

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	22 October 2019
<b>Subject:</b> Flat 3A 12 Trinity Square London EC3N 4AL Change of use from residential (Class C3) to short-term let accommodation (periods of less than 90 consecutive nights) (Class C3) (83sq.m).	<b>Public</b>
<b>Ward:</b> Tower	<b>For Decision</b>
<b>Registered No:</b> 19/00763/FULL	<b>Registered on:</b> 25 July 2019
<b>Conservation Area:</b> Trinity Square	<b>Listed Building:</b> No

### Summary

The application relates to a second floor flat in 12 Trinity Square. The building is on a corner plot at the junction of Trinity Square and Muscovy Street and is located within the Trinity Square Conservation Area.

Planning permission is sought for the change of use of flat 3A from residential (Class C3) to short-term let accommodation (periods of less than 90 consecutive nights) (Class C3).

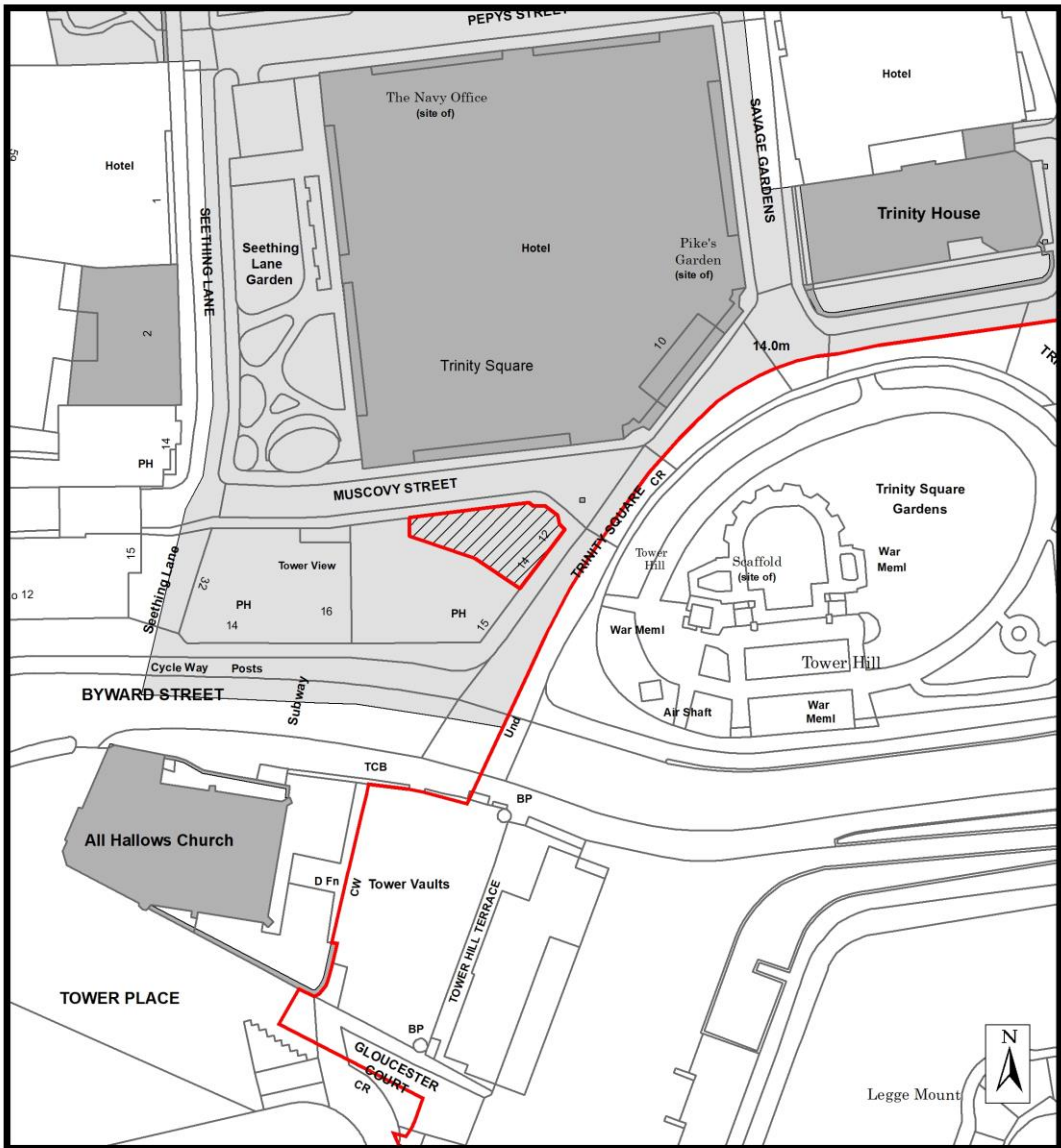
10 objections have been received from residents regarding the proposed development. The objections have raised concerns regarding the adverse impact on residential amenity, security and that the proposal is contrary to policy.

