



ASSC

Supporting self-catering in Scotland

ASSC Survey Results 18th September 2023

Barriers to Applying for Short-Term Let Licences

The Association of Scotland's Self-Caterers continues to collate evidence on the impact of the challenges facing our sector, specifically in this instance the barriers to applying for Short-Term Let Licences. The data shown in the below survey results will be used to inform ongoing discussions with the Scottish Government and other stakeholders.

***1848 BUSINESSES RESPONDED TO THIS SURVEY IN 48 HOURS
(15/9/23 – 17/9/23), 50% of whom were members of the ASSC***

Headlines

- 64% of respondents have not yet applied for a STL licence
- 90% of respondents have not had a licence granted
- 70% are concerned about displaying personal data in public spaces
 - This rises to 87% in the City of Edinburgh and 79% in the City of Glasgow
 - Concerns about identity fraud, abuse, personal safety and security, serious GDPR breach, breach of privacy, harassment, unwanted community conflict, vandalising of property, vulnerability of women and older people are all examples of the many comments from survey respondents
- Only 53% of businesses plan to stay open with the remaining closed/closing or not yet sure. This is a potential loss of 6248 bed spaces
- In Edinburgh 22% have applied and only 1% (4 licences) have been granted a licence
- In Perthshire 38% have applied for a licence and only 8% have had a licence granted
- 46% of operators are rural or island based
- 43% rank not being able to afford a licence as the primary or secondary reason for not applying

Where is your business based?

Local Authority	Number of Respondents	Local Authority	Number of Respondents
Aberdeen City	17	Highland	417
Aberdeenshire	62	Inverclyde	1
Angus	32	Midlothian	8
Argyll & Bute	189	Moray	44
Clackmannanshire	4	North Ayrshire	55
Dumfries & Galloway	70	North Lanarkshire	10
Dundee City	14	Orkney	30
East Ayrshire	5	Perth & Kinross	95
East Dunbartonshire	5	Renfrewshire	11
East Lothian	48	Scottish Borders	67
East Renfrewshire	6	Shetland	6
Edinburgh City	391	South Ayrshire	28
Eilean Siar	44	South Lanarkshire	21
Falkirk	4	Stirling	46
Fife	60	West Dunbartonshire	15
Glasgow City	94	West Lothian	7

How would you describe the location of your business?

- Urban 562 / 31 %
- Suburban 136 / 7.42%
- Semi-Rural 284 / 16 %
- Rural 637 / 35%
- On an Island 205 / 11.19%
- Pan Scotland 8 / 0.44%

Do you operate any of the following?

- Self-Catering 1511 / 82%
- B&B/ Guest House/ Small Hotel 148 / 8 %
- Farm / Agritourism Accommodation Business 36/ 2%
- Glamping / Shepherds Hut 69/ 4%
- Caravan, not part of a licence caravan site 9 / 0.49%
- Home Share (in your primary residence) 186 / 10 %
- Property Management Agency 38 / 2%

How many bed spaces do you provide in total? 17,563 bed spaces (1818)

Have you applied for a Short-Term Let Licence?

- Yes 657 / 36%
- No 1170 / 64%

Have you had a Short-Term Let Licence granted?

- Yes 188 / 10%
- No 1927 / 90%

Are you concerned about the requirement by some local authorities for applicants to display personal information in public spaces (on Notices and on Public registers)?

- Yes 1072 / 70%
- No 457 / 30%

Comment examples:

- *There is a lot of ill feeling directed at holiday let owners and this makes you feel very vulnerable*
- *As there have been many reports of anti stl groups gluing door locks and vandalising property*
- *With such bad publicity regarding short term lets and Airbnbs I fear for personal attacks*
- *In case it causes issues with locals*
- *It's invasive and NOT necessary. It also breaks GDPR rules*
- *Identity theft in particular but in addition vulnerability to persons who are intent to do harm*
- *I have nothing to hide but it makes you vulnerable to scammers which could threaten lively-hood and business*
- *Personal data can be misused or false complaints can be made using these details*
- *I am concerned that people or groups with a grievance against short-term lets will have access to my personal information and home address*
- *It is not a good idea to advertise the location of possibly unoccupied Self catering properties*
- *Impact on privacy. Negative press about STL owners. Exacerbated by political rhetoric*
- *It is a clear breach of GDPR legislation, putting owners at risk of misuse of data and harassment*
- *Yes, very concerned. There are several anti "Airbnb" groups in Edinburgh. Some are verbally abusive; others have damaged property. I am worried about it escalating further and am concerned for my personal safety*
- *Because of the huge amount anti STL reports - one person has actually set up a website to alert others to applications. And what about my GDPR rights?*

