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Doc 1

From: REDACTED@assc.co.uk>

Sent: 05 July 2023 23:00

To: REDACTED@gov.scot>; Short Term Lets Delivery Group
<shorttermlets@gov.scot>

Cc: MSP McLennan P <Paul.McLennan.MSP@parliament.scot>; Minister for
Housing <MinisterHousing@gov.scot>; zzzMinister for Small Business, Innovation &
Trade <MinisterSBIT@gov.scot>; Richard.Lochhead.msp@parliament.scot;
Neil.Gray.msp@parliament.scot; REDACTED@stalliance.co.uk>;
REDACTED@visitscotland.com>; REDACTED@highland.gov.uk>;
REDACTED@visitscotland.com>

Subject: Fwd: STL Seminar - Skye Connect - 05.07.23

Good evening,

Perhaps I might ask Scottish Government officials to respond to this email. Another example of the lack of clarity that the self-catering sector is having to endure as a result of ill-considered and poorly drafted 'short-term let' regulations.

Your assistance would be appreciated.

All the very best,

REDACTED

REDACTED

Web: www.assc.co.uk



Begin forwarded message:

From: REDACTED@glendrynoch.co.uk>

Subject: STL Seminar - Skye Connect - 05.07.23

Date: 5 July 2023 at 22:09:49 BST

To: "STL@highland.gov.uk" <STL@highland.gov.uk>
Cc: REDACTED@dunster.biz, "REDACTED SkyeConnect" <info@skye-connect.com>, Association of Scotland's Self-Caterers
<communications@assc.co.uk>, Association of Scotland's Self-Caterers
REDACTED@assc.co.uk>

Dear **REDACTED**

Thank you for this morning's seminar and I apologise if I came across as somewhat confrontational but I feel these questions need a clear answer, no one else seemed inclined to ask them:

a. **Application and Validation.** I can find no reference to validation in the form or the guidance. I understand why it is necessary but clearly it is likely to take significant time, particularly as, despite your plea, many are likely to leave it longer than they should. Can we be assured that the Provisional Licence Number will be issued automatically on receipt of the application (an automated reply would (just for once, in this instance only!) be suitable). And it could include the statutory notice template.

b. **Hosts, Operators, Managers, Duty Holders.** I still find the distinction confusing. The opening statement of the Mandatory Conditions is quite clear:

“Only those named as a holder of the licence can carry out the day to day management of the short-term let of the premises.” (Which begs the question: can there be more than one?)

Then, on the form, we are told that the “Host or Operator” (is this really an “or”? Can they be different people?) is:

“The owner, tenant, or whoever exercises control over the occupation and use of the property which is to be used as a short term let.”

A little further down the form we are asked how many operators are there and an operator is:

“the person that carries out the day-to-day management of your accommodation.”

But this has got to be the licence holder (Mandatory Conditions). So why the distinction? A little further and we are asked:

“Are you also the day-to-day manager of the short term let business?”

But “you” are the applicant and therefore the to be licence holder and you have got to be the day-to-day manager (Mandatory Conditions again). So where does a Manager come in? Then in the Fire Safety check list appears the term Duty Holder, It sort of implies that there can be more than one licence holder but despite the question about the number of Operators (not Holders) I don't believe there can be. I suspect it is a Fire Department term which has crept in and it should be removed.

It all seems to me to be a confusing mess!

c. **Fit and Proper Persons.** (I didn't raise this this morning, I thought others should have a chance!) All the above raises the question: "who really needs to be a fit and proper person?" The licence holder/host/operator (necessarily the same person) clearly. But the owners, if they are not involved in the management? Why? Are you not guilty of gathering personal details for the sake of it and not for any useful purpose? If the owners are a partnership (or other corporate body) and the membership changes does that then require the licence holder to submit details of the new partner to HC and have them vetted? The licence holder wouldn't necessarily know about such a change. The same consideration applies to a Manager (whatever that post may entail, it certainly cannot be "day-to-day management", that has got to be the licence holder). Many licence holders will employ (or maybe dragoon family members) people to help them with day-to-day management but you surely don't need them to be assessed as fit and proper persons nor to be informed when they change?

I am sorry if all this appears to be nit picking but you are a lawyer and know that nits matter.

Regards

REDACTED

Doc 2

From: REDACTED@assc.co.uk>

Sent: 04 July 2023 20:34

To: MSP McLennan P <Paul.McLennan.MSP@parliament.scot>; Minister for Housing <MinisterHousing@gov.scot>; Richard.Lochhead.msp@parliament.scot;

zzzMinister for Small Business, Innovation & Trade <MinisterSBIT@gov.scot>

Cc: REDACTED@highland.gov.uk>; REDACTED@highland.gov.uk>;

REDACTED@highland.gov.uk>; REDACTED@hotmail.co.uk>;

REDACTED@stalliance.co.uk>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Fwd: Licencing and Control Areas (what Else!)

Importance: High

Good evening,

Please see correspondence below. Perhaps I could ask Scottish Government officials to provide a detailed response as a matter of urgency.

Please confirm how this aligns with the principals of the New Deal for Business.

It it becoming impossible to run a business under these circumstances.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Begin forwarded message:

From: The Cottage Bogroy <info@thecottagebogroy.co.uk>

Subject: Licencing and Control Areas (what Else!)

Date: 4 July 2023 at 17:26:53 BST

To: REDACTED assoc@co.uk

Afternoon REDACTED

We have operated a self catering property in Carrbridge, Cairngorms National Park for nearly 30 years. The property is deemed by The Highlands & Western Isles Valuation Joint Board to be a self catering Unit, and we are covered by business rates accordingly. The property is in the Badenoch And Strathspey Short Term Let Licencing Control Area.

