

Appendix 1

[Consultation on a registration scheme for short-term lets in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Closing date 7th June

Question 1: Which high-level approach to the registration scheme do you prefer?

- **a)** An opt-in scheme for local authorities, with the framework set nationally.
- **b)** An opt-in scheme for local authorities with the framework set nationally, and a review point to determine whether to expand the scheme to mandatory.
- **c)** A mandatory national scheme, administered by one of: the English Tourist Board (VisitEngland), local authorities, or another competent authority.

Please give the reasons for your answer

c) Currently short term lets such as Air bnbs have varying health and safety standards depending on the host. There should be a minimum safety standard which these properties are let to. This should include having a gas safety and electrical safety certificate, a working smoke detector on each floor, a working carbon monoxide detector in any rooms with solid fuel burning appliance and a gas boiler. There should also be some security requirements such as connecting doors to the hosts own accommodation to be able to be locked from both sides. This scheme should be administered by either the local authority who have experience in property standards or the fire service who are experienced in fire safety requirements. These properties should be visited to advise and ensure that basic safety measures are met.

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

- **a)** Local authorities
- **b)** The English Tourist Board (VisitEngland)
- **c)** Another national body (please specify - this could be an existing body or a new one)

Please give the reasons for your answer.

a) This type of scheme does sit well with in local authorities. As they have experience in administrating HMO licensing schemes. However, whoever administrates this registration scheme should be provided with adequate new burdens funding to set up, and have the ability to self fund the scheme going forwards.

Question 3: Should there be an analogue version of the registration scheme which would run in parallel with the digital one?

- **a)** Yes
- **b)** No

If you answered 'yes', please suggest what form this could take.

b) Online would be best for all parties however there should be the ability for anyone who requires telephone/paper assistance to complete to be able to submit in that format.

Question 4: Should the platforms require a valid registration number in order to list a short-term let?

- **a)** Yes
- **b)** No

a) Yes. But this may be difficult to require multi-national company platforms to amend their advertising platform to accommodate this.

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

- **a)** Yes
- **b)** No

a) Yes. This enables the customer to check that their accommodation meets registration criteria, rather than just go off customer reviews.

We would be interested in views on alternatives to either of the above mechanisms.

Question 6: What should the 'unit' of registration be?

- **a)** Owners
- **b)** Premises/dwellings or part of a dwelling
- **c)** Individual accommodation units within a premises/dwelling
- **d)** Other (please specify)

b) This option would be enable an overview regarding the property to ensure it meets required standards. As option a) maybe too general and c) would be too onerous and require each individual room to be registered, where rooms are let with in a hosts property.

Question 7: How should the following types of accommodation be treated in respect of the registration scheme?

Accommodation type**Include****Exclude**

Caravans on sites or any site which accepts motorhomes or campervans or any other vehicle providing accommodation

Include

Treehouses

Include (while may not need safety certification the property should be assessed to be structurally sound).

Mountain bothies

Include ((while may not need safety certification the property should be assessed to be structurally sound)

Shepherd's huts

Include ((while may not need safety certification the property should be assessed to be structurally sound)

Cars

Exclude (too transient by nature and is assessed by MOT and servicing)

Accommodation type**Include****Exclude**

Motorhomes

Exclude (too transient by nature and is assessed by MOT and servicing)

Glamping

Include (while may not need safety certification the property should be assessed to be structurally sound)

Yurts

Include (while may not need safety certification the property should be assessed to be structurally sound)

Boats inc. houseboats, canal boats

Include (while may not need safety certification the property should be assessed to be structurally sound)

House swaps

Exclude (payment is unlikely to be received)

Accommodation type

Include

Exclude

Other - please specify

Question 8: Do you agree with this list of exemptions?

- **a)** Yes
- **b)** No

a) Yes. These types of accommodation are already exempt as HMOs under the Housing Act 2004 as are regulated by the fire and rescue services, Quality Care Commission or other relevant body.

Please explain your answer.

Question 9: Are there any other types of short-term accommodation that you think should be exempt from a requirement to register? If so, please specify.

None

Question 10: How long should registration be valid for?

