

**MEETING BETWEEN MINISTER FOR LOCAL GOVERNMENT & HOUSING and
Airbnb**

TIMING	Tuesday 3 rd March, 10:00 -10:45 T4.44
ATTENDEES	<p>[REDACTED], Director of Public Policy EMEA [REDACTED], Airbnb Public Policy, UK & Ireland</p> <p><u>Official Support</u></p> <p>[REDACTED] , Head of Housing Markets Tel: [REDACTED]/ Office: [REDACTED]</p> <p>[REDACTED], Short-Term Lets Delivery Group Tel: [REDACTED]</p>
AGENDA	<ul style="list-style-type: none"> • Our plans for regulation of short-term lets. • Airbnb's views on the way forward. • Plans for further engagement.
YOUR MAIN OBJECTIVE	<ul style="list-style-type: none"> • Reaffirm the Scottish Government's Programme for Government commitment to ensuring local authorities have the appropriate powers to manage short-term letting in a way that allows them to balance the needs and concerns of their communities with wider economic and tourism interests. • Explain next steps following the announcement of the Scottish Government's plans for short-term lets. • Listen to Airbnb's views on the way forward.
PRACTICAL ARRANGEMENTS	<p>Airbnb wrote to you in November requesting a meeting. You responded on 19 December 2019 declining to meet at short notice and offering a meeting in the new year: "...once the Scottish Government have announced plans for the way forward on regulation of the sector." Airbnb wrote again on 10 January following the SG announcement, to "reaffirm our commitment to working with the Scottish Government as you take forward your plans to regulate the short-term letting sector" (Micase reference number: 202000011997)</p>

Annex

Annex A – Airbnb Biographies, p7.

Annex B – Additional Background information:

- Airbnb statement issued 29th January;
- Airbnb letter to European cities and partners issued 29th January;
- Airbnb statement issued 17th January;
- Airbnb statement issued 8th January in response to SG Parliamentary statement;
- Recent Ministerial correspondence with Airbnb;
- Scottish Government's response to Airbnb's letter critiquing short-term let research, issued 19th December 2019;
- and Questions and answers.

ITEM 1	<ul style="list-style-type: none"> • Our plans for regulation. • Airbnb’s views on the way forward. • Plans for further engagement.
ISSUE/ BACKGROUND	<p><u>Regulation of short-term lets:</u></p> <ul style="list-style-type: none"> • The Scottish Government will provide local government with the power to introduce local licensing schemes under the Civic Government (Scotland) Act 1982, with a mandatory safety requirement covering every type of short-term lets across Scotland, and the flexibility for local authorities to apply additional conditions. • The Scottish Government will prioritise work to give local authorities the power to introduce short-term let control areas in the Planning (Scotland) Act 2019. • We will carefully consider the tax treatment of short-term lets, to ensure that short-term let’s make an appropriate contribution to local communities and support local services. <p><u>Engagement</u></p> <ul style="list-style-type: none"> • We will engage with local authorities and other stakeholders to develop the necessary regulations, with a view to laying statutory instruments before Parliament in good time for them to come into force in spring 2021. • Officials wrote to Airbnb and other organisations who responded to our consultation, offering to meet to discuss the way forward, and will be meeting those who responded. • SG will be engaging closely with local authorities – who will be responsible for licensing short-term lets and making decisions on short-term lets control areas. <p><i>Analysis of 2019 Consultation Responses</i></p> <ul style="list-style-type: none"> • Affected residents, community organisations and non-short-term lets landlords cited mainly negative impacts of short-term lets, while hosts, platforms and hosting intermediaries tended to focus on positive impacts. Overall a greater number of negative impacts than positive impacts were mentioned. • Affected residents, community organisations and non-short-term lets landlords tended to support more stringent regulation and enforcement within the sector, while hosts, platforms and hosting intermediaries tended to favour a less stringent approach. • Some respondents felt that more stringent regulations should be applied to secondary letting than to sharing and swapping. • There was a perception from respondents that landlords are switching from long-term letting to short-term letting as it is more profitable and subject to less regulation. • While there was a level of agreement for a national framework, there were calls for flexibility within this so that local authorities can apply

	<p>what is most relevant to their area, its economy and the impacts of short-term lets.</p> <p><i>Research on the impact of short-term lets on communities & housing</i></p> <ul style="list-style-type: none"> • Short-term lets have continued to grow, with a three-fold growth in Scotland between April 2016 and May 2019 to 32,000. • Short-term lets are geographically concentrated, both in terms of numbers and in respect to their 'penetration rate'. • 51% of all Airbnb listings are located in just 24 of Scotland's 354 council wards. The seven most popular wards, all in the City of Edinburgh, or Highland, accounted for a quarter of Scotland's active Airbnb listings in May 2019. • There were 9,994 active Airbnb listings in Edinburgh in May 2019 – almost a third (31%) of the Scottish total (31,884). • In Edinburgh's City Centre Ward, there were 16,759 dwellings and 2,710 Airbnb listings. This gives a penetration rate of 16.2% for all listings and 12.8% for entire property listings. • The majority of Scottish Airbnb listings were for entire properties. • Among the key positive impacts of short-term lets on communities the following were emphasised: local economic benefits, increased household income, increased vibrancy and investment and also social and lifestyle benefits. • Among the key negative impacts of short-term lets on communities the following were emphasised: reduced availability of residential housing, impacts on sustaining communities, quality of life and well-being related to disturbance of residents and congestion and changing communities.
<p>WHAT THE STAKEHOLDER MAY SAY/ASK</p>	<p><u>Questions within their 8th January statement:</u></p> <ol style="list-style-type: none"> 1. "Information on the cost of licensing to assess the potential impact for families that host spare bedrooms or their main property and that operate on smaller margins and are less able to absorb additional costs." 2. "Barriers to entry - again, to understand potential hurdles for those that do not host professionally yet may face onerous licensing requirements." 3. "Taxation - to understand how this will operate alongside existing proposals for tourism taxation." <p><u>Additional questions/issues Airbnb raised at the Cross-Party Group on Tourism, 19th February:</u></p> <ol style="list-style-type: none"> 1. Definition of STLs. 2. The criteria for licensing. 3. Clarity on the process of creating short-term lets planning control areas and the need for that to be evidence driven. 4. How SG will ensure that the whole regulatory framework is consistent with TVL and non-domestic rates.
<p>KEY MESSAGE(S)</p>	<ul style="list-style-type: none"> • Short-term lets can offer people a flexible and cheaper travel option, and have contributed positively to Scotland's tourism industry and local economies across the country.

	<ul style="list-style-type: none"> • In certain areas, particularly tourist hot spots, high numbers of short-term lets are causing problems and often making it harder for people to find homes to live in. • We also have concerns about compliance with existing safety standards. • This is why we have announced a package of measures that will promote safety and enable local authorities to put in place additional controls on short-term lets appropriate to their area. • These new powers will enable councils to balance the needs and concerns of their communities with wider economic and tourism interests. • We are committed to working with stakeholders to develop the detail of our proposals. • We welcome your offer and commitment to work with us, as we take forward our plans for regulation of the short-term letting sector. • Regulations giving local authorities powers to license short-term lets and introduce control areas will be in place by spring 2021. • We intend that local authorities will be able to charge a fee to cover the costs of administering the licensing scheme in their area. We will work with stakeholders as we develop the detail of the regulations for the licensing of short-term lets to prepare a full Business and Regulatory Impact Assessment (BRIA), which will accurately reflect the costs to participants.
<p>SUGGESTED QUESTION(S)</p>	<ul style="list-style-type: none"> • I'm aware of recent media coverage about 'fake hosts' and similar issues and Airbnb's commitment to review and verify listings worldwide. Do you have any thoughts on ways in which the implementation of licensing could assist Airbnb with verification and ensure that visitors to Scotland are protected? We would be very willing to discuss the feasibility of any suggestions with local authorities as we take forward implementation. • Your statement on 17th January states that Airbnb will "strengthen the communities we serve". That is welcome. Can you elaborate further on how you will do this in Scotland? • Recent statements include a commitment to working with governments to make it easier for "hosts and guests to pay their fair share of tax" and experience of doing this in France and Italy successfully. Can you share lessons or experiences that you could adapt for Scotland? • Recent statements from Airbnb have referred to a "strong track record of working with cities to support fair regulations and help hosts follow the rules." Can you share lessons or experiences from other places that you could adapt for Scotland which would help us introduce a licensing scheme?
<p>CONTACT POINT</p>	<p>[REDACTED], Head of Housing Markets Tel: [REDACTED]/ Office: [REDACTED]</p>

[REDACTED s38(1)(b)]

ADDITIONAL BACKGROUND INFORMATION

Including:

- Airbnb statement issued 29th January;
- Airbnb letter to European cities and partners, issued 29th January;
- Airbnb statement, issued 17th January;
- Airbnb statement, issued 8th January in response to SG Parliamentary statement;
- recent Ministerial correspondence with Airbnb;
- Scottish Government's response to Airbnb's letter critiquing short-term let research issued December 19th 2019;
- and questions and answers.

1. Airbnb Backs Calls for an EU Regulator for Digital Services, - January 29th 2020

Airbnb is today backing calls for an EU regulator for digital services to be included in proposals for a Digital Services Act, ensuring that future European regulations best serve all stakeholders, including cities, governments and companies. Airbnb said that an EU regulator would provide trusted guidance to policymakers and digital platforms to support the development of sound regulations that work for everyone and that comply with EU laws.

The proposed regulator would also help ensure a stable, predictable and consistent approach to regulations across the EU, and could help mediate talks between government and industry stakeholders when the right path forward on developing clear rules and regulations is unclear or disputed.

While our thinking on this topic is still in its early stages and we have much still to do, we are clear that we support calls for a single European oversight body for digital services.

Chris Lehane, Airbnb Senior Vice President of Global Policy and Communications "Over the last few years, governments have updated their rules and platforms such as Airbnb have developed innovative new ways to partner with governments to serve all stakeholders. But that journey has been long, sometimes confusing, and often costly. We want to work with everyone to ensure that the proposed Digital Services Act serves all stakeholders and provides the best possible deal for cities, governments and companies," added Lehane.

Airbnb shared its proposals for an EU regulator for digital services in a series of letters to EU and city leaders today, which also include steps being taken by the company on transparency, tax and trust to be good partners to cities, including news that it will launch a new partnership in the coming weeks to provide cities with independently published data on the impact of Airbnb in cities across Europe.

"Our commitment to cities is long-term and ongoing and while as a company we are not perfect, we are always learning and we will keep moving forward with this important work. Not only is this approach consistent with our mission to be a 21st century company that serves all stakeholders, it is providing a solid and sustainable foundation for the long-term future growth of our business," said Lehane.

2. Airbnb Letter to European cities and partners in follow up to the January 29th statement

Dear European cities and partners,

Last month, Nathan Blecharczyk, Airbnb co-founder and chief strategy officer, wrote to you to restate our commitment to being good partners to you and cities across Europe, following a judgement at the Court of Justice of the European Union (CJEU).

In recent weeks, we also shared details on our ambition to be the first truly 21st century company that serves all stakeholders. Among many values and goals, this work includes us identifying communities as a key stakeholder of Airbnb, along with a commitment to strengthening the communities we serve. Today, I want to follow-up and share some tangible next steps we are taking to build on these commitments, including some early thoughts on how we think EU law specifically the Digital Services Act - can best serve everyone.

While these steps are designed to build trust and strengthen our collaboration with cities, they are just the beginning and this is not an exhaustive list of our efforts in this area. Our commitment to cities is long-term and ongoing and while as a company we are not perfect, we are always learning and we will keep moving forward with this important work.

Transparency We want cities to have the information they need to regulate home sharing effectively, which is why we have always shared information on our impact in cities. Moving forward, we want to build on this work and in the coming weeks, we will launch a partnership to provide cities with independently published data on the presence and impact of short term rentals in cities across Europe. We believe that this data will be a vital resource for governments at all levels as they consider the impact of our platform and how effective regulation should work. We plan to share more information on this work shortly.

Tax We want to work together to help make tax simple for everyone, ensuring that it's easy for hosts and guests to pay their fair share and that cities receive this important financial resource. This work is delivering great benefits here in Europe and in the last 12 months alone, more than 10 new tax agreements came into force across Europe. We are continuing this work and in the first few weeks of 2020, we have remitted more than €80 million in tourist tax for 2019 in France and Italy alone, and we are currently engaged in further conversations with more than 20 governments at all levels across Europe on how we can collaborate on tax. We have also introduced tax guides to help users understand and follow any income tax obligations.

Trust We want Airbnb to be the most trusted accommodation platform in the world. While we recognise the inherent challenge in this ambition, over the past 2 years our investment in trust and safety has outpaced our revenue growth, and we have committed an additional \$150 million to this work.

Globally, we have announced a series of measures to build trust on Airbnb, including banning party houses and sharing that we are working to review 100% of our listings and hosts by the end of the year, with an objective of verifying all listings.

Here in Europe, we are busy furthering this mission by collaborating with cities on measures that address local challenges and make communities stronger. In Amsterdam, for example, we have launched a public consultation on measures to tackle noise and nuisance, and in Edinburgh are piloting noise detector devices in collaboration with Minut.

We want to expand this work and collaborate with you on measures that will have a positive impact in your city. If you have an idea, concern or topic that you wish to discuss, please reach out to me or a member of my team.

Action at EU Level With a new Commission now in place, a review of the laws that underpin electronic commerce in the EU is now underway. We want to work with everyone to ensure that the proposed 'Digital Services Act' serves all stakeholders and enables the benefits of a strong digital single market for everyone. While our thinking on this topic is still in its early stages and we have much still to do, we are clear that we support calls for a single European oversight body for digital services, for three main reasons:

Trusted guidance - Regulating digital services is complex, especially those whose online services affect the offline world. Over recent years, however, much has been learned about this diverse sector and how to regulate it effectively, using the right combination of EU, national and local solutions. We believe that an EU regulator for digital services can collate and share these learnings to help inform and guide digital platforms, and support the development of sound regulations at all levels to ensure they work for everyone and are compatible with EU rules.

Consistency - The EU Commission has stated that it wants to achieve a more joined-up and less fragmented approach to regulating digital services in Europe. As well as providing timely and informed guidance for digital platforms and governments at all levels, we believe that an EU regulator can help ensure a more stable, predictable and consistent approach to operations and regulations in Europe.

Mediating disputes - Rulings such as the recent CJEU case concerning Airbnb and French real estate law have clarified things for governments and platforms, but there is much more to do. Over the last few years, governments have updated their rules and platforms such as Airbnb have developed innovative new ways to partner with governments to serve all stakeholders. But that journey has been long, sometimes confusing, and often costly. As well as providing guidance and driving greater regulatory consistency, we believe that a single regulator could play a crucial role in mediating talks between government and industry stakeholders when the right path forward is unclear or disputed.

This work is just the beginning and we want to continue our collaboration and move forward in partnership to ensure our platform and community help to make communities across Europe stronger.

Chris Lehane, Senior Vice-President of Global Policy and Communications

3. Airbnb statement issued January 17th 2020 "An Update on Our Work to Serve All Stakeholders"

Airbnb recently issued a statement outlining their commitment to serving all of our stakeholders including stakeholders in the community:

In 2018 we publicly declared something we had felt for a long time—that we aspire for Airbnb to be among the first of the true 21st-century companies, one that benefits all our stakeholders over the long term. We believe that building an enduringly successful business goes hand-in-hand with making a positive contribution to society. Increasingly, that is what citizens, consumers, employees, communities, and policy-makers desire—even demand.

Serving all stakeholders is the best way to build a highly valuable business and it's the right thing to do for society.

We see the making of a company that serves all stakeholders as a design challenge. Every design challenge has a brief. These are the core elements of our brief and the roadmap for our work:

1. Identify our stakeholders.
2. Establish principles and metrics for serving our stakeholders.
3. Update our corporate governance and compensation.
4. Report on our progress.
5. Share our success.

