

## ASSC Submission to Renfrewshire Council

**Deadline – 22<sup>nd</sup> July**

### **Licence Conditions**

The short-term lets licensing system which the Council will introduce must contain mandatory conditions which, largely, relate to the safety of short-term let accommodation. These conditions will apply across Scotland. The Council has the power to agree additional licence conditions. 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, a condition might be used to set out the maximum occupancy of a property used as a short-term let.

Please note that the Council is not able under the new legislation to impose a condition which restricts the number of nights which a non-resident host can let out their property.

**Do you think the Council should adopt additional conditions?\***

**Yes**

No

**If so, what issues should the additional conditions cover?\***

Overcrowding of the property  **Noise and nuisance**  Litter or other mess in communal areas  Failure to maintain the property in a good state of repair  Failure to maintain, or contribute to the cost of, communal area repairs and increased wear and tear  Damage to property  Unlawful activity

**Please explain your reasons and what you think the conditions should achieve.**

The ASSC believes that Renfrewshire Council should adopt additional conditions in relation to: (a) noise monitoring devices in tenement buildings to evidence noise issues; 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/>

**Please note that the Council is not able under the new legislation to impose a condition which restricts the number of nights which a non-resident host can let out their property.**

**Should children under the age of 10 count towards the occupancy of a licensed short-term let?\***

Yes

**No**

### **Temporary licences**

**5. 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. Should temporary licences be allowed?\***

**Yes**

No

**Please provide any further comments you wish to make.**

Short-term lets operating under a temporary licence should be subject to the same mandatory and additional conditions as those with a permanent licence.

### **Temporary Exemptions**

The Council can also issue temporary exemptions from the requirement to have a licence. The Council require to adopt a policy as to whether these will be allowed. A temporary exemption could be issued for a property for certain occasions where there is a large number of visitors to Renfrewshire over a short period e.g., to support events or festivals. A Temporary Exemption would last for a single continuous period of up to six weeks in any period of 12 months.

**Should Temporary Exemptions be introduced?\***

**Yes**

No

**If so, in what circumstances do you think these should be allowed?\***

First and foremost, if introducing a temporary exemption, Renfrewshire Council will require a clear and unambiguous policy on the type and style of event that would be eligible. All those operating under a temporary exemption should expect to be subject to the same conditions as applying to short-term let licences.

If you answer no, you get the following question...

**Should any premises, or types of premises, not be allowed to operate under a Temporary Exemption? (for information, short-term lets can involve properties shared by a person who lives there, or let out by them, or a property in which the host does not live)\***

Yes

**No**

**Should similar conditions be attached to Temporary Exemptions, if allowed, as apply to short-term let licences?\***

**Yes**

No

**Please explain your response**

This would ensure consistency and fairness in the system for legitimate businesses.

### **General**

**Please add any further comments you would like to make regarding the licensing of short-term lets.**

The Association of Scotland's Self-Caterers (ASSC) welcomes the opportunity to respond to Renfrewshire Council's consultation on short-term let licensing. Founded in 1978, the ASSC are the leading source of knowledge on short-term letting and holiday homes in Scotland and are the only trade body representing the interests of the traditional self-catering sector. We represent over 1400 members, operating tens of thousands of self-catering properties throughout Scotland, from city centre apartments to rural cottages, to lodges and chalets, to castles. The ASSC commits its members to maintaining the principles of "quality, integrity, cleanliness, comfort, courtesy and efficiency" and to offering visitors to Scotland consistently high standards within their self-catering properties.

The ASSC is not averse to regulation; but we do challenge policies that are pursued while lacking a firm evidence base which will damage the livelihoods of our members and Scotland's vital tourism industry. Overall, we want to ensure a balanced and proportionate approach for business, tourism and local communities and get a regulatory framework in place that works for all. We will work constructively with all stakeholders, including Renfrewshire Council, to achieve this crucial objective.

Tourism is a mainstay of the Scottish economy; and self-catering is hugely important to Scottish tourism in terms of jobs, revenue, and world-class experiences offered to guests. To be such an essential part of Scotland's tourism mix is even more remarkable for our sector when most self-caterers operate small or micro businesses. Our professional self-caterers are diligent and considerate business owners who are too often unfairly maligned. They do not, for example, 'hollow out communities', as some have claimed, but rather are part of local communities across Scotland and have been for many, many years.

