

<b>Respondent</b>	<b>Representations made</b>	<b>Proposed response</b>
Park owner	Is of the opinion that their park will meet the criteria of the draft policy and fully supports the proposed policy approach set out in the consultation draft.	Support noted.
Park owner	In other areas where 12 months occupancy is permitted, the units are available all year regardless of the weather. Static caravans and lodges are now built to such a high standard that meet the BS3632 standards that are residential grade. Having a home to use all year has benefits with no need to close down. This approach allows fairer competition with other sites offering 12 months occupancy.	Support noted.
	It is not clear what the difference would be between 12 months occupancy for holiday homes and permanent residency. This needs to be clarified.	It is understood that it is not always possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residencies that would contribute to meeting housing need and as a consequence housing supply.
Park owner	In the event that 12 months occupancy isn't suitable for a particular site, can SBC follow the approach undertaken by neighbouring councils (Thanet, Canterbury and Medway) and allow 11 and a half months?	This is unlikely to be possible given the objectives of the draft interim policy statement.
	Size of parks could be a factor in determining their eligibility for extension to 12 months occupancy. Smaller parks are likely to have a less detrimental impact on local community and surrounding areas.	The significance of park size would be considered on a case by case basis along with other factors.
	12 month occupancy would have a beneficial impact on the local economy and make some services more viable.	Support noted.
	Provides opportunities for those to have their own home who otherwise wouldn't be able to afford one and/or save for a traditional home as caravan/chalet rents are lower.	Support noted.
	Caravan/chalets are particularly suitable for those with mobility and/or health issues.	Support noted.

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Resident of Oak Lane	All parks should have proper vehicular access and a safe walking route for pedestrians.	This will be assessed on a case by case basis and, if relevant to the individual proposals, the highways authority must be satisfied
	Sites should be reserved for non-Travellers	The Council has no control over who occupies any home.
Resident of Minster	Supports the proposed policy and approach.	Support noted.
Park owner	What means and resources will the Council employ to ensure 'unfettered access' to a second home does not become unpoliced residential use when they can't deliver effective policing and enforcement of existing site licence conditions.	Enforcement has already proven to be challenging for existing breaches due to the high legal bar that is set. It is understood that it is not always possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residencies that would contribute to meeting housing need and as a consequence housing supply.
	Does the policy apply to Sheppey or the whole Borough?	This would be a Borough-wide policy if adopted.
	The Borough is under extreme pressure to reach housing targets and to allow the conversion of holiday caravans would be a cheap and dirt way to unload the burden. The Council should not skate around the trouble and expense of planning enforcement activity related to this.	The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.
	The majority of people who are currently being allowed to 'live' on these parks do so because of their limited means and would not have the funds available to sell their existing holiday caravan back to the park owner (at a loss) and then spend many tens or even hundreds of thousands on a new BS3632 rated home. Policy in its current proposals could adversely affect the people it purports to be aiding.	The Council is seeking to ensure a minimum standard for permanent residency housing to be secured in line with Park Homes. The Council accepts that this may not be possible for every case but permanent residency in a home that is not at an acceptable standard will not be permitted.
	BS3632 (for non-permanent dwellings) does not match the stringent properties demanded by SAP calculations in current homebuilding. An explosion of reduced quality dwellings within the borough cannot be a good direction of travel.	Objection noted, although standard is in line with Park Homes.
	Presenting residential status to holiday parks (albeit with a few compliance requirements) will add much value to the premises, as much as doubling the value of some parks. SBC needs to ask itself if it wishes to reward rogue park owners who don't	Not all parks will be eligible for residential status. Permissions will only be granted where the criteria in the policy is met and with conditions.

