**ANNEX 1: THE NEED FOR EMPIRICAL DATA**

* Underpinning any decision to regulate the short-term letting sector is the need for **robust, empirical data**. Unfortunately, there has been a tendency to focus on scraped data from Airbnb – based on inaccurate information and flawed methodologies – leading to misleading conclusions about the nature of the short-term letting landscape.[[1]](#footnote-1)
* The **ASSC is not averse to regulation and has proactively shared evidence-based policy papers and recommendations**[[2]](#footnote-2) since 2017 about the nature and scale of short-term letting in Scotland but unfortunately this has been ignored by a focus on this unreliable data from one marketing platform.
* The Scottish Government’s draft BRIA for short-term let licensing references research noting that there were approximately 32,000 active listings on Airbnb in May 2019.[[3]](#footnote-3) However, this **does not** mean that there are 32,000 short-term lets which would be readily available on the long-term housing market as many have erroneously claimed.
* **The number of listings on online platforms in any given area is not necessarily an indication of impact on long-term housing**. For example: (a) many of these properties are already the primary residences of individuals involved in ‘homesharing’ who share a room(s), or their entire home while away; (b) each listing does not represent a single housing unit. A property can have multiple listings; and (c) marketing platforms like Airbnb contain a diverse range of accommodation including hotels and B&Bs, as well as unconventional accommodation like yurts, barns, boats, and campervans and one train, which cannot be seen as housing stock.
* Furthermore, properties can also be advertised across multiple platforms, be it Airbnb, Expedia or Booking.com – referred to as **‘cross-listing’** – creating the mistaken perception that there are more properties available for short-term let than there actually are. Properties can be listed multiple times on one or many platforms. Whole homes or single rooms in the same house often appear on more than one platform.[[4]](#footnote-4)
* Parliamentary answers from the Scottish Government[[5]](#footnote-5) confirm the **BRIA figures were from scraped data provided by InsideAirbnb** (not from Airbnb directly) and that they **could not break this down by property type** – be it a single/shared room, entire property, or unconventional accommodation. This means the estimation there are 32,000 *“short-term lets”* is wholly unreliable. It is also based on pre-pandemic 2019 figures. Moreover, they admit *“****we do not have an estimate of how many short-term lets will return to the long-term housing market****.”*[[6]](#footnote-6)
* The ASSC have previously argued that there is a lack of data showing an empirical link between short-term lets and housing shortages and that a more holistic approach needs to be taken to the issue. **Housing challenges are multifaceted and the growth of short-term lets should not be used as a convenient scapegoat for wider policy failures**; namely the failure to build more homes or bring empty homes back into use. Thus far, no evidence has been published in Scotland that demonstrates a concrete link between short-term letting and the Scottish housing supply.

**Annex 2: REGULATIONS AND GUIDANCE ASSOCIATED WITH ‘TRADITIONAL’ SELF-CATERING AND B&B ACCOMMODATION IN SCOTLAND**

The following table sets out the key requirements in place for self-catering and B&B accommodation in Scotland and identifies whether this is a legal requirement or guidance for each.

VisitScotland operate a Quality Assurance scheme which asks businesses to confirm they comply with their statutory obligations; health & safety/ fire regulations etc. However, they do not list the specifics nor check everything is in place (though the business owner/manager does sign up in commitment to having these in place and if any legitimate concerns regarding lack of compliance were raised they would be omitted from the scheme.