It is considered that the proposed use would have detrimental impact upon residential amenity, could result in the loss of a permanent residential unit, and would be contrary to London Plan policy 3.14, Local Plan policies CS21 and DM21.6, Draft Local Plan policy H5 and the aims and objectives of the NPPF.

### Recommendation

That the application be refused for the reason set out in the attached schedule.

# Site Location Plan



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ADDRESS:  
Flat 3A, 12 Trinity Square, EC3N 4AL

CASE No.  
19/00763/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

### **Site**

1. The application relates to a two bedroom flat on the second floor of 12 Trinity Square, a corner plot at the junction of Trinity Square and Muscovy Street. It is a ground plus five storey building comprising retail at ground floor and 13 residential flats above.
2. Adjoining the building to the west is 15 Trinity Square forming 16 residential units, and 11 Byward Street forming 32 residential units. To the north is Grade II\* listed 10 Trinity Square which predominantly comprises a hotel and 41 residential units. The building falls within Trinity Square Conservation Area.

### **Relevant Planning History**

3. Planning permission was granted on 04/09/1998 (ref. no. 1097AB) for alterations and change of use of part ground floor and upper floors from offices to 13 flats.

### **Proposals**

4. Planning permission is sought for the change of use of flat 3A from residential (Class C3) to short-term let accommodation (periods of less than 90 consecutive nights) (Class C3) (83sq.m) for more than 90 days in a calendar year.

### **Consultations**

5. The application has been advertised on site and in the local press and neighbour notification letters were sent to residents of 12 Trinity Square.
6. A total of 10 representations have been received from residents and owners objecting to the application. A summary of the issues raised is set out below:

<b>Topic</b>	<b>Objection</b>	<b>Number</b>
Land Use	Would be contrary to policy	4
	Reduction in amount of homes available for people to live in the City	3
	More than sufficient short term accommodation in the area	3
Residential Amenity	Short-term lets increase noise & unneighbourly behaviour	5
	Short term tenants would not use the bin store, leaving rubbish bags in front hall	2
	Noticeable when new people occupy the building	1
	Increase wear & tear in building	2

	Risk of damage to building from inexperienced occupiers	1
	Change the feel and character of the building	1
Security	High turnover of tenants raises security concerns	3
	Would give unknown people access to residential building	4
Other	Sets precedent for short-term use of flats	3

7. Not all the representations above are material planning considerations. Those that are have been dealt with in this report.

### **Policy Context**

8. The development plan consists of the London Plan and the City of London Local Plan. The Draft London Plan and the Draft Local Plan are material considerations to be taken into account. Relatively limited weight should be given to the draft London Plan and Draft Local Plan. The policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
9. Government Guidance is contained in the National Planning Policy Framework (NPPF).

### **Considerations**

10. The Corporation, in determining the planning application has the following main statutory duties to perform:-
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
  - For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
11. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF);

- The extent to which the proposals comply with the relevant policies of the Development Plan, having regard to other material considerations;
  - The impact of the proposed use on residential amenity.
12. Section 5 of the National Planning Policy Framework (NPPF) supports increasing the supply of housing within England through strategic and local policies. Paragraph 127 promotes healthy, inclusive and safe places, with a high standard of amenity for existing and future users. Paragraph 180 states that decisions should ensure that new development is appropriate to its location, taking into account the likely effects of pollution (e.g. noise).