- **a)** One year
- **b)** Two years
- **c)** Three years
- **d)** Four years
- **e)** Five years
- **f)** The length of registration should depend on the length/validity of relevant documentation
- **g)** There should only be a one off registration, with providers able to remove themselves if they no longer provide the STL(s)

Please give the reasons for your answer.

e) 5 years. Longer timescale so less onerous on the host however, still regular enough to remind the host to ensure certification is up to date and to maintain the property.

Question 11: What information should be collected? (Please tick all that apply).

	To be collected at registration	To be collected annually	Should not be collected
a) Address of the premises/dwelling(s)	yes		
b) Name of premises/dwelling owner	yes		
c) Address and contact details of premises/dwelling owner	yes		
d) Address and contact details of operator/manager, if different	yes		
e) Whether the premises/dwelling to be let is an dwelling or part of a dwelling, such as a room or outbuilding	yes		

	To be collected at registration	To be collected annually	Should not be collected
f) Self-certification of adherence to relevant regulations (see question 12)		Yes or as often as required following other legislation ie electrical certs longer time period.	
g) Proof (eg. a photograph or electronic upload) of adherence to regulations		On request	
h) Detail about the accommodation unit(s) (eg. number of units, number of bedspaces, accessibility)	yes		
i) If relevant, confirmation that in any rental, lease or other agreement that the responsible person is entitled to use the premises for short-term letting purposes	yes		
j) Number of nights per year the premises is available to let	yes		

**To be
collected at
registration**

**To be collected
annually**

**Should
not be
collected**

k) Number of night the premises was let out for in the last year yes

m) Whether planning permission has been granted or is not required yes

n) Other - please specify Property inspection findings

Please give the reasons for your answer.

Question 12: Which regulations should be satisfied in order for a property to be registered? Please tick all that apply.

- **a)** Gas safety - Yes
- **b)** Boiler safety - Yes for non gas using appliances
- **c)** Fire safety - yes
- **d)** Electrical safety - yes
- **e)** Furniture safety - yes
- **f)** Planning [where relevant, subject to DLUHC planning use class consultation] - yes
- **g)** Food safety - no (unless the host was providing food as part of this short term let. If so would this change to a B&B?)
- **h)** Equality Act - unsure the requirements of this
- **i)** Other - please specify
That the chimney has been swept/ will be swept regularly for solid fuel fires.

Please give the reasons for your answers.

In the case of re-registration, previous breaches of anti-social behaviour or nuisance legislation should also be capable of being taken into account.

Question 13: In the context of compliance and enforcement, what should be the starting point of the registration scheme? Please tick all that apply.

- **a)** An entirely self-certifying process with no element of ongoing physical inspection of documentation or of the short-term let.
- **b)** Light touch inspections of documentation uploaded as part of the registration process based on a % of all properties to be spot checked at random on an ongoing basis.
- **c)** Light touch physical inspections of short-term lets based on a % to be spot checked at random on an ongoing basis.
- **d)** Light touch physical inspections of short-term lets based on an intelligence or risk-based approach on an ongoing basis.

Please give the reasons for your answer.

c) The properties should also be inspected as well as documentation to ensure that they are fit for purpose and safe to be occupied. A % spot check would be a fair way to have a light touch scheme.

Question 14: What issues do you think should incur a penalty? Please tick all that apply.

- **a)** Short-term let owners/providers operating without registering
- **b)** Failure to provide valid documentation or information
- **c)** Failure to renew registration if applicable
- **d)** Failure to comply with registration requirements (for example, failure to pay the relevant fee or charge within the specified period)
- **e)** Falsification of registration documentation
- **f)** Failure to grant access to the short-term let to the scheme administrator or relevant authority, if deemed appropriate.
- **g)** Other - please specify

All.

Question 15: What penalties do you think would be appropriate? Please tick all that apply.

- Fines, which could vary according to the severity and duration of a violation.
- Revocation of registration, for a period of time or permanently.
- Notices requiring a short-term let owner/provider to rectify a violation could be issued in some circumstances before registration is revoked. If

the owner/provider fails to take the necessary action within a specified timeframe, then the registration would be revoked.