Due to the Edinburgh Judicial Review it is now unclear as to what we are obliged to do in terms of both licencing and Planning Permission. With regard to the latter the Highland Council Website is less than clear stating planning permission will definitely be required in the Control Area if the property is a dwelling house. Their website states: "In a control area the use of a dwellinghouse (including flats) as a short term let (secondary letting) will always be material and therefore require planning permission." We are further confused as to the status of our property. Is it a Self Catering Unit as categorised by the Valuation Joint Board or is it a dwellinghouse? This is further complicated by the Joint Board requiring documentary evidence of the property being used for this purpose (which has been provided). If it is already established that it is a Self Catering Unit, why do we then need planning permission for a status that is already accepted? It should also be remembered that in 2003 we were informed by Highland Council that as the property was used as self catering accomodation it would be subject to non-domestic rates, so they are already aware of the property's status. The above may provide further grounds for their planning permission requirement to be ultra vires.

More generally, we have received no communication at all from Highland Council as to licencing or planning requirements. This is a dereliction and a failure in their duty of care towards our business. They are fully aware of the status of the property but have done nothing to advise about these changes. If we were not members of the ASSC, it is possible we wouldn't know at all. How many other businesses are unaware of these changes?

Whilst we have no objection in principle to licencing and operators ensuring they provide a safe and compliant environment for guests, the current position is a shambles. Those elements of the programme which would promote best practice are drowning in confusion.

Can you offer any advice as to what we should do within the published time frames? As always the responses to the industry from the Scottish Government can be glacial which doesn't help whan faced with an October deadline.

Kind regards

REDACTED

The Cottage Bogroy, Carrbridge.

Doc 3

From: REDACTED@assc.co.uk>

Sent: 30 May 2023 19:14

To: REDACTED@assc.co.uk>

Subject: Initial Review of Implementation and Impact of Short-Term Let Legislation with Specific Focus on the Highland Region

Good evening,

Please find attached briefing from ASSC REDACTED.

As ever, please do let me know if we can assist with anything.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Initial Review of Implementation and Impact of Short-Term Let Legislation with Specific Focus on the Highland Region

According to Richard Heaton, a previous First Parliamentary Counsel and Permanent Secretary of the Cabinet Office, in launching the Good Law Initiative said *“good law is necessary, effective, clear, coherent and accessible. It is about the content of law, its architecture, its language and its accessibility – and about the links between those things. Excessive complexity hinders economic activity, creating burdens for individuals, businesses and communities. It obstructs good government. It undermines the rule of law.”*

There is already evidence that clearly demonstrates that the Scottish Short-term Let Legislation is not necessary, will not be effective, is over complex, incoherent and is challenging in terms of compliance and accessibility. It is already acknowledged, in the Tourist industry in Scotland, that excessive regulatory complexity is hindering economic activity and has created significant burdens for individuals and businesses. All of that with a total absence of any evidence to show that the legislation will achieve its purported aims.

The Scottish Government's postponement of the Licensing application date to 1st October 2023 has been accompanied by a delay to the implementation review promised for the Summer of 2023. Tourism and the provision of small accommodation play a major and undisputed role in the local economies of many areas of Scotland and particularly the Highlands. Delays in any monitoring, evaluation and review of the impact of the legislation on small businesses exacerbates the damage already being done and highlights the complete inadequacy of the Business Regulatory Impact

Assessment undertaken as part of the passing of the legislation.

Examination of the Highland Council Licensing Register, together with comparison of information provided in their response to an FOI submitted by the Association of Scotland's Self-Caterers, produces warning signs that strongly indicate that Short-term Let Legislation is already having disastrous consequences for the sector, particularly in terms of costs, uncertainty, administrative burden and future investment. Most critical, however, are the implications for the enforceability, or otherwise, of the licensing and planning regulations and the impact of that on individuals, businesses and community cohesion.

Taken together with a potentially disastrous conflation of legislation to impose Planning Control Areas

this is a potential black hole in terms of the inter-connected impact on self-catering operators.

A number of important facts emerge from consideration of the currently available data.

THC Freedom of Information Return

- Highland Council (THC) announced last year that they estimated 10,000 STLs in their area. They have used 8000 as the divisor for calculation of their fees. All other things being equal they have already **inflated "cost recovery" by 20%**.
- THC have or are going to recruit 21.3 FTE equivalent staff plus an apportionment of senior officer's time. The annual salary bill for this will be approximately £900,000 including on costs, IT, inspection costs, etc. It is highly likely that staffing will be reduced in years 2 and 3 once the initial "rush" is over and new licencees trickle in at a lower rate. Provision will need to be made for licence renewals but this is likely to be achievable through redeployment in 2026.
- Taking the average fees at £400 for 3 years and 8000 licence applications the fee income amounts to £3.2million or £1,067,000 hypothecated per annum.
- It is entirely reasonable to presume that THC are going to make a considerable excess of income over expenditure from STL licensing **IF** they achieve their 8000 applications target.
- Regrettably, there is another hypothesis that can be drawn from these figures which relates to the possible intent to dramatically reduce the numbers of self-catering and bed and breakfast businesses in Highland region.

THC Licence Register

- As of 29th May there are 18 weeks to go to before the new application submission date for existing operators of 1st October. 34 weeks have passed since licence applications systems should, and did in Highland Council's case, opened
- Licence applications stand at 1701. This represents 21.3% of the 8000 Highland Council used to calculate fee levels and 17% of Highland Council's 10,000 estimate of the number of STLs in the area in 2022.
- 1431 of the applications are for secondary letting. This is under 30% of those self-catering properties listed on Highland Council's Non-Domestic Rates valuation roll and assumes all secondary letting applicants do not pay Council Tax.

- 171 applications are for home sharing with a further 99 for home letting and sharing. On various estimates this represents between 3 and 8% of these categories of short-term let operating in the region. More challenging, to the SG's case that the licensing scheme will not deter responsible operators from applying, is that it suggests that **very few** B&Bs have so far applied.
- 838 licences have been granted as of 26th May 2023. 721 of these are for secondary lets with a further 117 for home sharing/letting. This is 10.5% of the 8000 Highland Council maintains it used for calculation of the cost recovery licence fee; or 8.4% of the 2022 estimate, with 18 weeks to go to the final submission date.
- 56 applications have been withdrawn. Whilst there is no way of knowing the reasons for the withdrawals there is at least one case where a licence was revoked following a neighbour objection (although this has now been returned); and there is considerable uncertainty surrounding the approach taken to planning requirements with respect to licence applications. Further, it is not known whether those that withdraw their application have lost the fees paid at submission or whether the local authority will refund these payments.

