

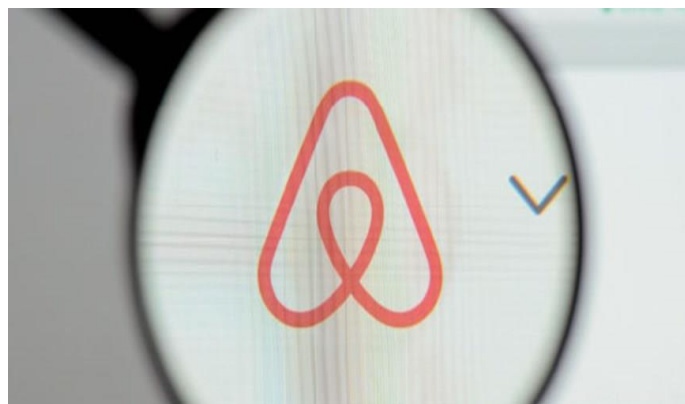


EDINBURGH TENANTS
FEDERATION

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Edinburgh's Federation of Tenants' and Residents' Associations

ETF's response to the City of Edinburgh Council's Short Term Lets Consultation



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Edinburgh Tenants Federation is a Scottish Charitable Incorporated Organisation (SCIO) SC048236, regulated by the Scottish Charity Regulator (OSCR)

1.0 Background

Edinburgh Tenants Federation (ETF) is the umbrella organisation for tenants' and residents' groups in the city of Edinburgh and a Registered Tenant Organisation.

ETF's overall aim is to represent tenants throughout Edinburgh, ensuring tenant influence in housing policy and service decisions with the City of Edinburgh Council (CEC) and the Scottish Government. ETF's primary objective is to improve housing conditions and standards, along with the quality of life of all CEC tenants.

2.0 Introduction

An online Focus Group Meeting was held for ETF representatives on Wednesday 20th October 2021 to discuss CEC's Short Term Lets (STL) Consultation and formulate ETF's response. The feedback has been grouped into themes where possible. ETF welcomes the opportunity to contribute to CEC's Short Term Lets Consultation.

3.0 ETF members' comments

3.1 Do you support the designation of a Short-Term Let Control Area for Edinburgh?

Overall ETF members were broadly in support of the designation of a STL Control Area for Edinburgh. However, it was agreed that more information is needed on how to make this a reality and ensure the aims and objectives are achievable.

Re-organisation and regulation

It was agreed that Edinburgh requires a re-organisation of its short term lets strategy. The current policy and guidance are confusing and there is uncertainty about how the forthcoming proposals would work in practice. For example, there are many similarities between the different types of short term-lets, i.e., home sharing, home letting and secondary letting. ETF representatives are unclear how the new policy will affect the different types of short-term lets now and in the future.

ETF representatives would like some form of regulation to be introduced on the change of use from domestic/residential to a holiday let.

Shortage of housing

ETF representatives are concerned about the lack of affordable housing in Edinburgh. "In 2019, 31% of all Airbnb listings in Scotland were in the City of Edinburgh, the next greatest proportion was 19% in the Highlands followed by 7% in Glasgow City"¹

ETF members recognise the need for new council homes for rent and agree these should be built. This should be a priority for the City of Edinburgh but the steady increase of Airbnb properties is making this difficult to achieve. Many properties are taken out of the private sector, into Airbnb and thus produces a shortage of rented accommodation in the City. That in turn increases the

¹ Short-Term Let Control Area – Statement of Reasons Background Report, chapter 1, page 1

pressure on CEC's waiting list for a home. "It is estimated that there has been a loss of around 10% of private rented homes to short term lets (STL) in recent years. The rapid growth in STLs is creating further pressure on supply, rent levels and house prices in some areas."² The chance to link the quality of private housing to the need for social rented housing is an opportunity for both CEC and Scottish Government to address.

Tourism

It was recognised that the city of Edinburgh relies heavily on its tourism, particularly at New Year and during the Festival. If there was a stricter regulation on short-term lets, it could affect the number of tourists that visit Edinburgh each year, as this could mean fewer types of accommodation available. Tourism is responsible for millions of pounds each year to Edinburgh's economy and owners do have the right to try and make money. ETF considers there is a need to strike the right balance of tourist income versus the needs of local people to have a safe and secure home.

Affordability of rents

There was concern that an increase in short-term let properties could affect the affordability of rents in Edinburgh. CEC tenants already pay the highest rents in Scotland and tenants living in the private rented sector also pay high and often unrealistic rents. It is recognised that Edinburgh is an affluent city, but this is not the case for many tenants who live in the social and private rented sectors in many parts of the city.

Upkeep of properties

Many of the short-term let properties in Edinburgh are viewed as potential fire hazards due to overcrowding. ETF representatives would like to know:

- If the owners are maintaining the upkeep of their properties., i.e carrying out the necessary repairs, alongside gas and electrical safety checks;
- Whether properties are inspected on a regular basis to ensure they are fit for purpose and people can live in them?

ETF representatives are aware of some properties being let out and the mandatory six-monthly inspection visits are not being carried out.

Anti-Social Behaviour

ETF representatives are concerned with the amount of Antisocial Behaviour, i.e. drinking alcohol and noise pollution that takes place in these properties. This is particularly evident in tenement properties that also house young families. This can lead to the erosion of a sense of community and can change the character of neighbourhoods. This is a real concern for ETF.

3.2 Do you agree with the proposal to designate the entire Council area as a Short-Term Let Area of Control?

Overall ETF representatives were broadly in favour of this proposal. However more information is needed on how this could work in practice.

² Housing, Homelessness and Fair Work Committee Report (04.11.21), Strategic Housing Investment Plan 2022-2027, page 14

Infrastructure

It was recognised that tourism is needed to keep Edinburgh's economy moving forward. Like many cities, Edinburgh has lost out due to the pandemic and it will be important for more tourists to visit to boost the economy. However, it is important to preserve Edinburgh's heritage and architecture, particularly in areas such as Edinburgh's Old Town. As mentioned previously, striking the right balance should be at the core of any strategy and practice developments.

Regulation

ETF representatives are nonetheless concerned about the increase of short-term lets, particularly in the city centre and Leith areas. This is diminishing a sense of community in many areas, so a stricter regulation of short-term lets is needed. "It was noted that since 2012, 24 hotels have opened in Edinburgh, which is an increase of 23%³". This could make Edinburgh over reliant on tourism as well as have a negative impact on people's ability to have a secure and safe home in the city.

Economy

Short term lets, such as Airbnb's are making a lot of money, but are giving very little back to support the further development of Edinburgh's future infrastructure requirements and economy. ETF representatives would like to know how much profit CEC is making on Airbnb's monetary value.

4.0 Conclusion

This paper will be shared with the Federation's Executive Committee, thereafter the paper will be shared with CEC staff as part of the Short-Term Lets Consultation. ETF looks forward to working with CEC representatives to address the issues raised in the paper.

Mark Henry
November 2021

³ Edinburgh Visitor Accommodation Sector Commercial Needs Study, January 2019