Greater London Council (General Powers) Act 1973 (as amended) and  
Deregulation Act 2015

13. The use of residential premises in Greater London as temporary sleeping accommodation involves a material change of use requiring planning permission by virtue of Section 25 of the Greater London Council (General Powers) Act 1973 (as amended) unless it benefits from the new exception introduced by the Deregulation Act 2015 which came into force on 26th May 2015.
14. Temporary sleeping accommodation is defined as sleeping accommodation which is occupied by the same person for less than 90 consecutive nights and which is provided (with or without services) for a consideration arising either by way of trade for money or money's worth, or by reason of the employment of the occupant, whether or not the relationship of landlord and tenant is thereby created.
15. Section 44 of the Deregulation Act 2015 creates a new section 25A of the 1973 Act which provides that the use as temporary sleeping accommodation of any residential premises in Greater London does not constitute a change of use, (for which planning permission would be required), if certain conditions are met. The conditions are set out in subsections (2) and (3) of section 25A:
- that the total number of nights of use as temporary sleeping accommodation in the same calendar year, does not exceed ninety nights.
  - that the person who provided the sleeping accommodation must be liable to pay council tax.
16. If the two conditions in the new exception are not met use as temporary sleeping accommodation of residential premises involves a material change of use requiring planning permission.

Use

17. The application site currently forms one of 13 residential flats within the building. It is proposed to use a second floor flat as temporary sleeping accommodation for more than 90 nights in a calendar year. Access to the unit would be through the buildings communal lift. The flat would be professionally cleaned following each letting.

18. Local Plan policy CS21 states that existing housing and amenity will be protected. Policy DM21.6 (Temporary Sleeping Accommodation) states that temporary sleeping accommodation will not normally be permitted where it is mixed with permanent residential accommodation within the same building. This is to avoid potential disturbance to permanent residents from people occupying the temporary accommodation who may cause noise disturbance, and who may be unfamiliar with the management practices relevant to the flats, particularly in communal areas. Policy DM21.6 also states that permanent residential accommodation will not normally be permitted to change use to temporary sleeping accommodation.
19. Draft Local Plan Policy H5 states that short-term residential letting will not normally be permitted as such a change of use would reduce the stock of permanent housing in the City, possibly jeopardizing housing delivery targets, and may adversely impact the amenity of existing residents.
20. London Plan Policy 3.14 states that the loss of housing to short-term provision should be resisted and recognizes that short term lettings can result in a serious loss of housing. Draft London Plan policy H11 says boroughs should take account of the impact on housing stock of and local housing need when considering applications for a change of use from housing to short stay holiday rental accommodation to be used for more than 90 days a year. It also states that the use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity.
21. It is acknowledged that the short-term let would normally still fall within use Class C3, and this being the case would not require permission to return to permanent residential use. However, this would be outside of the control of the local authority, and the London Plan, the Local Plan and the Draft Local Plan seek to resist the change of use of permanent residential to short-term lets on the basis of the loss of permanent housing.

#### Residential Amenity

22. Both the London Plan and the Local Plan, and the draft versions of both, seek to protect the amenity of existing residential units.
23. Residents within the building have raised concerns about the potential adverse impacts of the use of a flat for short-term lets. These include the potential for noise disturbance, unneighbourly behaviour, wear and tear and damage to the building, and concerns about the resulting reduction in security.
24. It is considered that the loss of residential accommodation to short-term lets has adverse consequences for the residential amenity of the long-term residents in the building. People on holiday and business people have a markedly different lifestyle to residents. Short stay visitors often do not have the same consideration for neighbourliness or care of their accommodation as permanent residents and they are often unfamiliar with domestic arrangements, for example waste disposal.
25. Some permanent residents feel that their amenity will be diminished through noise and disturbance and that a sense of community in the



building or neighbourhood is threatened by transient visitors. The Local Plan specifically seeks to resist temporary sleeping accommodation in mixed permanent residential accommodation within the same building for these reasons.

26. 12 Trinity Square is served by an entrance fronting on to Muscovy Street leading to a ground floor lobby providing access to the single lift. The use of a flat for short-term lets would result in anyone renting the property gaining access to the building, and the comings and goings of unknown people is a concern raised by residents of the building. There would be no means of vetting individuals to determine whether they are a security concern, and there would be limited control of who comes and goes from the flat as there is no-one permanently on site such as a concierge. For these reasons, the premises is considered to be an inappropriate location for a short-term let unit, as set out in Local Plan policy DM21.6.
27. It is acknowledged that there is scope for adverse impacts on amenity and security of residents to arise even where temporary lettings are lawful in that they do not exceed a total of 90 nights per calendar year and fall within the new exception. However, unlike the current proposal any such impact will be confined to a limited period each calendar year.