Questions:

1. What is a) The Highland Council's (THC) and b) the Scottish Government's (SG) justification for the financial forecasts and conclusions that can be drawn from the metrics gleaned from the Freedom of Information (FOI) return supplied by Highland Council?
2. Does the FOI data indicate grounds for challenging the legality of the fee calculation being restricted to "**cost recovery**" only?
3. How will THC reimburse licence applicants if overpayment of fees can be established by future legal challenge?
4. With 34 weeks gone from opening the scheme and 18 weeks to go to the new deadline, is it reasonable to assume that THC will:
 - a) be undertaking a concerted publicity campaign for the Licensing Scheme in the immediate future;
 - b) will be unable to process between 75% and 80% of applications in the 18 weeks to the deadline **OR** are they;
 - c) purposefully managing a process that decimates self-catering and bed and breakfast provision by up to 50% of the 8000 fee divisor or 60% of the 10000 in the 2022 estimate.
5. If THC don't receive and process the 6400 applications still to be submitted to reach the 8000 target by 1st October 2023, what is their policy for addressing the shortfall?
6. Will that policy pursue non-applicants who continue to operate after 1st October and, if so:
 - a) how will they be identified;
 - b) how will equality of treatment between STL categories be achieved; and;
 - c) what sanctions will be imposed after October 2023 and July 2024? For example, will they be undertaking an analysis of the NDR roll to identify operators who have not submitted a licence application by 1st October 2023? How will this analysis be replicated for CT paying operators?
7. Does the SG's request that Local Authorities take a light touch approach with B&Bs and home sharers suggest that they already know that these categories of operators will be decimated by the Licensing Scheme?
8. How will THC address this given the licensing register indicates that 95% of home sharers and 75% of secondary letters have yet to submit an application?
9. What calculations have been made to forecast the worst- and best-case scenarios in terms of losses to the Highland economy resulting from the Licensing Scheme?
10. What provision has been made by the SG and THC to enable analysis of the connectivity between PCA and Licensing in terms of:
 - a) forced business closures;
 - b) resulting losses to individual operators and the local economy;
 - c) changes in numbers of non-let second homes, empty homes, affordable homes; long

term lets; etc?

11. If, as the evidence gathered thus far strongly indicates, both the Licensing and PCA schemes are proving catastrophic to the self-catering and bed and breakfast sectors how will the SG and THC seek to:

a) address the damage caused, and;

b) recompense the applicants who have subscribed to a failed scheme and policy?

There are a lot more questions that SG Ministers and the LAs need to answer but the questions above provide a base for demonstrating that not only is the legislation ill-conceived, but its implementation is utterly devoid of any positivity from anyone's perspective.

Conclusion

There is only one way that the emerging disaster for individual livelihoods and the tourism economy more generally can be averted. The Licensing Scheme and associated SSI:

- Must be suspended until 2026, pending review and accompanied by establishment of a thorough and robust sectoral database.
- It is simply unacceptable (and indeed contrary to Provision of Services Regulations) to be implementing legislation, that is already having a very negative impact on people's business and livelihoods, on the grounds that the scheme itself will provide the data.
- The notion of a post implementation review is useless. Worse still it creates the illusion that the severe challenges faced by the sector can be addressed after the event. The damage is already done. The situation is irrecoverable and no amount of reassurance from the sg or assistance from helpful staff in Local Authorities can undo that damage.
- The only way to turn this round is to go back to the drawing board and establish a real basis for balancing the needs of local communities with the sector's contribution to those communities and the tourism industry in general.

REDACTED

Association of Scotland's Self-Caterers

30th May 2023

Doc 4

From: REDACTED@assc.co.uk>

Sent: 21 May 2023 23:23

To: Minister for Housing <MinisterHousing@gov.scot>; Minister for Small Business, Innovation & Trade <MinisterSBIT@gov.scot>; First Minister <FirstMinister@gov.scot>; Deputy First Minister and Cabinet Secretary for Finance <DFMCSF@gov.scot>

Cc: MSP McLennan P <Paul.McLennan.MSP@parliament.scot>; Richard.Lochhead.msp@parliament.scot; Neil.Gray.msp@parliament.scot; Short Term Lets Delivery Group <shorttermlets@gov.scot>; dundee@shona.robison.scot

Subject: Short-Term Let Planning Briefing

Good evening,

Please find attached briefing on Short-Term Let Planning considerations.

The dual requirement of planning and licensing policies for the self-catering sector is oppressive and disproportionate. It is irrational to apply national policies regulating the same activity in inconsistent ways across local authority areas. Moreover, it imposes unnecessary hardship to require operators to subject themselves to parallel processes for materially identical purposes and to pay repeat fees.

Meanwhile, uncertainty and ambiguity over the planning process are causing distractions from implementing Short-Term Let Licensing schemes. Clarity must be provided going forward, rather than applying planning policy changes retrospectively to those businesses that have already made significant financial investment and operated for some considerable time, in some cases for decades, without issue.

We do hope that the Scottish Government will now meaningfully consider our recommendations, alongside solutions already provided to ameliorate the unintended consequences identified following implementation of the Short-Term Let Licensing scheme (attached).

We welcome the New Deal for Business and look forward to working together with the Scottish Government to get short-term let regulations back on track.

As ever, please don't hesitate to let me know how we can assist.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 5

From: REDACTED@stalliance.co.uk>

Sent: 08 May 2023 16:33

To: Cabinet Secretary for Wellbeing Economy, Fair Work & Energy <CabSecWEFWE@gov.scot>; Deputy First Minister and Cabinet Secretary for Finance <DFMCSF@gov.scot>

Cc: Minister for Small Business, Innovation & Trade <MinisterSBIT@gov.scot>; REDACTED@assc.co.uk>; REDACTED@stalliance.co.uk>; Minister for Housing <MinisterHousing@gov.scot>; REDACTED@crieffhydro.com

Subject: Short Term Let Licencing - ASSC status report for IAG - Your URGENT attention and action is sought

Dear Deputy First Minister and Cabinet Secretary for Wellbeing Economy, Fair Work & Energy,

I write further to our recent Teams meets following your respective appointments by the First Minister and further to my own engagements with Richard Lochhead, Minister for Small Business Innovation and Trade.

