

HCS64  
National Assembly for Wales  
Communities, Equality and Local Government Committee  
Holiday Caravan Sites (Wales) Bill  
Response from: Chartered Institute of Housing Cymru

**Chartered Institute of Housing Cymru**

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Consultation Response to the  
Communities, Equality and Local  
Government Committee  
inquiry into the general principles of the  
**Holiday Caravan Sites (Wales) Bill**

From the  
**Chartered Institute of Housing Cymru**

The Chartered Institute of Housing is the only professional organisation representing all those working in housing. Its purpose is to maximise the contribution that housing professionals make to the well-being of communities.

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

For further information on this response please contact  
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## Introduction

CIH welcomes the opportunity to respond to this consultation.

CIH is the professional body for people working in housing and communities, with over 22,000 members across the UK, Ireland, Canada and Asia Pacific. Our mission is to maximise the contribution that our members make to the well being of communities.

Our response is informed by feedback from our members, our knowledge of the sector and expertise from our policy and practice teams.

## General Comments

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of affordable housing at the top of national, regional and local strategies;
- secures investment to ensure the high and sustainable quality of all homes;
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support service in place to prevent homelessness and protect the most vulnerable;
- uses current and potential financial powers to intervene in housing markets and benefit schemes

We understand the difficult decisions that Welsh Government and local authorities must make within the parameters of the UK government's austerity policy and its impact on public funding and spending. This must also be seen within the context of other changes that impact on households living costs and income, including the consequences of welfare reform and rising fuel poverty. It is important to recognise that all of these measures disproportionately impact on our poorest and most vulnerable households.

### The terms of reference for the inquiry are:

To consider—

- 1. the general principles of the Holiday Caravan Sites (Wales) Bill and the need for legislation to modernise the regulatory framework for holiday caravan sites in Wales,**
- 2. the Parts of the Bill, namely:**
  - Licensing (Part 2); - Residence test (Part 3); - Holiday caravan agreements (Part 4); - Protection from harassment (Part 5); - Supplement and General (Part 6),

- 3. any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them,**
- 4. whether there are any unintended consequences arising from the Bill,**
- 5. the financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum, the 'Regulatory Impact Assessment', which estimates the costs and benefits of implementation of the Bill), and**
- 6. the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out Part 1 of the Explanatory Memorandum, which contains a table summarising the powers for Welsh Ministers to make subordinate legislation).**

CIH Cymru understands that the Act pertains to holiday caravan sites in Wales, and not to the primary residences of occupiers.

Holiday residencies are not mobile/park homes; mobile/park homes are located in residential sites, and used all year round by their occupiers as their primary home, and are subject to regulation under the 2013 Mobile Homes (Wales) bill.

CIH is the professional body for the housing sector, and we want everyone to have a decent, affordable home in a thriving, safe community. Whilst CIH Cymru campaigns on behalf of housing professionals, promotes housing-led regeneration, and acknowledges that holiday caravan sites is not generally considered to be a housing issue, we welcome any increased rights for both occupiers and owners of caravans on sites in Wales, as well as intentions to raise standards and increase regulation, and to ensure that managers are 'fit and proper persons'.

We also recognise that there are some housing-related issues relating to caravan-sites and the proposals in this legislation. Where occupiers fail residency tests for example, because they are using the holiday caravan as their principal home or where they can not evidence permanent residency in a place other than the holiday caravan for whatever reason, we have concerns that this could result in homelessness for the household. We also have concerns that vulnerable households or households with protected characteristics, as defined under the Equality Act, may be disproportionately represented and affected in these circumstances. We would not wish for the legislation to have the unintended consequence of increased homelessness experiences for some households.

We have concerns that the additional requirements on local authorities should be fully considered and costed, and additional resources should be made available to ensure effective implementation of these proposals, especially at a time when councils are under increasing financial pressures and other new legislative requirements are happening and will have a cumulative impact.

This includes consideration of the additional statutory requirements to implement and manage the licensing scheme, site inspections and enforcement expectations, developing and raising awareness of the new legislation, as well as additional homelessness prevention, housing-related support and temporary housing requirements identified to meet the needs of any homeless households.

We would also suggest that there may be some scope to utilise the framework and resources of existing and new national licensing schemes in Wales, for Mobile Homes and the private rented sector for example, to reduce duplication, improve monitoring and minimise the resource requirements.