

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.**

C – a mandatory national scheme. In order to be effective, the scheme must be comprehensive and attain data from across the country. It is crucial that a true reflection both the current state of play regarding the number of holiday lets operating in the UK and the trends relating to changes of supply in the sector are accurately monitored nationwide. Without a full picture of the holiday lets market, it is impossible to draw accurate conclusions. Generation Rent research shows that [29 homes per day are lost](#) from the residential sector to become commercial holiday lets or second homes, but the registration scheme would allow more accurate data to be collected to gain a truer picture of the state of play.

Such a registration scheme should be supplemented by a licensing scheme operated at a local authority level, which could be run on an opt-in basis. This would give local authorities the power to limit the number of short term lets permitted under their jurisdiction based upon data made available by the licensing and registration schemes. This would also permit them to regulate standards within the holiday lets market and its effect on the local community – both in terms of quality of life and anti-social behaviour, and the effect on the housing market for those who wish to live there year-round. More on this is available in the [Generation Rent response to the consultation on use class changes for the holiday lets sector](#).

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)**

The registration scheme should fall under the remit of a new national body, ideally based within one of the relevant government departments (DCMS, DLUHC). This may be a part of the Property Portal for the private rented sector, to be administered by DLUHC as a part of the Renters (Reform) Bill.

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

Yes, but the data collected must be collated and logged digitally.

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

Yes, unequivocally. This is crucial to the efficacy of the registration scheme. It should also be incumbent on the platforms to validate this registration number, perhaps through a verification tool provided by the administrator of the registration scheme.

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

Yes. User-driven enforcement will be an important facet of ensuring the registration scheme is effective and adhered to. Giving users the ability to verify their property's registration, perhaps with the incentive of a rent repayment order if their owner/platform is found not to be compliant, will assist with the smooth running of the scheme.

It is also conceivable that someone who is renting a home advertised as a short term let could be there for long enough to qualify for rights as a tenant. It would be important for users to have a way of checking the status of the property they are renting in order to understand their rights.

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

- a. Owners**
- b. Dwellings or part of dwelling**
- c. Individual accommodation units within a dwelling**
- d. Other (please specify)**

As recommended by others, we believe that both the owners and the bookable dwellings should be registered. Both should be given reference numbers and local authorities should be given access to data pertaining to the properties owned by owners outside of their jurisdiction if an offence has been committed. Each bookable dwelling should be linked to its owner and information on both units should be stored. This will also allow data to be collected on the demographics of short term lets owners and to gain an understanding of how the market is shifting in that respect. The registrations must be updated when properties change hands, which will also allow information to be collected on which properties are entering the short term lets market from other sectors and which are transferring within it.

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

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

Treehouses

Mountain bothies

Shepherd's huts

Cars

Motorhomes

Glamping

Yurts

Boats inc. houseboats, canal boats

House swaps

Other - please specify

We would recommend to not include types of accommodation that are not capable of being lived in long term as an alternative to being rented out as short term lets. On this basis, fixed motorhomes/caravans and houseboats which are rented out as short term lets or holiday homes should be included, for the sake of consistency across owner registration information gathering.

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

Yes.

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.

No

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)**

g) - registrations should be one-off, but owners should be asked to validate annually that all information is up-to-date (and update the register more frequently if information or safety certification is updated). If owners do not do this within a set time, the registration should be suspended. This minimises the fees and burden for owners, but ensures that contact and property details are up-to-date. This is how e.g. Companies House manages company registrations. There should of course be an obligation to update the registration when ownership changes hands.

Local authorities should have the power to require holiday lets to have licences in order to operate, where the sector is creating pressures on housing affordability or otherwise. These licences should be renewed at intervals set by the local authority, e.g. every three years, in order to nudge homes back into residential use.

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

A) to K) should be collected as a matter of course, with j) and k) taken from the platforms (if applicable, [as per regulations being developed in the EU](#)). There appears to be no “L”. They should be collected at the point of registration, and every subsequent year the scheme should ask the owner to confirm items d, f, g, h and i.