Members of the ASSC are required to make an annual declaration confirming their Commitment to Quality, the ASSC’s Quality Assurance scheme. This is enshrined in the Members Operating Agreement, along with the Code of Practice which signposts members to legal compliance and best practice. This is a self-regulatory scheme, which comes atno additional cost to members.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Requirement** | **Legal or Guidance**  | **Self-catering**  | **B&B**  | **Additional Comments**  |
| Property Evaluation – General risk assessment to create a safe environment  | G | Y | Y | Identify potential Hazards for guests and employees and precautions to ensure safety  |
| Gas Safety Certificate | L | Y | N | Landlords are required to ensure gas appliances are safe and have a gas safety check by a Gas Safe Engineer. Certificate must be renewed annually. |
| Fire Safety and Mains Wired Smoke Alarms  | L | Y | Y | The Fire (Scotland) Act 2005 (‘the 2005 Act’): Requires all commercial premises to conduct a fire risk assessment and put in place appropriate mitigations. It is all accommodation providers’ legal obligation to comply, regardless of whether they are amateur or professional hosts.The Scottish Fire and Rescue Service (‘SFRS’) is the enforcing authority. [[7]](#footnote-7)There is different compliance for B&Bs and self-catering, and indeed different sizes of properties, proportionately reflecting the different accommodation models. |
| Carbon Monoxide Alarms  | L | Y | Y | CO detectors must comply with BS EN 50291-1+A1:2002 Hard-wired or wireless installations - applicable European directives. |
| Food safety hygiene  | L | N/A | Y | Businesses serving food (including breakfasts) must comply with [food safety legislation](https://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/regulation-legislation/general-food-law) |
| Electrical safety  | L | Y | N | From December 2015 Scottish landlords need an Electrical Installation Condition Report (EICR) for new tenancies: a check of the fixed wiring in the property (which lasts 5 years). Holiday home owners have a legal obligation to ensure that electrical appliances are in safe condition for the use of guests. The Electricity at Work Regulations 1989 recommends that every electrical installation is subjected to periodic inspection and testing[[8]](#footnote-8).  |
| Portable Appliance testing (PAT Testing) | G | Y | N | Landlords are legally required to have PAT testing carried out on any electrical appliances provided in a property (including ovens, fridge freezers and other white goods). There is no legal requirement for holiday home owners, but annual PAT testing is best practice and recommended by the ASSC.  |
| Legionella risk assessment  | G | Y | N | As a provider of self-catering accommodation, you must ensure that the risk from exposure to legionella in your premises is properly controlled. To that end it is advised that you identify and assess the risk from exposure to legionella to your own staff, guests and customers, and any other people working in your premises, and introduce appropriate measures to control any risk. It is also advised that you review your legionella risk assessment annually. Spa pools and hot tubs pose a significant risk of legionella and owners of properties with a spa pool or hot tub must carry out a legionella risk assessment and implement safety measures[[9]](#footnote-9).  |
| Furniture and furnishings  | L | Y | Y | The Furniture and Furnishings (Fire) (Safety) Regulations 1988 apply to all self-catering properties: holiday homeowners must ensure that furniture supplied in the property is safe. Boshers Ltd have a useful blog post on [Fire Safety of Furniture and Furnishings in your Holiday Home](http://www.boshers.co.uk/blog/health-and-safety-guidance/fire-safety-of-furniture-and-furnishings-in-your-holiday-home/). |
| Covid-19 Cleaning Guidelines | G | Y | Y | Self-Catering and B&B accommodation have protocols in place to ensure hygiene and minimise risk[[10]](#footnote-10), endorsed by the Scottish Government.  |
| Control of substances hazardous to health  | G | Y | N | If you provide cleaning products such as bleach and oven-cleaner in the house, or store chemicals for the swimming pool or hot tub on site, it’s good practice to complete a [COSHH](http://www.hse.gov.uk/coshh/index.htm) (Control of Substances Hazardous to Health) assessment.  |
| Certification and Assessment Schemes  | G | Y | Y | There are Quality Assurance schemes that operators can sign up to, such as Quality in Tourism, (Safe, Clean and Legal scheme)[[11]](#footnote-11). ASSC recommends that members sign up to this scheme to ensure compliance.  |
| Accessibility and non-discrimination  | L  | Y | Y | These requirements apply under the Equality Act 2010 (for example, this requires businesses to accept any lawful enquiry that can pay)  |
| Code of Conduct for Short-Term Letting Operators and/or their Agents | G | Y | N | The ASSC Code of Conduct[[12]](#footnote-12) was developed alongside the Scottish Government Expert Panel on the Collaborative Economy. It comes with a Policy Recommendation Paper, which sets out how the vital self-catering sector in Scotland can be improved for customers, hosts, and all others involved.  Members of the Short-Term Accommodation Association (STAA) also sign up to an equivalent Code of Conduct[[13]](#footnote-13). These members include online platforms.  |
| Energy Performance Certificate (EPC-12) | L | Y | N | Self-catering properties must have an EPC[[14]](#footnote-14). An EPC is not required where only a room within a building (such as a B&B. |
| Repairing Standard | L | N | N | The Housing (Scotland) Act 2006 (Modification of the Repairing Standard) Regulations 2019: holiday lets were formally exempted from this legislation, after much discussion with the Scottish Government. B&Bs are also exempt. |
| Private Water Supplies | L | Y | Y | Private Water Supplies (Regulations) 2006: You must notify Environmental Health when letting a property on a self-catering basis so that they can test the water to check that it is safe for guests. You must display the Drinking Water Supply Important Information Poster which can be obtained from your local Environmental Health office. You must provide details of the supply in publicity information or correspondence which is accurate and does not mislead guests.  |
| Insurance | G | Y | Y | Holiday let insurance is specialist insurance that covers holiday homes that are let to paying guests as well as friends and family on a short-term basis. Policies typically cover public liability, accidental damage, loss of rent as well as periods when the property is unoccupied. A standard home insurance policy is not sufficient to cover a holiday let. |
| Anti-social Behaviour | L | Y | N | Existing powers are available to local authorities. This includes Part 7 of the Antisocial Behaviour etc. (Scotland) Act 2004. The Scottish Government introduced the Antisocial Behaviour Notices (Houses Used for Holiday Purposes) (Scotland) Order 2011 that granted local authorities the power to deal specifically with the problem of antisocial behaviour in properties let for holiday use.  |
| PPL PRS[[15]](#footnote-15) |  |  |  | Under the Copyright, Designs and Patents Act 1988, permission is needed from the relevant copyright holders – those who create, record and publish music – in order to play or perform music in public.Broadly speaking, this includes any presentation of music outside of a domestic setting. For example, it will include using music in the following ways as part of your business or organisation (for the benefit of customers and/or employees): playing recorded music via any device, including the radio; TV broadcasts, or other audio-visual content, containing music; or putting on live performances of music. |
| MPLC[[16]](#footnote-16) |  |  |  | A licence is required regardless of whether an admission fee is charged. |
| Maximum Occupancy |  |  |  | Plans will have to be drawn up by an architect, with significant and unnecessary costs attached.  |
| Listings |  |  |  | Time will be required to keep listings updated. |