- Other - please specify

These are all appropriate and should be used in an escalating situation. Firstly to issue a notice of violation (this should be made public to any customers who may wish to check the status of their accommodation). To fines and revocation of registration. The fine level should depend on the severity of the issue and the effect of this to the customer and local area.

Please give reasons for your answer. If relevant, please also provide views on the appropriate quantum or procedure e.g. for a fine, a timeframe for addressing a violation, or for another penalty referenced above.

It should also be possible for the registration scheme to take account of complaints of anti-social behaviour and nuisance, such that registration can be reviewed if a specified threshold of nuisance is reached.

Question 16: Should there be a flat fee per owner, or a sliding scale attendant with the number of units being let? (See also question 6 on unit of registration)

- **a)** Flat fee per owner
- **b)** Flat fee per property or part of a property
- **c)** Sliding scale based on number of units owned
- **d)** Sliding scale based on size of a unit (eg. number of bedrooms)
- **e)** Other (please specify)

b) flat fee per property. As for each property the individual certificates, planning permissions, ownership will need to be checked. This takes resource to undertake checking each document.

Question 17: Should there be an annual fee to be in the registration scheme, regardless of the frequency of renewal asked in question 10?

- **a)** Yes
- **b)** No

Please give reasons for your answer.

b) No. This would be hard to administer and costly for the regulating body to chase non payments.

Question 18: Should the platforms and/or other areas of industry contribute to the set up and running costs of the scheme?

- **a)** Yes
- **b)** No

Please give reasons for your answer.

Ideally yes, platforms should contribute as it would raise the standards and safety of the letting market. However, realistically it would be difficult to ensure buy in from large Companies to contribute to its running especially when they have their own methods of checking and assessing property.

Question 19: Do you think that any of the data captured should be shared at all beyond the competent authority administering the scheme, as determined in Question 2?

- **a)** Yes
- **b)** No

If you answered 'No', please give reasons for your answer.

Yes to assist with other statutory functions such as planning enforcement (should there be a class change), environmental health for any antisocial behaviour concerns, fire service for any fire risks identified.

Question 20: If you answered 'Yes', which types of organisations should have access to the data collated by the registration scheme? Please tick all that apply.

Organisation	Should have access to aggregated/anonymised data	Should have access to detailed/individualised data
Local authorities / local planning authorities		yes
Enforcement agencies		yes
Organisations or individuals for commercial purposes	No	

Organisation	Should have access to aggregated/anonymised data	Should have access to detailed/individualised data
Mortgage providers, landlords, freeholders, commonhold associations, resident management companies and neighbours	No	
English Tourist Board	yes	
Central government	yes	
Academics	no	
Other - please specify		

Question 21: Should there be a de minimis below which a property can be let for without the requirement to register?

- **a)** yes (if so what should the minimum threshold be - please specify)
- **b)** no - all short-term let accommodation should be a requirement to register.
- **c)** Don't know

What are the reasons for your answer?

b) No as the resources used to check whether the number of nights is exceeded would be difficult to manage. It is simpler for the host to know whether they should or should not register.

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?

Ensure that there is sufficient linkage between the registration scheme, the consequences of non-registration and breaches of relevant legislation.

Ensure that the registration scheme does not inadvertently become another marketing tool for the operators of short term lets and suggests to consumers there is a level of quality endorsement from the local regulator, which is actually inaccurate/overstated.

Ensure the correct balance is struck between registration, regulation and market freedom.

Question 23: Do you have any comments about the potential positive and/or negative impacts that the options outlined in this consultation may have on individuals with a protected characteristic under the Equality Act 2010?

- **a)** Yes
- **b)** No

If you answered 'yes', please explain what you think these impacts (both positive and/or negative) would be.

b) no

Question 24: In your view, is there anything that could be done to mitigate any negative impacts?

- **a)** Yes
- **b)** No

If you answered 'yes', please specify what you think could be done to mitigate the negative impacts.

- a) Yes. To ensure there is sufficient time for implementation including issuing guidance to the regulating body, advertise to hosts and customers the changes. Provide sufficient funding to the regulatory body to set up and enforce on those lets which do not register.