- *I have concerns that vigilante groups will actively destroy these notices and raise an objection regardless of whether they live in the area or not. This has recently been highlighted as an ongoing issue in chat groups on Reddit where people are actively objecting to all notices.*
- *One of my neighbours is a bully and has acted aggressively to several of my guests over the last 6 months. I anticipate he and his wife will object to me taking guests for no just cause*
- *GDPR - information available for anyone to see and potential backlash/contact from unwelcomed parties, who don't really understand the Self-Catering business or individuals. And take to likes of social media with their responses and sometimes hatred*
- *I am in the military and Airbnb my house whilst I am away. I have specific security clearances and a particular job which I don't want to have my name out in public*
- *It's unnecessary B) Personal information should not be displayed. That breaks GDPR regulations C) Displaying personal information publicly compromises my personal safety D) It opens me up to complaints from people who have a disliking of self-catering rather than people who have a genuine problem with my particularly property*
- *This is highly dangerous - identity theft etc.*
- *I am concerned for two reasons. I would rather not have a public register of addresses which may be empty in the winter months as this may encourage criminal damage or break ins to my property in the more season. Secondly short term lets are the scape goat in our town for all of the housing problems that exist due to historical reasons. People rightly feel passionate about the housing crisis, operating in a small town I'd rather not appear on a public register which may bring unwanted conflict and conversations in my small town. I would like to operate my single premises professionally and privately if possible*
- *I have a dangerous ex-partner I don't want to fine me and hackers and scammers*
- *I'm a woman living on my own and also there is hostility to people who have short-term lets*
- *I am 71 and live alone. Though two men live in my 6 apartment building, one is 86 and the other is obese and disabled. I feel vulnerable making my circumstances / address publicly available for anyone to see. When I lived in Duddingston 13 years ago, I had to involve the police when I was stalked by a stranger by phone. He called repeatedly including during the night. I found myself wondering if every man who passed my house was the culprit. This went on for years.*
- *I am increasingly conscious of a verbal online mood shift against the self-catering sector who are now being used as the reason there is everything from town centre de-population to the so-called 'housing crisis'. I feel Scot Gov actively uses this to deflect from their own failings on housing, increased red tape in planning, etc.*

Are you planning on applying for a Short-Term Let Licence?

- Yes 943 / 62%
- No 151 / 10%
- Not sure yet 235 / 15%
- N/A 200 / 13%

Thinking about the reasons why you are yet to apply for a licence. Please rank the list of below options using the numeric drop-down menu. Please add your Primary Reason as No.1 and Secondary Reason as No.2. Please complete the remaining options if relevant or use N/A (thank you!). If you have already applied, please skip the question.

The results below are in order of popularity for the **Primary and Secondary** reason for not yet applying for a licence.

1. The costs associated with applying for a licence are too high (I cannot afford a licence) – **this was noted as the most popular response given (primary and secondary reason) by 43% of respondents** (27% primary and 17% as secondary)
2. I am worried about sharing my personal data and how it might be used – **Noted as the second most popular reason by 35% marked this as their primary and secondary reason for not yet applying.**
3. The process is onerous and time consuming – **30.83%** as primary and secondary
4. I don't have confidence that a licence will be granted – **25%** as Primary and Secondary **(a further 22% marked this as their third reason).**
5. I can't get the required certification in time for the deadline – **14%**
6. I am unable to apply for a licence due to planning permission requirements in advance of a licence application – **12% as Primary and Secondary**
7. I have concerns with the legality or uncertainty regarding planning processes that prevent me applying for a licence – **12% as Primary and Secondary**
8. My neighbours will object and the objection may be upheld – **7% as Primary and Secondary** (a further 21% marked this as their 4th reason for not applying)
9. I know I won't get planning permission – **7% as Primary and Secondary**
10. I refuse to do so on principal – **5% as Primary and Secondary**
11. I didn't know I had to until recently, it's too late now - **2% as Primary and Secondary**

Are you planning to stop letting your property/room as holiday accommodation?

- I have already closed 49 / 3%
- Yes, I plan to close 214 / 14%

- No, I plan to remain open 819 / 53%
- I don't know 453 / 30%

If you answered 'yes', or 'I don't know' which of the following will apply after 1 October (tick all that apply):

- None of the above 107 / 9%
- I will be financially worse off 716 / 62%
- I will struggle to pay my rent / mortgage / energy bills 368 / 32%
- I will need to find alternative sources of income to pay my bills 457 / 40%
- I will need to find alternative employment 252 / 22%
- I will need to go on benefits to help cover essential costs 104 / 9%
- I will need to sell my STL property 185 / 16%
- I will need to sell my home 77 / 7%
- I will need to sell both my STL property and my home 66 / 6%
- I will not be affected either way 27 / 2%
- N/A 229 / 20%

If you plan to sell or rent your home after 1 October, will your property:

- Be sold as affordable housing 7 / 0.52%
- Be available to rent at an 'affordable rate' in your area 36 / 3%
- None of the above 784 / 58%

