is not unusual to have unknown persons within the block. However, in relation to the appeal property, these activities will be significantly reduced as a matter of course while the property is a short term let.

5.38

The regular servicing of the property would be a professional cleaning company that would attend the property on change over days only between guest stays. As noted earlier the minimum stay for the property would be 3 nights. Given the above this would only result in at most 2 servicing visits per week. However given the expected occupancy rate of the property of between 50 - 75% this is more likely to be at most 1 visit per week or less.

5.39

Furthermore, it should be noted that servicing short term let accommodation is not a differentiator, as it has become more common for residential occupiers to use cleaners on a regular basis, especially if the occupier is in poor health or where both parents work full time for example. Therefore, the servicing of the proposed short term let would create minimal additional movements, which in any case, can be similar to those of a mainstream residential property.

5.40

The anticipated occupancy rate for the property over the course of a year is typically around 50-75% based on other similar short term let properties. This means that for between 90 - 180 days per year the the flat would be unoccupied, and there would be no guest movements in, out, or within the property.

5.41

Overall, when compared to mainstream residential use this would result in the short term let having a significantly reduced frequency of movement to the property, lower overall occupancy, and lower activity levels. Furthermore this also illustrates that in relation to safety and security, there is not going to be ever changing unfamiliar people every few days within the communal areas.

5.42

In conclusion this supporting statement has illustrated that in residential properties that share communal areas, it is common to have a wide range of living habits and patterns which can result in different frequency and times of movements by residents. The use of the property as a short term let does not create movement patterns which are remarkably different to that of mainstream residential occupants and therefore arrivals and departures of guests are unlikely to be much noticed, even if they occur at unusual or irregular hours.

5.43

It has been demonstrated that the applicant has taken steps through the restriction on the proposed maximum occupancy, and through the proposed management plans, that the risk to the residential amenity of the neighbouring properties being affected by noise, due to guest activities or parties is no worse than the risk if the property remained in mainstream residential use.

5.44

And details on the likely guest profile, length of stay, and levels of occupancy, as well as details on the servicing arrangement, provide reassurance that the neighbouring properties sense of safety and security will not be detrimentally affected.

5.45

In any case, taking all of the above into account, even if there was a slight increase in frequency of movements or activity, this does not necessitate on its own, noise (or other impacts in residential amenity) which would be significantly different and materially detrimental enough to adversely affect the 2 neighbouring properties as a result of the property being a short term let and breach the threshold of having an “unacceptable impact” as noted in policy.

5.46

We therefore imply that the proposed use as a short term let is considered complementary to residential use and that it would cause no conflict with, or any nuisance to, the enjoyment of existing residential amenity within the building in comparison to its existing use as a mainstream residential property.

6. PROPERTY LOCATION

6.1

The second reason for refusal for planning application 250701/DPP was stated in the decision notice as being:

“The property is located in a residential area and does not offer accommodation within or close to the city centre, with the nearest tourist hotspot being TECA, located 3 kilometres to the northwest. It thus conflicts with the aims of Policy VC2 (Tourism and Culture) of the Aberdeen Local Development Plan 2023 in that it would undermine the sequential spatial strategy to direct visitor facilities into the city centre. As such, the local economic benefits to the tourism and hospitality sectors are not considered sufficient to outweigh the loss of amenity to neighbouring residents. The proposed use is therefore contrary to Policy 30 (Tourism) of NPF4.”

6.2

Policy VC2 (Tourism and Culture) of the ALDP states that:

“Proposals for new, or expansion of existing, visitor attractions and facilities capable of strengthening the appeal and attraction of Aberdeen to a wide range of visitors will be supported. And

Proposals should complement existing visitor facilities and be sequentially located in the city centre, or on a site allocated for that use in this Plan, unless activity and locality specific issues demonstrate that this is impracticable”.