**ANNEX 3: COST OF COMPLIANCE**

* The updated Business and Regulatory Impact Assessment (BRIA) submitted by the Scottish Government as part of the 2020 Licensing Order Consultation was a distortion of the reality faced by the majority of small and micro STL operators in remote rural areas.
* The miscalculation of mandatory licence conditions compliance costs is seriously flawed as to be dishonest. The BRIA calculates the total of annually recurring and one-off compliance costs to be circa £963.00 in Year 1. The actual costs paid for a two-bedroom holiday let on Skye, for example, are £3420.00 with £1750.00 of that recurring on an annual basis. The Scottish Government have therefore underestimated the real costs by 72%. The implications that this then has for the affordability of additional licensing costs for the vast majority of micro-operators in the Highlands and Islands, with a turnover of under £20,000 a year, is hugely significant.
* It is important to include the cost of administration associated with new licensing requirements. Hours must be recognised as a cost of compliance, and charged appropriately, at National Living Wage as a minimum.
* Excluding these mandatory condition costs, efficient operators can expect to shoulder fixed costs, including part time cleaning, maintenance and garden contracts, laundry, cleaning materials and other consumables, heat, light, broadband, TV licensing and provision, and other sundries, for a two bedroomed property with an average rural area occupancy of 45%, as a minimum of 50% of takings. Take away the compliance costs and add an annualised license fee on top and the gross profit will be less than 25% of turnover, before tax and other fees.
* ASSC Member, October 2020*: “It’s not worth it, and the inexorable rise in costs, the total lack of certainty about what those costs will be, uncertainty as to whether or not we’ll be granted a licence, whether we will have to refund bookings if we don’t, and general inability to plan means that we will put our much-loved home on the market as soon as we know what’s happening and relocate to somewhere that values our presence. To be clear, we already have two prospective purchasers, one being resident abroad and another being a wealthy English family. Both would want our property purely as a holiday home and will leave it empty 44 weeks of the year. Given that we have no idea what additional restrictions and taxes on second home purchases will be imposed on us or prospective purchasers in the future it would be utterly stupid to reject their advances.”*
* In November 2021, the ASSC undertook a snap membership survey into the cost of existing compliance with regulations. In 22 hours, the survey generated **336 responses from businesses in 26 out of 32 local authorities**. 53% were from members of the ASSC and 47% responses were from non-members. The survey closed at 5pm on 8th November.
* The key findings were as follows:
* The vast majority of respondents identified that they came from rural areas / islands (81%).
* 75% or respondents report turnover of under £50k per annum, and 43% under £20k per annum.
* The June 2021 BRIA calculated the total compliance costs to be circa **£963.00**.
* Real costs identified by operators are three times those identified in the BRIA, illustrating an **average cost of £2,969**. This will, of course, vary according to urban / rural / remote / island operations.
* The costs identified in this survey do not include additional costs for ‘Information to be Displayed’, plans to show ‘maximum occupancy’, and other new costs associated with the proposed licensing regime.
* 76% of respondents’ report increases in operating costs of between 11-75%. The key driver is the pandemic in terms of additional cleaning times, operators leaving fallow days to ensure guests safety, the cost of materials and labour, extra linen costs, plus the need for relaxed cancellation policies.
* The cost of doing business generally has risen exponentially since the pandemic. One member commented: *“Gas bills have increased by 18%. Electricity bills have increase by 15%. Insurance has increased by 15% and cover has reduced.”*
* The revised BRIA should reference real and real-time costs. In the same way that scraped data is not accurate, nor are price comparison websites or outdated resources. In addition, there should be reference to, and cognisance of, the additional costs incurred by rural and remote locations in terms of call out charges, labour and increased material charges.
* The ASSC urges the Scottish Government to undertake a real impact assessment of the proposed legislation on the sector, collaborating with operators who can provide real figures associated with business and compliance costs, prior to any further discussion.