Other comment examples:

- *Guidance and support has been incredibly hard to get from the council. With the volume of businesses at risk and the knock-on effect on the local economy, you would think that more resources and a more proactive approach would have been taken before getting to the point where the industry is hanging by a thread*
- *There is a long delay on getting a license, and then there is still the issue of planning, they took my money 1000pounds, and I paid a planning consultant 1000 too, for the planning application over a year ago, and still no outcome. Unacceptable..... and I feel ripped off by the planning consultant too. Hopefully lots of people will not apply, supply of property will go down and rental prices in Speyside will rise to hopefully reach Skye levels*
- *Too many to list but mainly how this has put a lot of people in stress and anxiety with the current climate of change going on this was not the right time to be doing this it could be handled better and policies of how to apply should have been looked at thoughtfully with the tourism sector in mind. There is always need for change but it's how you do about making changes that count which something the Scottish government should look at*
- *We are family business who are 3rd generation self catering. Stirling council charge £420 per lodge no matter how many lodges you have. Highland Council are charging £650 for 10 chalets on one site. Shetland*

Islands Council are charging £156 for 9 chalets on one site. Where is the parity??? This is unfair!

- *Lack of electricians to do an EICR and work required to reach a satisfactory standard. Also getting EPC and PAT certificates and testing water supply*
- *The Scottish Government has unfairly targeted small businesses providing essential accommodation for short-term visitors, bringing income and jobs to Scotland. The government can only be doing this for the following reasons: 1. Their own investments in city-centre property will be boosted by cutting off competition. 2. Their overseas investors are encouraging them to use their powers to do no. 1. 3. This public attack on an easy target masks their woeful failure to address the real needs for social and affordable housing in Scotland. 4. The use of an ideological veil to cover all of the above is despicable*
- *This whole process has caused an incredible amount of work and stress trying to figure out if our business can operate or not. It has a direct impact on our mental health*
- *I completely agree with introducing reasonable regulations to ensure guest safety, but requiring planning permission for Edinburgh which they have already said will get refused if shared entrance means they are forcibly closing many successful businesses. We have operated for 8 years with no issues from guests/ neighbours, employ local people, pay a lot of tax and offer guests a really authentic experience. Feel as though the Scottish government do not wish anyone to be aspirational/ invest for their future. I will never vote SNP!!!*
- *I wish the Scottish government knew the practicalities to this scheme and who will be benefiting. It's so targeted and misguided it's hard to believe. For us this has cost us thousands due to having to go on to a variable rate on our mortgage because we are afraid if we fixed and were rejected on the license application, we'd have to pay an early repayment charge on our mortgage. It's up £800 on last year as a result and the numbers do not work as a standard BTL so we may lose what was our first home and what is absolutely suited to STL being where it is and what it is. To be honest I think having a licensing scheme or similar is a good idea but so many questions come to mind...why so expensive, why so strict, why so badly planned and rushed, why are STLs being blamed for government's inability to provide enough housing over the last several decades, I can go on, why have they not thought about the negative impacts enough like what mine are above. The bottom line is it seems about money, to make councils and government more money but I don't think they expected so many STLs to fall away...if hotels get to pick up the slack it's so sad...STL alternative accommodation is so fun and exciting for many travellers and offers unique perspectives and experiences of our country, these are being slaughtered inhumanely*
- *This is just the first hurdle in what I foresee to be a sustained attack on people who use houses for their business. Soon to be followed by the tourist tax and then UK changes to tax rules which will probably mean we can no longer run our business as from what I understand it will only be*

large operators that will be considered to be real businesses utter MADNESS. Thanks for all you have been doing to try to make sense of this over-burdensome legislation

- I am aware of loads of people who are no longer going to let out their second homes. If they go on the market, locals cannot afford them, it only encourages more English people to sell their expensive houses down south and move up here to a large house and retire. The average patient age in our local doctors surgery is 68. 65% of our town population is over 65 years of age because young people cannot afford to buy. The short term licensing programme will do nothing to alleviate this - it will only serve to reduce tourism and hence local jobs. We have our licence but it cost us well over £10k*
- The process has remained very unclear. I also run an HMO in Edinburgh and that process and importantly requirements to meet regulations are very clear. I cannot understand why the council will not give definitive answers like they do for hmo*
- My life feels on hold just now until this is all sorted and is decided one way or the other as would probably get the licence ok but COL another matter and it will all have been for nothing then. It is wasting time, energy and money. So stressful! People's time is precious. Just do not need this head pressure and the Scottish Government and CEC care absolutely not a jot about the people they are supposed to be elected to serve*

Regional Data

- Highlands 16% have had a licence granted (48% applied)
- Perthshire 8% have had a licence granted (38% applied)
- Edinburgh 1% has had a licence granted, 4 businesses – (22% applied)