As you will both I am sure recollect on the call you held with the nine Business Orgs, 17th April, I expressed and relayed the serious and very pressing concerns of industry colleagues operating in the professional Self-Catering and Bed and Breakfast sectors. The primary concerns being the need for urgent re consideration, clarity and fixes to issues with the current STL licencing policy and the anomalies arising with Local Authorities in respect of their approach to applying STL Licencing process (extract note of meet below).

I also stated on the call that whilst the 6- month extension to this licencing policy was welcomed by the sector, which we understand was granted to allow time to address the issues being highlighted, and in the hope that by Scottish Government working together with the industry , industry recommendations could be tabled, considered and hopefully adopted. I stated the clock was ticking down fast and 6 months was now 4.5 months with nothing don. Three weeks on from that meet we are no further forward to achieving any such outcome, if anything since in the sector fear that that those affected by the STL policy are now in a much worse and a far more precarious position. More worryingly it is one that I think will likely lead to further unintended losses of good professional self-catering and bed and breakfast operators which in turn will bring about yet more unwanted challenge for many trying to operate in wider tourism sector and compromise Scotland's accommodation offer.

Other STA members who have met personally with Minister Lochhead both at the round table discussions he has held with industry colleagues and most recently at the Scottish Tourism Alliance Council have expressed similar concerns. Each have stated the urgent need for Scottish government ministers to work with the sector trade bodies impacted to help remedy the worsening position we now find ourselves in..

To provide you with a very clear and concise picture of the status quo in respect of this specific policy area I attach the detailed report prepared by REDACTED Association of Scotland's Self Caterers along with evidence provided to the LGHP Committee . The May report sets out the anomalies and inconsistencies across different local authority areas in respect of both their interpretation and application of the policy. The ASSC report also refers to comments made by the Minister for Housing, past and present, and sets out many recommended courses of action or amends that the Scottish Government could take to fix the flaws in the current application of policy and process being adopted by LA's.

As I have often referenced in recent weeks and months , our national tourism industry's aim and ambition as set out in our strategy Scotland Outlook2030 is for Scotland to be world leaders in 21st Century Tourism – a collective vision shared by industry colleagues, government officials and tourism colleagues in the public sector agencies. Scotland Outlook 2030 also cites one of the conditions needed to achieve such success is to have the right policy and this by the very nature of our ambition requires policy to be world leading and world leading in its application. Currently the STL policy the application of it falls along way short of this aim, but we have a chance to fix it , and as such I would urge that the solutions and actions needed as set out in the ASSC report are given your urgent due consideration and support before more unintended damage is done to what is a vital sector in our visitor economy.

Extract of read out from meet 17/4/23 – Note I relayed the note to the STA Board & Council on receipt.

- *STA: welcome early engagement with Cab Sec & Mr Lochhead – particularly thankful for depth and breadth of engagement with sector by Mr Lochhead and taking on board the key issues. Welcome Deposit Return Scheme (DRS) being included in FM statement. Keen for an opportunity for industry to engage on Short Term Let licensing (STL) to fix anomalies, with swift action to drive this forward at pace. Happy to facilitate and test with members.*
- *DFM Response - Agree that we need more pragmatic solutions to STL, already delayed it for this reason.*

REDACTED has since his being appointed held several meets with the Minsiter for Housing Paul Maclennan which has been very welcomed and the attached report has been shared with him too . That said given the significant implications and risk both to the wider tourism visitor and wellbeing economy (national and local)and the health and wellbeing of the many 1000's of individuals who operate in this sector I felt compelled in my role as CEO of the overarching tradebody for the sector, and given our recent meets that I send this report and email to you direct. In the spirit of the FM's and your own affirmed commitment to work procatively and better with business and the private sector , REDACTED and I would welcome the opportunity for a formal in person meet to discuss the report in motr detail and agree an approach and actions to rescue this worrying situation as best we can.

Kind regards

REDACTED

REDACTED

Scottish Tourism Alliance

REDACTED

Scottish Tourism Alliance

Suite 3D, Wallace House, 17-21 Maxwell Place, Stirling, FK8 1JU



This message is sent in confidence to the addressee(s) only. It may contain privileged information. The contents are not to be disclosed to anyone other than the addressee(s), unless specifically authorised to do so. Unauthorised recipients are requested to preserve this confidentiality and to advise the sender immediately of any error in transmission. Attachments are sent in good faith. We virus check our files regularly and recommend that you virus check prior to opening attachments. Opinions and content in this message, or in attachments, will be understood as neither given nor endorsed by the Alliance, except in so far as they relate to our official business.

Doc 5 – attachment 1 – please see Doc 4, attachment 2

Doc 6

From: REDACTED@assc.co.uk>

Sent: 04 May 2023 09:39

To: MSP McLennan P <Paul.McLennan.MSP@parliament.scot>; Minister for Housing <MinisterHousing@gov.scot>

Cc: REDACTED @gov.scot>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Short-Term Let Licensing: Outstanding Issues & Recommendations

Good morning,

As discussed, please find attached briefing on outstanding issues and recommendation for solutions.

Genuine and meaningful partnership working can deliver beneficial results. The ASSC wants Scotland to be a leader in smart regulation which balances the needs of our economy and communities, not one which is burdensome and other countries seek to avoid as an example of bad practice.

We must strive to work collaboratively to protect Scotland's £867m self-catering industry and not burden small businesses who do so much to promote and enhance the country's unique tourism offering and boost local economies.

The Scottish Government have two pathways towards a more equitable, fair and effective STL regulatory landscape. It could:

- 1. Implement the ASSC's proposal to pivot licensing to align with the Antisocial Behaviour etc (Scotland) Act 2004.**, which would satisfy the aims of the regulations, covering the safety of the activity; or
- 2. Consider the various amendments to the 1982 Act and re-draft the guidance** associated with [Licensing Order 2022](#), in collaboration with industry and local government stakeholders.

