



Dear Short Term Lets Committee,

Comments on current position of legislation and concern about undue influence of Airbnb and similar.

Thanks for this update, it is really appreciated. We attach our comments on the current concerns and opportunities around the legislation.

We admit to feeling dismay that multinational organisations such as Airbnb, Booking.com and Expedia will have a place on this working group. We feel this goes beyond stakeholder involvement and puts these companies in a position where they will have undue influence on this vital regulatory framework.

We understand that this working group has been set up to prepare guidance to cover the commitments in the consultation report. From looking at this report this means that you will be preparing guidance on the following matters:

1. When a material change of use has taken place.
2. Principles for assessing planning applications
3. Duration of planning permission periods issued by local authorities
4. Applying control area designations
5. Discretionary license conditions
6. Definition of a fit and proper person
7. Who should be notified in planning applications
8. The obligation to refund customers on revocation of a license

These are matters of the interpretation and application of law. It is inappropriate that multinational companies that define themselves as information-sharing platforms, who specifically take no responsibility for unlawful and illegal activity that occurs on their platforms, and who would directly profit from the watering down of this legislation, should have this undue influence.

PLACE and community councils have a lot of experience of using the existing legislation to try and report and enforce against unlawful short-term lets. This would be invaluable when designing effective legislation free of loopholes. This lived experience needs to feed into the working group.

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