

# **Brockenhurst Parish Council**



Response to Department for Levelling Up, Housing and Communities  
Consultation on Introduction of a use class for short term lets & associated permitted development rights  
registration scheme for short-term lets in England.

June 2023

Brockenhurst Parish Council

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**Introduction of a use class for short term lets & associated permitted development rights.  
Brockenhurst Parish Council consultation response**

<b>Preamble</b>	We are providing our views as a Parish Council (local authority) in the New Forest National Park.
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Reference	Question	Brockenhurst Parish Council consultation response
Q1	Do you agree that the planning system could be used to help manage the increase in short term lets?	<p><b>Yes</b></p> <p>Brockenhurst Parish Council recognises the national housing crisis and the negative effects that short term lets can cause by the loss of housing for local people and carving out the heart of rural communities, particularly in tourist areas.</p> <p>We believe the planning system represents a robust way of redressing the issue, however we believe it must be supported by an active and locally visible monitoring system.</p>
Q2	Do you agree with the introduction of a new use class for short term lets?	<p><b>Yes</b></p> <p>To ensure an effective solution. we believe any new use class (C5) needs to include other types of accommodation. Second homes should also be included.</p> <p>We understand that the Scottish and Welsh Governments have both introduced schemes where separate classes to Class C 3 are deployed. Experience from these schemes should be drawn upon. Potentially a UK wide scheme should be considered.</p>
Q3	Do you agree with the description and definition of a short-term let for the purpose of the new clause?	<p><b>No</b></p> <p>In the New Forest National Park there is great pressure for short term lets and second homes, the latter need to be included in the proposed scheme along with the multiplicity of accommodation types that are actively sought. These include outbuildings, barn conversions, glamping pods, shepherd's huts and similar.</p>

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		On a larger scale, repurposing of holiday parks and youth activity centres etc. needs consideration such that they cannot be repurposed to become traditional dwelling units via the proposed registration scheme.
Q4	Do you have any comments about how the new C5 short term let use class will operate	<p><b>Yes</b></p> <p>We would like to see the proposed new classes applied retrospectively to form a single register of short term lets. Only by doing so will it be possible to compile a complete register, review the accommodation and maintain an effective planning system.</p> <p>.</p>
Q6	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)	<p><b>No</b></p> <p>We do not believe that permitted development rights should be available in protected areas such as national parks. All proposals for change of use between holiday lets and traditional houses use should be subject to full planning consent.</p> <p>We could not agree with any proposal that would involve any property in a lengthy consideration.</p> <p>Nor do we think that owners should be able to obtain permission by seeking a Certificate of Lawful Existing Use without the support of evidence that a register will provide.</p> <p>To ensure the level of dwelling houses is maximised we would wish to see planning permission revert to automatically revert to a traditional dwelling status once the registration period has expired and a period of grace allowed. The planning permission for a short term let should have limited life but be capable of renewal by application.</p>

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		<p>To operate effectively this scheme would appear to require the planning authority and registration authority to be the same body. (Not normally the case in a National Park)</p> <p>To address the issue of concealed use followed by an application for Certificate of Lawful Existing Use the accommodation register needs to be open and available for public inspection at the Parish level.</p>
Q7	Do you agree that there should be a new permitted development right for the change of use from C5 short term let to a C3 dwellinghouse (b).	<p><b>No</b></p> <p>This would appear to allow a property owner with a short term let in an outbuilding in their curtilage could convert to a C3 dwellinghouse under national permitted development rights.</p>
Q8	Do you agree that the permitted development rights should not be subject to any limitations or conditions?	<p><b>No</b></p> <p>Please see our other responses.</p>
Q9	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?	<p><b>Yes</b></p> <p>It would seem to us to be preferable that one authority deals with the register and the planning bearing in mind that in a National Park these are not usually the same body,</p>
Q10	Do you have any comments about other potential planning approaches?	<p><b>Yes</b></p> <p>The Glover Review (January 2023) states that the planning balance, “...<i>must be carried out differently in protected landscapes [including National Parks], to ensure their statutory purposes and special qualities are meaningfully protected. This involves giving greater weight to their special qualities in planning policies, procedures, and decisions.</i>” This does not seem compatible with the introduction of new national permitted development rights in National Parks for short term lets.</p>