We sincerely hope that the solutions outlined in this document can be actively considered by the Scottish Government so that we can arrive at a proportionate and fair regulatory regime, where unintended consequences are minimised, and the self-catering sector can survive and thrive into the future.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Attachments – please see Doc 4, attachment 2 and Doc 5, attachment 2

Doc 7

EXTRACT OF NOTE RELATING TO SCOPE OF FOI

Short Term Lets – Stakeholder Engagement Note of meeting with ASSC – 9 March 2023

Attendees

REDACTED

Note

Planning

- ASSC noted that letters from Scottish Government to Highland Council regarding the designation of control areas within their areas was clear that the control area was not retrospective, and took effect from the date of designation.

Doc 8

EXTRACT OF NOTE RELATING TO SCOPE OF FOI

Meeting with REDACTED, Association of Scotland's Self-Caterers (ASSC)

Tuesday, 07 March 2023, 16:15-16:45 - Note of the meeting

Attendees

Ivan McKee, Minister for Business, Trade, Tourism and Enterprise

REDACTED, Association of Scotland's Self-Caterers (ASSC)

REDACTED

Summary of discussions

Short Term Lets. The ongoing impact of STL regulation on the small tourism accommodation sector.

ASSC

There had only been around 900 in the Highlands (FC assumed Highland Council would be expecting 10k or more applications), only granted a handful.

Doc 9

EXTRACT OF NOTE RELATING TO SCOPE OF FOI

Short Term Lets – Note of meeting with Minister for Housing and Association of Scotland’s Self-Caterers 18 April 2023

Attendees:

- Paul McLennan MSP – Minister for Housing
 - REDACTED – Association of Scotland’s Self-Caterers
 - REDACTED – Head of Housing Markets and Taxation Unit
 - REDACTED – Short Term Lets Policy Manager
-
- ASSC felt that the scheme was not working – people were not applying due to administrative and financial challenges. As an example ASSC noted that c.1,300 licence applications had been received by Highland Council, when total numbers of STLs in the area were c.10-20k.
 - ASSC discussed recent survey evidence which suggested 22% of operators had already left the market on Skye, and across Scotland operators had indicated they would leave the sector due to the licensing scheme. Some of those leaving the sector were doing so out of principle, to object to the scheme.
 - REDACTED sought clarification on whether 22% of operators had already left the market in Skye, given that as existing hosts they would be able to continue trading over the busy summer months even if they wished to leave before the 1 October deadline. FC confirmed this was the case.

Doc 10

From: REDACTED@assc.co.uk>

Sent: 27 February 2023 21:23

To: REDACTED@gov.scot>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Planning Permission in Planning Control Areas

Good evening,

Further to decision letters sent from the Scottish Government to Edinburgh and Highland Councils, it is our understanding that Edinburgh and Highlands should not be asking for a planning application in all cases for those properties that were already operating before a Control Area was designated. This is based on two paragraphs in the letters, as follows:

“A change of use of a dwellinghouse to a short-term let after the designation of the control area will be deemed to be a material change of use by virtue of section 26B of the Act.

Where the change of a dwellinghouse to a short-term let took place before the designation of the control area the existing rules will apply. These require planning permission for a change of use of property where that change is a material change in the use of the property”.

These two paragraphs appear in both the Highland letter, and also in the earlier Edinburgh letter. Similar sentiments also appear in the Scottish Government’s draft planning guidance. It is clear that on this basis, existing operators have ‘grandfather rights’ in terms of planning within a Planning Control Area, where there is no material change of use. Presumably this is due to the logical principle that planning law shouldn’t be applied retrospectively for those who have already been operating whilst a different law existed.

Can you please confirm that new planning policies will not be deployed retrospectively, therefore protecting legitimate businesses that chose to invest in properties in good will (and in many cases having been told by the planning authority that no permission was required) pre these legislative changes?

It would be helpful to have a conversation specifically around planning as it is now becoming a significant issue that is not being addressed. Significant confusion (and huge expense) is arising.

Many thanks in advance.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 11

From: REDACTED@assc.co.uk>

Sent: 22 February 2023 17:11

To: zzzCabinet Secretary for Social Justice, Housing & Local Government 2021 to 2023 <zzzCabSecSJHLG@gov.scot>

Cc: REDACTED@gov.scot>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Fwd: Moffat Centre Short-Term Let Accommodation Evaluation Review 2022/23

Good afternoon,

Further to ongoing consideration by the Local Government Housing and Planning Committee, please find below email from one of our members.

This specifically relates to the issues that the ASSC has raised regarding investment. Licensing has created an insurmountable barrier to investment, buying or indeed selling a short-term let. This is the reality that legitimate businesses are facing.

Having sought legal counsel and liaised with lenders including the Royal Bank of Scotland, Cumberland Business (one of the only lenders specialising in the sector) as well as members of the National Association of Commercial Finance Brokers, they all concur that the position outlined below is now the reality for the small accommodation sector.

Amending the guidance will not ameliorate this situation.

It is critical, therefore, that this very grave situation and 'unintended consequence' is given due consideration and a solution is found.

Our written evidence to the LGHP Committee, submitted in January, goes into this in detail.

I look forward to hearing from you.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Begin forwarded message:

From: REDACTED welcome@speanlodge.co.uk>

Subject: Moffat Centre Short-Term Let Accommodation Evaluation Review 2022/23

Date: 22 February 2023 at 13:17:42 GMT

To: REDACTED@assc.co.uk>

Hello REDACTED

We hope you are well.

The findings of the Moffat Centre Review make unsurprising reading.

We have been trading successfully for just over 20 years and now wish to retire so our home and business was placed on the market last summer. We have been under offer since October 2022.

Everything appeared to be progressing well with the sale. All the relevant surveys have been carried out to the satisfaction of our buyer who wishes to continue operating a hospitality business from the property. Our sale, however, is now likely to collapse as our buyer's bank is making his loan conditional on him securing a STL Licence. That in itself would not be a fatal blow to the sales process. The conundrum is the mandatory requirement by the Scottish Government that public liability and buildings insurance must be in place before a licence is granted. Our buyer is obviously unable to purchase insurance cover on a property he does not yet own!