We are early in our work. And we are far from being a perfect company, which is why we want to share what we're doing:

1. Identify our stakeholders.

The stakeholders who make up the Airbnb community are Guests, Hosts, Communities, Shareholders, and Employees. The design challenge is to create a company that considers the needs of all stakeholders. Hosts provide Guests with unique, authentic experiences so they feel like they belong, and Communities are where our business takes place. Unique and authentic, community-based experiences inspire people to want to travel. Finally, our Employees and Shareholders help power this work and grow this incredible community.

2. Establish principles and metrics for serving our stakeholders.

Understanding the nature of these relationships, our leadership team has worked to develop a set of first principles that will guide how we grow and lead the business. These principles translate into how we aspire to behave every single day:

Guests

- We prioritize the safety of our community.
- We make guests feel like they belong.
- We enable the creation of billions of personal connections.

Hosts

- We treat our hosts as partners.
- We enable the creation of millions of entrepreneurs.

Communities

- We strengthen the communities we serve.
- We diversify the types of communities guests visit.
- We set a new standard for sustainable travel.

Shareholders

- We will build a highly valuable business.
- We will make long-term strategic decisions.

Employees

- We champion diversity and belonging.
- We live our Core Values every day.
- We enable long-term growth and career opportunities.

These principles inspire behaviors that lead to thinking not just about near-term actions but longer-term horizons. They encourage us to think about all our stakeholders and instill accountability. And they summon our creativity. Of course principles can be subjective, so we also developed metrics that will help us track our progress and ensure we are adhering to these principles. Below are examples of some – but not all – of the metrics we will use.”

Beginning in 2020, we will award grants to support local projects in the Communities our Hosts call home. These grants will focus on projects that promote cultural heritage, economic vitality, and sustainable communities, and demonstrate clear local impact. Final award decisions will be made based on input from regional experts, Hosts, Guests, and Airbnb company leadership. More details will be released in 2020.

4. Airbnb statement issued to the media 8th January 2020 in response to SG Parliamentary statement on the regulation of short-term lets.

Statement

We have long supported calls for fair regulations and a tourism tax in Scotland. Now we want to work with the Scottish Government and local authorities on clear and simple guidance for hosts. Together we can help locals share their homes and follow the rules, and avoid a system that excludes working families through fees, barriers and bureaucracy. Our platform is an economic lifeline for countless local families and travel on Airbnb boosts the Scottish economy by almost £2 million a day.”

Background

On the announcement:

- We are yet to see the full details of the Scottish Government’s proposals and we will look for clarity on areas that include:
 - The cost of licensing - to assess the potential impact for families that host spare bedrooms or their main property and that operate on smaller margins and are less able to absorb additional costs
 - Barriers to entry - again, to understand potential hurdles for those that do not host professionally yet may face onerous licensing requirements
 - Taxation - to understand how this will operate alongside existing proposals for tourism taxation

Partnering with governments:

- Airbnb has long supported evidence-based discussions around the future regulation of short-term lets in Scotland, and we have published our [own data](#) about all hosts in Scotland and within our own submission to the Government’s consultation which is [available online](#).
- We also have a strong track record of working with cities to support fair regulations and help hosts follow the rules. Examples include:
 - In London, Airbnb works with City Hall to help hosts follow the rules by automatically capping entire home listings at 90 nights per calendar year. We have also backed calls for a registration system in partnership with the Mayor of London and will run a roadshow across UK cities to discuss a national, statutory registration system for the UK with local authorities - more [here](#).

- In Hamburg, Airbnb works with the City of Hamburg to help hosts comply with its simple registration system - more [here](#).
 - In France, Airbnb automatically limits the hosts to sharing their homes for 120 nights in major cities. We also collect and remit tourism taxes in 28,000 cities across France.
 - In Barcelona, Airbnb works with City Hall to remove illegal commercial operators and help regular people share their homes.
- Already we have partnered with more than 500 local governments and organisations to promote healthy tourism, help hosts share their homes and follow the rules, and to collect and remit tourism taxes, which has so far generated more than \$2 billion for communities globally.

Community:

- Residents can report issues with guest parking, waste, noise or other issues directly to us via our online [Neighbour Tool](#). This year, we will be launching a new 24/7 Neighbor Hotline so that anyone can call us anytime, anywhere in the world and reach a real person at Airbnb.
- We launched a three-month trial in Edinburgh where hosts use a noise detector device to detect and act on potential noise and nuisance issues. We have also shared a [Good Guest Guide](#) with all hosts on Airbnb in Edinburgh that was developed in partnership with VisitScotland.

Key facts:

- There are 35,000 listings on Airbnb across Scotland
- Entire homes in Scotland listed on the Airbnb platform account for less than 1 percent of local housing stock
- 84 percent of host accounts in Scotland have one listing on the platform
- 51 percent of hosts in Edinburgh said they used the income from hosting on Airbnb to make ends meet
- 77 percent of guests who stayed with Airbnb in Scotland said they use the platform for a more local, authentic experience.

5. **Recent Ministerial correspondence with Airbnb**

Letter to Kevin Stewart MSP following announcement 10 January 2020

Dear Minister,

Following your Statement to the Scottish Parliament on 8th January 2020, we are contacting you to reaffirm our commitment to working with the Scottish Government as you take forward your plans to regulate the short-term letting sector.

Over the past three years, Airbnb has consistently supported fair regulation to provide clarity and legal certainty for hosts and communities across Scotland. From our work on the Expert Advisory Panel on the Collaborative Economy to our recommendations to the recent regulatory framework consultation, we hope this has demonstrated our willingness to constructively engage with the Scottish Government on new rules to serve and strengthen local communities.

We warmly welcome your recognition of the benefits of short-term lets as set out in your

statement. Our platform is an economic lifeline for countless local families and travel on Airbnb boosts the Scottish economy by almost £2 million a day. To this end, we are committed to working together with governments at all levels to avoid a system in Scotland that shuts out ordinary people through added complexity, barriers and bureaucracy.

We welcome the Scottish Government's pledge to consult widely and we look forward to working with you as you develop the detail of the regulations. Together we can help locals share their homes and follow the rules as we have done with over 500 governments all over the world.

Yours sincerely,

[REDACTED]
UK Public Policy Manager
Airbnb

6. Scottish Government's response to Airbnb's letter critiquing short-term let research, issued December 2019

In May 2019 Scottish Government commissioned research into the 'Impact of Short Term Lets on Communities and Neighbourhoods in Scotland', and published the report from this work in October 2019. On 25th November 2019, Halogen, who act as Airbnb's public relations representative, sent a letter regarding this research to Mr Stewart. This letter questioned the methodological choices of the research, despite the report providing a full explanation of the rationale for these as well as the associated limitations. The letter also criticised the use of scraped data, the limitations of which are also fully acknowledged in the report. Airbnb have not provided us with more accurate data on this or previous occasions. The response below was issued to Airbnb on 19th December 2019, responding in detail to the points they raised.

- 1. Methodology: just 5 areas, 200 residents, 200 hosts led to unbalanced and unrepresentative conclusions:*** As mentioned in Chapter 2 (p. 3), the research was designed around a case study approach to understand in-depth the impacts of short-term lets (STLs) across different types of communities in Scotland. Five case study areas were selected to reflect different types of areas and experiences. The research was mainly exploratory, undertaken through qualitative methods with residents, hosts, community actors and local businesses. This was combined with short quantitative surveys of residents and hosts, primarily used to recruit participants for qualitative in-depth interviews, but also to provide insights into the possible scale of impacts. The quantitative survey results are indicative only, which is clearly stated in the report.

The five different areas were identified to represent types of communities and experiences of STLs. Selection was based on the diversity of communities, incidence and growth of STLs, rural and urban context, and the socioeconomic profile of the area using the Scottish Index of Multiple Deprivation (SIMD). The study areas were not intended to be typical of Scotland as a whole, but they are likely to be representative of those areas where STLs are concentrated. Studying communities across the whole of Scotland, was not possible within practical constraints.

The qualitative research approach allowed for intensive exploration and description of key issues, thus allowing for insights into participants' views. It still allowed the

researchers to make reasonable judgements as to the prevalence of such views, although the nature of qualitative research (i.e. the number of interviews typically achieved, the free-form nature of responses, etc.) means that it is not possible to generalise the findings of the qualitative research in a statistical sense to that of the wider population. The qualitative approach allowed the researchers, given the number of interviews involved in this research and the recurring themes found, to summarize and develop general propositions and conclusions on the basis of these specific case studies. Whilst the numbers of qualitative interviews at a local level are obviously lower, they are still sufficient for the researchers to make judgements as to any notable characteristics of a particular area or distinctions between those areas (p. 6). It should be noted that the number of interviews included in this research was comparatively high for a qualitative piece of work. The secondary data analysis provides insights on Airbnb's activity across Scotland.

II. Only company mentioned in the report is Airbnb: The secondary data analysis, which forms only one part of the commissioned research, is based on data regarding the Airbnb platform. Airbnb are the leading online provider of STLs, but of course they are not the only online accommodation platform to offer this: Booking.com, TripAdvisor, tripping.com, FlipKey, HomeAway, and a range of other similar websites also offer STLs. Researchers have no way of knowing what proportion of the short-term lettings sector Airbnb accounts for but at the very least it would appear from the data analysed here, in addition to the results of the qualitative research, that it accounts for a very high proportion of it across Scotland (p. 83). According to a research report published in 2017 by Skift¹, the biggest peer-to-peer accommodation platforms with listings in Scotland (in November 2017) included:

- Airbnb: 21,900 active listings and 12,600 hosts in Scotland (between March 2016 and March 2017)
- Couchsurfing: 64,500 hosts in Scotland of which 11,000 in Edinburgh
- FlipKey: 7,000 listings in Scotland
- HouseTrip: 7,000 listings in Scotland
- HomeAway: 2,500 listings in Scotland
- Wimdu: under 1,000 listings in Scotland.

Regarding the case study areas, Airbnb kindly agreed to issue an invite to their hosts to participate in the research. Indigo House contacted Booking.com and other platforms to ask for the same invite to be issued to their members, but received no response. Residents were sampled on a geographic basis only (rather than be recruited via a specific platform) and so the experiences they describe could relate to any STLs platform.

We specified that some professional holiday let operators within the study areas be contacted as part of the local businesses aspect of the research. Professional holiday lets operators in the study areas who use an online platform may also be recruited to be interviewed as STLs hosts in the research.

III. Scraped data produce inaccurate conclusions on the impact of entire homes on housing supply: Indigo House used scraped data on Airbnb's activity as these are the only data source available at the moment. Airbnb has published some figures regarding their activity, but only in the form of reports and not datasets available to researchers for further analysis. We are aware that the veracity of scraped data has been challenged in the past (p. 74) and therefore Indigo House took a very cautious approach to make sure the data are correctly filtered and

¹ Skift, 2017, The State of the Global Vacation Rental Market.

validated (use of only active listings, validation of URLs of listings to make sure they were still active at the time of analysis, geographic validation by latitude and longitude, manual checking in relation to the accuracy of room type, property type, location and data availability and finally manual check on Google Street View) (see Appendix 1). It should be noted that Inside Airbnb data is often used in studies on STLs², and so the approach taken in this project is not peculiar.

There are some data limitations acknowledged in the research report (p. 77). First, the analysis presented here allows one to say something about the percentage of dwelling stock in Scotland that STLs have a presence in. The question of whether this represents an overall net loss of longer-term rental stock is not possible to discern from this data alone since it is impossible to tell whether properties are let occasionally, or permanently as STLs.

The second point is that some private rooms, listed separately on Airbnb, may be located in the same dwelling, though it appears that this is the case for 6% of listings at most. The research team arrived at this figure by identifying all active Airbnb listings with exactly the same geographic coordinates and then looking at individual property characteristics for these 1,900 listings in order to estimate how many listings were in the same building. However, without access to raw data from Airbnb or other platforms it is impossible to say for certain which of the listings in the same geographic location are in the same dwelling (and not just in the same building with identical coordinates).

The third issue relates to entire homes or apartments and the fact that some listings do not relate to traditional dwellings and include tents, camper vans, caravans, yurts, boats and pods. Based on the analysis presented above, it appears that these account for just under 2% of all listings across Scotland. This figure was arrived at after conducting a more in-depth analysis of property type (e.g. 'house', 'apartment', 'tent', 'yurt', 'camper van'), which is one of the fields included in the secondary data provided to the research team by Inside Airbnb. The research team has not excluded these from the analysis on the basis that it is impossible to be certain which of them would qualify as a 'dwelling' from a statistical point of view. Such a decision would require further qualitative analysis on a listing-by-listing basis.

IV. *Impact of entire homes on housing:* According to the secondary data analysis, the majority of Airbnb listings are for entire properties in Scotland (as of May 2019): 69% (p. 16). As stated in the report, it is not possible to tell from the data whether whole property listings are occasionally shared, or permanently available on a short-term basis, or whether they are permanently removed from the long-term rental market. Rather, the secondary data analysis indicates the percentage of dwelling stock that STLs had a presence in, with particularly high rates in Edinburgh, Skye and other key Scottish tourist locations.

However, there were indications from the survey and recurring themes coming through the qualitative research across all areas, from all types of participants except for some hosts that properties were moving from long-term private lets and owner-occupation into STLs. This was voiced as a major area of concern in Edinburgh, Fort William and Skye due to the impact this was considered to be

² For instance, Rae, A. (2019) 'The rapid rise of short-term lets and the implications for the housing market', Chapter 3 in UK Housing Review, 2019, Chartered Institute of Housing, Coventry; A SPICe [report](#) on short-term lets in Edinburgh published in April 2019; Gurran, N. & Phibbs, P. (2017) 'When Tourists Move In: How Should Urban Planners Respond to Airbnb?', Journal of the American Planning Association, 83:1, 80-92; and others.

having on shortage of housing supply and affordability. In Edinburgh and the East Neuk of Fife the rise in STLs was associated with the fall in resident population and school rolls, with fears about the long term sustainability of the community. A related negative impact in the rural areas of Fort William and Skye was identified as availability of labour supply and on wider local economic development due to housing shortages (p. 64).

V. *Multiple listings are only a small minority on Airbnb platform:* As stated in Chapter 3 of the report, in order to shed more light on the topic of how many properties each host advertised, all 31,884 active Airbnb listings for Scotland were cross-referenced with the number of individual hosts in the Inside Airbnb dataset. This analysis showed that there were 18,902 Airbnb hosts in Scotland in May 2019 (p. 15). The report states that there are two different ways of looking at this:

- The first is that hosts with one listing (of which there were 14,373) accounted for 45.1% of all Airbnbs in Scotland.
- The second is that 76% of all hosts had only one listing (i.e. 14,373 out of 18,902 hosts had one Airbnb).

VI. *Airbnb helps disperse visitor numbers geographically (more than large chain hotels):* The research highlights that STLs stretch tourism out of traditional touristic hotspots (pages 39, 42, 67). This finding has also been included in our policy suggestions to the Ministers.

VII. *Indigo House makes assumptions on cities' liveability based on number of Airbnb guests, while they should consider the whole of Scotland's tourism industry:* Indigo House has drawn conclusions on liveability based on the descriptions of the experiences of the research participants. The report does not generalise these experiences to cities or locations outwith the case study areas.

The research also highlights that among the benefits of STLs are local economic benefits generated by Airbnb guests in Scotland (p. 63). Based on the qualitative research and in particular from the residents' participants, the report also states that STLs in general (and not particularly Airbnb) may have negative impacts related to disturbance of residents, quality of life and well-being, especially in cities and tenements (p. 64). Increased tourism might also have a negative impact on congestion, demands on local infrastructure and changes to communities (p. 65). Increasing the vibrancy and investment in local areas was identified by some resident, host and community participants in all areas as a positive impact of STLs, and spreading the benefits of tourism to areas out of the traditional tourist areas was identified by some businesses and hosts participants in Edinburgh.

