

HCS56

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Tai Pawb



## Tai Pawb

### Response to 'Consultation on the Holiday Caravan Sites (Wales) Bill

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### **Who we are**

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's mission is, "To promote equality and social justice in housing in Wales". It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

### **What we do**

Tai Pawb works closely with the Welsh Assembly Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services.

### **Tai Pawb's vision is to be:**

The primary driver in the promotion of equality and diversity in housing, leading to the reduction of prejudice and disadvantage, as well as changing lives for the better.

A valued partner who supports housing providers and services to recognise, respect and respond appropriately to the diversity of housing needs and characteristics of people living in Wales, including those who are vulnerable and marginalised.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078  
Company No. 5282554

## **1: 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**

Tai Pawb welcome's the potential protection which this Bill affords to both occupiers and owners. We feel that clarity surrounding site licences including associated conditions and consequences for breach of licence is a proactive and helpful step for this type of holiday accommodation.

## **2: The parts of the Bill**

**Residency Test (Part 3 and Schedule 2):** Tai Pawb believes that Schedule 2 could benefit from further consideration and investigation of best practice relating to proof of residency. It would be advisable to take into consideration the proof of residency requirements relating to each of the suggested applicable evidence bases, any potentiality for gaming behaviour should also be addressed. Checks should be made to ensure those who may find it more difficult to prove residency due to their circumstances (and potentially protected characteristics under section 4 of the Equality Act (2010)) are not substantially disadvantaged.

**Licensing (Part 2):** Tai Pawb welcomes the proposed need for 'site managers to be fit and proper persons' and fully support this. In particular we welcome the requirements under subsection 3 (b and c).

## **3: Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them**

Clwyd West Assembly Member Darren Millar, on introducing the Bill has stated there are approximately 70,000 holiday units in Wales however it is unclear how many of these are being occupied on a permanent basis. The 2012 IFF Research, [Park Homes Research: Wales](#), prepared for Consumer Focus Wales highlights a further potential difficulty relating to accurate site classification, the potential of which should be considered in relation to implementation of the proposed Bill.

## **4: Whether there are unintended consequences arising from the Bill**

While we understand and support legislation which seeks to clarify and strengthen the distinction between permanent (residential) sites and non permanent or holiday sites we

have concerns on the potential effect for those who are currently living (illegally) on non-permanent holiday sites. We would welcome clear research to be undertaken with regard to this and a full Equality Impact Assessment to assess if any particular group protected under section 4 of the Equality Act (2010) could be disproportionately affected. If it is found that certain groups could be disproportionately affected we would urge consideration of actions to mitigate these; including (but not limited to) a moratorium of sanctions for those potentially affected by any of the proposed changes. We also believe it would be beneficial to consider how such changes may impact on rates of homelessness in the areas where there exist significant numbers of illegal permanent residencies on holiday sites.

As indicated previously careful consideration should also be paid to the potential for any requirements of this Bill to either permit or encourage gaming behaviour.