M) should also be collected in relation to use class (ie whether the property is being let out for the appropriate purpose) to ensure that the property is compliant with its planning permission requirements. This is to alleviate resource demands on local authorities. Information surrounding the number of properties with such planning permission granted (as per the registration scheme’s data) should be readily available to local authorities to ensure that they can make informed decisions on granting further applications. This is also in anticipation of a use class change as per the concurrent consultation. However, should another method of analysing and controlling short term lets be chosen, that information should still be made available.

With relation to further information, the Levelling Up and Regeneration Bill may be amended to see that further information including energy efficiency and electrical safety are required as a part of letting out a holiday property, and this requirement should be enforced by publication on the registration scheme.

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

A) and D) may be required as referenced above, but if not should be welcomed anyway. F) as discussed, pending the outcome of the second consultation, should also be encouraged to assist local authorities in enforcement.

A guiding principle should be what regulations private rented homes and hotels are subject to.

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.

Depending on subsequent reforms to the holiday lets sector (ie. Use class changes or other), a light touch approach should be taken here, with joined up information sharing schemes allowing the data uploaded by owners with relation to their properties to be verified within the registration process. Licensing schemes introduced by local authorities would be more appropriate for the level of enforcement under options c and d.

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 of the above. Under the Property Portal for the PRS, set out in the Renters (Reform) Bill as drafted, E) and repeated offences of A) and B) would incur a fine, and such an enforcement mechanism should be introduced here as a minimum. Furthermore, it should not be possible to register for the scheme without providing all of the documentation required, rendering B) redundant. The validity of the documentation would amount to a violation on E) if found to be false.

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

Fines in the first instance, with revocation to follow.

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)

No response, but emphasis on both encouraging properties to remain in the residential sector, and encouraging holiday lets to return to the residential sector.

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

Yes, particularly as the scheme would need ongoing revenue, and it may also help to nudge property owners to switch back to the residential sector.

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

Yes, most notably platforms.

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?

Yes. The address of the property, name of the owner/manager and the type of registration, if applicable, should be available online following a search for the address or postcode, and ideally via the PRS portal.

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.

All of the above.

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

No, but below a certain threshold, e.g. 30 days in the year, will be property owners who are letting their primary home out for short periods. These types of lets should be encouraged, and do not have a negative impact on the supply of residential housing. On this basis, properties expected to be let for less than 30 days during the year should qualify for a significant discount. It may also be appropriate to exempt them from certain regulations that permanent holiday lets are subject to.

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?

This scheme should work with any scheme designed to reduce the impact of the proliferation of short term lets at the expense of long term homes, which is an acute issue across the country. As stated earlier, such a registration scheme should be supplemented by a licensing scheme operated at a local authority level, giving them the power to limit the number of short term lets permitted under their jurisdiction based upon data made available by the licensing and registration schemes. This would also permit them to regulate standards within the holiday lets market and its effect on the local community – both in terms of quality of life and anti-social behaviour, and the effect on the housing market for those who wish to live there year-round. More on this is available in the [Generation Rent response to the consultation on use class changes for the holiday lets sector](#).

This scheme should also interact with the Property Portal for the PRS (to be implemented by the Renters (Reform) Bill) and any selective or additional licensing schemes which are in place.

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?

At present people with certain protected characteristics are more likely to be living in unaffordable, exploitative or non-decent housing as a result of the shortage of homes caused by the recent growth of holiday lets. These people include disabled people, who are more likely to rely on the benefits system to pay their rent, women, who tend to earn less than men so can less afford high rents, and people from minority ethnic backgrounds who are more likely to be in poverty or otherwise reliant on benefits. There are a number of challenges facing people who rely on benefits, but one of the biggest is that Local Housing Allowance has been frozen for more than three years and does not cover market rents which have increased substantially, particularly in holiday hotspots.

We therefore believe that any policies which successfully limit the growth of holiday lets and encourage property owners to return their properties to residential purposes will reduce rent inflation and therefore have a positive impact on these groups.

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

N/A