



VisitScotland is Scotland's national tourism organisation. Our core purpose is to make the most of all the economic benefits Scotland's tourism industry has to offer. We work closely with individual tourism businesses, public agencies, local authorities and other tourism stakeholders to help achieve this. This paper is provided in response to the proposed short term letting changes to highlight the views of the industry, who have engaged extensively in the process.

1. Do the proposed changes strike the correct balance between protecting the long-term sustainability of local communities and promoting tourism and strong local economies?

Pre-pandemic, Scotland's buoyant tourism industry supported jobs, economies and communities across the country. Bed and Breakfasts, self-catering properties and other forms of short term lets are an important part of the accommodation mix and make a valued contribution to the visitor economy.

The industry has highlighted the timing of the proposed changes presents a huge challenge given tourism businesses have been devastated as a result of the pandemic. The financial and administrative implications of this legislation are of concern to many accommodation owners. They argue the legislation will further damage businesses that are already struggling for survival and be harmful to local economies and livelihoods. As such the industry want this process to be paused, to allow time for recovery.

2. Has the Scottish Government defined short terms lets in a clear and correct way in the legislation?

The sector is concerned about the inclusion of traditional self-catering and Bed and Breakfast providers in the term 'short term lets', particularly because such operators are already subject to regulation. 'Short term lets' in the legislation encompasses a broad range of accommodation providers from peer to peer accommodation platforms through to traditional self-catering properties. This has caused concern among industry who feel there is not an appropriate distinction between very different accommodation types.

The industry highlights that B&Bs were originally not included in the scope of this legislation, causing confusion among business owners on publication of the new rules. They have also raised concerns over a lack of direct consultation with B&Bs.

3. Will local authorities have adequate resources, powers and expertise to make a success of their new powers and duties?

New legislation will put pressure on planning and licensing teams to deliver the scheme at a time when resources are limited. The introduction of new legislation should be properly funded and made as straightforward as possible for both owners and local authorities. As such, the industry is calling for an impact assessment of the costs involved for local authorities.