

Response ID ANON-FAEG-5GJ4-D

Submitted to Introduction of a use class for short term lets and associated permitted development rights
Submitted on 2023-06-07 10:10:08

Scope of the consultation

What is your name?

Name:
Duncan Bowie

What is your email address?

Email:
duncanbowie@yahoo.co.uk

What is the type of organisation that you work for?

Other

If applicable, what is the name of your organisation?

Organisation:
Highbury Group on Housing Delivery

What is your position in the organisation?

Position in organisation:
Chair

About this consultation and privacy notice

Introduction

Using the planning system to manage short term lets

Introduction of a short term let use class

Q.1 Do you agree that the planning system could be used to help to manage the increase in short term lets?

Yes

Please give your reasons :

This is essential to protect the supply of residential accommodation available for long term residence.

Q.2 Do you agree with the introduction of a new use class for short term lets?

Yes

Please give your reasons :

This is essential to enable LAs to determine where short term lets are appropriate.

Q.3 Do you agree with the description and definition of a short term let for the purpose of the new use class?

Yes

Please give your reasons. :

There is however a need for national consistency. The existing London threshold should be reduced from 90 days to 30 days

Q.4 Do you have any comments about how the new C5 short term let use class will operate?

Yes

Please make your comments here. :

see above

Q.5 Do you consider there should be specific arrangements for certain accommodation as a result of the short term let use class?

No

Please give your reasons here. If yes, please say what these should be. :

New national permitted development rights

Q. 6 Do you agree that there should be a new permitted development right for the change of use from a C3 dwellinghouse to a C5 short term let (a)

Yes

Please give your reasons :

However a LA would need to justify why a permitted development right is appropriate and not adversely effect the supply of housing available for long term residence. The LA would need to demonstrate that there is no shortage of affordable housing supply in the area. This would clearly be only demonstrable in limited areas

Q.7 Do you agree that there should be a new permitted development right for the change of use from a C5 short term let to a C3 dwellinghouse (b)

Yes

Please give your reasons :

This will allow short term lets to be returned to C3 use as appropriate.

Q.8 Do you agree that the permitted development rights should not be subject to any limitations or conditions?

No

Please give your reasons :

PD rights for C5 short term use should be subject to conditions set out in response to Q6.
PD rights for conversion from C5 to C3 as proposed in Q 7 should not be subject to limitations or conditions.

Q.9 Do you agree that the local planning authority should be notified when either of the two permitted development rights for change of use to a short term let (a) or from a short term let (b) are used?

Yes

Please give your reasons :

Q.10 Do you have any comments about other potential planning approaches?

No

If so, please provide details here :

Flexibility to let out your own home

Q.11 Do you agree that we should expressly provide a flexibility for homeowners to let out their homes (C3 dwellinghouses)?

Yes

Please give your reasons :

Q.12 If so, should this flexibility be for:i. 30 nights in a calendar year; orii. 60 nights in a calendar year; oriii. 90 nights in a calendar year

i up to 30 nights in a calendar year

Please give your reasons :

As commented above, London threshold needs to be reduced from 90 nights to 30 nights.

Q.13 If so, should this flexibility be provided through:i) A permitted development right for use of a C3 dwellinghouse as temporary sleeping accommodation for up to a defined number of nights in a calendar year ii) An amendment to the C3 dwellinghouse use class to allow them to be let for up to a defined number of nights in a calendar year.

An amendment to the C3 dwellinghouse use class

Please give your reasons :

Planning application fees

Q.14 Do you agree that a planning application fee equivalent to each new dwellinghouse should apply to applications for each new build short term let?

Yes

Please give your reasons :

Existing permitted development rights

Q.15 Do you agree with the proposed approach to the permitted development rights for dwellinghouses (Part 1) and minor operations (Part 2)?

Yes

Please give your reasons :

Local and neighbourhood plans

Any other comments on the proposed planning changes?

Q.16 Do you have any further comments you wish to make on the proposed planning changes in this consultation document?

No

If yes, please provide comments :

Public Sector Equality Duty and Impact Assessments

Q.17 Do you think that the proposed introduction of the planning changes in respect of a short term let use class and permitted development rights could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No

Please give your reasons :

Existing anti-discrimination legislation applies.

Q.18 Do you think that the proposed introduction of the planning changes in respect of a short term let use class and permitted development rights could give rise to any impacts on: a) businesses b) local planning authorities c) communities?

Yes

If so, please give your reasons and specify whether your comments relate to a) businesses, b) local planning authorities, c) communities or a combination.
:

There will be a negative impact on existing short term letting agencies and owners which is justifiable.

There will be a resource impact on LA planning departments. However a fee system should seek to cover LA costs.

There will be a positive impact on neighbourhoods. LA policies will be determined through local Plans and Neighbourhood Plans which will be subject to public consultation