**ANNEX 4: LOCAL AUTHORITY RESPONSES FROM 2020 SHORT-TERM LET CONSULTATION**

**COSLA**

*“It will be necessary to understand the administrative burden that this may place on local authorities and how this will be resourced.”*[[17]](#footnote-17)

**Aberdeen City Council**

*“We believe that the 12-month lead-in time to establish our Short-term Let regime will be resource intensive and there will be no ability to recruit additional staff when resources aren’t available until licence applications are submitted and fees paid. This poses staffing issues for the council. Consequently, we believe that the Scottish Government should fund the start-up costs.”*[[18]](#footnote-18)

**Borders Council**

*“…it is considered essential that Scottish Government provide specific funding for additional resources required by LA’s to cover the initial set up costs, including the transitional and compliance elements of the new legislation.”*[[19]](#footnote-19)

**Comhairle nan Eilean Siar**

*“We have no indication of what the full impact of any COVID-19 fallout will be as the situation is ongoing. Economic recovery may be protracted and we may be dependent on our Tourism Sector to inject life into our economy. Providing us with as much flexibility as possible with regard to regulations would help us in the long term.”*

*“The evidence gathering, consultation and mechanism to set up a control area will require resourcing, finance and additional staff time to deal with retrospective planning applications where these are required during the transitional period. This legislation will have significant implications for both Development Plans & Development Management, ever diminishing teams against a background of annual budget cuts.*

*The issue of enforcing regulations and the extra work this will entail is likely to fall on Planning and Licencing staff. In the current climate, the Comhairle is undergoing consultations on cuts that will need to be made to balance support given during lockdown. There is no budget available currently for the recruiting and training of staff and although it is anticipated that potential fees will pay for any staff, there is an initial outlay required, which has not been planned for in budgets. We propose an initial start-up grant or loan from Scottish Government.

Each application would require due consideration and income from planning fees for Change of Use, at current levels, would be unlikely to cover additional staff time for this work.”*

*“Paragraph 6.4 all local authorities must have a live licencing scheme open to receive licensing applications by 1 April 2022.
• There are 18 months until this needs to be in place, and probably about 12 months once we know the outcome of this consultation and see guidance in the spring. There are policies to be written, consultations to be carried out with public and stakeholders, committees to seek approval from, staff to be employed and trained etc. We are still working from home and under restriction, and with the best will in the world, 18 (or 12) months to get everything underway, when we don’t know what is happening with our workplace, or indeed the way we are working, seems ambitious.”*[[20]](#footnote-20)

**Glasgow City Council**

*“It is anticipated that there will be significant resourcing issues for the Local Authority in setting up a licensing scheme. Significant staff resourcing for set of scheme/verification process/carrying out inspections/enforcement etc. would be required.”*[[21]](#footnote-21)

