



**SCOTTISH
TOURISM
ALLIANCE**

Your voice in tourism matters

Scottish Tourism Alliance Submission to Local Government, Housing and Planning Committee (1 October 2024): Short-Term Let Licensing Implementation Update Report 2024

About us

[The Scottish Tourism Alliance \(STA\)](#) is the largest and overarching trade body for the tourism and hospitality industry in Scotland.

Its core membership comprises of over 250 trade associations, tourism and hospitality facing businesses, destination groups and other business organisations with an interest in tourism, including many from the critical supply chains that support the sector, food, drink, finance, transport, and training providers.

The STA's Council membership includes The Association of Scotland's Self-Caterers (ASSC) and the Scottish Bed & Breakfast Association (SBBA).

In total, an estimated 15,000+ businesses are connected to the STA from across all regions of Scotland.

Introduction

The Scottish Tourism Alliance (STA) thanks the Local Government, Housing and Planning Committee for the invitation to submit written evidence on Short-Term Let (STL) Licensing Implementation Update Report 2024.

The operation of the STLs licensing scheme continues to cause significant concern for our sector, negatively impacting not just on our valuable accommodation providers but also the wider tourism and hospitality ecosystem.

The availability and blend of price and types of overnight accommodation goes hand-in-hand with ensuring that we can meet the needs of our visitors and support the wider events, festivals and cultural offering that makes Scotland an attractive place to visit, alongside meeting the accommodation needs of those working in the tv and film industry to support opportunities to showcase the country to the world on our screens.

We support the asks of both of our Council members ASSC and SBBA to amend the STLs licensing regime as an urgent priority to separate the link between licensing and planning and focus on delivering better regulation of the sector.

1. Did you know that the Scottish Government was gathering views on the operation of the short-term let licensing regime? If so, did you submit views to the Scottish Government?

The STA was aware that the Scottish Government was gathering view on the operation of the STLs licensing regime. Although we did not submit our views directly, we support the regular dialogue that the ASSC has had with the Scottish Government, which highlights the continuing concerns and issues faced by accommodation providers across Scotland.

We have previously submitted evidence to the Scottish Parliament's Local Government, Housing and Planning Committee on The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) (Amendment) Order 2024.

2. Has this review addressed any fundamental concerns you have about the design and operation of the short-term let licensing regime? If not, what issues should any future review consider?

Unfortunately, no. There continues to be significant issues around the linking up of planning and licensing concerning STLs. We are continuing to hear from ASSC members that the most significant barrier to achieving a STLs license is the different planning requirements being put in place by individual local authorities.

Along with updating guidance to give greater clarity to licensing authorities to avoid different interpretation of the legislation, further legislative action is needed to separate the relationship between licensing and planning to ensure the successfully delivery of a STLs licensing regime that is focused on delivering improved safety, quality, and standard of STL accommodation.

We support the calls of ASSC to ensure that any future STLs review take into detailed consideration an evidence-based approach concerning the unintended consequences that have resulted from the legislation and whether it is meeting its original policy objectives.

This should be backed by data from across all Scottish local authority areas to demonstrate if the introduction of the STLs regime has resulted in any measurable difference to the availability of affordable housing, safety improvements for guests, and reduced antisocial behaviour.

At the same time, it should capture self-catering, B&B and guest house closures and associated local visitor economic data, and tourism data to capture accommodation availability, range of options, pricing, and as a result any negative impact on local visitor numbers.

A future review must also capture if lack of accommodation options has had a direct impact on loss of business, including hosting of tour groups, conferences, events and festivals, along with local accommodation for film crews.

The STA urges the Scottish Government to accelerate a review of how the STLs regime has worked in practice to avoid unintended consequences for the tourism and hospitality sector and ensure any necessary changes are introduced quickly.

3. The report sets out a series of relatively minor changes to the licensing regime and other “next steps”, notably the establishment of an Expert Group. Do you have any comments on these proposed changes and next steps?

As set out in our answer to question 2, the STA believes that the creation of an expert group should be focused on capturing and measuring the wider impact that the STLs regime is having in real-time to identify the changes necessary to improve the licensing regime to avoid unnecessary business closures and loss of business, which have a knock-on impact across the tourism and hospitality ecosystem.

Careful consideration is also needed about getting the right mix in an expert group. The Visitor Levy Scotland Expert Group, chaired by VisitScotland, is an excellent model for effective engagement with Scottish Government, industry, and local authorities.

We remain concerned that failure of the Scottish Government to take more immediate action to address the shortfalls of the STLs regime will result in job losses, a knock-on impact on local visitor economies, and the loss of visitor accommodation options in many parts of Scotland, particularly in rural and island communities.

The right blend of visitor accommodation is key in achieving the shared ambition of our national tourism strategy, Scotland Outlook 2030, to be the world leader in 21st century tourism.

4. Whilst it is difficult to draw firm conclusions about the short-term lets licensing scheme at what remains a relatively early stage, what impact do you think it has had on:

- **Visitor numbers in Scotland;**
- **The number of short-term lets;**
- **The safety and quality of short-term lets; and**
- **The experience of communities living near short-term lets.**

Please see the [previous evidence that we submitted to the Local Government, Housing and Planning Committee](#) on the wider impact of the STLs licensing scheme.