Scottish Government, December 2019

7. Questions and Answers

General

Has the combined impact of the proposed TVL and STL legislation on Scotland's tourism and hospitality sector been considered?

- We welcome visitors from across the world and are delighted to show them the best of Scotland.
- We recognise the importance of the tourist and hospitality sector to the economy of Scotland. We will consult key stakeholders and representatives of groups that are likely to be impacted to prepare a Business and Regulatory Impact Assessment (BRIA) alongside the development of the detailed regulations.

Will the framework make a distinction between professional and 'amateur' short-term letting?

- Safety is a concern across all types of short-term lets, whether the host is sharing their own home or renting out one or more entire properties.
- That is why the safety component of the licensing scheme will be mandatory for all short-term lets in Scotland, regardless of the type of short-term let.
- Local authorities will be given the discretion to put in place further conditions to help tackle other issues specific to their area.

Why has the Scottish Government opted for a licensing scheme and not a registration system?

- A licensing scheme allows for local authority oversight to ensure that license conditions are met. This is important for ensuring compliance.
- The licensing scheme will allow local authorities to impose additional conditions to enable them to manage the issues facing their communities more effectively.

Costs

What assessment it has made of the total cost of a licensing system for short-term lets to (a) owners of short-term lets and (b) local authorities.

- We intend that local authorities will be able to charge a fee to cover the costs of administering the licensing scheme in their area.
- We will work with stakeholders as we develop the detail of the regulations for the licensing of short-term lets to prepare a full Business and Regulatory Impact Assessment (BRIA), which will accurately reflect the costs to participants.
- The BRIA will accompany the draft regulations when they are laid at the Scottish Parliament.
- The cost of licenses will be a matter for local authorities. Our intention is that local authorities will be able to charge fees that will recover the full cost of administering a licensing regime, and that each local authority will have the ability to set different fees in different circumstances.

Evidence

What concrete evidence is there to show that short-term lets are having a negative impact on housing supply / rental rates?

- Prior to launching our consultation, we identified that the impact of short-term lets on residential housing was an area of concern, although there was a lack of robust evidence. We therefore commissioned independent research to explore in-depth, the impact of short-term lets on communities and housing.
- That independent “*Research to assess the impact of short-term lets in Scotland, with a focus on communities, particularly on neighbourhoods and housing*” was published on 28 October 2019.
- The research showed that the majority of Scottish Airbnb listings are entire properties. This is supplemented by the survey and qualitative evidence, which provided indications of a shift of housing accommodation from the residential sector to STLs.
- The survey results from the research indicated that 21% of respondents had an entire property that was not being fully utilised while 11% stated the property had previously been on a long-term lease in the private rented sector.
- The qualitative study showed that many participants in Edinburgh experienced shifts from the residential sector to the short-term lets market. Similarly, in Fort William and Skye, there was evidence provided by participants of properties moving from the residential sector to short-term lets with opinions that there were increasing shortages of housing for workers in both these areas.
- This research provides clear indications that short-term lets are impacting the housing market in some areas. The findings in this research are also consistent with many of the responses we received in our consultation.

Has the Scottish Government studied examples of regulation in other countries?

- Yes, we undertook a review of existing regulations and policies in a number of European and non-European countries which helped to inform our consultation. However, we did not find studies with detailed evaluations of specific approaches.
- Furthermore, we need to develop a solution reflecting Scotland’s unique circumstances in order to meet the needs of Scotland’s communities.

Licensing

What will the requirements be, for obtaining a license and will there be grounds for a local authority to refuse a license based on ‘overprovision’ grounds?

- We will work with Parliamentary colleagues and stakeholders to design a licensing system that is fair and proportionate. As part of this we will consider the use of ‘overprovision’ policies, although this is not the primary intent of the licensing scheme.
- One of the strongest messages from our consultation and research was the need for any regulatory regime to be responsive to different circumstances in different locations. This is why local authorities will have discretion to put in place further licensing conditions, over and above the mandatory safety conditions.

How will the licensing system be enforced?

- We will work with local authorities to design a licensing system that encourages compliance.

- We will explore options for platforms to require licensing numbers be displayed in order to advertise on their websites in a similar way to advertising of properties in the private rented sector.
- We will also consider what penalties may be appropriate for hosts that do not comply with license conditions.

What sort of additional requirements will local authorities be able to require?

- One of the strongest messages from our consultation and research was the need for any regulatory regime to be responsive to local circumstances. This is why local authorities will have discretion to introduce additional license conditions. These might include measures to tackle littering or overcrowding, for example.
- We will work with local authorities to help define the additional conditions which they might want to include.

Will the licensing scheme include a nights per year limit on letting?

- We will explore whether a nights per year limit may be something that local authorities could introduce as part of their additional licensing requirements. However, we would want to avoid the outcome of properties simply sitting empty for significant periods of time.

Safety

How will a licensing system ensure compliance with safety standards?

- Some basic safety standards are already a legal requirement. Every host that operates a short-term let in Scotland should be complying with their legal responsibilities, including under fire safety legislation.
- Currently, it is hard to enforce compliance as there is no accurate data on where short-term lets are operating.
- A licensing system will facilitate checks being carried out and also help remind hosts of their responsibilities.

Planning

How will the short-term let control areas work?

- Local authorities will be able to designate short-term let control areas where change of use of whole properties for short-term lets will be subject to planning permission.
- These powers are set out in the Planning Act 2019 but require regulations to take effect.

Are the powers in the new Planning Act not sufficient to deal with short-term lets, why do we need these new measures?

- The role of planning is to consider the impact of any development or change of use on the local amenity, including neighbours. While planning can consider matters such as increased activity, cumulative change of character of a neighbourhood, etc, it is not the right mechanism to try to manage issues such as potential for anti-social behaviour, the background of landlords or safety matters within the property.

What are the timescales for introducing short-term let control areas?

- The Scottish Government will give priority to implementing regulations providing for short-term lets control areas under the provisions of the Planning (Scotland) Act 2019. We propose to make regulations in good time to come into force in spring 2021.

Will existing short-term lets be required to obtain planning permission?

- Existing short-term lets may or may not require planning permission under current planning legislation. It is for the relevant planning authority to determine on a case-by-case basis whether or not the change from a dwellinghouse to a short-term let is material or not. If the planning authority consider a material change of use has occurred then planning permission is required.
- We will consider how existing short term lets that fall within short-term let control areas are to be treated when drafting regulations to implement the provisions of the Planning (Scotland) Act 2019. It is likely however that they will require planning permission if the use as a short-term let continues following designation of a short-term let control area.

Tourism

Will these changes harm the Scottish tourism industry including employment in the tourist sector?

- Changes will enable councils to balance community needs and concerns with wider economic and tourism interests.
- Visitors will take comfort in knowing that action is being taken to ensure all short-term lets in Scotland comply with basic safety standards.
- As part of developing the detail of the scheme, we will assess the potential impact on relevant stakeholder groups across Scotland and local communities. We also work closely with key stakeholder groups to ensure that these changes do not adversely impact the Scottish Tourist Industry.

Will there be enough accommodation for tourists after these changes, particularly during the Edinburgh festival?

- We will closely monitor the impact of these changes, and encourage local authorities to consider the impact on tourism and the local economy, particularly during peak visitor season, to ensure that accommodation capacity continues to meet visitor demand.

Does this unfairly penalise the short-term rental sector and advantage other parts of the hospitality sector?

- A key aim of the proposed regulatory framework is to ensure fairness across the hospitality sector for all types of accommodation. Ensuring that compliance with safety standards align with other forms of accommodation such as Bed and Breakfasts and Guest Houses will help deliver parity in this area, and we will work closely with key stakeholder groups to ensure there is a level playing field across the hospitality sector.

Transient Visitor Levy

Are these changes linked to the Transient Visitor Levy (Tourist Tax)?

- The commitment to introduce a transient visitor levy is part of a package of measures focussing on local tax reforms and local fiscal empowerment. Creating a power for councils to apply a local discretionary visitor levy, if it is appropriate for local circumstances, is a distinct and separate measure from the potential regulation of short-term letting accommodation.
- Local authorities may, in due course, wish to take into account any arrangements for short-term lets, if they are considering a transient visitor levy for the area.

How will the Transient Visitor Levy affect the short-term let sector?

- To ensure a level playing across all types of accommodation it is intended that the visitor levy would apply to overnight stays in all types of accommodation, including short term lets. It will be for individual local authorities to decide whether or not to apply a levy if they consider it appropriate in their circumstances.

Taxation

What do you propose to do about the tax treatment of short-term lets?

- We will carefully and urgently review the tax treatment of short-term lets.
- Details of the review will be announced in due course.
- The review would be tasked with identifying whether a change to the current tax treatment of short-term lets is needed, and if so in what manner.
- Our consultation on a transient visitor levy made clear that it would apply to all types of overnight accommodation, including short term lets.

Background Note

[REDACTED under exemptions s.30(b)(i) (provision of advice) and s.30(b)(ii) (exchange of views)]

Will the SBBS be scrapped for short-term lets?

- As at 31 May 2019, the Small Business Bonus Scheme provided relief to over 120,000 businesses across Scotland in 2018-19.
- We accepted the Barclay Review recommendation that the Scheme could better support small businesses, and inclusive economic growth.
- The contract for the independent review has been awarded to the Fraser of Allander Institute. It is set to report its findings this year.

How will changes proposed through the NDR Bill affect the short-term let sector?

- Under current legislation self-catering holiday accommodation is subject to non-domestic rates if, broadly speaking, it is not someone's sole or main residence and is made available for let (on a commercial, "for profit" basis) for at least 140 days per financial year.
- Otherwise it is liable for council tax and entered on the council tax valuation list. An avoidance tactic that may be used by some property owners is to avoid payment of tax on second homes by claiming the property has moved from domestic use (liable for council tax) to non-domestic use as a self-catering property (and liable for non-

domestic rates) and subsequently applying for relief under the Small Business Bonus Scheme with the effect that no rates may be payable.

- The independent Barclay Review of non-domestic rates recommended that, in order to close this loophole, self-catering accommodation be required to provide, in addition, evidence of 70 days of actual letting. This will apply from 2020-21 onwards.
- The consultation on the implementation of the Barclay Review in summer 2018 concluded that there may be occasions where it would be appropriate for local authorities to be able to exercise a degree of discretion with regard to the 70 day actual let criterion.
- Section 5 of the Non-Domestic Rates (Scotland) Bill allows Ministers to set out classes of property which are not to be regarded as “dwellings” (making them liable to non-domestic rates instead of council tax). The Bill provides for such regulations to also set out circumstances where local authorities have discretion to decide whether particular properties can continue to be regarded as falling within a class set out in the regulations, despite not meeting the criteria for inclusion in the class.

Affordable Housing

What is the Scottish Government doing to increase the availability of affordable housing?

- We have transformed access to affordable housing with a record investment of over £3.3 billion to deliver our 50,000 affordable homes target, including 35,000 homes for social rent by 2021. That is a 94 percent increase on our previous five-year investment, and the single biggest investment in, and delivery of, affordable housing since devolution.
- As well as providing grant to registered social landlords to deliver homes for social rent, mid-market rent and low-cost home ownership, grant is available to incentivise local authorities to deliver more council homes.
- We continue to work creatively with our partners and use innovative ways to deliver more affordable homes, for example the Charitable Bond model is a funding mechanism which provides loan finance for affordable housing, whilst generating instant capital funds in the form of Charitable Donations which contribute towards the development of social housing.
- Our Low Cost Initiative for First-Time Buyers helps households access home ownership where it is affordable for them, and the Rural and Islands Housing Funds have the primary aim of increasing the supply of long term affordable housing of all tenures in rural and island areas.

NOTE OF MINISTERIAL MEETING WITH AIRBNB 03 March 2020

Attendees:

- [REDACTED], Director of Public Policy, Airbnb EMEA
- [REDACTED], Head of Public Policy, Airbnb UK and Ireland
- Kevin Stewart, Minister for Housing, Planning and Local Government
- [REDACTED], Head of Housing Markets, Strategy and North Programmes Unit
- [REDACTED], Short Term Lets Policy Team

Introductions

- [REDACTED] thanked the Minister for his time and explained he had requested the meeting to: highlight the positive work Airbnb had done with SG including through the collaborative economy panel and report; discuss the licensing system proposals; and offer insights, based on his experience of working with regulatory systems in Europe over the last six years to ensure that the Scottish system was effective.
- Mr Stewart advised that SG would consider the use of primary legislation in the next parliamentary term if the current proposals were not effective.

Registration and licensing

- [REDACTED] stated he understood the rationale for regulation and appreciated that, in some areas, it was legitimate to take measures to control the numbers of whole property lets; he understood these were a problem in some communities. However, he wondered whether the licensing scheme would sufficiently differentiate 'sharers' and 'swappers' with those who rent out entire properties as businesses. He noted he had concerns that the cost and bureaucracy for 'sharers' and 'swappers' could be unduly burdensome.
- KS responded, clarifying the rationale for the licensing system noting there were a number of different issues which needed to be addressed and these varied across Scotland. He added that a one-size-fits-all approach would be disproportionate.
- KS stated he envisaged that some local authorities would only want to introduce the safety aspects of the licensing scheme, whilst others would wish to add additional conditions. He noted that this local flexibility was a key principle of the licensing system.
- [REDACTED] stated that, in his view, a well-designed national registration system might be more effective than a licensing system. He explained that registration systems had been very effective in other European cities, such as Lisbon and cities in Germany, and added that a registration system would ensure that everybody would know who was operating and where.
- KS noted that the Scottish approach would be a national licensing framework but with each local authority running its own licensing scheme.
- [REDACTED] asked the Minister how he would ensure that licensing was done in such a way that would not be unduly burdensome on 'sharers' and 'swappers'. He noted an unintended consequence in some cities where 'sharers' and 'swappers' had simply left the market, leaving only the 'professional' operators, where requirements had been too onerous.
- KS was confident common sense would prevail and that local authorities would concentrate their enforcement efforts and resources to best effect. KS noted they had taken this approach with the HMO licensing system and he envisaged a similar approach being taken with STL licences.
- [REDACTED] asked whether an in-person inspection would be required for every property and whether this would encompass quality of experience criteria (e.g. Quality in Tourism).
- KS stated that the focus of the licensing system would be on safety. He added it was unlikely that every short-term let would require an in-person inspection but that this was something which officials were exploring with local authorities.

Design of a licensing scheme

- [REDACTED] explained that Airbnb wanted to do what they could to ensure that hosts were meeting their requirements under the new licensing system. He stressed concern that this would be more difficult if every town and city had different requirements. He wanted to see a menu of options to avoid arbitrary divergence (c.f. Netherlands approach). He noted that the EU was pushing for more consistency in regulation and challenging local authorities to work together.

- KS reiterated that a key principle of the licensing system was flexibility for local authorities. He considered that some local authorities were likely to introduce only the mandatory safety component. All local authorities would want to operate the scheme efficiently to make best use of resources and would not want to deter tourism.
- KS noted officials we were currently engaging with local authorities and other stakeholders on the details of the licensing system which would be established under the Civic Government (Scotland) Act 1982. This would limit the parameters of the scheme. Local authorities were familiar with this legislation, as it was the legal basis for a number of licensing schemes, e.g. taxis.
- [REDACTED] noted that Airbnb would look at the 1982 Act and requested a follow up with officials to discuss the details of the licensing system.

Action [1]: Officials to set up follow up meeting with Airbnb to discuss details of the licensing system.

