

## City of Edinburgh: Self-Catering Briefing

### **Introduction**

- The ASSC is not anti-regulation but supports smart, effective and proportionate regulations which provide a balance between supporting the tourist economy and protecting communities.
- The self-catering industry provided Edinburgh with a £70m boost to the local economy in 2019 (the last normal trading year) according to Frontline Consultants.<sup>1</sup>
- The ASSC worked constructively with the Scottish Government and other MSPs in terms of the Planning Act 2019 regulations which allow for the introduction of control areas.

### **Specifics of City of Edinburgh Council's proposals:**

- Proposals to introduce a Short-Term Let Control Zone across the entire local authority area are wholly disproportionate. Alongside licensing, this would amount to the most stringent regulatory regime in Europe.
- City of Edinburgh Council intend that licensing and planning control areas will interact (it will be a mandatory condition of any licensing application to have made a planning application, or to have planning permission already when providing accommodation that requires it) but we still don't have the final details of what the licensing scheme will be from the Scottish Government.
- There is a lack of robust empirical data to inform the control area proposals, with much of it relying on pre-pandemic figures scraped from Airbnb.<sup>2</sup>
- The ASSC is concerned that many are using the self-catering and short-term letting sector as a convenient scapegoat to detract from wider housing policy failures. There needs to be a much wider holistic conversation encompassing the need to build more affordable homes and to bring empty homes back into the market. For instance, figures released from GoodMove showed that Edinburgh was Scotland's empty home hotspot, with over 7,000 in the capital.<sup>3</sup>
- Many councillors in the SNP-Labour Group are giving the impression that thousands of short-term lets will transfer back into the housing market through regulation. This is a false narrative as:
  - (a) many of these properties are already the primary residences of individuals involved in 'homesharing' which will not be affected by the control area proposals;
  - (b) it relies too heavily on scraped data from Airbnb and also fails to understand the nature of listings on the Airbnb platform, that is, one property could have multiple listings; and
  - (c) Airbnb is a marketing platform for all accommodation providers including hotels, and unconventional accommodation which cannot be seen as housing stock.
- Instead, the Council needs to secure a firm evidence-base to inform its proposals and target it more effectively rather than this disproportionate approach which may fail in its objectives while damaging Edinburgh's tourist economy.

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<sup>1</sup> <https://www.assc.co.uk/wp-content/uploads/2021/08/Economic-Impact-Study-%E2%80%93Scotland-Report.pdf>

<sup>2</sup> For instance, the Council's report to the Planning Committee from 11 August 2021 states that figures from Airbnb can provide "a useful indicator of the scale of this in the city" and that "In 2019, 31% of all Airbnb listings in Scotland were in the city of Edinburgh". See:

<https://democracy.edinburgh.gov.uk/documents/s35923/Item%207.1%20-%20Short%20Term%20Let%20Area%20of%20Control%20-%20Final.pdf>

<sup>3</sup> <https://goodmove.co.uk/empty-housing-hotspots/>

### City of Edinburgh – Key Facts on Housing

- On 30 June 2019, the population of City of Edinburgh was 524,930, with the number of dwellings in City of Edinburgh was 252,731.
- City of Edinburgh is projected to have the 2nd highest population out of the 32 council areas in Scotland in 2028<sup>4</sup>.
- There are currently 7152 empty houses in Edinburgh, the highest number in Scotland.<sup>5</sup>
- Such figures should be viewed against the 1460 Self-Catering units on non-domestic rates in Edinburgh on 25<sup>th</sup> August 2021<sup>6</sup> who are providing an economic boost to the city.
- Between 2010-2019, 18,118 houses were completed in Edinburgh<sup>7</sup> - and we need much more affordable housing.
- Edinburgh does face housing challenges but Airbnb listings, nor scraped data, do not translate to homes that will be available on the private market, either to buy or rent.
- For example, Airbnb Listings in Scotland include:
  - 258 hotels
  - 138 boutique hotels
  - 421 guest houses
  - 206 serviced apartments
  - 300+ B&Bs
  - 300+ guest suites
  - 70 Chalets
  - 64 hostels
  - 95 Cabins
  - 75 shepherds huts
  - 181 tiny houses
  - 32 Barns
  - 45 campsites (largely with pods)
  - 65 campervans / motorhomes
  - 3 tree houses
  - 5 boats
  - 1 train<sup>8</sup>
- Boutique hotels, chalets, shepherd huts, and a train will not help solve the housing crisis.
- Instead, robust, empirical data is critical in underpinning policy decisions. Current figures from City of Edinburgh Council give a misleading picture of the situation in Edinburgh.

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<sup>4</sup> <https://www.nrscotland.gov.uk/files/statistics/council-area-data-sheets/city-of-edinburgh-council-profile.html>

<sup>5</sup> <https://goodmove.co.uk/empty-housing-hotspots/>

<sup>6</sup> [https://www.saa.gov.uk/search/?SEARCHED=1&ST=advanced&SEARCH\\_TABLE=valuation\\_roll\\_cpsplit&TYPE\\_FLAG=C&STREET=&TPTLA=edinburgh&POSTCODE=&ASSESSOR\\_ID=&CLASS=&CORE=SELF+CATERING&CORE2=Self+catering&FEFFECTIVE\\_DATE=&TEFFECTIVE\\_DATE=&MIN\\_RV=&MAX\\_RV=&searchtype=listing&AS\\_UARN=&DISPLAY\\_COUNT=10#results](https://www.saa.gov.uk/search/?SEARCHED=1&ST=advanced&SEARCH_TABLE=valuation_roll_cpsplit&TYPE_FLAG=C&STREET=&TPTLA=edinburgh&POSTCODE=&ASSESSOR_ID=&CLASS=&CORE=SELF+CATERING&CORE2=Self+catering&FEFFECTIVE_DATE=&TEFFECTIVE_DATE=&MIN_RV=&MAX_RV=&searchtype=listing&AS_UARN=&DISPLAY_COUNT=10#results)

<sup>7</sup> <https://www.gov.scot/publications/housing-statistics-for-scotland-new-house-building/>

<sup>8</sup> [https://www.airbnb.co.uk/s/Scotland/homes?tab\\_id=home\\_tab&refinement\\_paths%5B%5D=%2Fhomes&flexible\\_trip\\_dates%5B%5D=october&flexible\\_trip\\_dates%5B%5D=september&flexible\\_trip\\_lengths%5B%5D=weekend\\_trip&date\\_picker\\_type=flexible\\_dates&query=Scotland&place\\_id=ChIJn6HyA8TiYUgRFAfDCdj6wec&source=structured\\_search\\_input\\_header](https://www.airbnb.co.uk/s/Scotland/homes?tab_id=home_tab&refinement_paths%5B%5D=%2Fhomes&flexible_trip_dates%5B%5D=october&flexible_trip_dates%5B%5D=september&flexible_trip_lengths%5B%5D=weekend_trip&date_picker_type=flexible_dates&query=Scotland&place_id=ChIJn6HyA8TiYUgRFAfDCdj6wec&source=structured_search_input_header)