**Highland Council**

*“The new regulatory responsibility of both licensing and control areas are anticipated to have significant, budgetary and regulatory impacts on the Highland Council; invoking responsibilities in relation to the status and safety of a very large number of properties across a dispersed geographical area…”*

*Highland Council also estimate that they could receive as much as “10,000 potential applications” on licensing and that while the “scheme permits a phased approach over a 3-year period but this will still present considerable administrative and operational undertaking for dealing with the initial applications. Ongoing resource will then be needed for renewals and new premises.*

*The workload will necessitate additional staff for the following teams:*

 *• Licensing team - additional administrative licensing staff
• Planning team – additional full-time posts (professional support officers) for a two-year period. There would still be resource required after this two-year period to cover new and renewed licence enquiries, however this is anticipated to be at a much lower level.
• Environmental Health additional full-time posts (technical officers) for a two-year period. There would still be resource required after this two-year period to cover new and renewed licence enquiries, however this is anticipated to be at a much lower level.
• ICT systems – a review of the on-line tools to enable self-service and on-line payments to streamline the application and payment process.”*[[22]](#footnote-22)

**North Ayrshire Council**

*“Councils are to set up a new system, complete with new conditions and an inspection system involving Housing, Protective Services and Planning by 1 April 2022 at the latest. This would be a substantial task at any time, but it is particularly onerous when Council staff, working remotely, are facing increased demands to provide services to the public due to the coronavirus pandemic and Councils are facing unprecedented challenges, particularly with regard to licensing due to the coronavirus pandemic.

(a) if premises are to be inspected, Council staff must be available for this;
(b) Council staff are already having to work under pressure as the Coronavirus restrictions are regularly changed. In the case of STLs, where there are objections or representations to Licence Applications, delegated powers are not available to Council officers and the Application must be considered by the Licensing Committee. If there are to be around 327 Applications in North Ayrshire, then a portion of them will need a 'virtual hearing' compliant with ECHR 6. This would place a burden on Licensing Authorities at a time when they are least able to bear it.

2.2. Although Councils will be able to choose when the licencing scheme will start locally, it must be within 12 months after 1 April 2021.

2.3. The new STL system commences at most 18 months away, and Councils have not seen the secondary legislation on which the new system will be based. It will be laid in Parliament in December 2020 and has not been issued in draft. It has not been stated whether Application forms and other documentation will be prescribed, or whether they are to be drafted by individual Councils.”*[[23]](#footnote-23)

**South Ayrshire Council**

*“…there is an element of concern regarding the proposed lead in time for implementation of a robust licencing regime, the resources this will require and the added pressure to workloads required of staff and services.”*[[24]](#footnote-24)

**Stirling Council**

*“The implementation, management and enforcement of the [licensing] process is considered particularly resource intensive for local authorities, with little guidance given around who would be expected to lead the process.”*[[25]](#footnote-25)

**West Dunbartonshire Council**

*“For smaller authorities with fewer short term let premises it may be difficult to fully resource an effective and efficient service without the fees being very high and thereby creating a wide and varying fee structure across the country. There is a concern about the level of Fees that a smaller Local Authority may charge where they are not dealing with a large volume of applications and have limited resources to deal with such applications. The fee structure may not be of a sufficient level to meet resource concerns and the adverse comparisons by the public as to differing fee structures around the country as can happen in Civic Government Licensing.”*[[26]](#footnote-26)