Tax Review

- [REDACTED] asked about the timescales for the tax review.
- KS responded that everything would be completed by spring 2021.
- [REDACTED] noted the importance of ensuring there was clarity for hosts in relation to all taxes due and would be happy to help with education and enforcement, noting that they had worked with tax advisory firms to get bespoke advice in the past.
- KS explained a significant concern driving the tax review was that some hosts pay neither non-domestic rates or council tax. It was important that short-term lets made an appropriate contribution to local communities and supporting local services.

Tourism

- [REDACTED] noted the positive work they have undertaken with SG on the tourist tax.
- KS thanked Airbnb; SG and local authorities appreciated this.

ENDS



Dear Cabinet Secretary,

The return of travel will bring much-needed economic benefits to communities that have been affected by the pandemic - but when tourism returns Airbnb wants to make sure that recovery is sustainable.

Earlier this month, we wrote to all MSPs to rebalance tourism and ensure that the return of travel is safe, sustainable and benefits everyone. Given your remit as Cabinet Secretary for Social Justice, Housing and Local Government, with responsibility for short-term lets legislation, we would like to meet with you to discuss these initiatives in more detail.

According to a report from [BiGGAR Economics](#), activity on Airbnb contributed £677m to Scotland's economy in 2019, supporting almost 34,000 jobs nationwide. Public policy can both enhance these benefits but also, unfortunately, put them at risk.

Scotland is absolutely right to pursue new rules for short-term lets and we wholeheartedly support proposals that recognise the way people live, work and travel today. We have long said that we support regulation and have signed more than 1,000 regulatory and tax agreements globally.

But the combination of licensing and planning legislation as currently proposed by the Scottish Government is an example of how policy can put key sectors at risk. It is disproportionate and simply goes far **beyond what we've seen elsewhere in the world.**

Since the Scottish Government proposed licensing and planning rules for short-term lets, the tourism industry has been severely impacted by the COVID-19 pandemic, as has the worldwide community of hosts and guests who use online travel platforms. **This unprecedented crisis sets the regulation of the tourism sector in a new context.**

In association with voices from the wider tourism industry, [we support the proposals put forward by the Association of Scotland's Self-Caterers \(ASSC\)](#) which provide a detailed, cost-effective, and proportionate response to short-term lets regulation. The tourism industry in Scotland is united behind a registration system, which would be less costly and burdensome than the proposals for licensing put forward by the Scottish Government.

Last week, we published our [UK Short-Term Lets Registration Whitepaper](#) which includes proposals for an industry-wide statutory registration system. Our registration whitepaper proposes a

simple-to-use, statutory national registration system for short-term lets, which would empower local authorities and communities, hosts and guests in equal measure.

In partnership with the University of Brighton and BritainThinks, we consulted local authorities, destination marketing organisations, residents' associations, Hosts on Airbnb, trade associations, local businesses **and policymakers from across Scotland** in 2020 on the benefits and drawbacks of a registration system. The [report from BritainThinks](#) highlights the **concern amongst local authority and industry stakeholders outside Edinburgh that the proposed regulations risk overreaching** and will result in a fragmented and complex system for hosts. This concern is compounded by the context of COVID-19 and its impact on the Scottish tourism economy and the wider industries it supports.

We have consistently committed to supporting a tourism levy, should communities in Scotland wish to introduce one, but it is also **important to consider the interplay between different policies here**. According to research by Edinburgh City Council, guests on Airbnb would raise around one-fifth or one-quarter of the total revenue from a tourism levy depending on the model adopted.³ However, this amount of revenue would be reduced if restrictions on short-term lettings led to a significant tightening of supply. **The licensing scheme as currently proposed would severely impact the revenue that could be generated by a tourism levy.**

The registration system being proposed in this Whitepaper is designed to address the key issues that were raised during the national consultation. Ultimately, the aim of the registration system is to create a better regulatory environment for all - giving hosts better tools to understand their obligations, without creating a disproportionate

³ http://www.edinburgh.gov.uk/download/meetings/id/57232/item_83_-_edinburgh_transient_visitor_levy

compliance burden on local authorities in exercising their existing functions. Below we have set out the broad principles of the registration system as set out in the whitepaper:

- **A simple, centralised and national system.** A one-stop, online, registration system, where hosts offering short-term lets can input their personal information and instantly obtain a registration number through a simple, online user-friendly website.
- **Mandatory for hosts in order to capture all short-term letting activity.** It is important that all online and offline short-term letting operators support the new system, so that all hosts comply with the rules that apply to them, whether they advertise their properties through an online platform or not.
- **Providing data and transparency for local enforcement bodies.** Any new system should ensure that it receives the requisite information from hosts to support local authorities' effective performance of existing regulatory functions, including enforcement of local laws.
- **Driving awareness of existing health and safety standards.** Hosts will need to attest that they have understood obligations around fire safety, quality and standards as part of the process. This could be modelled around Visit Britain's "We're Good To Go" kitemark, launched in June 2020 to help businesses comply with COVID-safe practices.
- **Minimal cost to hosts.** The cost of administering this system should be accessible for all, proportionate and based on the host's level of activity. We suggest the system should be free for non-commercial hosts and there should be a reasonable fee for commercial hosts, set by reference to the actual cost of administration.

Platforms would play a role in enforcement by taking action against listings and hosts when local authorities or the emergency services notify them of illegal activity. This would include suspension or permanent removal of listings, if appropriate.

Airbnb knows from the hundreds of agreements we have signed around the world and the wide-ranging rules that have been introduced, that good regulation must be followed by good implementation. We've typically seen that the most successful systems have been simple, centralised, digital, and user-friendly.

That is why, in a world first for Airbnb, we have commissioned a digital-first approach to help the Scottish Government and local authorities with the introduction of new rules. The digital prototype will demonstrate how an integrated regulatory solution could work with existing government websites that provide other services to residents. This prototype will demonstrate what will be expected of hosts - depending on the final short-term lets rules that are agreed - and provide regulatory bodies with a simple, efficient way to manage and report on short-term lets. We have invited the Scottish Government to join these conversations, as well as COSLA and select local authorities.

We would be delighted to discuss our proposals to you in more detail. My office will be in touch with yours to see if a meeting can be arranged in the near future.

Yours sincerely,

[REDACTED]

UK Public Policy Lead
Airbnb



Scottish Government
Riaghaltas na h-Alba
gov.scot

Cabinet Secretary for Social Justice, Housing and Local Government

Rùnaire a' Chaibineit airson Ceartas Sòisealta, Taigheadas,
agus Riaghladh Ionadail
Shona Robison BPA/MSP

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[REDACTED]

Our Reference: 202100215792

29 June 2021

Dear [REDACTED],

Thank you for your letters of 17 June requesting a meeting with the Cabinet Secretary for Social Justice, Housing and Local Government and the Cabinet Secretary for Finance and Economy to discuss the regulation short-term lets. Ms Robison would be pleased to meet with you, subject to Parliamentary business and diary availability. I would be grateful if you could contact Ms Robison's Diary Secretary, via e-mail at CabSecSJHLG@gov.scot to make the necessary arrangements.

Yours sincerely,

[REDACTED]
Private Secretary

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot Tha Ministearanna h-Alba, an luchd-comhairleachaidh sònraichte agus Rùnaire Maireannach fo chumhachan Achd Coiteachaidh (Alba) 2016. Faicibh www.lobbying.scot St Andrew's House, Regent Road, Edinburgh EH1 3DG www.gov.scot



Accredited
Until 2020



Kevin Stewart MSP

Minister for Local Government, Housing and Planning
The Scottish Government
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Dear Minister,

Thank you for your letter dated 9th March 2021. Ahead of the next meeting of the Short-Term Lets Stakeholder Working Group tomorrow, we wanted to take this opportunity to respond to you, and set out our current position in more detail.

We welcome the decision not to push forward with the licensing regulations at this time and look forward to continuing to work with the Scottish Government in the weeks and months ahead to help build consensus on a new system of regulation for short term letting. We have long backed calls for sensible new rules in Scotland that work for everyone, and support the country's tourism industry as it recovers from the global pandemic.

The Short-Term Lets Stakeholder Working Group

The Scottish Government's working group provides a real opportunity for us to pause and rethink.

Hosts on Airbnb and many other representatives of Scotland's tourism industry are clear: the Scottish Government can best support our sector by changing parts of these regulations. We believe there is a better way forward and we are committed to continuing to work with you to make sure we get this right.

However, following the first meeting of the working group, many stakeholders commented that it is a difficult forum in which to present changes and recommendations. We are particularly concerned that - at this late stage - the Scottish Government is still unclear on the definitions of certain types of tourism accommodation and the scope of the licensing legislation.

Tourism is vital to Scotland's economy and proper support at this time is key to the recovery of the sector. We want to make sure the Scottish Government collaborates with the Tourism Department as part of this work and so we have also written to Tourism Secretary, Fergus Ewing MSP, to set out our suggestions.

What we are asking for is a meaningful opportunity to engage and provide constructive solutions. Therefore, we wanted to share our thoughts with you directly, with the hope that this can be incorporated into our work going forward:

- **Remit of the working group:** we request that the Scottish Government outlines how the working group recommendations will have significant impact on the legislative definitions and scope as we move forward.

- **Clarity on the legislation, before guidance is drafted:** The working group is being asked to structure guidance against a piece of legislation that hasn't yet been discussed, or agreed. The first task of the working group should be to improve the legislation and make suggested amendments, before drafting guidance begins.

- **Digital solutions:** The technical complexity of introducing workable digital systems gives rise to a separate forum whereby the Scottish Government can communicate directly with platforms and Hosts. We would welcome the opportunity to start this with you.

Beyond the remit of the Working Group, we believe that there are urgent issues that need to be addressed, particularly regarding planning rules which are due to come into effect in less than a month:

- **Control Zones:** In our experience, requiring planning permission for short-term lets constitutes an effective ban. This is often due to the cost of processing planning applications, which was outlined in the 2019 Planning Bill BRIA. Currently, local authorities have no explicit duty to consider the representations or explain the process by which control areas are selected. This lack of detail and accountability is likely to lead to confusion and greater costs for Hosts and local authorities. We urge the Scottish Government to set out clear guidance on how local authorities should implement Control Zones.
- **Engagement with the Host community:** Last week, we held a virtual meeting with Hosts to explain the current status of the regulations. It was clear that they would like to hear from you directly about what action they need to take with regards to applying for planning permission, as Control Zone regulations come into force on April 1st 2021. As such, we would like to invite you and your officials to address our community directly at a virtual roundtable and explain what Hosts need to do, and when, ahead of travel reopening across Scotland on April 26th 2021.
- **Collaboration with platforms on notice and action processes:** Airbnb has worked with governments around the world to support compliance with, and enforcement of, fair and proportionate regulatory frameworks for short-term lets. We recommend that the Scottish Government collaborates with platforms on compliance and enforcement measures, and agrees detailed notice and action processes with platforms that are consistent with existing legal frameworks across Europe.

A better way forward

We want to work with other stakeholders and with the Scottish Government to ensure that these rules work for everyone. To this end, we would like to speak with you directly to offer further details on what we have set out below:

- **A simple, digital, straightforward registration system:** As we stated in our 2019 consultation response, we firmly believe that registration is a better way forward.
 - In line with European Commission recommendations, such a system should operate at national level, minimising the scope for local fragmentation, along the lines of the [Scottish Landlords Register](#) - which already has requirements around health and safety.
 - With a registration system providing transparency, and a new planning regime in place with the Planning Act 2021 SSI, local authorities will have the tools they need to shape the housing market to meet their unique needs. The proposed licensing system adds complexity without any guarantee of greater effectiveness.
- **Working in tandem with the European Commission:** The European Commission is due to publish recommendations imminently on how simple, proportionate registration systems can be implemented across member states. We would strongly encourage the Scottish Government to implement the recommendations set out at a European level, an approach that supports the Scottish Government's political objectives. Over the past four years we have had many meetings with your officials on the very subject of how short-term lets legislation works across Europe.

- **Our commitment to you:** We want to find solutions that work for everyone. We have begun to discuss what the implementation of these rules could look like, and we would welcome the opportunity to discuss these solutions with you in more detail.

Fair and proportionate rules will help support Scottish families who rely on the additional income most.

We look forward to continuing to work collaboratively with the Scottish Government, to find the best way forward, together. We wish you the best of luck with the upcoming election and look forward to continuing to engage with you on this issue in the new parliament.

Yours sincerely,

[REDACTED]

UK Public Policy Lead
Airbnb



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000
E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202100183033

24 March 2021

Dear [REDACTED],

Thank you for your letter dated 16 March outlining Airbnb's position on the short-term lets working group, and proposed way forward. I would like to thank you for taking the time to share Airbnb's views with me.

As you are aware, we have been working on proposals for the regulation of short-term lets since 2018. In 2018 we established the Short-Term Lets Delivery Group, containing officials representing a range of different areas including: housing, tourism, planning, local government and taxation. In 2019, the First Minister launched a consultation on a regulatory framework for short-term lets, and we commissioned independent research into the impact of short-term lets on communities. In January 2020, I announced the Scottish Government's proposals for the regulation of short-term lets, which followed careful consideration of the evidence provided by the consultation and research. In autumn 2020, we launched a second consultation on detailed proposals for a licensing scheme and planning control areas. Despite restrictions imposed by the COVID-19 pandemic, we received over 1,000 responses and officials engaged with over 200 people through online workshops.

I understand that you favour a registration scheme at a national level. However, I do not believe that is the right approach. We have taken the time to develop proposals that we believe are right for Scottish circumstances. The principal component of our licensing scheme is a set of mandatory safety conditions. All short-term lets in Scotland will be required to adhere to minimum basic safety standards. Beyond that, local authorities will have flexibility to add discretionary conditions in order to strike a balance between the needs of their communities, and the economic and tourism benefits of short-term lets in their areas.

Working Group

In your letter, you highlight your view that clarity on legislation is needed before working on developing guidance. I believe that the working group can achieve its objectives by focusing on developing guidance based on the current licensing order, informed by the policy intentions, and use that process to flush out any issues for resolution.



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In my letter to the Local Government and Communities Committee on 18 February, I set out that the working group would actively explore solutions to issues raised by operators, with a view to identifying any changes to the legislation that may be needed. But this does not extend to considering whether or not a licensing scheme is required, or the requirement that all short-term lets must comply with basic safety standards. Where there are genuine concerns, we need to get to the root of the issues so that we can consider appropriate solutions. I believe the approach of developing guidance in tandem with considering changes to the legislation will allow us to do that.

Control Areas

You also raised concern that the Control Area Regulations would come into force on 1 April, but no guidance would be available until June. I would like to reassure you that there will be no change to existing planning law for hosts and operators from these Regulations on 1 April. In order to designate a control area, local authorities are required to go through the process set out in the regulations. The planning application process is well established, and remains the same within and outwith a control area.

Meeting with hosts

I would like to thank you for the offer to attend a meeting with hosts on 26 April. As you will be aware, the pre-election period begins on 25 March and runs until the election on 6 May. I am therefore unable to attend the meeting on 26 April.

I appreciate Airbnb's continued support for working collaboratively with other stakeholders and the Scottish Government to consider any changes required to legislation in order to make it as efficient and effective as possible, and in developing guidance that is comprehensive, clear and helpful.

As I have set out previously, this Government remains committed to monitoring and evaluating the impact of our proposals to ensure that they are effective and targeted.

I hope this reply is helpful.

Yours sincerely


[Redacted]

KEVIN STEWART

St Andrew's House, Regent Road, Edinburgh EH1 3DG



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From: [REDACTED]
Sent: 09 February 2021 16:32
To: Stewart K (Kevin), MSP <Kevin.Stewart.msp@parliament.scot>
Subject: Airbnb Letter 09.02 - Short Term Lets Legislation

CAUTION: This e-mail originated from outside of The Scottish Parliament. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Kevin Stewart MSP,
I am writing to you on behalf of the [REDACTED s33(1)(b)] constituents in Aberdeen Central who use Airbnb to share their space and be a part of Scotland's fantastic tourism economy.

