

## ASSC Submission to East Dunbartonshire Council

### Deadline 17 July

### Pricing/Duration

Proposed licence costs:

#### **Secondary Letting**

£650 up to 2 bedrooms with £50 per additional bedroom

#### **Home Letting**

£450 up to 2 bedrooms with £50 per additional bedroom

#### **Home Sharing**

£250 per bedroom room

#### **Home Letting and Home Sharing**

£450 up to 2 bedrooms with £50 per additional bedroom

#### **Do you agree with the licence costs proposed\***

Yes

**No** (if you answer no, you have to provide reasons for your answer)

These proposed costs are wholly disproportionate and will discriminate against small, professionally run businesses like self-catering. The figures proposed for East Dunbartonshire Council are way out of kilter with nearby local authorities for short-term let licensing, including City of Glasgow Council. Furthermore, they appear to be even higher than for HMO licensing. This raises significant concerns that tourism accommodation like self-catering will be used as a revenue raiser by East Dunbartonshire Council.

With this in mind, we believe that four questions need to be answered by East Dunbartonshire before the fee structure is introduced:

- (1) What is the fee structure based on?
- (2) What are the numbers of short-term lets within each category listed by the Council?
- (3) Why is it more expensive for secondary letting compared to other types of short-term let when the Council will be checking for the same mandatory conditions?
- (4) Why are the fees more expensive than for even HMO licensing?

Without such assurances and detail, local businesses will have absolutely no confidence in what has been proposed by East Dunbartonshire Council.

#### **What do you feel is a suitable licence cost?\*** (this is a further question if you answer no)

The fees attached to short-term let licensing are meant to be based on the principle of cost recovery – fees should not be set at a level greater than the amount necessary to recover establishment and running costs.

The ASSC maintains that the licensing costs should reflect cost recovery and further detail is therefore required as to how East Dunbartonshire arrived at their proposed costings. We would also refer the Council to Scottish Government guidance which highlights ways to keep costs down,

including: (a) economies of scale; (b) integrating service delivery with other housing and licensing functions; (c) using online and digital verification where possible, for example through photo and video evidence instead of a visit; and (d) taking a proportionate, risk-based approach to checks and verification, for example in considering whether, when and how often visits to premises are needed, especially in more remote and rural areas where the costs of such visits could be higher.

Self-catering provides a huge £867m boost to the Scottish economy and needs to be supported for a sustainable recovery for our tourism industry. However, the figures quoted may cause irreparable damage to many small businesses throughout the local authority who do so much for our local businesses and communities.

### **Conditions**

The Council has the power to set additional conditions for short term let properties.

All short term lets which are granted a licence will be required to comply with a set of mandatory licence conditions which will apply across Scotland.

Licence conditions set out a number of rules which the licence holder must comply with during the period for which the licence is in effect. For example, conditions can be used to set out the maximum occupancy of a property used as a short term let.

### **Should the Council adopt additional conditions?\***

**Yes**

No

### **Which issues should the conditions cover?\***

- Noise  Anti-social behaviour  Waste management  Failure to maintain the property  
 Failure to maintain/contribute to communal repairs  Damage or alteration to property   
Unlawful activity  Other

### **If other, please give details below**

The ASSC believes that East Dunbartonshire Council should adopt additional conditions in relation to: (a) noise monitoring devices in tenement buildings; and (b) community accreditation and mediation. One example where such additional conditions have been shown to work is Barcelona, where this was introduced by local government, and further information is available in the ASSC's Forward Together paper.

ASSC, Forward Together: A Collaborative Approach to Short-Term Letting, Url:

<https://www.assc.co.uk/policy/forward-together-a-collaborative-approach-to-short-term-letting/>

### **Maximum occupancy**

It will be a mandatory condition of a short term let licence that hosts and operators ensure that they do not exceed the maximum number of guests for their premises.

The Council may choose to specify on a licence that guests may bring children under a specified age limit, and that these children would not count towards the occupancy of the premises. Scottish Government guidance states that licensing authorities may wish to set the age limit as 'under 10

years', which is in line with the reference to children in the context of housing within the Housing Act (Scotland) 1987.

**Should children under the age of 10 count towards the occupancy?\***

Yes

**No**

### **Temporary licences**

The Council can issue temporary short term let licences. A temporary licence may be granted for a continuous period of up to six weeks, or longer if a host or operator has also made an application for a full licence.

Due to checks required and costs that will be occurred the Council do not intend to issue temporary licences.

**Should temporary licences be introduced?\***

**Yes**

No

**Should there be additional conditions for temporary licences?\***

**Yes**

No

**What additional conditions should be attached?\***

- Noise  Anti-social behaviour  Waste management  Failure to maintain the property  
 Failure to maintain/contribute to communal repairs  Damage or alteration to property   
Unlawful activity  Other

**If other, please give details of other issues below**

As per our earlier answer, we believe that there should be two additional conditions in relation to noise monitoring and community accreditation/mediation.

However, whatever approach is agreed to, short-term lets operating under a temporary licence should be subject to the same additional conditions as those with a permanent license.