#### Impact upon Conservation Area

28. No external alterations are proposed as part of this application. As such the proposals would not affect the appearance of the Trinity Square Conservation Area.
29. The Conservation Area was traditionally occupied by public buildings and warehouses associated with the Port. In recent years the use of many of these buildings has changed, increasingly featuring residential apartments, hotels, restaurants and bars. In this context, it is considered that the proposed use of a flat for short-term letting would not adversely impact the character of Trinity Square Conservation Area.

#### Conclusions

30. The proposed change of use would have a detrimental impact upon residential amenity and would result in the loss of a permanent residential unit, contrary to London Plan policy 3.14, Local Plan policies CS21 and DM21.6, Draft Local Plan policy H5 and the aims and objectives of the NPPF.



## **Background Papers**

Supporting Statement

Email Prof. and Mrs Stone 12/08/2019

Online Mark Henwood 14/08/2019

Online Colm Malmberg 14/08/2019

Online Elizabeth Szanto 16/08/2019

Email Rob and Kate Hutchings 16/08/2019

Online Chris David 18/08/2019

Email Steve Whicher 19/08/2019

Online Nick Thomas 19/08/2019

Online Martin Trumper 20/08/2019

Online Grant Hunter 22/08/2019

Email Panos Koumi 16/09/2019

## **Appendix A**

### **London Plan Policies**

The London Plan policies which are most relevant to this application are set out below:

Policy 3.14 Support the maintenance and enhancement of the condition and quality of London's existing homes. Loss of housing, including to short-term provisions, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.

Policy 4.5 Support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision.

### **Draft London Plan Policies**

Policy H11 Take account of the impact on housing stock and local housing need when considering applications for a change of use from housing to short stay holiday rental accommodation to be used for more than 90 days a year.

### **Draft Local Plan Policies**

Policy H5 Short term residential letting will not normally be permitted as such a change of use would reduce the stock of permanent housing in the City and may adversely impact the amenity of existing residents.

### **Relevant Local Plan Policies**

#### ***CS21 Protect and provide housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

#### ***DM21.6 Temporary sleeping accommodation***

1. Temporary sleeping accommodation will not normally be permitted where it is mixed with permanent residential accommodation within the same building.
2. Permanent residential accommodation will not normally be permitted to change use to temporary sleeping accommodation.
3. Where temporary sleeping accommodation is permitted, conditions will be imposed to prevent any later changes to permanent residential use in unsuitable accommodation or locations.

## ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

### ***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

## **SCHEDULE**

**APPLICATION: 19/00763/FULL**

**Flat 3A 12 Trinity Square London**

**Change of use from residential (Class C3) to short-term let accommodation (periods of less than 90 consecutive nights) (Class C3) (83sq.m).**

## **REASONS FOR REFUSAL**

- 1 The proposed change of use would result in the loss of a permanent residential unit, contrary to London Plan policy 3.14, Local Plan policy DM21.6, Draft Local Plan policy H5 and the aims and objectives of the NPPF.
- 2 The proposed change of use would have a detrimental impact upon residential amenity contrary to London Plan policy 3.14, Local Plan policies CS21 and DM21.6, Draft Local Plan policy H5 and the aims and objectives of the NPPF.

## **INFORMATIVES**

- 1 The Plans and Particulars accompanying this application are: Site Location Plan, Floor Plan drawing 1 of 1, Trinity Square Floor Layout.

**From:**

**To:**

**Cc:**

**Subject:**

Planning Application 19/00763/FULL - Flat 3A, 12 Trinity Square London EC3N 4AL

**Date:**

12 August 2019 11:21:06

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Location: Flat 3A 12 Trinity Square London EC3N 4AL

CoL Reference: 19/00763/FULL

Application: Change of use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3)

Case Officer: Gideon Stothard

Dear Mr Stothard, my wife and I are owner-residents of Flat 12 within 12 Trinity Square, EC3N 4AL, and for more than the past year our daughter has been living there full-time as well. We are all very concerned with Planning Application 19/00763/FULL which seeks to change the use of Flat 3A from residential (Class 3) to short-term let accommodation. Currently 12 Trinity Square is a "permanent residential dwelling" and in our view should remain as such. The loss of a "permanent residential building" would contravene current City of London policy and the opening up of permission to one dwelling in the building, Flat 3A, for short-term letting, would also go against the convention of having all dwellings in the same building being classified under the same purpose. Currently 12 Trinity Square contains all permanent residences and should remain as such. We ask you to reject this application.