Appendix 2

[Introduction of a use class for short term lets and associated permitted development rights - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Recommended officer responses are in italics

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

Yes/No/Don't know.

YES

Please give your reasons.

The planning system could and should be used to manage short terms lets, to provide greater control over the quantum of short lets in an area, to avoid an over concentration of short term lets and ensure that sufficient existing dwellinghouses remain available to buy or to rent to meet identified local need. Using the planning system to manage short term lets could also provide local authorities with appropriate tools to avoid or at least minimise adverse impacts on the character of individual premises and/or an area and to support local services such as schools, health and public transport services, that can be adversely affected by a disproportionate level of short term lets.

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

Yes/No/Don't know.

YES

Proposed definition of Class C5 Short Term Let:

Use of a dwellinghouse that is not a sole or main residence for temporary sleeping accommodation for the purpose of holiday, leisure, recreation, business or other travel.

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

Yes/No/Don't know.

YES

Please give your reasons.

The proposed definition is sufficiently clear and wide ranging enough to address concerns raised by communities and others about the potential economic, social and environmental impacts of short term lets.

Note: When the use class comes into effect existing properties would fall into the short term let use class (referred to as C5) where they met the definition or they would remain as C3 dwellinghouse. Any re-classification is not considered development and so property owners should not need to apply for planning permission where they meet the definition of short term let. They would be classified as such and would not require planning permission. Where the use class is unclear the owners can apply for a lawful development certificate.

Some homeowners let out a room within their house to boost their income and for some to help with rising costs. The creation of the new use class may provide greater clarity about whether permission is required for a change of use to a short term let. The proposed structure of the new use class means the letting out of a room or rooms, for example to a lodger, within a 'sole or main' dwellinghouse will be unaffected by the introduction of the new class.

'Second homes' that are additionally let out for part of the year will fall into the C5 short term let use class where they meet the definition.

Once the new use class is introduced planning permission could be granted for new development conditioned as C3 dwellinghouses or C5 short term lets as appropriate, in line with any development plan policy.

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

Yes/No/Don't know

YES

Please make your comments here:

The way in which the new C5 use class would operate is sufficiently clear but further guidance in the PPG would be welcomed where any ambiguity emerges nationally.

Note: Consideration is being given to whether there will be any impact on certain types of housing from the introduction of the proposed short term let use class and the proposed PDRs. Specific arrangements may be required for student accommodation, where it sits in C3, that is traditionally only occupied for part of the year, or which alternatively may additionally be let out over holiday periods when students are not in residence.

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

Yes/No/Don't know.

YES

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

The nature of student accommodation both purpose built and adapted with the benefit of planning permission is such that it may not be appropriate for this type of accommodation to be caught by the new C5 use class, particularly where there is a high concentration of student accommodation in some areas. Student accommodation should be excluded from the proposed changes.

New national permitted development rights

Note: High volumes of short term lets are concentrated in some locations and are not considered to be problematic in all areas. Therefore, Government is considering whether to introduce new national permitted development rights to provide flexibility where short term lets are not a local issue, and areas would only see a change where the rights have been removed by making an Article 4 direction. This model will provide local areas with tools that they can apply, or not, depending on local circumstances.

It is proposed that the GPDO could be amended to introduce permitted development rights to allow:

a. **The change of use from a C3 dwellinghouse to a C5 short term let.** This would allow for continued flexibility to use a property as a home or short term let where there is no local issue

b. **The change of use from a C5 short term let to a C3 dwellinghouse.** This would allow short term let properties to be made available to rent or to buy without the need for a planning application for the change of use.

A second right, (b) could allow the change of use from a short term let to a C3 dwellinghouse. This would allow those premises that fall into the short term let use class when the changes are introduced to return to use as dwellinghouse for rent or to buy without the need for a planning application. This approach may be important where there are already concentrations of short term lets as it would facilitate their move to provide more sustainable housing for the community. Those areas where there is a local issue may choose therefore to retain this permitted development right, even where they remove the permitted development right for the change of use from a dwellinghouse to a short term let (a).