Both ourselves, our solicitor and our buyer's solicitor have been in contact with REDACTED, Solicitor and head of Highland Council's Licensing team, but no resolution is forthcoming. REDACTED says his hands are tied by the mandatory conditions of the STL Licensing scheme, although he has written to REDACTED in the STL Policy Team at the Scottish Government for clarification on various policy issues. All the solicitors agree that the fault lies in the lack of precise detail in the legislation and its generally opaque nature. It's a half baked cake.

We know there's a range of different lending criteria imposed by banks and building societies. We have checked with our own lender who states that they would be more flexible in their approach. They also report that the STL Licence requirements are

causing significant issues, especially with regard to the inability of local authorities to give precise timescales on how long it would take to consider individual licence applications. This in turn is causing delays in loan approvals as well as confusion and uncertainty in the market.

You can imagine how angry we feel about this whole situation and the amount of anxiety it is creating. Not to mention the additional legal costs that we are now incurring because the sale of our home and business has suddenly become much more complex.

We imagine that there must be many other hospitality businesses going through the same sorry experience.

To end on a lighter note: we hope you enjoyed your starring role on TV!

Best wishes

REDACTED

Doc 12

From: REDACTED@assc.co.uk>

Sent: 20 February 2023 18:21

To: First Minister <firstminister@gov.scot>; Deputy First Minister and Cabinet Secretary for Covid Recovery <DFMCSCR@gov.scot>; Cabinet Secretary for Social Justice, Housing & Local Government <CabSecSJHLG@gov.scot>; Minister for Public Finance, Planning & Community Wealth <MinisterPFPCW@gov.scot>; Minister for Business, Trade, Tourism & Enterprise <MinisterBTTE@gov.scot>

Subject: Moffat Centre Short-Term Let Accommodation Evaluation Review 2022/23

Importance: High

Good evening,

The Moffat Centre for Travel and Tourism Business Development at Glasgow Caledonian University was commissioned by the Association of Scotland's Self-Caterers (ASSC) to undertake an evaluation of the short-term let sector in Scotland. The *Moffat Centre* is the UK's largest university-based consultancy and research centre for tourism and travel market research.

This independent study from respected policy experts in their field provides important findings for policymakers in respect to the Scottish Government's short-term let regulations. We hope that you find it of interest.

Aims

Using a mixture of quantitative and qualitative research, the objectives of the review were as follows:

- To explore the positive and negative impacts of the short-term let legislation on the sectors operators in Scotland;
- Assess how short-term let across different locations (urban and rural) have been affected by the STL licensing scheme legislation so far; and
- Summarise assessments and, where applicable suggestions and alternatives to short-term let licensing based on the opinions and experience of the STL operators.

Main Findings

Some of the main findings included:

- The majority of operators felt that STL licensing was **time consuming and complicated**.
- Over-three quarters (77.5%) found that the STL legislation was a **significant or a medium threat to their business**;

- Most **do not intend to apply for the licence until at least September 2023**. As a result, it is anticipated that immediately before the October 2023 deadline, councils will receive the majority of applications; and
- Many stated that the regulations **create uncertainty for their future operations**. The most frequently cited issues were the high cost of the application, a lack of necessary tradesmen to conduct surveys and safety and compliance checks in remote communities, the complexity of the application process, confusion about the necessity of all licensing requirements, and the lack of sufficient planning and structure in the proposed legislation.
- Participants also highlighted that the licensing legislation has **no clear purpose**, with confusion as to whether it aims to ensure health and safety standards or address housing challenges.
- The legislation **doesn't recognise that these challenges manifest themselves differently across urban and rural areas**, with a one-size fits all approach being irrelevant for their business.
- Alternatives to legislation are available, such as **voluntary and compulsory registration**.

As ever, we are here to assist policy makers in getting this critically important regulatory framework right to support Scotland's economic recovery.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 13

From: REDACTED@assc.co.uk>

Sent: 14 February 2023 23:41

To: REDACTED@gov.scot>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Update

Hi REDACTED,

REDACTED

Highland is still asking for a 1:1000 site plan which has nothing whatsoever with licensing.

REDACTED

Thanks in advance.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 14

From: REDACTED@assc.co.uk>

Sent: 12 January 2023 08:35

To: REDACTED@gov.scot>; REDACTED@gov.scot>; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Advice

Importance: High

Good morning,

REDACTED

Highland Council has had in the region of 600 applications so far and every one is being blocked by consults (SFRS / police). Not one licence has been granted.
REDACTED.

I look forward to hearing from you in due course. Many thanks in advance.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 15

From: REDACTED@assc.co.uk>
Sent: 01 December 2022 16:05
To: REDACTED@gov.scot>; REDACTED@gov.scot>; REDACTED
[@gov.scot](mailto:REDACTED@gov.scot)>; Short Term Lets Delivery Group <shorttermlets@gov.scot>
Cc: REDACTED@stalliance.co.uk; REDACTED@visitscotland.com>;
REDACTED@visitscotland.com>
Subject: Planning Permission for STLs

Good afternoon,

As you know, several local authorities are requesting proof of planning permission for secondary lets as part of their licensing schemes.

Other licensing authorities that are asking for evidence of planning permission / to check if planning permission is required include:
Highland Council

Others suggests a check, but it is not a requirement. There is a cost associated with checking if planning permission is required in some areas.

This is causing a huge amount of pain throughout Scotland. Perhaps we can discuss?

Thanks in advance.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Planning Permission

13. Where the premises is in a short-term let control area for the purposes of section 26B of the Town and Country Planning (Scotland) Act 1997(4) ("the 1997 Act"), the holder of the licence must, where the use of the premises for a short-term let requires planning permission under the 1997 Act, ensure that either—

- (a) an application has been made for planning permission under the 1997 Act and has not yet been determined, or
- (b) planning permission under the 1997 Act is in force.

Doc 16

From: REDACTED@assc.co.uk>
Sent: 23 November 2022 15:43
To: REDACTED@gov.scot>
Subject: Briefing Papers

Dear REDACTED,

In advance of our meeting tomorrow, please find attached some evidence that Paul McLennan MSP asked me to compile to submit to the Local Government, Housing and Planning Committee.