The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 and the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2021 will come before the Scottish Parliament for final approval tomorrow, **Wednesday, 10 February**.

We have always said that we would welcome sensible regulation of our industry. But we firmly believe these proposals go too **far beyond** the issues they sought to address - they will be some of the strictest rules worldwide. The sheer cost to hosts (for many it will be thousands of pounds) and complexity of these rules will mean only big businesses will find it easy to take part in this industry. They will cost thousands of jobs, hurting every community in Scotland, when the survival of tourism is crucial to help local economies recover.

In a recent poll conducted by [ORB International](#) 72% of Scots say **now is not the time** to be rushing through these rules:

- [REDACTED s33(1)(b)]. These hosts make tourism possible in a way that shares the best of what Scotland has to offer.
- **The tourism industry is on its knees:** These regulations have been condemned by [CBI Scotland](#), the [Association of Scotland's Self-Caterers](#), [Visit Scotland](#), and the [Scottish Tourism Alliance](#). The [European Holiday Home Association](#) has stated the restrictions could contravene European Union law.
- **The consultation was rushed:** We have long called for sensible, proportionate regulation of short-term lets in Scotland and have worked with hundreds of governments at every level across the world in doing so. However, the Scottish Government has not followed their own process on consulting on new rules, without adequate justification.

Scottish hosts on Airbnb are a vital part of ensuring the tourism sector - and therefore the country's economy - recovers. You do not need to put 17,000 jobs on the line, increasing unemployment in the long term, when a simple, online, straightforward solution could serve the Government's objectives.

Tomorrow, we're asking that you oppose these rushed proposals and call on the Scottish Government to look again at how they can best support the tourism industry as it recovers in the months and years to come.

[REDACTED]

UK Public Policy Manager, Airbnb

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Scottish Government
Riaghaltas na h-Alba
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Minister for Local Government, Housing and Planning
Kevin Stewart MSP

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E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202100166751

Your Reference: FW: Airbnb Letter 09.02 - Short Term Lets Legislation

9 March 2021

Dear [REDACTED],

Thank you for your email of 10 February 2021 outlining Airbnb's response to the Scottish Government's proposals for the regulation of short-term lets on behalf of hosts based in Aberdeen.

As you are aware, on 18 February 2021, I announced that I was withdrawing legislation for the short-term lets licensing scheme from the Scottish Parliament to allow for draft guidance to be developed, and to address concerns that had been raised by stakeholders. Subject to the outcome of the election, this government intends to re-lay the Licensing Order, amended as appropriate, and accompanied by the draft guidance, in June. Our overall timescales for implementation remain the same. If it is passed, local authorities will still have until 1 April 2022 to establish a scheme tailored to their local needs and existing hosts will have until 1 April 2023 to apply.

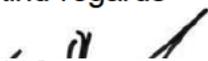
I understand that Scotland's tourism and hospitality sectors have been hit hard by this pandemic and we do not underestimate the crisis this has created. The Scottish Government has been supporting the tourism and hospitality sector through the pandemic in every way possible, given the limits of devolved power. We continue to work closely with the tourism sector to explore how best to support them through the pandemic and to work towards recovery.

I would like to thank you for being part of the stakeholder working group to develop guidance for hosts and operators and local authorities. We will continue to work with the working group as we develop guidance, to allay any unfounded concerns and actively explore solutions to any real issues. The guidance will help to provide reassurance on the operation of the scheme to operators and hosts in the sector.

We are committed to monitoring and evaluating the impact of our proposals to ensure that they are effective and targeted.

I hope you find this reply helpful.

Kind regards


[Redacted]

KEVIN STEWART

St Andrew's House, Regent Road, Edinburgh EH1 3DG



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3 December 2020

Dear Jamie,

Since September, we have outlined significant concerns about the economic, social and community impact of the Scottish Government's proposed planning and licensing restrictions for short-term lets. As you will know, the Scottish Government's consultation has now ended.

Today, we are sharing the details of our submission, as well as the findings of a new report commissioned to better understand the impacts of the Scottish Government's regulatory proposals.

We have backed calls by Scottish business leaders, including the Scottish Tourism Alliance, the Association of Scotland's Self Caterers, the Federation of Small Businesses, the Institute of Directors and the Confederation of British Industry, to pause the implementation of these regulations until the impact is properly considered. Find out why below.

- **BiGGAR Economics study: short-term lets proposals could risk 17,000 jobs in Scotland**

As stated in our letter to you on 21st September 2020, we need to be absolutely clear about the cost of implementing this system for hosts, local authorities, local businesses and communities. Without the publication of a Business and Regulatory Impact Assessment (BRIA) to accompany this consultation, respondents have been asked to blindly respond to proposals without any evidence of what their effects could be.

In the absence of this information, we commissioned independent consultancy BiGGAR Economics to analyse the impact of these proposals. The study found that:

- Host income and guest spending related to Airbnb boosts the Scottish economy by £677 million a year and supports more than 33,500 Scottish jobs
- The current proposals to regulate short-term lets could put 17,000 jobs in Scotland at risk and take almost £1 million a day out of the Scottish economy.
- The potential job losses are the equivalent of increasing unemployment by 0.6% in Scotland - taking figures from 4.5 to 5.1%.

You can read the full report [here](#), which has more information on data for your local authority area.

We strongly believe that if the Scottish Government had followed its own guidance, and produced a BRIA, they would have identified, and still could identify, more viable alternative measures to its current proposals that did not put the livelihoods of tens of thousands of people at risk.

We have significant concerns about the impact on Scotland's tourism industry, which has suffered badly as a result of the COVID-19 pandemic. At a time when we stand on the precipice of economic crisis, we simply want to work in partnership with the Scottish Government towards a better solution that will protect communities and drive long-term recovery.

- **Our response to the Scottish Government's consultation into a new planning and licensing system for short-term lets**

You can find a full copy of our consultation response [here](#).

Airbnb has long supported simple, smart and fair regulations. We want to work together on a balanced way forward that regulates short-term lets while protecting livelihoods and prioritising the needs of local families, who are the beating heart of Scottish hospitality and who need the additional income most.

We have worked with many governments across Europe on straightforward approaches, but the current proposals put forward by the Scottish Government risks significant damage to jobs, livelihoods and the tourism industry.

Under these proposals, someone offering up their spare room for one night of the year will be subject to more regulation than private rented sector landlords, defying any sense of reason or proportionality. According to leading

Scottish law firm Shepherd and Wedderburn LLP, the average Scottish host would need to pay over £700 just to meet the mandatory requirements of the license, with the full licensing fee yet to be determined.

These measures will simply price out ordinary people from being able to be a part of the Scottish tourism economy. As a result, thousands of people in Scotland sharing their home or room to make a little extra money will simply be shut out of the system.

We believe that an open, simple and inclusive approach will ensure that Scotland's tourism sector not only survives, but thrives:

- **A tiered approach to licensing**, with the lightest possible obligations for occasional, non-professional hosts (spare rooms hosts and those letting out their primary home for a few weeks a year), and stricter obligations for commercial and professional operators.
- **National oversight and guidance** to avoid a complex and arbitrary patchwork of restrictions.
- **A robust evidence base** to guide needs at local authority level. A national registration system, similar to Scotland's Landlord Registration system, should provide an evidence base first and local areas should choose if they require a more onerous licensing system once that evidence has been collated.
- **A digital first approach that is simple, online and prompt**. Hosts should be able to apply for a licence and otherwise comply with regulations in a single visit to a user-friendly website, with no requirement for prior in-person validation.
- **Licences should be granted instantly with minimal renewal requirements**. All hosts who are required to obtain a licence should receive a licence number upon submission of the online application.

We're backing calls by Scottish business leaders - including the Scottish Tourism Alliance, the Association of Scotland's Self Caterers, the Federation of Small Businesses, the Institute of Directors and the Confederation of British Industry - to pause the implementation of these regulations until the impact is properly considered.

We're asking you to support this call.

We hope the Scottish Government considers our proposals to protect the income and livelihoods of Scottish residents and communities in the years ahead. If you need any further information on our response to the Scottish Government's consultation, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Airbnb UK Public Policy Manager



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000123082

Your Reference: FW: Airbnb letter 03.12.20

22 December 2020

Dear [REDACTED],

Thank you for your letter to me and my Ministerial colleagues dated 3 December 2020 calling for the Scottish Government to postpone the introduction of our short-term lets licensing scheme, and sharing the findings of a new report you commissioned to analyse the economic impact of our proposals. I am responding as short-term lets falls under my portfolio.

As you know, the Scottish Government has been working on proposals for the regulation of short-term lets since 2018. We first consulted in summer 2019 for twelve weeks. We published the results of both that consultation exercise and the independent research commissioned by Scottish Government in October 2019. We announced our proposals for a licensing scheme, planning control areas and a review of taxation in January 2020.

Unfortunately, work on implementing these proposals had to be suspended from March to July 2020 to deal with the worst of the COVID-19 pandemic. We had originally planned for a longer period of engagement on our proposals in autumn 2020 but the timetable had to be compressed in order to ensure that the secondary legislation could still be laid at the Scottish Parliament in this session. This is important so that local authorities can make progress in establishing licensing schemes and control areas from April 2021 to address what is a pressing issue for some of our communities. Furthermore, the Scottish Government is anxious to see the measures to protect the safety of guests and neighbours rolled out without unnecessary delay.

We understand the pressures facing the tourism industry as it recovers from COVID-19 restrictions. The Scottish Government has been supporting the tourism and hospitality sector through the pandemic in every way possible, given the limits of devolved power. We are planning for a recovery of

the tourism sector. Regulation of short-term lets is part of ensuring a responsible and sustainable approach to tourism, which better balances the benefits of tourism with wider community needs and concerns.

On 10 December we published a report into the consultation on proposals for the regulation of short-term lets in Scotland. As I hope you will agree, this report sets out how we have listened to the many and various views expressed and refined and improved our proposals as a result. For example, we have adjusted our proposals so that existing hosts in Scotland can be sure they have until 1 April 2023 to apply for a licence, giving them over two years to get ready.

On 14 December, the Licensing Order, Control Area Regulations and Business and Regulatory Impact Assessment (BRIA) were laid at the Scottish Parliament. The legislation, BRIA and consultation report can all be found here: www.gov.scot/publications/short-term-lets/

We are committed to monitoring and evaluating the impact of the legislation to ensure that it is effective and targeted. We can take action in the next Parliament if this is not the case.

I hope this information is helpful.

Kind regards


[Redacted]

KEVIN STEWART

St Andrew's House, Regent Road, Edinburgh EH1 3DG



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6 November 2020



Dear First Minister,

I am writing to you to outline our position on the Scottish Government's plans to regulate short term lets and to request the opportunity to discuss with you why we believe that the proposals risk further harm to Scotland's economy, tourism sector and local communities.

Last week we joined calls from across the Scottish tourism industry to ask the Scottish Government to pause action on the proposed regulations.

Airbnb is built on the principle that we would make a positive contribution to society. We're committed to being a company that benefits people and places over the long term.

Our platform operates in almost every country in the world. As a result, we have a truly global perspective on how countries can support the critically important tourism and hospitality sectors, particularly during these unprecedented times.

Scotland's beauty draws visitors from across the globe and millions of guests have chosen to enjoy world-renowned Scottish hospitality in the homes of local residents on Airbnb. Guests on Airbnb also stay longer, spend more, and are more likely to return to Scotland than other visitors. According to an independent study we commissioned by Graeme Blackett and BiGGAR Economics, travel on Airbnb boosted the Scottish economy by almost £2 million a day, supporting around 34,000 jobs last year alone.

Public policy can both enhance these benefits but also, unfortunately, put them at risk.

We believe that engaging with governments and communities is not only the best way to build a highly valuable business, but the right thing to do. That's guided our approach in discussing what regulation means for Scotland for almost four years.

We support smart regulation, especially in forward thinking governments across Europe. For example, in the Netherlands we are supportive of their phased and tiered approach towards an evidence-based registration system and in Denmark we've worked with the tax authority to help hosts increase day limits and tax-free earnings.

Scotland is absolutely right to pursue new rules for short-term lets and we wholeheartedly support proposals that recognise the way people live, work and travel today. But this approach is an example of how policy can put key sectors at risk. It is disproportionate and simply, goes far beyond what we've seen elsewhere in the world.

As they stand, the proposals could take £1 million a day out of the Scottish economy and put 17,000 jobs at risk - the same as boosting unemployment by 0.6% - according to BiGGAR Economics.

For local hosts - nearly half of whom say that the additional income they earn from hosting on Airbnb is an economic lifeline - the effects would be devastating. These families, who are just trying to weather the impacts of the pandemic, aren't asking for additional support or funding. They just want the opportunity to open their doors again when all this is over.

That is why last week we joined calls from across the Scottish tourism industry to ask the Scottish Government to pause these proposals.

We want to work together on a balanced way forward that regulates short-term lets while protecting livelihoods and prioritising the needs of local families, who are the beating heart of Scottish hospitality and who need the additional income most.

We hope the Scottish Government considers the alternative proposals we highlighted in our consultation response. We believe this approach will safeguard the tourism sector from further harm, and protect the income and livelihoods of Scottish residents and communities in the years ahead.

I hope we can arrange a time to discuss this further with you or a member of your team. My office will be in touch with you to see if this works in your diary.

Yours sincerely,

[REDACTED]

Director of Public Policy, EMEA
Airbnb



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000113943

22 December 2020

Dear [REDACTED],

Thank you for your letter to the First Minister dated 6 November 2020 calling for the Scottish

Government to postpone the introduction of our short-term lets licensing scheme, and to outline Airbnb's position on the Scottish Government's plans to regulate short-term lets. I am responding as short-term lets falls under my portfolio. Please accept my sincere apologies for the delay in responding to you.

As you know, the Scottish Government has been working on proposals for the regulation of short-term lets since 2018. We first consulted in summer 2019 for twelve weeks. We published the results of both that consultation exercise and the independent research commissioned by Scottish Government in October 2019. We announced our proposals for a licensing scheme, planning control areas and a review of taxation in January 2020.

Unfortunately, work on implementing these proposals had to be suspended from March to July 2020 to deal with the worst of the COVID-19 pandemic. We had originally planned for a longer period of engagement on our proposals in autumn 2020 but the timetable had to be compressed in order to ensure that the secondary legislation could still be laid at the Scottish Parliament in this session. This is important so that local authorities can make progress in establishing licensing schemes and control areas from April 2021 to address what is a pressing issue for some of our communities. Furthermore, the Scottish Government is anxious to see the measures to protect the safety of guests and neighbours rolled out without unnecessary delay.

We understand the pressures facing the tourism industry as it recovers from COVID-19 restrictions. The Scottish Government has been supporting the tourism and hospitality sector through the pandemic in every way possible, given the limits of devolved power. We are planning for a recovery of the tourism sector. Regulation of short-term lets is part of ensuring a responsible and sustainable approach to tourism, which better balances the benefits of tourism with wider community needs and concerns.

On 10 December we published a report into the consultation on proposals for the regulation of short-term lets in Scotland. As I hope you will agree, this report sets out how we have listened to the many and various views expressed and refined and improved our proposals as a result. For example, we have adjusted our proposals so that existing hosts in Scotland can be sure they have until 1 April 2023 to apply for a licence, giving them over two years to get ready.

On 14 December, the Licensing Order, Control Area Regulations and Business and Regulatory Impact Assessment (BRIA) were laid at the Scottish Parliament. The legislation, BRIA and consultation report can all be found here: www.gov.scot/publications/short-term-lets/

We are committed to monitoring and evaluating the impact of the legislation to ensure that it is effective and targeted. We can take action in the next Parliament if this is not the case.