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/No/Don't know.

YES

Please give your reasons.

This permitted development right is appropriate and where justified it could be removed by an Article 4 Direction.

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/No/Don't know.

YES

Please give your reasons.

This permitted development right is appropriate and where justified it could be removed by an Article 4 Direction.

Note: To minimise planning requirements where there is no local issue, it is proposed that the rights would not be subject to any limitations or conditions. This means there would be no size limits or exclusions, and the rights would apply to listed buildings, and in National Parks and Areas of Outstanding Natural Beauty etc. As there would be no matters for prior approval there would be no planning process and therefore no fee payable.

Government proposes that the local planning authority should be notified whenever either of the individual rights for the change of use to a short term let (a) or from a short term let (b) are used.

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

Yes/No/Don't know.

NO

Please give your reasons

Listed buildings should be excluded from the proposed changes and PDRs should not apply. The nature of short term letting can have a significant adverse impact on heritage assets and planning permission and listed building consent for works to a building to facilitate short term letting should be considered by the local planning authority concurrently.

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/No/Don't know.

NO

Please give your reasons

Unless adequate funding for new burdens, to cover salary costs and overheads is to be provided to local authorities, the resources will not be available within planning departments to administer this new area of work.

Note: Where it is necessary to protect the amenity or wellbeing of the area, and there is evidence to support it, an Article 4 direction may be made to remove a permitted development right. The Government does not consider it necessary to change paragraph 53 of the National Planning Policy Framework (the NPPF).

While this consultation seeks views on the introduction of a new short term let use class, subject to the outcome of the consultation, there may be other planning routes to achieving the same policy aims. For example, rather than introducing a new use class in Schedule 1 of the Use Classes Order, a short term let could be added to the list of uses specified in article 3 (6) as not in a class (commonly known as sui generis). A permitted development right could also be introduced to allow dwellings to be used for temporary sleeping accommodation. This would not require a new use class to be introduced but risks less flexibility over future use of properties.

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

Yes/No

YES

If so, please provide details here.

A new use class C5 is preferable. Classifying short term lets as Sui-Generis would not provide the same clarity.

Note: Some home owners (C3 dwellinghouses) see benefits in letting out their own home for a short time, including to help boost household income to manage the increase in the cost of living. Government seeks views on whether it would be helpful to expressly provide a degree of flexibility for C3 dwellinghouses to be let out for a number of nights. This could for instance be where homeowner is themselves on holiday, or to benefit from where sporting or other events are held locally, or where the owner works away, while retaining its use as a main or sole dwellinghouse. The evidence provided as part of the DCMS Call for Evidence, estimated that on average properties used as short term lets are occupied for a limited period over the year. Government therefore propose that a limit of a certain number of nights a year should apply. We are open as to whether this limit should be 30, 60, or 90 nights in a calendar year. Planning permission will continue to be required where a main or sole C3 dwellinghouse is

let out for longer than this number of nights in a calendar year where there is a material change of use.

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

Yes/No /Don't know

YES

Please give your reasons.

Given the current cost of living crisis some flexibility for homeowners is necessary. To not include flexibility could result in unintended consequences and hardship for those that are now reliant on the income from short term letting. There may also be unintended consequences for local economies and tourism.

Q.12 If so, should this flexibility be for:

i. 30 nights in a calendar year; or

ii. 60 nights in a calendar year; or

iii. 90 nights in a calendar year

iii. 90 nights in a calendar year

Please give your reasons.

This would appear to be consistent with the approach taken to date in London. However, the Government should commit to future research and review, and if necessary change the limit.

Note: There are two potential ways this flexibility could be delivered:

i) An additional **permitted development right** could allow the use of a main or sole C3 dwellinghouse for temporary sleeping accommodation for up to a defined number of nights in a calendar year. This would provide a flexibility for homeowners where there is no local issue while setting a limit on the extent of that flexibility. The permitted development right could be removed by making an Article 4 direction. This model would help to avoid any unintended consequences to the operation of other housing models in the C3 Dwellinghouse use class.

ii) The **C3 dwellinghouse use class** could be amended to provide that all homes could be let out for up to a defined number of nights in a calendar year. This flexibility would be built into the use class and would apply nationally. It could not be removed, or amended, by the local planning authority and so would apply irrespective of whether there was a local issue. The use class provides for a range of housing models, including for single households, supported housing,

small homes where care is provided etc, and will continue to do so. It would however, introduce a degree of uncertainty into the existing operation of the use class that we would seek to manage by applying the change only to dwellinghouses within C3(a) (a single person or people forming a single household).