I look forward to speaking to you tomorrow morning.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk



Doc 17

SHORT TERM LETS

STAKEHOLDER ENGAGEMENT

NOTE OF MEETING WITH MR EWING & CONSTITUENTS, 01 OCTOBER 2021

Attendees

- Shona Robison – Cabinet Secretary for Social Justice, Housing and Local Government
- REDACTED – More Homes Division
- REDACTED – More Homes Division
- Fergus Ewing – MSP for Inverness and Nairn.
- REDACTED – Office Manager for Fergus Ewing MSP
- REDACTED – REDACTED B&B, Grantown on Spey
- REDACTED – REDACTED, self-catering cottage (in annex), Grantown on Spey
- REDACTED – ASSC, and owner of two self-catering properties
- REDACTED – B&B, Nethy Bridge

Summary

1. Fergus Ewing (FE) introduced attendees, and highlighted that the self-catering sector was worth £867m to the Scottish economy, demonstrating the importance of the tourism sector.
2. Ms Robison valued the opportunity to hear directly from Mr Ewing's constituents, and set out that she had valued hearing from businesses and others impacted by the licensing scheme. Ms Robison reassured attendees that the Scottish Government (SG) valued the contribution of small businesses and SG wanted to see a thriving tourism sector in Scotland.
3. REDACTED explained that he owned a B&B in Grantown on Spey, which was at the luxury end of the market. His small B&B was in class 9 of the Use Classes Order, and he paid council tax rather than non-domestic rates. REDACTED indicated that a lot of his competitors were larger B&Bs, guest houses and small hotels, many in class 7, and therefore excluded¹ from the licensing scheme. REDACTED felt that small B&Bs were being discriminated against by this legislation. REDACTED also raised concern about potential fees, and suggested the licensing scheme meant that small B&Bs would be subject to more stringent inspections than hotels. REDACTED suggested that a level playing field would involve licensing all businesses in use class 7, but this would be disproportionate.
4. REDACTED also highlighted that small B&Bs were not to blame for housing pressures, given owners lived in their B&B properties, and participated in local communities, unlike second homes, which were often empty. REDACTED's view was that, if the licensing scheme went ahead, a lot of small B&Bs would close. He was concerned that owners would sell up and downsize, and their property would likely be bought as a second home.

¹ Hotels within use class order 7 are excluded from licensing, however guesthouses and B&Bs are not.

5. REDACTED supported REDACTED's registration system, which would provide confidence that businesses met all the necessary safety requirements. REDACTED also believed the use classes order could be used as a tool in regulating short-term lets, noting that self-catering lets were not a separate category in the Use Classes Order.
6. FE asked REDACTED to talk about the purpose of the licensing scheme concerning safety (set out in paragraphs 12 and 15 of the BRIA). FE noted that in his previous role as Community Safety Minister he had chaired a group for around 21 months with REDACTED (Chair of the Scottish Government Regulatory Review Group) to simplify fire safety regulations in the B&B sector, and was surprised that no references had been made to this in the BRIA. REDACTED felt the BRIA and licensing proposals did not take existing requirements into account.
7. FE noted that, in 22 years as an MSP, he had received no complaints about antisocial behaviour from B&B premises. REDACTED had never had issues with antisocial behaviour from his guests, having operated for 13 years, nor had he heard about it from any B&B across Scotland.
8. REDACTED managed REDACTED, in Grantown on Spey, where the annex was in use as a self-catering property. REDACTED was concerned that many businesses would be faced with additional costs, which may impact on their livelihood and pensions (where their business was used to supplement retirement income). REDACTED wanted to share constructive solutions to address some of the housing challenges, and suggested the Scottish Government should consider a range of proposal proposals, including: local authorities enforcing s.75 agreements to stop housing being built unless for the purpose intended, reuse of abandoned buildings and conversion of hotels into apartments. It was noted that many hotels had gone onto the market as a result of COVID-19. REDACTED agreed and wanted to see a holistic look at the wider housing system in order to develop solutions that tackled housing issues, whilst protecting existing businesses.
9. FE gave an example of former hotels in Grantown on Spey which had been converted to housing. FE asked REDACTED and REDACTED about health and safety. REDACTED noted her business was already compliant with existing health and safety legislation, and they had followed all additional regulations and guidance in relation to COVID safety (including from ASSC and Airbnb).
10. REDACTED also operated two self-catering properties, in addition to her role as REDACTED of the ASSC. REDACTED noted the ASSC now represented 1,400 members and between 10-15k self-catering properties. REDACTED wanted to draw a distinction between licensing and planning, noting licensing was about safety, whereas planning regulated use. REDACTED felt it was also important to differentiate self-catering properties (great benefit to economy and local communities) from second homes (much less benefit to economy and local communities). REDACTED rejected suggestions of exponential growth in the sector: there were approximately 17,000 self-catering units on the NDR roll in 2017 and just over 18,000 in 2021. The exponential growth related to use of online platforms.
11. REDACTED felt the licensing scheme was tantamount to discrimination against small businesses, and against women – as it was largely women that ran these businesses (including retired ladies, wives of farmers, single mothers who operated self-catering units as the flexibility helped when raising kids). REDACTED reiterated that self-catering properties and B&Bs were already heavily regulated. REDACTED welcomed Ms Robison's comments recognising the value of small businesses.