In the meantime, we are establishing a working group to develop really effective guidance for hosts in working with the licensing scheme. We would be very pleased if you or a colleague from Airbnb would join that group to help us get this right.

I hope this information is helpful.

Yours sincerely

[Redacted]



KEVIN STEWART

16 October 2020



Dear Minister

Following our letter dated 24th September 2020, Airbnb and the host community has continued to engage with the Scottish Government proposals on the future regulation of short-term lets.

Airbnb has significant concerns about the proposals and the impact it would have on tens of thousands of hosts across Scotland as well as the tourism industry, which has suffered so badly as a result of the COVID-19 pandemic.

If enacted, this regulation would have one of the most regressive and bureaucratic regulatory regimes for short-term lets anywhere in the world.

Last year, Airbnb hosts and guests contributed almost £700 million to Scotland and will be a vital part of ensuring the tourism sector - and therefore the country's economy - recovers from the pandemic.

We have always said that we would welcome sensible regulation of our industry. But we firmly believe these proposals go too far and will harm non-professional hosts who are trying to earn extra income during these difficult times.

We would therefore like to take this opportunity to share more information with you on our position and how these regulations will affect hosts, guests and communities across Scotland and would request an urgent meeting to discuss these points in more detail.

- **What the regulations mean for ordinary people**

Under these proposals, Scotland would have one of the most regressive regulatory regimes for short-term lets worldwide. Last week, hosts across Scotland joined a meeting with the Scottish Government to discuss the regulations, where they set out key concerns about the impact this will have on their monthly household costs and livelihoods. Key impacts to hosts are set out below:

- **Complex:** Under the proposals, hosts will face a more stringent licensing system than landlords in the long-term rental market, with recommendations including tearing up wooden floors and replacing them with vinyl, imposing mandatory check-in curfews on guests and being subject to unannounced inspections. [Here is an illustrative demonstration of the steps that hosts will have to take in order to comply.](#)
- **Costly:** Leading Scottish law firm Shepherd and Wedderburn LLP estimates a host renting out a spare room could face costs of over £700 to comply with the mandatory requirements, notwithstanding the costs of the license system itself which will be determined by the local authority. Meanwhile, a host requiring planning permission could face costs of thousands of pounds in application fees and professional costs.
- **Unfair:** All Scottish hosts will face stricter rules than any host in Paris, Amsterdam, Hamburg, Beijing or London. Hosts in Scotland will have to complete up to 75 steps and face months of bureaucracy, whereas hosts in Hamburg register for their right to host online, in five minutes, for free.

We believe that further consultation setting out the costs and benefits of the government's current proposals is absolutely essential before any decision is taken on what legislation should be put to the Scottish Parliament.

That is why we are calling on the Scottish Government to follow their own guidance and publish the Business and Regulatory Impact Assessment without delay. Giving businesses, individuals and all organisations responding to the consultation time to consider this information is crucial to understanding if the current proposals are proportionate by clearly setting out any positive and negative effects they are likely to have. Otherwise we are being asked to blindly respond to proposals without any evidence of what their effects could be on Scotland's tourism industry and the wider economy.

- **New findings on what communities across Scotland think about the regulations**

Today, we have launched [a new report in collaboration with BritainThinks and the University of Brighton](#) which reveals insights from stakeholders across Scotland on the upcoming regulations. This consultation - taking place June to August 2020 - included input from local authorities, destination marketing organisations, residents associations, hosts on Airbnb, trade associations and politicians.

The report highlights the concern amongst local authority and industry stakeholders outside Edinburgh that the proposed regulations risk overreaching and will result in a fragmented and complex system for hosts. This concern is compounded by the context of COVID-19 and its crippling impact on the Scottish tourism economy and the wider industries it supports.

There are concerns from stakeholders in Scotland that the proposals will be **complex**:

“Overprovision policy was seen as a panacea to everything but it’s not been. Licensing just couldn’t get to grips with overprovision policy. It’s a minefield. We don’t think it’s going to give residents the protection they want.” (Aberdeen stakeholder)

There are concerns from stakeholders in Scotland that the proposals will be **costly**:

“There’ll be 32 different versions of the regulations we’ll see across Scotland, in each local authority...the path we’re going down will be more expensive and will make it far less economically attractive for amateur hosts.” (National stakeholder)

There are concerns from stakeholders in Scotland that the proposals are **unfair**:

“As a sector we’re already on our knees. People want short term letting. There’s a market demand. If they come in with a more heavy-handed approach and our profits dwindle then that market will disappear. Then jobs disappear.” (National stakeholder)

Many Airbnb listings across Scotland are located outside traditional tourist districts which are not served by hotel-supported tourism. We want to continue to support economic recovery in Scotland and have continued to [collaborate with VisitScotland](#) over the past few months to promote destinations across Dumfries & Galloway, Ayrshire, Moray, Angus and Dundee. Under these proposals, hosts in these areas would face more stringent regulation than anywhere in London, Paris, Amsterdam or Barcelona. We have attached a copy of the BritainThinks report to accompany this letter and would be pleased to discuss the findings with you.

It is clear from the findings of this report that whilst Edinburgh is a vitally important cultural and economic centre for Scotland, it is not representative of the whole of Scotland. Many communities across the country want to encourage more tourism and short term lets in their area, yet the current proposals are designed with Edinburgh in mind but under the guise of national regulation. We’re asking the Scottish Government to simplify and streamline these proposals to ensure that hosts and guests on Airbnb can continue to help communities, high streets and struggling businesses get back on their feet and discover the best of what Scotland has to offer.

- **A better way forward, together**

We have long agreed that there should be a simple, practical and proportionate regulatory framework for short-term lets in Scotland, incorporating user-friendly rules that will be easy for hosts to understand and comply with. In our experience working with governments all over the world, complex, arduous and expensive licensing systems favour professional operators and penalise ordinary households.

The current proposals go counter to the Scottish Government’s stated objective of looking to target and meaningfully control unwelcome professional operators. This will result in long-term regulatory failure, with likely low rates of compliance and overworked and under-resourced local authorities, without the expected income of compliant, law-abiding hosts to bolster resources. To be clear, this is not the reality we want. We want sensible regulation:

- **A tiered approach to licensing**, with the lightest possible obligations for occasional, non-professional hosts (spare rooms hosts and those letting out their primary home for a few weeks a year), and stricter obligations for commercial and professional operators.
- **Affordable for hosts**. Spare room and non-professional hosts should be able to comply at a nominal cost, with higher non-burdensome fees for professional hosts.
- **A digital first approach which is simple, online and prompt**. Hosts should be able to comply with regulations in a single visit to a user-friendly website, with no requirement for prior in-person validation.
- **Applications should be granted instantly and one time only**. Home sharing licenses and temporary licenses should be received at the point of application. If more verification is required for secondary property letting, hosts should receive their licensing number in a specified proportionate timeframe on application. Hosts should not need to repeat a licence application, except in the case of material changes of circumstance.

- **National oversight and guidance.** In order to ensure that local authorities proportionately balance the needs of communities, hosts, housing and tourism, the Scottish Government must implement clear criteria, in legislation, which define where and when it is appropriate to introduce licensing systems and Control Zones as the Scottish Government has done for [Rent Pressure Zones](#). There also must be clear guidance on how planning and licensing systems interact with one another.

- **A commitment to data minimisation.** Consistent with data protection best practices, hosts should only be required to provide the minimum data necessary to process an application.

Under the current proposals, if local authorities use all criteria outlined by the Scottish Government, second home owners will need to complete 75 steps in order to be fully compliant. The Scottish Government needs to streamline compliance requirements.

- **Working together with platforms.** To minimise local fragmentation, local authorities should adopt common processes and systems (such as uniform licence numbers and obligations). We recommend establishing detailed processes, where listings of concern can be flagged to platforms for appropriate action.

We want to work together with an open and inclusive approach so we can ensure that Scotland not only survives, but thrives, in the years ahead. We will continue to keep you informed of our position and will share our full response to the Scottish Government's consultation which concludes today. In the meantime, if you would like to speak about this in further detail, please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

Airbnb
UK Public Policy Manager



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000099616

Your Reference: Airbnb letter 16.10.2020

29 October 2020

Dear [REDACTED]

Thank you for your letter of 16 October 2020 regarding Airbnb's concerns about the Scottish Government's short-term lets licensing scheme.

The Scottish Government is committed to getting the regulation right. Neither Scottish Government nor local authorities want to unduly curtail the many benefits of short-term lets to hosts, visitors and the Scottish economy. We are committed to monitoring and evaluating the impact of our proposals to ensure that they are effective and targeted. We can take action in the next Parliament if this is not the case.

I can assure you a Business and Regulatory Impact Assessment will be completed for the licensing and planning legislation and laid at the Scottish Parliament at the same time. Any information you can share with my officials to inform such an assessment would be very helpful.

I note your creative suggestions with regard to the new legislation and my officials will, as always, consider carefully the points that you and others make. I thank you for your participation in the consultation to help ensure we strike the right balance between community, industry and local government interests at this challenging time.

I appreciate your constructive contribution to the development of the short-term lets regulations and your commitment to the self-catering sector and tourism recovery from the impact of the COVID-19 pandemic.

Kind regards

[Redacted]

✓

KEVIN STEWART



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000
E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000105185
Your Reference: Airbnb letter 161020

17 November 2020

Dear [REDACTED],

Thank you for your email of 16 October 2020 addressed to Fiona Hyslop, Cabinet Secretary for Economy, Fair Work and Culture, regarding your concerns about our short-term lets licensing scheme. I am responding as short-term lets policy is part of my portfolio.

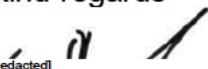
Our consultation on detailed proposals for the regulation of short-term lets in Scotland closed on 16 October. We have engaged with a wide range of stakeholders on the detail of the proposals and received over 1,000 responses and appreciate you taking the time to attend our workshops. We will carefully consider all responses to the consultation ahead of laying regulations giving local authorities powers to license short-term lets and introduce control areas in Parliament in December.

The Scottish Government is committed to getting the regulation right. Although the consultation is now closed, we will, of course, continue listening but we need to focus on work to finalise the statutory instruments. It would be premature to comment on the final shape of the legislation while we are still considering all the stakeholder comments from events and responses. Your letter sets out your position clearly.

We are committed to monitoring and evaluating the impact of the legislation to ensure that it is effective and targeted. We can take action in the next Parliament if this is not the case.

I hope this information is helpful.

Kind regards


[Redacted]

KEVIN STEWART

From: [REDACTED]

Sent: 05 October 2020 12:34

To: Minister for Local Government, Housing and Planning <MinisterLGHP@gov.scot>

Subject: Airbnb - STL consultation meeting request

Dear Minister,

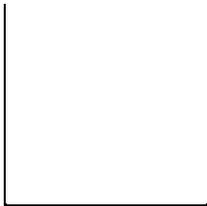
I am writing in reference to the Scottish Government's consultation on short-term lets, following the letter dated 24th September 2020 from Director of Public Policy [REDACTED].

We would welcome a further discussion on potential solutions beyond what we addressed in our meeting earlier this year, based on our experience in working with Governments around the world to implement restrictions on short-term lets. Airbnb supports the balanced and transparent regulation of short-term letting in Scotland and we are committed to working in partnership with all stakeholders to implement a proportionate, effective, accessible and, crucially, digital system.

My office will be in touch to arrange a meeting.

Kind regards,
[REDACTED]

--



[REDACTED]
Public Policy
UK & Ireland

[REDACTED]

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Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000
E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000099474

29 October 2020

Dear [REDACTED]

Thank you for your correspondence of 5 October 2020 regarding the short-term lets consultation requesting a meeting to discuss the proposals. I note that you have provided a formal response to the consultation and I would like to thank you for setting out your views.

Thank you for your offer of a meeting. My officials have already met with a range of stakeholder groups and representative bodies during the consultation, including Airbnb. These meetings have proved helpful in gathering stakeholders' views. My officials will be in touch with you if they need further information.

Kind regards

[Redacted]

KEVIN STEWART

24 September



Dear Minister,

Following the launch of the Scottish Government's consultation into new planning and licensing restrictions for short-term lets, we would like to take this opportunity to share some key concerns about the likely economic, social and local impact of these plans.

The Airbnb platform has helped millions of hospitality entrepreneurs monetise their spaces and their passions while keeping the financial benefits of tourism in their own communities. It is often the preferred choice of travellers who are looking for more affordable and flexible accommodation options, and can unlock new opportunities for travel for everyone.

1. **The Airbnb platform is a vital part of Scotland's tourism economy**

Almost 2.5 million visitors travelled to Scotland using Airbnb last year, generating approximately **£700 million of economic activity across the country**. With up to 97 pence of each pound spent on the platform being paid directly to hosts, Airbnb boosts the incomes of Scotland's residents, whilst helping pubs, restaurants and local businesses reach new consumers. Visitors spend an average of £100 per day in local communities, and spent £162 million in Scottish restaurants and cafes in 2018.

We [support balanced and transparent regulation of Scotland's short-term lettings sector](#), and have consistently provided evidence-based policy solutions to the Scottish Government since we began regulatory [discussions in 2017](#). The path set out in the Scottish Government's consultation; however, will lead to unnecessary red tape, **penalising everyday families and non-professional hosts that are looking to make ends meet by hosting responsibly and respectfully**. Beyond the impact on the Airbnb community, the proposals amount to a significant blow to Scotland's tourism and hospitality industry at a time when many such business owners are hanging on to their livelihoods by a thread.

2. **No mention of COVID-19 and its impact on the Scottish economy for years to come**

Since these proposals were suggested by the Scottish Government in January 2020, the way people live, work and travel has completely changed. COVID-19 has significantly damaged the Scottish tourism industry and the greater economy, and it is now clear it will continue to do so for the foreseeable future.

Airbnb has significant concerns that the Government's consultation document - which will impact millions of guests, thousands of hosts and countless nearby businesses - makes zero mention of the global pandemic and its impact. Furthermore, the process only allows struggling businesses and individuals four weeks to meaningfully engage with the process, at a time when they face countless personal and professional challenges.

3. **One of the most regressive short-term lets regulatory regimes in the world**

At a time of huge economic uncertainty, these proposals will mean less income for individuals and local businesses, and higher prices for the tourists and visitors, from which Scotland has benefited from in the past, and will rely on in future.

Under these proposals, **Scotland would have one of the most regressive regulatory regimes for short-term lets worldwide**. The proposed system is complex, clunky and costly, falling short of addressing the strategic priorities set out by the Government around key concerns, including affordable housing shortages. Instead, over-reaching proposals mean a host letting their spare bedroom for just one day a year faces a more stringent licensing system than any faced by a landlord in the long-term rental market who has tenants all year round, defying any sense of proportionality.

Introducing restrictive regulation will not incentivise individuals to put their property on the long-term rental market. The vast majority (84 percent) of host accounts in Scotland have one listing on the platform⁴, and a typical listing is booked for 49 nights of the year. Over half (51 percent) of surveyed hosts in Scotland said they would no

⁴ [Airbnb Submission, Scottish Government Consultation into Short Term Lets July 2019](#)

longer advertise their space on Airbnb, and would not put it on the long-term rental market, if a licensing system of this nature were introduced⁵.