Q.13 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.

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

Please give your reasons.

Local authorities should have the opportunity to make an Article 4 direction if there are local issues. A change to the C3 use class would not be acceptable even if it were limited to dwellinghouses within C3(a) (a single person or people forming a single household).

Planning application fees

It is proposed that where new build short term lets are developed a planning application fee for each short term let equivalent to that for new dwellinghouses would apply. This would be delivered through a future amendment to the [fees regulations](#). Where the permitted development right has been removed by making an Article 4 direction, the standard fee for a planning application for the change of use would apply.

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/No/Don't know.

YES

Please give your reasons.

The level of resource needed to consider a planning application for short term lets is commensurate with the resource needed to consider an application for new dwellinghouses.

Existing permitted development rights

Note: Dwellinghouses currently benefit from a range of permitted development rights set out in Part 1 of the GPDO: Development within the curtilage of a dwellinghouse. These rights allow for improvements including rear or upward extensions, roof alterations or porches etc. We propose that short term lets should additionally benefit from these rights.

Part 2 of the GPDO sets out permitted development rights for minor operations such as putting up a fence and external painting etc. These are not limited to dwellinghouses and will therefore apply to short term lets.

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

Yes/ No/Don't know

NO

Please give your reasons.

The nature of short term lets and their economic, social and environmental impacts can be very different to the impacts associated with dwellinghouses that are occupied as a sole or main residence, hence the proposed changes that are the subject of this consultation.

Short terms lets should not benefit from Part1 PDRs but could benefit from Part2 PDRs.

Local and neighbourhood plans

Note: The National Planning Policy Framework expects local areas to plan to meet the housing needs of their communities. The loss of existing C3 dwellinghouses to buy or to rent as short term lets can add to the pressure on local housing supply.

Local planning authorities and neighbourhood planning groups would in future be able to set out relevant policies in their local or neighbourhood plan the circumstances where they would support, or not, new short term lets as defined by the new class that would achieve the appropriate balance for their area. Any future planning applications for new build short term lets, or for the change of use to a short term let where the permitted development rights have been removed, would be determined in accordance with the development plan and other material considerations.

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

Yes/No

NO

Public Sector Equality Duty and Impact Assessments

We are required to assess these proposals by reference to the Public Sector Equality Duty contained in the Equality Act 2010. A Public Sector Equality Duty Assessment and an impact assessment will be prepared reflecting the detail of the changes to be made prior to any secondary legislation being laid.

We would welcome your comments as part of this consultation on whether the proposed changes 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).

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).

Yes/No/Don't know.

NO

Government would welcome comments on whether the proposed changes in respect of use classes and / or permitted development rights could have any impacts on business, local planning authorities or communities. There may be different impacts in particular where one or more of the permitted development rights have been removed by making an Article 4 direction.

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 impact on:

- a) businesses**
- b) local planning authorities**
- c) communities?**

Yes/No/Don't know.

YES

Please give your reasons. It would be helpful if you could specify whether your

comments relate to a) business, b) local planning authorities, or c) communities, or a combination.

- *The introduction of additional regulation in terms of changes to the planning system as well as the introduction of a register for short term lets could be an added burden to businesses but it is concerned that what is proposed is proportionate overall (subject to the changes recommended in the above responses) and balances economic, social and environmental considerations appropriately.*
- *The proposed changes will impact on local planning authorities in terms of the resourced needed to administer the changes at a local level and it is important that public confidence is maintained and additional funding for planning departments is provided that covers salary costs and overheads.*
- *The proposed changes are likely to benefit communities by providing greater certainty over the regulation and control of short term lets and where necessary Article 4 directions can be imposed.*