

Brockenhurst Parish Council



Response to Department for Culture, Media, and Sport Consultation into Short Term Holiday Lets

Sept. 2022

Brockenhurst Parish Council
70b Brookley Road, Brockenhurst Hampshire SO42 7RY

The Department for Culture, Media, and Sport - Consultation into Short Term Holiday Lets

Call for evidence questions

Brockenhurst Parish Council are pleased to be invited to respond to the consultation.

Question 1: Are you able to provide us with evidence illustrating the size and nature of the short-term and holiday letting market in England and/or its regions, and how that has changed over time?

Brockenhurst is a popular tourist village in the New Forest National Park. The Council represents a settled population of around 3400 inhabitants. There are 1300 private properties and around 400 social housing properties.

The Parish is land locked by Crown Lands, Open Forest, and large private estates. Extensive areas are designated SSSI, SAC, RAMSAR and as such the land available for new homes is very severely restricted.

As a visitor destination with limited resources to provide permanent homes, we look forward to working with DCMS to find a straightforward, affordable regulatory solution which maintain the balance of housing stock; preserve village employment and a sense of community.

We do not have direct access to data on holiday lettings but consider we can provide qualitative information on how this has changed overtime and affected the social, economic and community feel of the area.

The New Forest National Park is the smallest and most populated in England. The village is the crowded Southeast region within 90 minutes' drive of 16 million people. It is under intense pressure from tourism, See

<https://www.newforestnpa.gov.uk/app/uploads/2019/01/Visitor-day-statistics-different-English-National-Parks.pdf>

The southwestern sector of the National Park in which Brockenhurst sits also has the most holiday accommodation in the park. It has a significant number of hotels, B&Bs, camping and caravan sites. In the summer, the village population doubles due to visitors.

The unique natural beauty of the New Forest and especially the mixed landscapes around Brockenhurst have attracted tourists since the railway arrived in 1846. The tourism developed quickly from the early 20th century with the establishment of large and medium size hotels and lodging houses. From around 1960 and the widespread ownership of the motor car there was a further large influx from camping and caravanning. With the increase in personal wealth since the 1980s there has been an upturn in the number of properties available for short term rental. This has been driven by an increasing desire for informal accommodation, mostly for family and family groups, and a decline in the use of hotel accommodation. Additionally increased prosperity has led to a market for people wanting second holidays each year and this has in turn extended the visitor season.

The village has seen the loss of several smaller hotels in the last 25 years as the larger hotels moved into higher market segments, and visitors have sought less formal accommodation. In part this has been driven by an increasing desire to holiday with the extended family or friends, take a second holiday and a greater desire for weekend breaks.

There appears to be little evidence about the number of holiday lets in the New Forest or nationally. see <https://www.newforestnpa.gov.uk/app/uploads/2019/01/New-Forest-National-Park-recreation-leisure-visits-RJS-Associates.pdf>

Question 2: What do you consider to be the main benefits of short-term and holiday letting for:

a) Homeowners

Supplementary income derived from short-term letting can help individuals and families to earn additional income from their most important asset when they are not using it. This is an important freedom. Householders may for example become “accidental” property owners by inheritance. Householders who are also farmers or small holders may also benefit by renting surplus accommodation as part of a farm diversification scheme.

b) Consumers

Consumers are seeking more travel options which include renting a home, or a room within a home, when they travel. It also can be more appropriate for families who need additional space or additional facilities. However, consumers often do not appear to recognise the ability to provide space is limited.

c) Businesses and the wider economy

Local businesses appear to be seeing moderate benefits with guests who are spending money in local shops and possibly monies that would not have been spent by the traditional hotel guest. It is less clear if the food and provision businesses are benefiting with short term renters using national supermarket deliveries rather than local shops.

Employment opportunities – While the holiday letting potentially offers employment opportunities for domestic service staff it draws on a limited labour pool driving up the cost of employing people in the essential services. This in turn tends to create a commute, usually by car, from other nearby settlements. However, it must be recognised that good levels of summer trade allows many businesses to trade through the year. The loss of a sizable residential market in the winter period potential risks the closure of businesses and could bring about “dead” villages at least in the winter period.

Question 3: How do you assess levels of compliance with regulations on:

- a) Fire safety
- b) Gas safety
- c) Health and safety
- d) Food and drink

within the short-term and holiday letting market in England?

We are unable to comment on these topics but believe the level of compliance is good.

Question 4: Do you consider there to be a problem with breach of contractual agreements in the short-term and holiday letting market in England? If so, why?

Option 1 - Yes, this is a major problem

Option 2 - Yes, but this is only a minor problem

Option 3 - No, there is no problem

Outside the scope of our knowledge

Question 5: Do you consider there to be other legal provisions concerning the supply of short-term and holiday letting to paying guests which are not covered elsewhere in this call for evidence but where there are issues with awareness, compliance and/or enforcement?

