

# Response to the Local Government, Housing and Planning Committee's Consultation on Licencing of Short Term Lets

**October 2021**

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## Summary

Scotland's Citizens Advice Network is an essential community service that empowers people through our local bureaux and national services by providing free, confidential, and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Citizens Advice Scotland is pleased to respond to this consultation on short term lets.

## Response to Questions

### **1. How would you describe your view of the proposed licensing system for short-term lets?**

In principle, CAS welcomes the proposed licensing system for short term lets. A well-functioning licensing system should help to ensure that communities are able to have peaceful enjoyment of their homes, as well as help to regulate a market which has contributed to the squeeze on the affordability and availability of homes, the latter of which is CAS' key concern regarding short term lets.

As expressed before in previous consultations<sup>1</sup>, there is currently a significant lack of information available on both the private rented sector and the short term lets sector. The data collected through the proposed licensing system should help to resolve this and ensure that local authorities are more aware of how short term lets are working alongside and within the local housing market. This in turn should allow them to plan how to meet housing need in the area and incentivise investment in long term housing. The proposed establishment of control areas should limit the loss of whole properties to the short term lets market in areas which are already well- or over-served by short term lets, such as Edinburgh and particular island areas which are popular with tourists.

The licensing system also offers the opportunity for quicker resolution of issues that prevent peaceful enjoyment of homes, such as excessive noise and anti-social behaviour. Indeed,

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<sup>1</sup>CAS (2020) [Response to the Scottish Government's consultation on Housing to 2040](#)

analysis of data from the Citizens Advice network<sup>2</sup> last year showed an uptick in queries about antisocial behaviour, including noise complaints. While this cannot reasonably be linked to short term lets as it was during the height of the pandemic, as people continue to work from home and tourism re-opens, this could become a bigger issue. The system should encourage hosts of short-term lets to be as considerate as possible to neighbours, and allow for easier reporting of issues to the local authority.

## 2. Why do you think this? (please tick all that apply)

- It will safeguard the amenity of people living alongside short-term lets
- It will protect existing communities in areas with high visitor numbers
- It will ensure short-term lets meet minimum safety and management standards
- It protects legitimate short-term let businesses
- It should not include traditional Bed and Breakfast accommodation
- It will disproportionately affect businesses in rural areas
- It will lead to the closure of short-term let businesses
- It will increase costs for short-term let businesses

Any other reasons:

## 3. Thinking about your response above, how do you think the proposed licensing system could be improved?

CAS is surprised to see the removal of the requirement to adhere to energy efficiency requirements in the guidance for hosts and operators, which seems incongruent to the Scottish Government's overall net zero ambitions. However, we are aware that the Scottish Government has recently released a Heat in Buildings strategy which may address this gap through its tenure-neutral approach. We believe this is an area that may merit further consideration by the committee to ensure that it is in line with climate commitments.

## 4. Is there anything else about the proposed licensing system, or its potential impact, that you would like to mention to the Committee. It would be helpful if you could keep any comments brief and provide evidence to support any claims made.

Close monitoring of the licensing system will be required, as well as flexibility to respond to any issues that local authorities flag up when it rolls out. The licensing system should provide a

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<sup>2</sup> CAS (2021) [Annual Housing Data Briefing](#)



wealth of information to the Scottish Government on the use of short term lets, and will be invaluable for long term housing strategy.

**For more information, please contact:**

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