

Response to short-term letting consultation from the Scottish Crofting Federation

In general our crofting representatives believe that short-term lets and B&Bs should be licensed or regulated, but there are caveats.

This licensing scheme on its own is not the answer to the lack of affordable housing. The Scottish Government needs to allocate the necessary budget to provide affordable housing where it is needed, in rural and urban locations. To imply that licensing short-term lets will alleviate the problem of lack of affordable housing is unfounded.

Planning consent should be required for change of use from a home to a short-term let. It is further suggested that legislation should prevent properties switching from full-time residencies to short-term lets or second homes. Homes coming onto the market should be controlled so that the purchaser must live there full time. Sales should be regulated to offer them first to young local families who wish to remain in their locality but are currently priced out of the market. Crofting is a regulated land use. The housing market should also be regulated.

The new licence fee should relate to the size of the establishment and the income generated. Proportionality would be only fair. The Society of Local Authority Lawyers and Administrators in Scotland suggests that the scheme would have to run on a cost recovery basis and could cost in the region of £1,500-£2,000 per licence. The three-year landlord registration fee for one property is £82, with £15 per additional property. There must be equivalence.

If additional works, planning applications and professional fees are included, the likely cost suggested above will be considerable. It will also be a burden on local authorities for their resources and time.

Many crofters have been running modest tourist enterprises on their crofts for decades, without issues. Most hosts already have gas and electricity checks and appropriate insurance. It is a requirement of advertising on most holiday accommodation platforms.

The proliferation of tourist accommodation which has sprung up in recent years is directly attributable to Airbnb, which makes it far too easy for anyone to list unsuitable places. It is Airbnb which should be regulated.

Crofting offers families the opportunity to build a home on the croft, with assistance from the Croft House Grant Scheme. This is good use of public funds, providing affordable homes and sustaining remote communities. The government should work to designate more crofts across Scotland, enabling more people to enter crofting, which is environmentally friendly land use and encourages self-sustaining communities.

In areas where there is a saturation of holiday accommodation, this new regulation is not going to free up properties for long-term affordable accommodation. Many people will not wish to take a long-term tenant.

If additional works, planning applications and professional fees are included, the likely cost suggested above will be considerable. It will also be a burden on hard-pressed local authorities for their resources and time.