



From: Nat Slade
Sent: 11 February 2019 17:23
To: Daniel Vick
Cc: Anna Appleton
Subject: BE/85/18/PL

Dear Dan,

I am providing comments on planning application BE/85/18/PL on behalf of Environmental Health who are the licensing authority for caravan sites.

The proposal is to increase the period of the year that these holiday caravans can be used, to 50 weeks of the year.

The static caravans on the site are holiday caravans. This means that they are unsuitable for all year round occupation as a residence as they are neither large enough, nor constructed to provide sufficient warmth/insulation. The site has planning permission for use for holiday purposes, and a site licence for the same. The nature of the tenure is very different for caravans used for holiday purposes, and those used as residences. The conditions which are placed on the site licences of holiday parks are there to help maintain amenity differ from those placed on site licences for residential sites. I am concerned that by increasing the period of the year during which the caravans can be occupied to all but two weeks of the year, it would blur this important distinction between holiday and residential use. It would provide the circumstances for residential misuse of this holiday site. Therefore in order to protect the amenity of the sites, I recommend that the application BE/85/18/PL be refused.

If there is a planning reason why this cannot be refused, I would recommend that conditions be attached to prevent residential misuse of the site:

- 1) It shall be the site owner's responsibility to ensure that the holiday caravans are only used for holiday purposes, and that each holiday caravan owner has a main home at which they are recorded on the electoral register. In order to satisfy this responsibility, the site owner shall maintain a register that includes the names of all the caravan owners. That this register is updated at least every 12 months. The register must include, for each holiday caravan owner, their holiday caravan number, and the address and postcode of the property at which they are registered on the electoral register. In order to make an entry in the register, the site owner, or his/her representative must have seen and retained a copy of documentary evidence that the holiday caravan owner is registered is on an electoral register at a different address. The register must include for each entry, a record of when the entry was made, by whom, and who it was that has seen the documentary evidence provided by the holiday caravan owner.
- 2) The register shall be kept on site and made available on request by an officer of the Council at any reasonable time.
- 3) During the two weeks, it shall be the responsibility of the site owner to prevent access to all the holiday caravans.
- 4) The two weeks during which the site must be [STATE THE DATES].

Regards,

Nat

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