Option 1 - Yes

Option 2 – No

Outside the scope of our knowledge

Question 6: Do you consider the increase in short-term and holiday letting in England to have had adverse consequences on the housing market?

Option 1 - Yes, this is a major problem

We do not oppose the concept of second homes or holiday lets but are concerned that an abundance of them especially in small / medium size villages has the potential to distort the housing market.

Since 2000 the number of holiday lets and to a degree second homes, has increased significantly especially in the period following the financial crisis of 2008 as the return on investments in this market is much greater than elsewhere due to exceptionally low interest rates.

We note the three main online letting agent's websites indicate they alone have around 177 holiday lettings properties on offer in the parish.

We have observed smaller family properties and flats being purchased and deployed as letting properties. In some areas of the village with lower priced property many have been purchased for short term rental. This is creating enclaves where permanent residents are left with few wintertime neighbours potentially creating a lack of community and the social and health problems.

We have recent evidence of hotels, and shops being specially converted to breakfast rooms and letting, the current planning regime allows this. Other new or improved homes are offered as open market properties but are quickly acquired for the short-term letting market.

COVID has undoubtedly created an increase in short stay lettings and added, in the short term at least, to the number of properties being used as short term lets. We do not think working from home has significantly affected this market, but it has increased the desire and use of second homes in the village.

Question 7: Do you consider noise, anti-social or other nuisance behaviour in short-term and holiday lets in England to be a problem? If so, why?

Option 1 - Yes, this is a major problem

Option 2 - Yes, but this is only a minor problem

Option 3 - No, there is no problem.

We have no evidence of any problems.

Question 8: Aside from the impacts on housing and incidents of anti-social/nuisance behaviour, do you consider the increase in short-term and holiday letting in England to have had other adverse impacts on local communities and residents?

Option 1 – Yes, Employment

The increase in short-term letting properties is compounding the acute shortage of homes in the National Park where house prices were already high and being forced higher. The effect is that local young families, key workers, agricultural and forestry workers and cannot live in the village. The village needs carers for its older people and accommodation for such key personal such as retained firefighters and teachers. It is our understanding the local school has currently no teachers that live in the village.

The increase in the demand to buy short term rentals also impacts heavily on long term village retirees wishing to downsize. This either causes them to remain in homes that are larger than they may need or cause them to move away from what they regard as their home community. It also distorts the market preventing local families with school age children “up sizing.”

Question 9: Which of the following do you consider to be the most appropriate form of response in the short-term letting market?

- 1 - Do nothing
- 2 - Provide more information to the sector
- 3 - Develop a self-certification registration scheme
- 4 - Develop a registration scheme with light-touch checks
- 5 - Develop a licencing scheme with physical checks of the premises
- 6 - Regulatory alternative to a registration system, such as extension of the Deregulation Act 2015

Are there other options that should be considered?

We consider regulation is required to protect communities but believe this should be light touch. We believe the most effective way of achieving this is maybe to create a new planning use category for short term rental properties with the granted permission having a limited life and subject to review after, say, 5 years.

Question 10: What do you consider to be the costs and associated burdens of these options, who would bear the costs and how might they be mitigated?

Potentially costs could be recovered through the planning fees which would be passed onto the short-term renters. By this means checks could be made and concerned members of the community would be able to report suspected breaches to the local planning enforcement office.

Question 11: Do you have any insight or evidence on the impact of schemes that are already running, or approaches taken elsewhere in the world?

No

The government would also be keen to learn about any other approaches that have been taken that are not included in the annex below.

Question 12: What has been the impact of the Deregulation Act 2015, specifically changes made by section 44 to the Greater London Council (General Powers) Act 1973?

We do not have any knowledge of issues and suggest a higher level of local government may be able to provide this.

Glossary

SSSI, Sites of Special Scientific Interest

SSSIs are legally protected under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006. Natural England has powers to ensure farmers and landowners protect and manage their land SSSI effectively.

SAC – Special Areas of Conservation

Special Areas of Conservation (SAC) are internationally important areas defined by the national planning policy framework (NPPF) as ‘Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.’

RAMSAR - Ramsar Sites are wetlands of international importance designated under the Ramsar Convention. Sites proposed for selection are advised by the relevant statutory nature conservation body (or bodies) within the UK.

Crown Lands – land owned by the Crown and vested in the Secretary of State for the Environment, Food and Rural Affairs. Crown Land in the New Forest is managed on behalf of the Secretary of State by the Forestry Commission.

Open Forest – the unenclosed Crown Lands and adjacent commons which are subject to commoning rights

End

15 Sept 2022