The 'negatives' concerning short-term letting are often based on hearsay. Sadly, in recent years, due to the rise of the collaborative economy and online accommodation platforms, negative attitudes have increased with a hostile media and political climate which has been detrimental to hard-working professional self-catering operators who have operated in Scotland for decades with minimal complaints or issues. This climate has, in turn, impacted upon community cohesion and led to bad policy decisions where short-term lets are used as a convenient scapegoat for long-term failures to address housing challenges. We would respectfully encourage an evidence-based approach to short-term letting – as well as a holistic approach to tackling housing challenges – and not one that relies on perception or anecdote.

When introducing local licensing schemes, we must not lose sight of the considerable economic benefits from short-term letting. Self-catering provides a £867m per annum boost to the Scottish economy, benefiting local communities the length and breadth of Scotland, supporting 23,979 FTE jobs. Given the importance of this sector to the Scottish tourism industry, which has experienced such a challenging time due to the impact of Covid-19, an appropriate regulatory balance is a necessity, as is a supportive environment to help businesses recover and flourish. The recovery of Scottish tourism will benefit small businesses, while responsible and sustainable tourism can help communities to recover too.

Short-term letting also adds to the diverse range of accommodation available and responds to consumer trends towards more authentic local experiences. The fact that consumer trends are shifting towards short-term lets and self-catering is illustrated by the fact that hotel chains are moving into this market and why they list rooms on popular booking platforms like Airbnb and Booking.com.

Moreover, traditional short-term letting activity, such as self-catering, is a small business like any other, with dedicated full-time professionals striving to provide positive experiences for guests and visitors. Given the competition to maintain standards, holiday let owners often spend money more frequently on additional property maintenance than they would on their own property. Their guests spend money in local food shops, cafes, gift shops, galleries, restaurants, tourist attractions etc – many of which would simply be unviable without visitor spending. Therefore, the impact of licensing (in tandem with any control areas) with the aim of reducing the number of properties, will not be limited to self-catering and short-term letting overall as there will be a significant negative impact to businesses in the wider supply chain. This emphasises the value that short-term letting provides to the wider economy (especially within the context of Covid recovery) from the operators themselves, with negative knock-on effects on hospitality, local activity providers and local attractions. There will also be a negative impact on laundry providers and cleaning services and guests, not to mention property managers, and the onward tech supply chain.

Finally, for Scotland – and indeed Renfrewshire – to remain competitive as a tourism destination, it needs to be responsive and adaptive to consumer trends, both in respect of the range of accommodation available, as well as for more environmentally conscious options. Holidaying within Scotland, rather than jumping on a plane to a resort overseas, should not only be encouraged during a global pandemic – but as an environmental, social and economic positive going forward. Self-catering properties can, therefore, be viewed as a solution to sustainability, not the problem. Indeed, as one ASSC member – Louise Dickins (owner of Dickins Edinburgh Ltd) – so ably put it: *“Quite often in our rural locations [self-catering units] are the main choice of where to stay. And they’re an opportunity to stay in the heart of nature. They’re affordable to families too. Scotland is one of the most beautiful countries in the world and so we’re so lucky across the UK to be able to holiday here and not damage the planet in the process.”*

We believe that traditional self-catering provides both economic and environmental benefits for communities in Renfrewshire and the country as a whole. However, in order to ensure benefits are realised, self-catering needs to be actively encouraged as a sustainable option for travellers and an enabling regulatory landscape, not a draconian one, is critical.

#### Sources

Frontline Consultants, *Economic impact of Self-Catering Sector to the Scottish Economy*, Url: <https://www.assc.co.uk/policy/economic-impact-study-self-catering-worth-867m-to-scottish-economy/>

ASSC, ‘Short-Term Lets Vital for Sustainable Tourism in Scotland’, Jan 2021. Url: <https://www.assc.co.uk/short-term-lets-vital-for-sustainable-tourism-in-scotland/>