



Dear Shona and Arianne,

Concerns over a failure to resist lobbying and the impact on progress to increase housing affordability and availability.

We write to express our concern about the reasons for, and the consequences of, any additional delay to the short-term lets licensing scheme:

- **The delay would worsen the cost of living crisis for those most at risk** - Your letter states that the delay is needed to protect short-term letting operators from the cost of living crisis. This concern is clearly misplaced. Those most affected by the cost of living crisis are not short-term letting investors with multiple properties, they are those struggling to afford the cost of their own personal housing. The impending legislation was already noticeably increasing the availability, affordability and livability of housing as investors sold off their stock in advance of the impending implementation date. These sales have stopped overnight as investors are gifted with another season of income, particularly in Edinburgh. More homes will gain immunity from enforcement as they tip into the 10 year rule.
- **The license conditions for short-term lets are uncontroversial, and fundamental for customer and neighbour safety.** We have reviewed Annex B of the Guidance for Hosts and Operators and are at a loss to understand why additional time is needed. The conditions necessary for the licensing scheme are fundamental for any business providing accommodation and we are confident that every responsible commercial operator in Scotland would already have these measures in place. For those who don't they are simple and inexpensive to implement. Of course, we know from evidence already given to the committee that there are a significant number of operators who do not, cannot, and will not meet these conditions. These operators are unsafe, unlawful and exploitative and need to be stopped.
- **Are similar "cost of living" dispensations being made to other licensed businesses?** If not, why are short-term letting operators being singled out above those who run similarly licensed businesses such as those operating taxis, markets or private hire cars?
- **This represents a clear failure by Ministers to resist lobbying** - There are no reasonable grounds for further delaying this legislation. Rather, this represents a failure by Ministers to resist lobbying by moneyed interests and a failure to protect the interests of people and communities.

We write to implore the government to protect the existing deadlines to implement this important legislation which support the right to adequate housing and resists the financialisation of essential housing stock.

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