

Consultation* on a registration scheme for short-term lets in England – Summary of Key Answers/Points from SPC (as resolved at SPC meeting 16.5.2023)

Question 1: Which high-level approach to the registration scheme do you prefer? (from a list of options)

A mandatory national scheme. A consistent approach across English Local Authorities would help reduce misunderstandings, misinformation, and doubt.

Question 2: Who should be responsible for administering the registration scheme?

Local Authorities. Local Authorities that are also the Local Planning Authority (LPA) have the necessary legal powers to implement planning regulations and directly take enforcement action against planning contraventions for this type of building use. LPAs are democratically answerable to the local communities whose interests they should serve rather than vested interests. LPAs are also aware of local housing needs, especially for affordable housing, and can determine whether planning permission is required for a potential change of use, or if the proposed use complies with the Local Plan and/or may have an impact on other planning regulations or restrictions, e.g. an AONB, Conservation Area, SNCI, SSSI, Local Nature Reserve, Landscape Designation, provision of off-street and on-street parking, etc. NOTE: Please see also answer (ii) to Question 22 which also makes the case for why the LPA should be the registration authority.

OTHER KEY POINTS MADE BY SPC:

Question 5: Should the registration number be displayed in any advertisement or listing of a short-term let?

Yes. Providing a registration number in advertisements and short-term-listings would provide some reassurance to clients that they were renting a legitimate short-term let which presumably they could also then check with the registration authority (preferably the LPA).

Question 7: How should the following types of accommodation be treated in respect of the registration scheme (include/exclude)?

To include the following (from list):- Caravans on sites or any site which accepts motorhomes or campervans or any other vehicle providing accommodation; Shepherd's huts; Motorhomes; Glamping; Yurts; Boats inc. houseboats, canal boats.

Question 10: How long should registration be valid for? A one-off registration for each premises (with annual fee to finance the scheme) should be sufficient if the registration also names the proprietor so that if the proprietor changes, a fresh registration is required (to avoid those with a criminal record etc. being able to provide short-term lets without the necessary background checks).

Question 11: What information should be collected? Other (i.e. additional to listed info.) At registration and annually: Off-street parking provision (to avoid pressure on existing parking provision for residents).

General: At registration all such information would ensure the amount of letting is appropriate to the location (e.g. within or remote from a residential road, near sheltered housing, Local Nature Reserve, within a Conservation Area, provision of off-street parking/public transport, etc.). There should be a requirement that if any of the key information changes (e.g. increased letting rate) this should be notified when the annual renewal fee is paid or if a significant change is to be made (e.g. no. of units) then a fresh registration would be required.

Questions 12 & 13: REGULATIONS

[Option c) Light touch physical inspections of short-term lets based on a % to be spot checked at random on an ongoing basis.] - would allow the registration authority (preferably the LPA) to make checks if complaints are received from clients, neighbours or community representatives such as a Town or Parish Council.

Question 15 PENALTIES Repeat “offenders” may need to be prevented from providing short-term lets if they are found to be consistently irresponsible in how they manage the lettings for a given period (or permanently in extreme cases).

Question 17 ANNUAL FEES IN THE REGISTRATION SCHEME? YES. To ensure scheme remains self-funding and to remind landlords/managers of their responsibilities (i.e. they are paying for the right to provide short-term lettings within a regulated framework) and to notify registration authority of any material changes since original/last registration.

Question 18: *Should the platforms and/or other areas of industry contribute to the set up and running costs of the scheme?* YES - To help get the scheme up and running, more widely recognised, and to contribute to compliance by landlords using such platforms.

Question 21: Should there be a de minimis below which a property can be let for without the requirement to register? YES - Ad hoc and occasional one-off lettings, e.g. to family and friends or for a short term emergency to help someone-in-need out, should not be subject to this scheme.

Question 22: *Are there any other issues that you think the government should be considering as part of its work to develop a short-term let registration scheme?*

(i) A “three strikes and you’re out” within a given period and/or other restrictions for noise/Anti-Social Behaviour as a repercussion for short-term lets that have an adverse effect on the local community might be a registration/enforcement approach, as used overseas, that could work. It will already be a stressful situation for many residents living near problematic visitor accommodation. It is important therefore that burdens are not placed on neighbouring residents to keep detailed records of noise and Anti-Social Behaviour associated with the checks and regulation of visitor accommodation; such records should be kept by the registration authority, ideally the Local Planning Authority that also has responsibility for enforcing local Environmental Health matters (noise, air quality, excessive litter, etc.), when issues are reported to that authority. Such records should be part of a transparent reporting and recording process maintained by the Registration authority (LPA).

(ii) The adverse loss of availability of residential homes to short-term letting can also hollow out communities, e.g., visitors outnumbering locals, with a consequential loss of a “sense of community” hence the LPA needs to have a level of control through the planning system in such a change of use. The increase in staycations and short term lets (weekend breaks) as well as the construction of new housing developments without the provision of new public parks for residents to relax etc. during periods of fine weather can put an unacceptable pressure on neighbouring communities that have recreational attractions such as riverside or lakeside areas. This has become a major problem for Saltford in recent years where our riverside areas are also residential. A combination of noise, anti-social behaviour and traffic congestion from visitors that gridlock minor residential roads, has become a significant safety issue for residents. Increases in short-term holiday letting in the wider area can only contribute to this growing problem (of new housing developments not being accompanied by public parks) and the general lack of facilities to cater for recreational activities of different age groups whether visitors from neighbouring communities or those using short-term let properties. For these reasons, it is imperative that the registration authority, ideally the Local Planning Authority, is able to limit the short-term lets it permits in certain sensitive areas.

Chair of Planning, Saltford Parish Council, 16 May 2023

<https://www.gov.uk/government/consultations/consultation-on-a-registration-scheme-for-short-term-lets-in-england/consultation-on-a-registration-scheme-for-short-term-lets-in-england>