Yours sincerely,

Prof P Stone and Mrs P Stone.

Flat 12

12 Trinity Square

London

EC3N 4AL

# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Mark Henwood

Address: 15 Trinity Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: As an adjacent neighbour to this property, living in a very similar permanent residential development, I object to the proposal to allow this unit to be used for short-term let accommodation. I am a permanent resident of the City, and I had understood that it was Corporation policy to encourage residential accommodation alongside commercial property and visitor accommodation. In an area which has no fewer than seven hotels within several hundred metres, I can see no need to remove one of the few permanent residences. I would urge you to reject this application.

# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Cort Malmberg

Address: 15 Trinity Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The City has limited residential space available, much of which has already been converted to serviced apartments for business travelers. There is a real risk that the remaining residential space will simply become short term rentals and the few residents left will be surrounded by transients and hotel guests. From vibrant cities around the world it has become resoundingly clear that an abundance of short term rentals is not positive and indeed is very harmful for the local population.



# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Ms Elizabeth Szanto

Address: 25, Methley st London

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building should be preserved for residential use. As the owner of one of the flats in the building, I am concerned that allowing additional short term letting will have a negative impact on the residents in terms of noise, security and respect for the common parts of the building.

**From:** [Rob Hutchings](#)  
**To:** [PLN - Comments](#)  
**Cc:** [Kate Hutchings](#)  
**Subject:** your ref 19/00763/FULL - Flat 3A, 12 Trinity Square, London EC3N 4AL  
**Date:** 16 August 2019 13:47:54

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Dear Mr Stothard

We have owned Flat 3 at 12 Trinity Square for approximately 8 years - we object to this application for permission for change of use because:

- the proposed short term tenants (whom we understand book via AirBnB) frequently drag heavy suitcases up and down the stairs – also, they are often arriving late at night, which exacerbates the noise
- they tend to prop open the front door to the street for significant periods with their suitcases, which is a security risk, particularly in the evening
- they tend not to use the proper bin store – instead they leave their rubbish bags in the front hall / postal area
- they tend to allow the internal fire doors to slam shut (which is noisy), rather than closing them gently, which is what long term residents in the building do as a courtesy to each other
- approximately three years ago, our flat suffered a serious ingress of water through the roof (causing damage to our ceiling as well as requiring significant clean-up of the floor) from the flat above ours, when the flat above ours was in the hands of an inexperienced tenant, who left water overflowing - we would have a concern for the fabric of the building generally if any of the flats are in the hands of a series of inexperienced short term tenants
- we are concerned that the grant of this permission would create an unattractive precedent and would change the character of what is otherwise a quiet, owner occupied (or long term tenanted) residential building.

Yours sincerely

Rob and Kate Hutchings

Flat 3  
12 Trinity Square  
London  
EC3N 4AL

# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Chris David

Address: 12 Trinity Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: There are already 7 hotels within a 200m radius of 12 Trinity Square. I believe the City should be encouraging 'more' permanent residents by ensuring the continued availability of residential property, not reducing the housing stock in favour of more transient visitors. This personal view is supported - I believe - by the current City Local Plan - CS21/DM21.6 - which notes that applications to convert single units to short term accommodation, within entirely residential blocks, should be opposed. I do not believe any special circumstances have been put forward by the applicant in this application.

## Policy DM 21.6 Temporary sleeping accommodation

1. Temporary sleeping accommodation will not normally be permitted where it is mixed with permanent residential accommodation within the same building.
2. Permanent residential accommodation will not normally be permitted to change use to temporary sleeping accommodation.

**From:** [Tumbridge, James](#)  
**To:** [PLN - Comments](#)  
**Subject:** Fwd: URGENT : 12 Trinity Square. Planning application for change of use of flat 3A to short term letting  
**Date:** 19 August 2019 08:31:30

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Good morning,

Can you please take note of the resident concern below.

Thank you,

James Tumbridge

Begin forwarded message:

**From:** Steve Whicher [REDACTED]  
**Date:** 19 August 2019 at 08:21:34 BST

[REDACTED]

**Subject: URGENT : 12 Trinity Square. Planning application for change of use of flat 3A to short term letting**

Dear Members – Tower Ward

I write to you with as a matter of urgency and concern which I understand must be registered with you by close today.

