

**Argyll and Bute Council submission on The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) (Amendment) Order 2024, 28 May 2024**

Good afternoon

I refer to the email from Alan Hunter, of 16 May 2024, seeking comments on the proposals within the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) (Amendment) Order 2024.

Having considered the document and proposals, Argyll and Bute Council are largely supportive of the proposed changes to the short-term let licensing regime, as defined in the 2004 Order, although further consideration is required on the amendments relating to "multiple accommodation on single sites". Whilst welcoming that multiple accommodation can be considered in parts, the proposals do not address the difficulties around the definition of "single premises". There are differing interpretations across Scottish local authorities leading to confusion and the threat of possible judicial review against some local authorities. Argyll and Bute Councils STL Licensing Policy is based on expert legal opinion on the definition of "single premises", but this is being challenged. The difficulties are around multiple properties located in rural areas including timeshare developments or country estates.

The Council asks that further consideration is given in the review of this Order, to redefining the definition of "single premises" for multiple accommodation, and improved guidance. This would provide benefits to local authorities and the sector, promote consistency across Scotland and minimise the risk of any further judicial reviews.

In addition, revised guidance is required to support any changes implemented in by the Order. This should include guidance on how the new requirements for information to be displayed in Short Term Let premises, applies to existing licences.

Should you require further clarification, please contact me initially.

Kind regards

Alan Morrison  
Regulatory Services and Building Standards Manager  
Development and Economic Growth