1. This is evident in both the Scottish Government’s BRIA accompanying their licensing proposals, as well as City of Edinburgh Council’s plans for a city-wide short-term let control area. [↑](#footnote-ref-1)
2. For instance, see ASSC*, Far More Than Just Houses: The Benefits of Short-Term Rental in Scotland* (2018). Url: <https://www.assc.co.uk/wp-content/uploads/2018/06/MoreThanJustHouses.pdf>; and ASSC, *Forward Together: A Collaborative Approach to Short-Term Letting* (2020). Url: <https://www.assc.co.uk/wp-content/uploads/2020/12/2020_ForwardTogether.pdf> [↑](#footnote-ref-2)
3. <https://www.gov.scot/binaries/content/documents/govscot/publications/impact-assessment/2021/06/short-term-lets-licensing-scheme-planning-control-area-legislation-draft-business-regulatory-impact-assessment-bria/documents/short-term-lets-licensing-scheme-planning-control-area-legislation-draft-business-regulatory-impact-assessment-bria-consultation/short-term-lets-licensing-scheme-planning-control-area-legislation-draft-business-regulatory-impact-assessment-bria-consultation/govscot%3Adocument/short-term-lets-licensing-scheme-planning-control-area-legislation-draft-business-regulatory-impact-assessment-bria-consultation.pdf> [↑](#footnote-ref-3)
4. Airbnb, *Short-term Lets Registration White Paper* (2021). Url: <https://news.airbnb.com/wp-content/uploads/sites/4/2021/06/UK_RegistrationWhitepaper_2021.pdf?_ga=2.58889198.2135609438.1634834161-1390504533.1634834161> [↑](#footnote-ref-4)
5. Parliamentary answer to S6W-02111. Url: <https://www.parliament.scot/chamber-and-committees/written-questions-and-answers/question?ref=S6W-02111> [↑](#footnote-ref-5)
6. Parliamentary answer to S6W-02109. Url: <https://www.parliament.scot/chamber-and-committees/written-questions-and-answers/question?ref=S6W-02109> [↑](#footnote-ref-6)
7. <https://www.gov.scot/publications/practical-fire-safety-guidance-existing-premises-sleeping-accommodation/> [↑](#footnote-ref-7)
8. <https://www.hse.gov.uk/pubns/indg231.pdf> [↑](#footnote-ref-8)
9. [www.hse.gov.uk/legionnaires/spa-pools.htm](http://www.hse.gov.uk/legionnaires/spa-pools.htm) [↑](#footnote-ref-9)
10. <https://www.assc.co.uk/policy/cleaning-protocols-for-self-catering-properties-in-the-context-of-covid-19/> [↑](#footnote-ref-10)
11. <https://www.qualityintourism.com/quality-assessment/safe-clean-and-legal> [↑](#footnote-ref-11)
12. <https://www.assc.co.uk/policy/code-of-conduct/> [↑](#footnote-ref-12)
13. [https://static1.squarespace.com/static/592576e4b8a79b7c470261cb/t/5e7b83e9223c2f20ac35c9d8/1585153001941/STAA+code+of+conduct+-+June+2019.pdf](https://static1.squarespace.com/static/592576e4b8a79b7c470261cb/t/5e7b83e9223c2f20ac35c9d8/1585153001941/STAA%2Bcode%2Bof%2Bconduct%2B-%2BJune%2B2019.pdf) [↑](#footnote-ref-13)
14. <https://www.gov.scot/publications/energy-performance-certificates-for-holiday-lets-guidance/> [↑](#footnote-ref-14)
15. <https://www.googleadservices.com/pagead/aclk?sa=L&ai=DChcSEwil5v7y-4T0AhWRuu0KHeGqD1cYABAAGgJkZw&ae=2&ohost=www.google.com&cid=CAESQOD2B_vfMcJThw4lerUmXRT28Y98i4UQJ-RTSeBcCsFzh6TfhPgbkmK5El8n_lM_Cru7yWjw7fJgYuwZN-DfzcI&sig=AOD64_0uMb3R5IK-mF_3QouvRk5ERwNKtQ&q&adurl&ved=2ahUKEwix0ffy-4T0AhVTSsAKHUieD2IQ0Qx6BAgCEAE&dct=1> [↑](#footnote-ref-15)
16. <https://www.themplc.co.uk> [↑](#footnote-ref-16)
17. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=900&uuId=552786991> [↑](#footnote-ref-17)
18. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=480&uuId=738532527> [↑](#footnote-ref-18)
19. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?show_all_questions=0&sort=submitted&order=ascending&_q__text=borders&uuId=648059965> [↑](#footnote-ref-19)
20. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=780&uuId=458288928> [↑](#footnote-ref-20)
21. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=900&uuId=52867059> [↑](#footnote-ref-21)
22. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=840&uuId=880423694> [↑](#footnote-ref-22)
23. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=780&uuId=560815682> [↑](#footnote-ref-23)
24. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=900&uuId=900902345> [↑](#footnote-ref-24)
25. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?_b_index=900&uuId=465853950> [↑](#footnote-ref-25)
26. <https://consult.gov.scot/housing-services-policy-unit/short-term-lets-licensing-scheme/consultation/view_respondent?show_all_questions=0&sort=submitted&order=ascending&_q__text=West+Dunbartonshire+Council&uuId=124670121> [↑](#footnote-ref-26)