

**Orkney Islands Council Submission, Civic Government (Scotland) Act 1982
(Licensing of Short-term Lets) (Amendment) Order 2024, 29 May 2024**

Dear Sirs,

We refer to your email dated 16 May 2024 asking for views on the above statutory instrument.

Orkney Islands Council is supportive of the changes proposed. In particular, clarity that licensing authorities can approve part of an application for a single licence for multiple premises on the same site will assist us in progressing multiple sites where planning is an issue. We have several of these pending and we have had to wait for one or more of the multiple premises to gain their planning consent before we could issue a short term let licence.

Orkney Islands Council is in favour of the introduction of provisional short-term let licences which can be applied for at the construction stage of new short-term let accommodation. This will assist the new hosts to get up and running sooner. We have recently had a few of these and we have started the application close to the completion of the build so that the licence could be processed once they were finished.

The introduction of provisions for the transfer of licences in certain circumstances also seems like a practical amendment which will assist both the hosts and our Licensing Officers when properties are sold on.

Yours sincerely

Karen Bevilacqua

Service Manager (Legal Services)

Strategy, Performance and Business Solutions

Orkney Islands Council, Council Offices, Kirkwall KW15 1NY