6.3

The officer notes in the report of handling *“Given that the proposal would comprise a tourism facility that would not be in the city centre (sitting c. 4 km from the city centre boundary), the proposal would have tensions with Policy VC2 (Tourism and Culture) of the ALDP” and goes on to add “The application site sits c. 3 km from TECA as a tourist hotspot, requiring to be accessed via bus or car, with more suitable alternative accommodation sitting closer to this complex”.*

6.4

The officer concludes *“The proposal is therefore not considered to be appropriately located to support local business and amenity due to the type of services nearby which would outweigh the harm to the residential amenity of the neighbouring properties. The proposal is therefore considered to be contrary to the aims of Policy VC2 of the ALDP in that it would undermine the sequential spatial strategy to direct visitor facilities into the city centre”.*

6.5

While the officer concluded that *“the proposal is generally compliant with Policy 13 of NPF4 and Policies T2 and T3 of the ALDP 2023”* in relation to transport and accessibility, they added that they *“acknowledged that there are more appropriate locations in the city centre or near visitor demand areas for short-term let accommodation which would be more readily accessible via sustainable modes of transport, as well as more compatible with the sequential space strategy and aims of Policy VC2 of the ALDP for tourist accommodation”.*

6.6

The aims of the ALDP in relation to tourism and the citing of tourism facilities is acknowledged, however we argue that report of handling fails to take into account the diverse range of visitors to the city, their needs, and preferences. The policy implies that staying in the city centre, or next to tourist facilities such as TECA is the preference for all visitors, and that visitors who stay out with these areas don't generate the same local economic benefits to the tourism and hospitality sectors.

6.7

In contrast to the ALDPs city centre first approach, the Government's publication on 'Short Term Lets: Business and regulatory impact assessment' from November 2021 states: *"Short-term lets make an important contribution to the tourist economy because they can...offer accommodation in places not served by hotels and hostels, for example, and therefore help with dispersal of visitors from 'hotspot' areas"*.

6.8

As noted within section 5 of this statement, it is anticipated that a majority of the guests will be workers visiting the city on business. It is likely that such visitors may be staying for several weeks or months at a time. The types of workers visiting other similar properties cover a wide range of occupations, from hospital workers, construction operatives, oil and gas engineers etc.

6.9

When staying in the city for a longer period of time than a week or two, guests usually look for a more home like experience for their stay, where they can feel safe and comfortable, and they can adopt a more regular routine. Guests are therefore unlikely to always want to eat out at restaurants or visit bars. Instead they will look to cook at home, and contribute to the local economy by visiting shops and supermarkets, or getting groceries delivered. However, like permanent residents, they will often visit the city centre at the weekend or on other special occasions during the week.

6.10

Living in the city centre for longer periods of time does not suit all visitors. This could be for a wide range of reasons including the higher background ambient noise, access and parking issues, or the higher costs of staying in a more central location. Additionally, based on the location of the visitors place of work, commuting from the city centre may take longer and be less convenient.

6.11

As described in Section 2 of this statement, due to the appeal properties location next to the Haudagain Roundabout, it is conveniently located to provide access to a wide range of business areas, including the business parks in Dyce and Bridge of Don, areas which are quicker to access from the appeal properties location in comparison to the City Centre. The appeal property is also easily commutable to ARI, TECA, and the City Centre, while the AWPR provides access to Kingswells and South Aberdeen.

6.12

Short term lets located within the City Centre are less likely to have dedicated parking spaces. And while on street parking is available this may come with additional costs or time restrictions. Additionally some visitors need the security of a dedicated parking space or garage due to items stored within their vehicle, such as construction workers with tools. The appeal property, which has both secured dedicated parking, as well as nearby free on street parking, is attractive to potential visitors who are unable to use more sustainable modes of transport.

6.13

Larger sized short term let properties can also be harder to find within the city centre, and as such can drive up costs. The Scottish Government's publication on 'Short Term Lets: Business and regulatory impact assessment' from November 2021 states:

"Short-term lets make an important contribution to the tourist economy because they can...offer more affordable accommodation, helping to attract tourists that may have a lower budget".

6.14

Being located outwith the city centre, and providing accommodation for 4 guests, helps provide more diverse and affordable accommodation to visitors, making Aberdeen a more attractive place to work in and visit.

6.15

The officer concludes in the report of handling that *"the proposal is...not considered to be appropriately located to support local business and amenity due to the type of services nearby which would outweigh the harm to the residential amenity of the neighbouring properties"*.

6.16

The appeal property is well served by both parking for vehicles, and as noted in Section 2 of this statement, by public transport, particularly a large number of bus routes. Visitors using the appeal property would be easily able to access any services they require, either by walking along Auchmill Road or Great Northern Road, driving, or by taking public transport to the City Centre. And as noted above, economic benefits from visitors does not require them to visit restaurants and bars in the city centre every night, but instead they can contribute by using local facilities such as shops, supermarkets, pharmacies, bakeries, takeaways, petrol stations etc. all of which are easily accessible from the appeal property.