12. On antisocial behaviour, REDACTED advised that there were very few antisocial behaviour incidents connected with self-catering units.
13. FE wanted to draw a distinction between legitimate businesses and amateur operators. He outlined that the primary concerns had arisen due to amateur operators, largely in Edinburgh, running Airbnb flats. FE asked if REDACTED wanted to see a differentiation between legitimate businesses and amateurs, through Visit Scotland registration or valuation roll data. FE recognised a distinction would go a long way to reassuring the self-catering sector that they were valued.
14. REDACTED agreed, and explained that she had welcomed opportunity to work with Ms Forbes in 2020 on which businesses should get COVID-19 support, and considered it would be straightforward to use those criteria to differentiate those businesses from those causing the issues.
15. REDACTED had ran a two bedroom B&B in Highlands since 2006, and had always been registered with Visit Scotland. REDACTED lived on the premises, and had had no issues with antisocial behaviour. REDACTED intended to keep her house when retiring, and explained that her income from running the B&B was modest. REDACTED enjoyed meeting guests from around the world and supported the community by buying food locally where possible. High licence fees would force REDACTED to close.
16. FE raised a number of specific issues and questions:
 - Did REDACTED agree with the £1,500-£2,000 licence fees, as quoted by SOLAR?
 - Would a field with glamping pods require a licence for each pod, or one to cover the entire site?
 - What criteria would a licensing authority would apply in determining an application?
 - Why were the neighbour notification requirements more onerous than in the 1982 Act?
 - What happened if one neighbour objected?
 - How would businesses secure finance with the uncertainty around how their application would be determined or how long a licence would last? Lenders would be cautious given potential uncertainty of a licence being revoked or refused.
17. On antisocial behaviour, FE noted that powers were already in place through the Antisocial Behaviour Notices (Houses Used for Holiday Purposes) (Scotland) Order 2011. The Order set out the existing regime for dealing with antisocial behaviour. FE highlighted that any complaints with self-catering properties tended to relate to hen parties and stag nights. FE did not want to see duplication of regulation to solve a problem that was already solved. FE also set out that often antisocial behaviour issues were best resolved informally, by neighbours speaking to property owners.
18. Ms Robison thanked attendees and undertook to write to FE on the specific points he had raised. Ms Robison noted work was already being taken forward on empty homes and the other ideas proposed by REDACTED. Ms Robison noted the Scottish Government had just completed a third consultation on short term lets, and explained that some changes had already been made (such as removal of minimum energy performance requirements for secondary letting) and we continued to work through all the suggestions that had been made.

19. Ms Robison wanted for focus on specific suggestions for improvements to the Licensing Order, rather than any alternative proposals. She acknowledged that good hosts and operators already met basic safety standards, but stressed it was important that all met those standards. The Scottish Government supported responsible and sustainable tourism businesses.
20. Ms Robison did not want the licensing scheme to be onerous or costly. Additional powers in the licensing scheme, such as those relating to antisocial behaviour, would only be used where they were needed.
21. Ms Robison explained that local authorities could use control areas to help manage high concentrations of short-term lets. Edinburgh and Highland were considering the introduction of control areas, and it was right that these decisions could be taken at a local level.
22. REDACTED noted that the indicative fees set out in the BRIA had been developed through detailed conversations with five local authorities. Officials were working with Fife and SOLAR to understand how they had estimated a fee of around £1,500. REDACTED noted meetings had been arranged with ASSC/Frontline, Airbnb and others to understand their analysis of the economic impacts; these would inform the final BRIA.
23. REDACTED addressed FE's earlier question about glamping, explaining that a single field (premises) containing a number of pods may only need a single licence but that multiple fields in different locations would need multiple licences.
24. REDACTED expressed concern about fees being on a scale dependent on premises size. Given that licensing was concerned with basic health and safety, she did not see why a larger property should be charged more than a small one. REDACTED explained that we wanted fees to scale approximately to revenue to make it fair.
25. Ms Robison queried whether REDACTED was really proposing that a large 20-bed shooting lodge should pay the same flat fee as one bed accommodation. REDACTED felt that existing businesses who were already complying with existing regulations should not have to pay any licence fee at all.
26. REDACTED raised concern that levels of liquor licensing fees under the 2005 Act potentially meant that a large (70 bed) hotel would be paying less in licence fees than a two bed self-catering unit.
27. FE thanked Ms Robison for her time, and indicated he was happy to have a discussion with officials and REDACTED on specifics to help get the legislation right.

Actions

- **Officials** to prepare a letter for Ms Robison to send to Mr Ewing addressing specific points he had raised during the meeting.

REDACTED
01 October 2021

Doc 18

From: REDACTED@assc.co.uk>

Sent: 28 June 2023 11:18

To: Minister for Housing <MinisterHousing@gov.scot>; zzzMinister for Small Business, Innovation & Trade <MinisterSBIT@gov.scot>; Cabinet Secretary for Wellbeing Economy, Fair Work & Energy <CabSecWEFWE@gov.scot>

Cc: REDACTED@gov.scot>; REDACTED@gov.scot>;

REDACTED@stalliance.co.uk>; Neil.Gray.msp@parliament.scot; MSP McLennan P <Paul.McLennan.MSP@parliament.scot>; Richard.Lochhead.msp@parliament.scot; Short Term Lets Delivery Group <shorttermlets@gov.scot>

Subject: Local Authority Short-Term Let Licensing Policies: Illegalities

Importance: High

Good morning,

Resending, amending a typo.

All the very best,

REDACTED

The Association of Scotland's Self-Caterers (ASSC)
REDACTED

Web: www.assc.co.uk



Doc 19

From: REDACTED@assc.co.uk>

Sent: 16 December 2022 11:26

To: Cabinet Secretary for Social Justice, Housing & Local Government
<CabSecSJHLG@gov.scot>

Cc: Deputy First Minister and Cabinet Secretary for Covid Recovery
<DFMCSCR@gov.scot>; Scottish Ministers <Scottish_Ministers@gov.scot>;
Paul.McLennan.msp@parliament.scot; Euan.Donald@parliament.scot;
localgov.committee@parliament.scot; Minister for Business, Trade, Tourism &
Enterprise <MinisterBTTE@gov.scot>; REDACTED@assc.co.uk>

Subject: Association of Scotland's Self-Caterers - Short-term let licensing extension

Dear Cabinet Secretary,

On behalf of the board and members of the ASSC, we would like to start by thanking the Scottish Government for the six-month extension for existing operators in terms of short-term let licensing applications set out in your letter on the 7th December 2022.

This provides the opportunity for us to take stock and assess the impacts related to the regulations.

I hereby attach a letter outlining our ongoing concerns across the 32 local councils.

We very much look forward to working with you to constructively ameliorate the outstanding issues

Thank you.

Kind regards,

REDACTED

On behalf of REDACTED, ASSC REDACTED

REDACTED

The Association of Scotland's Self-Caterers (ASSC)

REDACTED

Web: www.assc.co.uk