A planning application has been submitted by the owner of flat 3A at Flat 5, 12 Trinity Square for a change of use to convert the flat into permanent holiday (short term) letting accommodation. This delightful listed building looks over the Tower of London and has been sensitively managed by the 12 owners and specifically by an elected small team of owners to ensure it can remain a truly magnificent property reflecting its character and original intent for those privileged to live there.

Having been made aware of this application, I know this would be very bad for the building as it is widely known that Airbnb style letting entails extra wear and tear on a building's common parts, noise nuisance, security issues (i.e. the sharing of keys with temporary residents) extra refuse, people unaware of where to put their rubbish, etc. Our building is supposed to be used for permanent long term residential use, not holiday letting.

I would like to register my objection to this application and would greatly appreciate if I could receive acknowledgment and if this has been sent to the wrong parties, please forward this without delay; very much appreciate the great work you do for the London City of London

Owner Flat 5 for over 10 years.....

Kind Regards

Steve



**Stephen Whicher** | BD Leader - Advanced Manufacturing & Mobility | WEM

Ernst & Young LLP  
Boompjes 258, 3011 XZ Rotterdam, P.O Box 2295, , Netherlands

Website: [REDACTED]

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# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Nick Thomas

Address: Flat 10 12 Trinity Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: My wife and I purchased our flat as a residential amenity for ourselves our children. The proposed use and the associated proliferation of keys will increase security risk, as well as the likelihood of un-neighbourly behaviour.

Living in the City should be encouraged and there is more than sufficient short term accommodation in the area.

# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Martin Trumper

Address: 15 Trinity Square London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: As an adjacent neighbour and resident we are very concerned that this application should NOT be approved.

We are concerned by the dangerous precedent of a full change of use as articulated by this application. In essence approval could lead to the entire building and/or neighbouring residential buildings being converted to hotel status, one apartment at a time.

As it is we are already suffering significantly due to short term letting (supposedly following the 90 day rule) since this regularly causes us great concern by the increased noise, unneighbourly behaviour, transience, wear & tear and security concerns.

Essentially, short-term letting of any kind enables entirely unknown individuals (straight off the internet) unfettered access into a private residency. A sense of being secure is a natural expectation for one's home and the increased security risk caused by short letting runs in conflict with this need.

It will in fact have been for these concerns that the majority of individual apartment leases in residential buildings of this type specifically deem any 'short-letting' to be a breach of lease terms.

Finally, we are concerned that greater involvement of short letting will result in further reduction in the availability of homes for citizens that wish live in the City thereby causing erosion of the sense



of community that the City seeks to engender.

# Comments for Planning Application 19/00763/FULL

## Application Summary

Application Number: 19/00763/FULL

Address: Flat 3A 12 Trinity Square London EC3N 4AL

Proposal: Change of Use from residential (Class C3) to short-term let accommodation for more than 90 days in a year (Class C3).

Case Officer: Gideon Stothard

## Customer Details

Name: Mr Grant Hunter

Address: Flat 11 12 Trinity Square London

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please accept my apologies for not having submitted my comments prior to the deadline of 21 August 2019 but I have been working away and then on holiday and have only just returned.

There are 13 flats within 12 Trinity Square which are all permanent residential dwellings, with the flats being occupied by either owner-residents or long term rental arrangements and in my view it is important that they remain that way.

Altering the use of Flat 3A would lead to the loss of 12 Trinity Square's status as a "permanent residential building" and would contravene current City of London policy. Furthermore, it would go against the convention of having all dwellings in the same building being classified under the same purpose.

I am very concerned by the thought of the property being changed from its current status as residential to short-term let accommodation.

The applicant notes that residents "probably have not even noticed" that his apartment is being let out as a holiday let with AirBnB, however I beg to differ. With the small number of flats and relatively stable residents, it is noticeable when new people occupy the flats within the building. Such high turnover of tenants under short term holiday letting raises significant concerns around security. Despite the vetting procedures noted to occur prior to being allowed to let the property, the associated risks are something, as an owner-resident, with which I am not at all comfortable. Furthermore, by granting permission to one dwelling in the building, Flat 3A, to undertake short-term letting for more than 30 days per year, would alter the whole feel and character of the building, which is not what I signed up for when I became an owner-resident of one of the flats a number of years ago and has the potential to only get worse if, having set a precedent, other flat owners seek to do the same. Should this be allowed to happen it would have a significant impact

on the property.

I ask you to reject this application.