6.17

Furthermore, the economic benefit to businesses through providing suitable and convenient accommodation for their workers, should be taken into consideration. This can help businesses expand their services, cover vacancies, increase output, provide specialist services etc, all which can increase fiscal output, create or sustain jobs, boost growth, and contribute to increasing the local economy.

6.18

In relation to guests who might be visiting the property for shorter periods, such as for events at TECA, the report of handling notes: *“The application site sits c. 3 km from TECA as a tourist hotspot, requiring to be accessed via bus or car, with more suitable alternative accommodation sitting closer to this complex”*.

6.19

As noted in Section 2 of this statement the appeal property is located within 70m of a bus stop which serves both the regular buses such as the 727 which serve TECA, as well as the special event buses which Stagecoach operate when required. The property is therefore very easily accessible to TECA for events.

6.20

The report of handling references the hotel accommodation sitting closer to the TECA complex, however when events are on this accommodation can be in short supply and more expensive. Further to the earlier note regarding the Scottish Government’s publication on ‘Short Term Lets: Business and regulatory impact assessment’ from November 2021 regarding supporting development which provides more affordable accommodation, the publication also noted:

“Short-term lets make an important contribution to the tourist economy because they can....provide additional capacity to accommodate tourist or other visitor demand in areas with a high demand over a short period of time”.

6.21

During such events as the Offshore Europe Energy Expo & Conference there is a significant increase in demand for accommodation at both TECA and within the city centre. Due to the appeal properties location on the A96, and its access to public transport, it is conveniently located to provide additional capacity for such events.

6.22

The proposal is for a short term let with a maximum capacity of 4 people. Typically this would require groups to purchase 2 hotel rooms. Whereas, the proposal would allow a group of visitors to purchase 1 property, to stay together, and to have a separate room each. This not only makes visiting the city more affordable, but also makes the city a more attractive and easier destination for groups of visitors.

6.23

In conclusion this supporting statement has illustrated that a short term let in this location can support economic benefits through short term visitors due to its occupancy for 4 people, its facilities, and convenient location for accessing the rest of the city through both private vehicle and sustainable transport options, which make it an attractive option for guests visiting the city.

6.24

It has also illustrated that the economic benefits should not just be analysed through typical tourist experiences, such as eating out, visiting museums etc. but through its contribution to the vitality and success of local businesses and projects which require accommodation for their staff visiting the city.

6.25

As with the aims of NPF 4 Policy 30 the proposal can contribute to encouraging, promoting and facilitating a sustainable tourism sector which benefits local people, inspires people to visit Aberdeen and Scotland, and supports the success of local industry and businesses.

7. CONCLUSIONS

7.1

It is our contention that the proposed short term let at AFF 440 Auchmill Road, accords overall with NPF 4 Policy 30, as well as NPF Policy 14 and Policies D1 and H1 of the Aberdeen Local Development Plan 2023 that were given as reasons for refusal of the initial planning application by officers in the report of handling.

7.2

It has a maximum occupancy similar to that of a residential use and is unlikely to attract the types of guests typically associated with party flats due to its restriction on the maximum capacity and the proposed management procedures, and any guest activities within the flat will have no detrimental impact on residential amenity in comparison to its existing use as a mainstream residential flat.

7.3

The activities of guests while in the property, and their patterns of accessing the property, are typical of a residential flat and the established character of the building. The change of use to a short term let does not necessarily mean the nature of the occupation is different and there are not necessarily greater movements of people, or different times of movement.

7.4

The proposed profile of guest, the anticipated length of stay, the expected occupancy rate of between 50-75%, and the proposed servicing levels, mean that turnover of guests will be less frequent, there will be less guest movements in and out of the building, there will be less unknown people in the communal areas, and therefore the neighbouring properties occupants sense of safety and security will not be unacceptably affected.

7.5

It has been illustrated that the proposed short term let being located outwith the city centre is suitable and even preferential for a wide range of visitors, increases the capacity and diversity of affordable accommodation on offer, that the guests can still access all the services and amenities they require either by walking, private vehicle, or by public transport, and that they can create an economic benefit to the the local economy through increased spending, supporting local businesses and jobs, and helping to support the proposed outcomes related to tourism in Policy NPF 4 policy 30.

7.6

Taking all of the foregoing into account, it is hoped that the local review body will be able to support this appeal, as it is considered to successfully address NPF4, Local Development Plan Policy and its supporting Guidance.