

HCS79

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Royal Town Planning Institute Cymru



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e-mail response sent to: CELG.committee@wales.gov.uk

Dear Sir/Madam,

Response to: Holiday Caravan Sites (Wales) Bill

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to comment on this consultation. This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Sections 10 and 12 of the Holiday Caravan Sites (Wales) Bill, as introduced, are most relevant to the planning system.

Section 10 of the Holiday Caravan Sites (Wales) Bill, as introduced, implies that a planning permission must exist for a site licence to be issued, however clarification is required regarding Certificates of Lawfulness for an existing use or development and how these relate to site licenses.

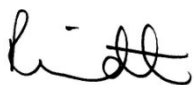
We note that the conditions which can be attached to licences include some matters which are often included in conditions of planning permissions (see section 12 (2)). There is a need to ensure that there is consistency between planning conditions and licence conditions and also that there is close liaison between local authority licensing and planning departments over site monitoring and enforcement plus

consultation with licensing when local development plan policies or supplementary planning guidance are being prepared.

Section 45(1) of the Holiday Caravan Sites (Wales) Bill, as introduced requires all site licences to include a condition requiring the owner of the site to conduct a residence test to establish that the holiday caravan is not that person's main residence. Obtaining information and evidence on the occupancy of touring caravan sites is currently very difficult. The residence test will therefore be a very useful source of information in this respect and will help the proper functioning of the enforcement system where it is needed. You may be aware that the Welsh Government has recently consulted on a "[Review of Planning Conditions Circular and Model Conditions](#)". The RTPI Cymru response to the [Planning Conditions Circular](#) and [accompanying letter](#) are available via the links provided. We note that model condition 92 set out in the above consultation states, "92. An up-to-date register shall be kept at the holiday accommodation hereby permitted and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all the occupiers of the accommodation, their main home addresses and their date of arrival and departure from the accommodation." It would therefore seem an appropriate time to review the licences and planning conditions concurrently, ensuring consistency.

If you require further assistance, have any queries or require clarification of any points made, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



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