

Communities, Equality and Local Government Committee
CELG(4)-20-14 Paper 3

National Assembly for Wales - Holiday Caravan Sites (Wales) Bill

Natural Resources Wales (NRW) response to questions from the
Communities, Equality and Local Government Committee via
email, 6 June 2014.

“The Communities, Equality and Local Government Committee had an oral evidence session with the Welsh Local Government Association and local authority representatives on 5 June, and it would like to enquire about the following issues that were raised in relation to the Bill:

- 1. What are Natural Resources Wales’ views on the requirement for local authorities to consult with Natural Resource Wales when considering what conditions to impose in a holiday caravan site licence (section 15 of the Bill);*
- 2. What are the implications of allowing residential occupation of holiday caravan sites that are situated in areas of flood risk, and what steps can be taken to mitigate against this risk;*
- 3. What work is being undertaken by Natural Resources Wales to improve flood awareness and safety at caravan sites in Wales?”*

Question 1 – What are Natural Resources Wales' views on the requirement for local authorities to consult with Natural Resources Wales when considering what conditions to impose in a holiday caravan site licence? (Section 15 of the bill)

Response:

We would support a requirement for caravan sites located in flood risk areas to produce and implement a flood management/evacuation plan as well as associated warning notices and agree this should be secured as a condition on their licence (in line with the advice set out in TAN15 (Section 11.22 & appendix 6).

This should be the case for all sites applying for an initial licence and those that require a renewal of their licence. In the cases of renewal, a caveat to re-visit any flood management plans/ site notices might be useful to ensure they are up to date.

Following recent examples of cliff collapses during which caravans have been lost, it may be useful to consider a condition on the licence for a 'buffer' zone between the cliff edge and the site itself. This would be for the Local Planning Authorities (LPA) to consider.

Consultation with NRW would help us secure appropriate licence condition/s, although we should be clear in that we are unable to help develop the flood management procedures. This should be done in conjunction with the Local Resilience Forum and /or the local authority emergency planners / emergency services.

In terms of new planning applications for a caravan site, if they are located in Zone C2, then as 'highly vulnerable' developments, we would recommend that in line with TAN15, the LPA should refuse the application.

The very nature of the caravans (instability etc.) makes them very vulnerable during a flood event and places both the caravan and its occupants at risk. It may also be difficult depending on location etc. to operate an effective warning service.

However, if the LPA confirm the site is justified and are minded to grant permission then we should support the inclusion of a suitable planning condition which requires the erection of suitable flood warning notices and the preparation of an effective warning /evacuation plan.

For sites that sit within lower flood risk areas we would advise the erection of suitable flood warning notices and the preparation of an effective warning /evacuation plan.

Question 2 – What are the implications of allowing residential occupation of holiday caravan sites that are situated in areas of flood risk, and what steps can be taken to mitigate against this risk?

Response:

The implications of allowing residential occupation of holiday caravan sites that are situated in areas of flood risk are;

- Introduction of people into flood risk for a longer period of time, i.e. permanent occupation as opposed to time limited occupation. In general terms this will increase the risks to people.
- As noted above the very nature of the caravans (instability etc.) makes them very vulnerable during a flood event and places both the caravan and its occupants at risk
- Permanent occupation by a 'stable' population could present the positive opportunity for improved and sustained local awareness and planning. So the choice becomes more of an informed and prepared local population at risk all of the time, compared with a less informed more transient, holiday population at risk less of the time.

In terms of mitigation (see also Q1 above);

- The local flood risk must be assessed and understood both in terms of the likelihood of flooding and the consequences of flooding.
- Appropriate risk management measures (e.g. informing, warning and evacuation measures) would be required to manage the risks to acceptable levels.
- Where the risks cannot be managed to acceptable levels residential occupation of the holiday sites should be avoided.

Question 3 – What work is being undertaken by Natural Resources Wales to improve flood awareness and safety at caravan sites in Wales?

Since January 2011, Natural Resources Wales' Flood Awareness Wales staff have worked with 80 high risk camping and caravan sites across Wales. Officers worked collaboratively with site owners, managers and staff to raise awareness of their local risk, encourage take up of flood warning service (where available), discuss business disruption implications and complete business flood plans. These plans were tailored to be specific to the needs of each site.

As camping and caravan sites are businesses, flood plans were developed and promoted as an appendix to their existing emergency evacuation plans, rather than something separate. This approach increased take up and willingness to engage. To date there are **64** completed flood plans and four are in development. 12 sites declined to take it further.

We developed and made available a range of supporting materials for use by the sites. This includes staff training presentation templates, evacuation point signs and staff information signage.

In addition, a guidance booklet for camping and caravan sites was produced and published on our website in November 2013.

<http://naturalresourceswales.gov.uk/alerts/whats-my-flood-risk/caravan-and-campsites-owners/?lang=en>

Called 'Flooding – minimising the risk in Wales', this is the output from the Camping and Caravan Emergency Flood Planning Group – a national project between Welsh Government and Defra and a range of umbrella organisations and partners.

These resources are promoted through our website and through partners organisations such as Welsh Government, the Wales Flood Group and Local Resilience Fora. This work on caravan and campsites is part of the wider resilience and preparedness work, which is led by Local Resilience Fora.

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