



## City of Westminster

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**CLLR ADAM HUG**  
Leader of the Council

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The Rt Hon Lucy Frazer KC MP  
Secretary of State for Culture, Media and Sport  
100 Parliament St  
London  
SW1A 2BQ

The Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing and Communities  
2 Marsham St  
London  
SW1P 4DF

14 June 2023

Dear Secretaries of State,

### **Short-Term Lets**

As you know, Local Authorities like Westminster have been calling for some time for more powers that would allow us to tackle the issues caused by short-term lets. We therefore welcome the Government's recognition in the recent consultations of the impact which short-term letting can have on the sustainability of communities, the availability and affordability of homes for local people.

Westminster has previously campaigned for a registration scheme for short-term lets and we welcome the direction of travel set out in the consultation on a registration scheme. Short-term lets are an easy way for property owners to make use of their empty property to supplement their income, offering flexibility for both visitors and hosts, however this needs to be balanced with their impact on residential amenity and the local housing market. To strike this balance it is important that we get the details of the registration scheme right. We will be submitting a response to the consultation with some constructive suggestions about how we strike that balance.

However, a registration scheme will only improve regulation of short-term lets, it will do nothing to stop housing stock being lost to the short-term let market. We have serious concerns about the proposals set out in the consultation on a new planning use class for short-term lets. The creation of a new use class and the automatic regularisation of residential properties as short-term letting would have a catastrophic and permanent effect on the number of homes available in the City. The council's indicative data suggests that at least 10,500 homes would meet the proposed definition of short-term letting, and so would be permanently removed from the residential market should the proposals be brought forward in their current form. To put that figure into context, we currently have approximately 4,000 households on our housing waiting list, and it amounts to seven times the



number of homes the Governments Housing Delivery Test has identified are required annually in Westminster over next decade.

Given these concerns, we are calling for a return to the pre-2015 position in London, which categorises any use of residential dwellings for short-term letting as a material change of use without any flexible right for properties to be used for more than 90 nights a year, and the expansion of these rules to the rest of the country. This would give local authorities the tools to regulate short-term letting where it causes the most harm, while enabling local authorities without concerns with short-term letting to use their discretionary powers to allow it to continue.

As an alternative position, we would suggest the retention and expansion of the existing framework in London nationwide, making short-term letting a sui-generis use nationally. We believe this approach offers the benefits of giving powers to local authorities to regulate short-term lets, while preventing a dramatic loss of housing stock nationally, without the associated employment benefits found with other tourism accommodation.

We will be responding to the planning class consultation with some constructive suggestions to make the proposals more workable should the government be intent on adopting them, including the introduction of a transitional period for the new permitted development rights to give local authorities nationally the ability to act swiftly to bring in Article 4 directions to regulate short term letting where it is causing a local issue, preventing the further loss of much needed residential homes.

Alongside the two consultations, we would support the introduction of improved enforcement powers aimed at landlords. Our experience is that tackling antisocial behaviour in short term lets is near impossible, as we can only target tenants, who leave, rather than the landlords that enable it. Improving enforcement would help to address a key Government priority, protect both residents and tourists, and promote higher standards of care within the short term letting industry, by levelling the playing field between the responsibilities of commercial hosts and those of traditional accommodation providers such as hoteliers.

Once again we thank the Government for recognising the issues caused by short-term lets and taking action. Should you wish to discuss in more detail the concerns we have raised we would be more than happy to meet with you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adam Hug', with a long, sweeping underline.

Cllr Adam Hug

Leader of Westminster City Council