We must remember that only a small minority of people cause problems. The focus should be on holding them accountable, while allowing everyone else to benefit from Scotland's vibrant tourism economy. As such, **the Scottish Government's proposals will be a major, and lasting, barrier to the recovery of the tourism sector.**

4. Finding a better way forward, together

Bad licensing systems shut out ordinary people that want, and often need to, supplement their income. The result will be an exclusively professional industry, which was never the stated objective of government policy. Indeed, the conclusion of the Scottish Government's own report on the potential of the so-called "sharing economy" highlighted the potential benefits of a more inclusive tourism industry. Scotland needs a system that is clear, simple, inclusive, easy to follow and empowers regular people. To achieve this, we ask the Scottish Government to consider the following:

- **Protect ordinary Scots** - we recommended a tiered approach to licensing, with the lightest possible obligations for occasional, non-professional hosts, and potentially stricter obligations for commercial and professional operators. As things stand, some of the proposals, such as requiring hosts tear up their wooden floors and replace them with vinyl, or to wait months for licensing approval, are not proportionate.
- **Publish a Business and Regulatory impact Assessment (BRIA) of the proposals** - we need to be absolutely clear about the cost of implementing this system for hosts, local authorities, local businesses and communities. It appears that Scottish Government has not followed its own Guidance on producing a BRIA in relation to these proposals. We ask the Scottish Government to publish immediately any impact assessment it has undertaken of the effect of the proposals, and to extend the consultation to allow interested parties a proper opportunity to consider and comment on the predicted impacts. Our initial analysis is that the proposals risk pricing casual homesharers out of the market.
- **Phase implementation** - create a robust evidence base first, and leave it for local authorities to choose more stringent approaches. For Scotland, a national registration system - similar to Scotland's Landlord Registration system - should provide an evidence base first and local areas should choose if they require a more onerous licensing system once that evidence has been collated.
- **Pilot Edinburgh** - whilst Edinburgh is a vitally important cultural and economic centre for Scotland, it is not representative of the whole of Scotland. Many local authorities across the country want to encourage more tourism and short term lets in their area, yet the current proposals are designed with Edinburgh in mind but under the guise of national regulation.

Good licensing systems aim to provide a defined set of effective tools, guarding against fragmentation, so that businesses are able to operate in a consistent and predictable way. This is what they look like:

- **An online, one-stop shop** - hosts should be able to comply with regulations in a single visit to a user friendly website, with no requirement for prior in-person validation. The vast majority of hosts on Airbnb are not businesses or professionals. The Scottish Government should adopt a digital first approach to licensing approval - simple, online and prompt.
- **Instant and one time only application** - Hosts should not need to repeat a licence application, except in the case of material changes of circumstance. If all the necessary criteria are met, hosts should be able to welcome their first guests without delay or the requirement for a follow up. Home sharing licenses and temporary licenses should be received at the point of application. If more verification is required for secondary letting, hosts should receive their licensing number in a specified proportionate timeframe on application.

⁵ [Airbnb Submission, Scottish Government Consultation into Short Term Lets July 2019](#)

- **Data minimisation** - consistent with data protection best practices, hosts should only be required to provide the minimum data necessary to process an application. Under the current proposals, if local authorities use all criteria outlined by the Scottish Government, second home owners will need to complete 75 steps in order to be fully compliant. The Scottish Government needs to streamline compliance requirements.
- **Ongoing technical discussions** - Local licensing systems for individual hosts are complex and often ineffective unless they are designed in consultation with the platforms who must interact with them. In addition, there is a distinct lack of detail about what platforms are required to do. We would welcome further guidance sooner rather than later.

We are committed to working with the Scottish Government to find a better way forward. Regulations that promote responsible hosting whilst also empowering people in Scotland to make everyday life more affordable will strengthen communities and boost the tourism industry further in the long-term. This has guided our proactive approach through our work with the [Scottish Expert Advisory Panel on the Collaborative Economy](#), our policy recommendations to the Scottish Government and our work with governments all over the world.

We would appreciate the opportunity to meet with you to further discuss our position and will be in touch again in due course. Please contact UK Public Policy Manager, [REDACTED] if you would like to schedule a call.

Yours sincerely,
[REDACTED]

Director of Public Policy, EMEA
Airbnb



Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Our Reference: 202000091992

Your Reference: Airbnb responds to the Scottish Government's licensing and planning proposals

12 October 2020

Dear [REDACTED]

Thank you for your letter of 24 September 2020 regarding the Scottish Government's short-term lets licensing and planning proposals.

As you know, the Scottish Government values the contribution your sector makes to the wider visitor economy and we have taken action to support the tourism and hospitality sectors during the COVID19 pandemic.

Concerns continue to be expressed by communities around the expansion and impact of short-term lets. The COVID-19 pandemic has exacerbated and heightened existing tensions around short-term lets in certain areas. We understand the pressure that the COVID-19 pandemic has placed on tourism, and wish to implement these regulations in a way that helps with recovery by promoting our commitment to sustainable, responsible tourism. We are engaging with a wide range of tourism and other stakeholders on the proposals in the consultation paper we published on Monday 14 September so that we can ensure they are robust but proportionate and fair.

Subject to the approval of the Scottish Parliament, the licensing scheme and control area regulations will be in force by April 2021. However, local authorities will have until April 2022 to establish a licensing scheme in their area and open it to receive applications. We are not placing additional requirements on short-term let operators in the midst of the COVID-19 pandemic. In due course, operators will need to make an application for a licence to their local authority. However, existing operators will be able to continue operating whilst their licence application is processed.

At the heart of our licensing scheme is a set of mandatory standards which will help to protect the safety of guests and neighbours in short-term lets across Scotland. Many of your platform users will already be following these standards as a matter of compliance with existing law or best practice. We do not consider them to be onerous. The COVID-19

pandemic has highlighted the importance of safety to visitors and communities. It is right we are taking action now to ensure that all short-term lets across Scotland adhere to a common set of safety standards. It is likely to give visitors increased confidence in staying in Scotland.

Our research does indeed show that collaborative models of short-term lets (home sharing and home letting) do not cause the same level of concern as secondary lets. However, the important exception is with regard to safety standards. There needs to be effective processes in place for monitoring compliance with safety standards in all short-term let accommodation, regardless of whether or not the host is present. This is why we are introducing a mandatory licensing scheme for all short-term lets in Scotland.

A Business and Regulatory Impact Assessment will be completed for the licensing and planning legislation and laid at the Scottish Parliament at the same time. Any information you can share with my officials to inform such an assessment would be very helpful.

I note your thoughts and concerns with regard to the new legislation and my officials will, as always, consider carefully the points that you and others make. I welcome your participation in the consultation to help ensure we can empower local authorities to strike the right balance between the needs and concerns of local communities and wider economic and tourism interests. As you know, the consultation closes on 16 October. Thereafter, the Scottish Government will be considering all the consultation responses and material gathered from workshops to determine the final form of the regulations.

I appreciate your constructive contribution to the development of the short-term lets regulations and your commitment to the recovery of tourism in Scotland from the impact of the COVID-19 pandemic.

Kind regards


[Redacted]

KEVIN STEWART

From: [REDACTED]

Sent: 13 January 2020 16:22

To: Minister for Local Government, Housing and Planning <MinisterLGHP@gov.scot>

Cc: [REDACTED]

Subject: Meeting Request: Airbnb

Dear Minister,

I am contacting you on behalf of our client Airbnb. I understand that they have recently been in touch to reaffirm their commitment to working with the Scottish Government as you take forward your plans to regulate the short-term letting sector, following your Ministerial Statement to the Scottish Parliament last week.

To this end, our client would welcome the opportunity of meeting with you to discuss the next steps in establishing a regulatory framework for short-term lets in Scotland. This request is further to the reply we received from your colleague, [REDACTED], dated 19th December 2019 (ref: 201900007748).

[REDACTED], Director of Public Policy EMEA Airbnb, would be able to travel to meet with you on either 4th or 5th February, should your diary permit.

Please let me know at your earliest convenience whether this is suitable.

Yours sincerely,

[REDACTED]

Head of Policy

M: [REDACTED]



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Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

By Email: [REDACTED]

Our ref: 202000011782

9 January 2020

Dear [REDACTED]

Thank you for your letter dated 13 Jan 2020 inviting Kevin Stewart MSP, Minister for Local Government, Housing and Planning to meet with your client, Airbnb, to discuss the next steps in establishing a regulatory framework for short-term lets in Scotland.

Mr Stewart would be delighted to accept your invitation subject to Parliamentary business and diary availability. I would be grateful if you could contact the Minister's Diary Secretary, Mark Gibson, via e-mail at MinisterLGHP@aov.scot to make the necessary arrangements.

Kind regards

[REDACTED]

[REDACTED]

Private Secretary

From: [REDACTED]

Sent: 25 November 2019 10:02

To: Minister for Local Government, Housing and Planning <MinisterLGHP@gov.scot>

Cc: Cabinet Secretary for Culture, Tourism and External Affairs <CabSecCTEA@gov.scot>

Subject: Briefing from Airbnb

Dear Minister,

I am contacting you on behalf of our client Airbnb. We wish to share with you two briefing documents which you may find useful.

The first document is a letter and briefing from Airbnb on their response to the independent research report undertaken by Indigo House as part of the Scottish Government's short-term lets consultation process. The second is a data briefing on Airbnb in Scotland which sets out some key data in relation to tourism, housing and communities.

If you would like to discuss the contents of the documents in further detail, Airbnb's [REDACTED] will be in Edinburgh on 2nd and 3rd December and she would be happy to meet with you should your diary permit.

Kind regards,

[REDACTED]

[REDACTED]

Head of Policy

M: [REDACTED]



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Airbnb Response: Short-Term Lets Regulatory Framework Consultation Summary of Responses & Independent Research

Last month signalled the latest stage in the Scottish Government's short-term lets consultation with the publication of the independent analysis of responses which indicated a high level of stakeholder interest in the subject matter in Scotland.

Airbnb want to reaffirm our support for the evidence-led process that the Scottish Government have embarked upon. We understand that there is a balance to be struck between accommodating higher visitor numbers in certain areas of Scotland and managing the impact this might have on the future availability and affordability of permanent housing. We agree that a new regulatory framework for short-term lets will help solve some of the challenges outlined within the Scottish Government's Summary of Responses, and the independent report conducted by Indigo House. That is why in our submission, we stated our support for a simple, free and online registration system in communities that need it, requiring professionals that offer short term lets over 140 nights per year to get planning permission, and the introduction of a tourism levy should communities in Scotland desire.

However, in taking forward such important regulations, it is important that the government has accurate and robust information at its disposal in order to underpin its regulatory approach. Whilst we welcome independent research in principle, a number of assertions misrepresent the scale, nature and impact of the Airbnb community in Scotland. We wanted to take this opportunity to provide you with further evidence to highlight this at this time. Please find a briefing attached.

If you require any additional information, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]
UK Public Policy Manager
Airbnb [REDACTED]

Airbnb Briefing – Indigo House Report: Impact of Short-Term Lets on Communities (November 2019)

This briefing aims to understand the nature of the Airbnb community and should be read in tandem with our submission to the Scottish Government's consultation on short-term lets. We hope you find this supplementary information useful as you consider further regulation of the industry.

Methodology

The research conducted by Indigo House was focused on just five areas of Scotland and a qualitative survey sample of 200 citizens and 200 hosts. The limitations of this approach was highlighted by Indigo House too, as “a case study approach and was mainly exploratory in nature, undertaken through qualitative methods.”

This has ultimately lead to conclusions which we believe are **unbalanced and unrepresentative**. In contrast, **we have included data in our submission which details activity across Scotland**. In addition, Airbnb is just one of the brands in the home sharing and short-term rental space, but is **the only company mentioned in this report**. The whole short-term letting industry should be kept in focus to ensure findings are both balanced and inclusive of the full spectrum of rental activity.

Housing

As detailed in our submission, **public scrapes of our site use inaccurate information and flawed methodology to make misleading assumptions about our community**. For example, examining the total number of entire home listings in any given area is not necessarily an indication of impact on long-term housing. Indeed, some of these properties are primary homes rented on an occasional basis. The Airbnb platform is also open to other types of hosts, including traditional serviced apartments, dedicated holiday homes and a growing number of boutique hotels and commercial bed-and-breakfasts. Therefore, **it is deeply inaccurate to assume that all entire home units would otherwise share the spaces on the long-term rental market, and that each listing represents a distinct housing unit**.

Entire home listings on Airbnb represent less than 1% of the available housing stock in Scotland, however, **only a minority of those listings appear to be used as short-term lets on a year-round basis**, for example (all data as of 1 January 2019):

- Scotland has 35,000 listings, but 36% are private rooms and 88% of all listings are booked for under half the year
- Edinburgh has 13,200 listings but 38% are private rooms and 64% of all listings are booked for under 90 nights a year (30% for under 30 nights)
- Glasgow has 3,800 listings, but 40% are private rooms and 57% of all listings are booked for under 90 nights a year
- The Isle of Skye has 1,000 listings on Airbnb, 44% of which are private rooms and 52% of all listings are booked for under 90 nights a year. As a historic holiday destination, many listings on Skye are classed as traditional hospitality such as B&Bs and holiday homes.

Multiple listings are an absolute minority on our platform, but are also not necessarily an indicator of an increasing trend of short-term lets investment portfolios in Scotland. 84% of host accounts in Scotland only have one listing. Those with 5+ listings account for 1% of our total host community in Scotland. Equally, a host who appears to have multiple listings may be managing these on behalf of individual home-sharers who have only one listing each. There are a number of management companies who offer services to individual hosts, such as check-in, cleaning and account management, so while that business may be commercially motivated, the underlying listings may still be primary homes rented occasionally. This is one of the reasons why attempts to “scrape” the data from our platform often result in misleading conclusions.

Spreading Tourism

The Indigo House report raises concerns around the concentration of Airbnb listings in areas such as Edinburgh and the Highlands. The accommodation listed on Airbnb is located in a less-concentrated areas than large chain hotels, and therefore helps disperse visitor numbers geographically. Globally, over two thirds of all guest arrivals on Airbnb are outside traditional tourist areas.

One way to mitigate challenges around tourism is to promote tourism dispersal. In a global first for Airbnb, we launched a campaign earlier this year to highlight non-traditional tourism destinations across the UK, including Callander in Scotland (<https://www.airbnb.co.uk/d/callander>). The campaign - running from September to December 2019 - seeks to help spread the tourist season, extending the economic benefit brought by visitors over a longer period without adding to the burden on local infrastructure at the busiest times. Malcolm Roughead, Chief Executive of VisitScotland said: "This is a super initiative by Airbnb, encouraging domestic tourists to explore further afield rather than the key city hot spots."

Indigo House makes assumptions on the liveability of cities in Scotland, based on the number of Airbnb guest arrivals compared with population figures. **However, the whole of Scotland's tourism industry should be kept in focus when making conclusions regarding the impact of tourism arrivals in communities across the country.** For example, Airbnb guest arrivals only make up 3% of the total tourism arrivals to the Isle of Skye, meaning 97% of guest arrivals are from other accommodation providers or day visitors. This activity is bringing real value to Scotland's economy; visitors using Airbnb accounted for 5% of the total number of visitors to Scotland in 2016 and boosted the economy by over £1.5m per day, helping to spread these benefits beyond tourist hotspots and across the country:

My short-term let provides an increased income to the one pub, one shop and one cafe in the local area. It is vital to the sustainability of this local area that tourism is not affected by visitors having reduced access to affordable accommodation - the danger is that they simply pass through the area and don't stay. **Host,**

Scotland

Trust and Safety

Indigo House recommend that health and safety standards and building insurance should be required for all short-term lets in Scotland. We already have programmes in place that offer protection to hosts. Our Host Guarantee provides up to \$1 million in property damage protection for every host and every listing. Moreover, all hosts on Airbnb have Host Protection Insurance of up to \$1 million to protect against third party claims for personal injury or property damage.

Airbnb's five standards – safety, security, fairness, authenticity, and reliability – remain central pillars in our efforts to help ensure safety for guests. We are increasing accountability for the behaviour of guests and remove individuals from our platform if they have been found to violate these standards. More information can be found on our website (<https://www.airbnb.co.uk/trust>)

In addition, as announced earlier this month, Airbnb is embarking on one of the most significant steps in designing trust on our platform, which will roll out across Scotland in 2020. This includes the introduction of a 24/7 Neighbour Hotline so that anyone can call us anytime, anywhere in the world; manual screening of high-risk reservations; reviewing 100% of homes and Experiences on Airbnb and; a refund and rebooking guarantee for guests if listings don't meet our standards. These measures further underline that we take our responsibilities on trust and safety extremely seriously and, unlike other platforms, are proactive in responding to the needs of guests, hosts and local communities.

