

## Serviced Apartments SG – Consultation Responses

Respondent	Comment	Officer Response	Modification to SG
Steven Harry	The basis for the definition of service apartments, is it not dependent on what 'market' the owner of an individual Service Apartment is looking to provide accommodation for, and should they be restricted to limit their ability to diversify, whether it is Quasi Hotel accommodation, B&B/Guest hotel -Sui Generis.	It is not proposed through this Supplementary Guidance that a business must restrict their ability to diversify. However, a change of use would be required to change between a serviced apartment (sui generis) and guest house (Class 7).  The Supplementary Guidance aims to make a distinction between residential dwellings and commercial properties used for temporary accommodation.	No modification required.
	As stated in 2.2 ' <i>the intended use</i> ' is as it states INTENDED, but can be open to change as one persons idea maybe different to another, policing of the intended use - how?	In accordance with the Use Class Order, serviced apartments are sui-generis, hotels and guest houses are Class 7 and residential use is Class 9. Therefore, a planning application must be submitted for a change of use.	No modification required.
	Throughout the city there are numerous Quasi Hotel accommodation- Service Apartments, B&B/Guest hotel - Sui Generis etc in residential buildings, will they be subjected to the proposed Serviced Apartment Supplementary Guidance, or their own type of use Guidance or will they stay as existing established business until there is a change of use.	New planning applications for serviced apartments will be subjected to the proposed Serviced Apartments Supplementary Guidance.	No modification required.
	Servicing - viewed and accessed as per individual Service Apartments.	Agreed.	No modification required.
	Viewed and accessed as per individual Service Apartments intended clientele?	Each application determined on their own merits. This is not guidance on the suitable	No modification required.

	E.g. If the clientele is mainly for offshore workers, a large majority may not need car-parking, bicycle stands on the property, the likely form of transport is from Taxi or buses.	tenant but on the use.  Location and nature of application will be taken into careful consideration.	
	Do not agree with penalizing the developer, they are paying Taxes and Rates which reflects in the usage of services they use, the council should be encouraging development / investment.	Although the Council continues to encourage development and investment within the city, developer contributions are set through Scottish Planning Policy, the Proposed Aberdeen City and Shire Strategic Development Plan and the Aberdeen Local Development Plan to offset the cost of infrastructure and services.	No modification required.
	If properties are set up as individual flats/service apartments, what right has the council have to stop a sale of a service apartment?  Existing service apartments: throughout Aberdeen, many flats have changed into service apartment, if anything the service apartments should be a higher standard, better fire regulations etc, in many cases would only be a change of use back to a flat.	Aberdeen City Council will seek to enter into a legal agreement with the applicant(s) to ensure that blocks of serviced apartments remain in single ownership to prevent sale of individual apartments. Any planning application received would need to be determined on its own merits. A legal agreement would not prevent the sale of the development as a whole.  If it is proposed for a serviced apartment to be changed into a residential dwelling planning permission must be sought as this constitutes a change of use.	No modification required.
	Occupation of property relating to period of intended use/night, there are other situations where rental for longer period up to 1 year/five years to oil companies, would this be viewed as an exception?  Legal Agreements: single ownership, does this	Occupancy is based on the individual rather than the company who block books it. We encourage pre-app discussion to consider each case.  Legal agreements will only apply to new planning applications received for serviced	No modification required.

	only apply to ownership of NEW block of Service Apartment, or are existing Service Apartments to be subjected to the proposed single ownership.	apartments.	
	In general I am in agreement there needs to be specific guidance for Service Apartments readily available, the draft Supplementary guidance goes some way to resolving some of the grey areas.	This comment is noted.	No modification required.
	The market can change, and I would not want to be tied into an agreement not allowing me to diversity or to be financially penalized, not good business sense, situations change.	It is acknowledged that the market can change. However, planning permission must be sought for a change of use from a serviced apartment to another use and possible modification or removal of obligation (legal agreement).	No modification required.
<b>Ian Lakin</b>	Agree with paragraphs 2.1 – 2.5	Noted.	No modification required.
	Compare to Short Assured Tenancy (SAT) our experience is that there is LESS waste with serviced apartments due to lower occupancy rates (75%) , less eating in the units and fewer people per unit i.e. less families and more business people. The important issue is that there should be a reasonable amount of storage for sundries within the apartment block to service the units which reduces requirement for vehicle access.	We have seen no evidence for less waste in Serviced Apartments. Storage and servicing will be assessed on the applications own merits. Servicing should be considered as part of the design process.	No modifications required.
	None of our clients to date have used bicycles. As business people, or skilled craftsmen they mostly arrive from the airport, the train station by taxi (mostly) or private car. Once arrived they use public transport, taxi, picked up by the company they are visiting or use their own vehicle. However booking enquiries	Planning is not in control of parking permits. Planning policy encourages sustainable modes of transport. Comment regarding Residential Travel Packs is noted.	No modification required.

	<p>drop by 25% if parking spots or permits are not available which makes it very difficult to compete. My suggestion would be for a 75% reduction on parking permits and not 100% as this is what the serviced apartment market requires to meet our customer's needs.</p> <p>If there is a Residential Travel Pack available we would be happy to supply the residents. Interestingly there are very few genuine tourists use our facilities other than the odd weekend.</p>		
	<p>In designing our serviced apartments we have insured that if the market changed and the demand fell dramatically the units could be changed into SAT or sold off to first time buyers. Clearly from the investor's point of view we would require this flexibility albeit we understand we would have to apply for a change of use.</p>	<p>Noted. As well as a planning application for a change of use there would need to be a modification / discharge of obligations (legal agreement), all of which would be considered on their own merits.</p>	<p>No modification required.</p>
	<p>In our opinion this should be an extremely important condition for the serviced apartments business owners to comply with for the following reason: Provided the serviced units are all in ONE block and under ONE owner it means accountability for safety, security, fire regulations and illegal activities can be more easily monitored. If you operate at random throughout the City or only own or sub-let part of a block of flats for serviced apartments it impossible to administer effectively. It can also be extremely annoying to neighbouring apartments or homes with</p>	<p>Noted.</p>	<p>No modification required.</p>

	constant "coming and goings" and noise of guests etc.		
	Agree with paragraph 2.10	Noted.	No modification required.
<b>Peter Roberts –Cults, Milltimber and Bielside Community Council</b>	Agree with the sections on ownership and preventing sale of single units.	Noted.	No modification required.
	Typo in section 2.5, second line "... this is the ..." should be "...this in the ..."	Noted.	Typo to be rectified.