



12th February 2021

Dear Minister,

Request for the Withdrawal of the Scottish Government's Short-Term Let SSIs

Back in October 2020, 38 leading tourism and business stakeholders, including many signatories to this letter, wrote to the Scottish Government to express concerns over the timing and impact of the short-term let regulations. The sector remains resolute in its belief that the proposed regulations will entail damaging consequences for Scottish tourism at a time when the sector can least afford it.

However, as developments have unfolded, this coalition of support has broadened to include other organisations, including the Scottish B&B Association and the National Farmers Union of Scotland. Moreover, it is notable that one of the most influential proponents of regulation, Andy Wightman MSP, voiced concern about what has been set out in the SSIs and argued that they should be withdrawn; while other MSPs have highlighted concerns over the scope and cost to operators, the tourist economy and local government.

Overall, it is our firm belief that:

- **The regulations are ill-timed and inopportune during the pandemic.** Many businesses captured by the regulations are focused on their very survival. Numerous Covid-19 restrictions have been placed upon them and uncertainty endures as to when these might be lifted. The prioritisation of the regulations makes even less sense when similar legislation, such as the Transient Visitor Levy, has been rightfully postponed.
- **The regulations are a blunt tool to fix a perceived and localised problem of amateur operators in urban areas like Edinburgh,** rather than being a solution that is appropriate for the whole of the Scotland. The regulations offer no real flexibility to local authorities where concerns over short-term lets are not an issue. The regulations will hit rural Scotland hard, with many businesses and communities depending on the economic footfall generated by visitors to self-catering accommodation.
- **The regulations go beyond what was originally envisaged as B&Bs will be captured by the licensing regime.** The Scottish Government's Short-Term Let Delivery Group did not consult with the B&B sector which we believe would be a basic duty given the impact of the regulations.
- **The regulations will be burdensome financially and from a resourcing perspective for local councils.** They are already under considerable pressure due to the pandemic and, despite assurances from government that the scheme will be cost neutral, they will not receive any additional funds to assist with start-up costs. Several authorities noted these issues in their consultation responses and Highland Council has called for the implementation of the regulations to be delayed.

Unfortunately, despite such concerns, the Licensing Order was approved by the Scottish Parliament's Local Government and Communities Committee on 3rd February 2021 by the slimmest of margins, with MSPs noting serious flaws in the SSIs. It is expected that the SSIs will be tabled for a vote in plenary at the Scottish Parliament in the immediate future.

With so many stakeholders now highlighting deficiencies in the plans, it is incredibly disappointing that there is no opportunity to amend the regulations. **Given the importance of these measures to lives and livelihoods throughout Scotland, we need to get the regulations right at the first opportunity and not rely on revisiting the rules once implemented.**

We would therefore respectfully recommend that the regulations are withdrawn by the Scottish Government.

Instead, it is our sincere hope that government will work constructively with affected stakeholders in the next parliament to devise balanced, proportionate and world-leading regulations that will support the sustainable recovery of Scottish tourism.

Proceeding with regulations that are not fit for purpose will merely compound the many difficulties faced by struggling businesses the length and breadth of this country. Let's work together to get the details right for the benefit of everyone – business, visitors and local communities.

Yours sincerely,

Airbnb: Marie Lorimer, Public Policy UK & Ireland

Association of Scotland's Self-Caterers: Fiona Campbell, Chief Executive

Association of Scottish Visitor Attractions: Gordon Morrison, Chief Executive

Association of Serviced Accommodation Providers: James Foice, Chief Executive

Best Scottish Cottages: Jackie Robertson, Owner

British Holiday & Home Parks Association: Jeanette Wilson

Cairngorms Business Partnership: Mark Tate, Chief Executive

Confederation of British Industry: Mari Tunby, Head of Policy

Dickins Edinburgh Ltd: Louise Dickins, Managing Director

European Holiday Home Association: Carlos Villaro Lassen, Secretary General

Federation of Small Businesses: Andrew McRae, Scotland policy chair

Glen Tanar: Claire Bruce, Sales and Marketing Director

Holiday Home Association: Martin Sach, Chief Executive

Inverness & District B&B Association: Daniel Mackenzie-Winters, Chair

Knoydart Hide and Knoydart House: Jackie Robertson, Owner

Laggan: Duncan McConchie, Managing Director

NFU Scotland: Martin Kennedy, President

Oban & Lorn Tourism Alliance: Linda Battison, Director

Outer Hebrides Tourism: Rob McKinnon, Chief Executive

Professional Association of Self-Catering: Alistair Handyside, Executive Chairman

Quality in Tourism: Deborah Heather, Director

Scotland's Best B&Bs: Patti Walker-Booth, Chairperson

Scottish AgriTourism: Caroline Millar, Lead

Scottish B&B Association: David Weston, Chairman

Scottish Chambers of Commerce: Liz Cameron, Chief Executive

Scottish Hospitality Group: Stephen Montgomery, Spokesperson

Scottish Wholesale Association: Colin Smith, Chief Executive

Sharing Economy UK: Jenna Cane, Manager

Shetland Tourism Association: Emma Miller, Chairperson

Short-Term Accommodation Association: Merilee Karr, Chairperson



SkyeConnect: Alistair Danter, Project Manager
South of Scotland Destination Alliance: David Ibbotson, Chair
UK B&B Association: David Weston, Chairman
VisitAberdeenshire: Chris Foy, Chief Executive
VisitArran: Sheila Gilmore, Executive Director
Visit Inverness Loch Ness: Michael Goldie, Chief Executive
Visit Moray Speyside: Laurie Piper, Chief Executive
Where Stags Roar: Rod Frazer
WildScotland: Victoria Brooks

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