Regulatory Recommendations

Any new regulatory system needs to be introduced in a cross-industry partnership between local operators, the major short-term letting platforms and the relevant layers of government. That is why we have used our expertise in working with over 500 governments across the world to put forward recommendations as to how the industry might be regulated. And why we have engaged with, and supported, the evidence-led approach taken by the Scottish Government on establishing a new regulatory framework for short-term lets. If the underlying rules are too restrictive or if the implementation of the scheme is too burdensome, the process will typically suit only commercial operators - discouraging non-professional hosts from providing accommodation, leading to a loss of the benefits for residents, businesses and communities in Scotland. It would be a missed opportunity if Scotland's approach led to an entirely commercial short-term lets sector in the country, shutting others out.

Data Briefing: Airbnb in Scotland

The short-term letting market brings economic, social and environmental benefits for travellers, residents and the communities in which they live. As part of our global commitment to transparency with local governments, we frequently publish data about our economic impact.

Tourism

Airbnb opens-up new benefits to those who use the platform; be they guests, hosts, or the wider community. boosted the incomes of Scotland's residents, whilst helping independent restaurants and businesses reach new consumers.

£693m

estimated economic activity generated by hosts and guests across the country in 2018

35,000

Active listings across Scotland in 2018

97%

The amount of money hosts get to keep when they list their space on Airbnb.

\$1.2bn

how much Airbnb has collected and remitted in tourist taxes worldwide

£100

per day is spent in local communities in Scotland, helping local cafes, pubs and restaurants

13,200

Active listings in Edinburgh

14-36%

of each chain-hotel pound may never reach the actual destination community.

25%

Of Edinburgh City Council's tourism tax is expected to be generated from Airbnb listings alone

93%

of hosts in Scotland said they recommend restaurants and cafes to guests

5%

of visitors to Scotland in 2016 were guests on Airbnb which boosted the economy by over £1.5m per day

80%

hotel capacity in Scotland in August 2017

Housing

We understand that there is a balance to be struck between accommodating higher visitor numbers in certain areas of Scotland and local concerns. This discussion must be evidence based - host accounts with multiple listings are in the absolute minority of our platform, in addition, introducing restrictive regulation will not incentivise individuals to put their property on the long-term rental market.

<1%

the amount of available housing stock entire homes on Airbnb make up in Scotland

36%

of listings in Scotland were private rooms

88%

of listings were booked for less than half of the year

5x

as many empty homes in Scotland as there are self-catering units

84%

of host accounts in Scotland have one listing on the platform

80%

of hosts surveyed in Scotland said they had no plans to change the number of listings on Airbnb in the next year

50%

reduction in the number of second homes in Scotland in the last six years from more than 40,000 in 2012 to under 25,000 in 2018

94%

of hosts sharing space in one or two homes

51%

of hosts in Edinburgh have said they use Airbnb income to help make ends meet

34%

said they would still live in, but not let their property if restrictive regulations were introduced.

51%

surveyed hosts in Scotland said they would no longer advertise their space on Airbnb and would not put it on the long-term rental market either if restrictive regulations were introduced.

17%

of hosts surveyed said they would leave their property empty if restrictive regulations were introduced.

Communities

Airbnb is committed to fostering trust between our guests, hosts, neighbours and governments to ensure that our community has safe and positive experiences while using the platform. The vast majority of the users of our platform have enjoyed a trusted and safe experience

92%

- Number of hosts surveyed by Airbnb in Scotland said they had never experienced any issues with antisocial behaviour, waste, parking or noise caused by their guests.

<1%

- of hosts surveyed in Scotland had experienced issues with anti-social behaviour with guests on Airbnb

32%

- of hosts on Airbnb surveyed said they had hired a cleaner to help them

Useful definitions

- **Listing (Active)** - A property listed on Airbnb. Listings may include entire homes or apartments, private rooms or shared spaces. Active Listings are all listings that appear on the website during a search. Active listings do not necessarily have availability on a particular date or at all. The number of listings does not represent the number of properties - a single host may have multiple listings for separate rooms within their house, or an additional listing for their entire home when they are on holiday.
- **Entire Home / Apartment Listing** - A listing where the Guest can let the entire home from the host. The host is not present in the home during the Guest's stay.
- **Private Room Listing** - A listing where the Guest can let a private bedroom within a home. The host may be present in other parts of the home during the Guest's stay, and the Guest may share common spaces like the kitchen, living room, and/or a bathroom with the host.
- **Shared Room Listing** - A listing where the Guest can let a communal space, such as a shared bedroom or a living room sofa bed, within a home. The host may be present in the home during the Guest's stay, and the Guest may share common spaces like the kitchen and/or bathroom with the host.
- **Guest:** Airbnb community members who stay in Airbnb listings.
- **Host:** Airbnb community members who let out space on Airbnb.

Minister for Local Government, Housing and Planning
Kevin Stewart MSP



Scottish Government
Riaghaltas na h-Alba
gov.scot

Government

T: 0300 244 4000
E: scottish.ministers@gov.scot

[REDACTED]

Our ref: 2019/0019838

26 July 2019

Thank you for your email of 2 July 2019 to Nicola Sturgeon, First Minister, inviting Ms Sturgeon to meet with Airbnb following the close of the consultation on short-term lets, which closes on 23 July 2019. I am replying as the focus of your meeting is on short-term lets, which falls within the portfolio of the Minister for Local Government, Housing and Planning.

Mr Stewart would be delighted to accept this invitation, subject to Parliamentary Business. Please contact his Diary Secretary at MinisterLGHP@gov.scot to make the necessary arrangements.

[REDACTED]
Private Secretary

From: [REDACTED]
Sent: 25 February 2019 10:01
To: Cabinet Secretary for Finance, Economy and Fair Work
<CabSecFEFW@gov.scot<mailto:CabSecFEFW@gov.scot>>
Cc:
Derek.Mackay.msp@parliament.scot<mailto:Derek.Mackay.msp@parliament.scot>

Subject: Meeting Request - Airbnb

Dear Mr Mackay,

Thank you for taking the time to speak with me briefly at the SNP conference last year. As I mentioned at the time, Airbnb would really appreciate the opportunity to sit down and discuss with you the contribution that Airbnb offers to the Scottish Economy, as well as hear your perspective on how Airbnb can work with the Scottish Government in future.

Airbnb General Manager for Northern Europe, [REDACTED], and Public Policy Officer for the UK and Ireland, [REDACTED], are available in Edinburgh on the 19th March at whatever time is suitable for you.

Please let me know if you would be available to meet and feel free to ask if you have any questions.

Kind regards,

[REDACTED]

Associate | Halogen Communications

Mobile: [REDACTED]

Email: [REDACTED]

UK: 4 Queen Street, Edinburgh, EH2 1JE

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Scottish Government
Riaghaltas na h-Alba
gov.scot

Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Dear [REDACTED]

Thank you for your emails of 25 February to Derek Mackay, Cabinet Secretary for Finance, Economy & Fair Work; and Fiona Hyslop, Cabinet Secretary for Culture, Tourism and External Affairs inviting Mr Mackay and Ms Hyslop to meet with Halogen and Airbnb on 19 March in Edinburgh. I am replying as the focus of your meeting is on short term lets, which falls within the portfolio of the Minister for Local Government, Housing and Planning.

Mr Stewart has asked me to let you know that he is sorry he is unable to meet you on the date you proposed. Mr Stewart is, however, aware that Airbnb have had regular meetings with Scottish Government officials, most recently on 28 February and 5 March. That engagement with officials has been helpful and the Scottish Government will continue to welcome the participation of Airbnb and other stakeholders as we develop our proposal for the future.

[REDACTED]

Private Secretary



Scottish Government
Riaghaltas na h-Alba
gov.scot

Minister for Local Government, Housing and Planning Kevin Stewart MSP

T: 0300 244 4000

E: scottish.ministers@gov.scot

[REDACTED]

Our ref: 2018/0030381 & 2018/0029381

4 October 2018

Dear [REDACTED]

Many thanks for your letters to me and Mr Mackay on 30 August, requesting meetings to discuss the economic impact of Airbnb in Scotland, and outlining the benefits of short term lets for tourism and the Scottish economy. I am responding for myself and on behalf of Mr Mackay.

I welcome your engagement with my officials and your constructive approach to assisting the Scottish Government develop policy in this area. As I am sure you appreciate, we want to take advantage of the opportunities presented by short term lets, whilst making sure this is balanced with the needs of local communities.

The Short Term Lets Delivery Group is preparing to engage widely with stakeholders on developing our approach to short term letting. I, and my Ministerial colleagues, will want to hear what Airbnb and other stakeholders have to say, as part of that engagement. My officials will advise you of the opportunities for Airbnb to be a part of that engagement in due course.

Thank you again for your letters. 
[Redacted]

EVIN STEWART //

From: [REDACTED]

Sent: 15 June 2018 16:19

To: Minister for Local Government and Housing

Subject: Airbnb hosts and guests in Scotland contribute approximately ?500m to the economy

Dear Minister,

Airbnb hosts and guests in Scotland contribute approximately ?500m to the economy. Airbnb is delighted to release new data on our top 15 destinations across Scotland for the first time. The findings show that hosts and guests using the platform generated nearly half a billion pounds (£482.9m) of economic activity in Scotland in 2017. This is the first time Airbnb have shared such extensive data on our top tourism destinations in the UK, signifying our commitment to Scottish tourism as one of the nation's most important industries.

Since first welcoming visitors into homes in 2009, individuals across Scotland have embraced the economic, social and cultural value of homesharing and Airbnb hosts take considerable pride in promoting their neighbourhood, local businesses, and sharing the experience of living like a local. Hosts can take advantage of the platform in several ways - sharing a spare room while at home or their entire homes when they themselves go on holiday.

The attached infographic shows that Airbnb is helping to disperse and spread the benefits of tourism throughout Scotland and is becoming a vital component of the country's thriving tourist economy. While properties listed in traditional tourist destinations such as Edinburgh and Glasgow are popular, hosts are also welcoming guests in rural communities, and smaller towns and cities including Oban, Elgin and Ullapool.

As part of a global commitment to transparency with governments, the figures highlight the number of guest arrivals, typical host income, typical number of nights hosted per listing, total economic activity and total numbers of active listings, for each featured region. The new data coincides with the launch of our Office of Healthy Tourism<<https://www.airbnbcitizen.com/airbnb-launches-oh/>> - an initiative to help drive local, authentic and sustainable tourism in countries and cities across the globe.

In 2017 the headline data for Scotland as a whole shows that:

- * Hosts and guests using Airbnb contributed an estimated £482.9m to Scotland's economy, bringing much needed additional revenue into local businesses and communities across the country.

- * Hosts in Scotland have earned £113.4m from the platform, with 1.4m people using Airbnb to visit Scotland.

- * The average Airbnb host in Scotland earned £3,800 from sharing their space, for an average of 44 nights a year, which enables them to generate supplemental income to help make ends meet and support their household and families.

In addition, as our top two destinations in Scotland, we have attached a programme of work detailing how Airbnb can work in partnership with Edinburgh and Glasgow. Please find attached more information on our offer, detailing how together we can help spread the benefits of tourism, be a good partner to communities and ensure that homes are shared safely on the platform.

We want to work in partnership with local and national policymakers to promote responsible homesharing, which empowers thousands of families in Scotland with a tool to make everyday life more affordable, connects people, values and cultures, and strengthens communities through sustainable tourism.

If you have any questions regarding our new release, or require any further information, please do not hesitate to get in touch.

Yours sincerely,

[REDACTED]
Public Policy, UK & Ireland
Airbnb

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Scottish Government
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Minister for Local Government, Housing and Planning
Kevin Stewart MSP

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED]

Our ref: 2018/0021736

13 July 2018

Dear [REDACTED]

Thank you for your email and enclosures of 15 June.

I was pleased to see your commitment to "work in partnership with local and national policymakers to promote responsible homesharing"

With their work, the Expert Advisory Panel on the Collaborative Economy has made a significant contribution to our thinking on this. At the strategic level, the Panel identified a need for Scotland to work with new market entrants to develop businesses and platforms that create fair work and wider economic, social and environmental benefits.

The Scottish Government will shortly be publishing our formal response to the Panel. Since the Panel reported the Scottish Government has remained in close contact with local government. This was to consider further evidence and data, council's intentions and aims in addressing the challenges and making use of the opportunities offered by a changing global economy and increasing use of peer-to-peer platforms such as Airbnb.

I would therefore highlight that the issues already raised with us include use of housing and housing supply planning issues, impact on existing tourism businesses (as well as opportunities for new market entrants) the effect on communities of a changed nature of housing use in the areas in question and questions about the regulation and oversight of properties, landlords and customers.

The Scottish Government recognise though that the collaborative economy can help us in our ambition for sustainable economic development and that we need to address challenges that can be presented as well as harness the opportunities.

Throughout all of this the Scottish Government will seek to ensure that communities are fully engaged in discussions and that their views are heard in this work.

We must do this in order to deliver the fair and socially responsible collaborative economy that we all want for Scotland and I look forward to engaging with Airbnb, and the wider visitor economy in Scotland, to take forward our work on this.

[Redacted]


EVIN STEWART

From: [REDACTED]

Sent: 09 March 2017 10:58

To: Scottish Ministers

Cc:

angela.constance.msp@parliament.scot<mailto:angela.constance.msp@parliament.scot>

Subject: C/O Angela Constance: Airbnb meeting request 15.03.2017

Dear Ms Constance,

I am contacting you on behalf of [REDACTED], Airbnb's Public Policy Manager for the UK & Ireland.

As you may know, Airbnb is a trusted community marketplace for people to list, discover and book unique accommodation around the world. People across Scotland and the UK more widely have embraced the economic and social value of home sharing, and many Airbnb hosts take pride in promoting their own neighbourhood and sharing the experience of living like a local with a traveller.

[REDACTED] will be in Edinburgh on 15th March and would very much welcome an opportunity to meet with you to introduce herself and Airbnb more formally, and to discuss Airbnb's plans to help ensure that Scotland and its cities continue to benefit from home sharing. Please find a short introductory letter attached with further details.

I do hope we're able to fix something. She will be available for meetings from 3pm onwards.

Do let me know if you would like any further information.

Best,

[REDACTED]

Executive

Office: [REDACTED]

Mobile: [REDACTED]

www.pagefield.co.uk<<http://www.pagefield.co.uk>>

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[REDACTED]

[PagefieldLogo]

Cabinet Secretary for Communities, Social Security
Equalities Riaghcltcts ncl II-Albcl Angela Constance



and Scottish Government
MSPgov.scot

T: 0300 244 4000

E: scottish.ministers@gov.scot

[REDACTED]

Your ref:

Our ref: 2017/0009931

March 2017

Dear [REDACTED]

Thank you for your emails of 09 March to the Scottish Ministers.

I am pleased that you were able to meet with Fiona Hyslop MSP, Cabinet secretary for Culture, Tourism and external affairs during the STA Conference on the 15th March

As was discussed, the Scottish Government has commissioned a piece of research work to establish the extent and impact of short-term lets, including sharing platforms such as Airbnb. Once that report has been received it can perhaps be cross-referred with the most helpful economic impact data you supplied for Edinburgh.

I would suggest therefore that you continue to engage, in the first place, with the relevant Scottish Government Officials.

I am also copying this reply to [REDACTED] at Pagefield, for her information.

Yours sincerely

[REDACTED]
Private Secretary

CC: [REDACTED]

St Andrew's House, Regent Road, Edinburgh EH1 3DG
WWW.GOV.SCOT