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	manage their business affairs legally and who flout regulations, because this will be the net result of the proposed changes – they've been breaking your rules and now you propose to fill their pockets with money	The draft policy seeks to ensure a quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.
	If Swale Planning intends to offer residential status to qualifying holiday parks I believe it should place a five-year moratorium (on residential status) on those parks subject to existing planning enforcement notices. This would show great justice and fairness being dealt and would allow the professional and conscientious park operators to show the way forward.	The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal 'high bar' in place for evidence to support the fact that someone is living permanently in a holiday home.
Resident of Minster	Oppose this proposal on grounds of further negative impacts on local image, social deprivation, quasi-urban sprawl and burden on infrastructure.	Opposition to the draft policy is noted.
	To allow existing caravans to become permanent homes would make it difficult to refuse other developments of a similar low standard. To refuse those is liable to end up in Judicial Review, unless the Council could identify exceptional circumstances to justify the exercise of discretion. Shanty towns would spread, consuming ever more viable agricultural land.	Not all parks are eligible to become permanent homes. Proposals will be determined based on their individual merits and would be required to meet the standards of the draft policy as a minimum. Allowing, where appropriate, the permanent use of holiday caravans will assist with delivering needed homes in the Borough and has the potential to reduce some of the pressure to develop on greenfield sites in the Borough.
	Infrastructure on the Island is already at breaking point and will not cope with an increase in more permanent homes.	Opposition noted. Proposals will be determined based on their individual merits and could create opportunities to support existing local services and facilities. Holiday parks will only be eligible to become permanent residences if they meet the criteria in the draft policy.
	The existing arrangements limiting occupation of caravans already sends a clear signal that they are not suitable for permanent residence.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits.
Park owner	Generally supportive of the approach proposed in the draft interim policy statement.	Support noted.

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	<p>With regard to external space standards we suggest that these should be based on Government Model Standards for Caravan Sites in England and Wales. as follows.</p> <p>- Except in the case mentioned in sub paragraph (iii) and subject to sub-paragraph (iv), every caravan must where practicable be spaced at a distance of no less than 6 metres (the separation distance) from any other caravan which is occupied as a separate residence. (ii) No caravan shall be stationed within 2 metres of any road or communal car park within the site or more than 50 metres from such a road within the site. (iii) Where a caravan has retrospectively been fitted with cladding from Class 1 fire rated materials to its facing walls, then the separation distance between it and an adjacent caravan may be reduced to a minimum of 5.25 metres.</p> <p>For chalets this would be controlled by building regulations and subject to materials.</p>	<p>These standards are set out in the draft policy under BS 3632.</p>
	<p>With regards to conditions relating to occupancy, those applied to previous permissions extending occupancy from 8 months to 10 months should be revised. This is because they would not apply satisfactorily to 12 – month occupancy in certain circumstances. Therefore, the current schedule of conditions attached to a planning application should be revised as follows:</p> <p>“ 1.(a) No chalet shall be used as a postal address; and</p> <p>(b) No chalet shall be occupied in any manner, which shall or may cause the occupation thereof, to be or become a protected tenancy within the meaning of the Rent Acts 1968 and 1974; and</p> <p>(c) If any chalet owner is in breach of the above clauses their agreement will be terminated and/or not renewed upon the next expiry of their current lease or licence. On request, copies of the signed agreement[s] shall be provided to the Local Planning Authority.</p>	<p>Conditions for 8 months or 10 months would only be revised through the planning process and an application for a change of condition or fuller scale changes such as for permanent residential use. Each case is assessed on its own merits and would need to meet the criteria in the policy once approved.</p>

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	<p>2. Any chalet that is not the subject of a signed agreement pursuant to condition 2 shall not be occupied at any time.</p> <p>3. (a) The owners or operators of the Park shall at all times operate the Park strictly in accordance with the terms of the Schedule appended to this decision notice.</p> <p>Schedule: The Park operator must:</p> <p>(1) Ensure that all chalet users have a current signed agreement covering points (a) to (c) in condition X of the planning permission; and</p> <p>(2) On request, provide copies of the signed agreement[s] to the Local Planning Authority; and</p> <p>(3) Not allow postal deliveries to the caravan or chalet, postal deliveries to be made to the park office”.</p> <p>This schedule will enable the units to be occupied in a way which complies with the suggested intentions of the council Local Plan Panel report.</p>	
	<p>Para 2.6 should be amended to reference that existing parks could be designated as park home sites if they are satisfactorily laid out in accordance with the space standards set out above and conditions are attached to a 12 month occupancy.</p>	<p>Noted. This is set out in the draft policy.</p>
<p>Warden Parish Council</p>	<p>The revised policy to allow 10 months of the year occupancy was consulted on and agreed. Enforcement action not being taken against 200 individuals. Why are these sites that break the rules not being served the notices?</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>The areas in the East of Sheppey are poorly served by services and facilities, particularly roads, schools, bus services and roads.</p>	<p>Objection noted.</p>
	<p>There has been no enforcement for years on the current regulations to stop unfettered use, what will change if this is granted?</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place.</p>

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	<p>There is no evidence to suggest that more than a very few sites could have access to the millions of pounds to provide the units you are suggesting, prices for Park Homes start at £200,000. Probably 1 or 2 smaller sites might qualify now.</p> <p>The proposals will not help the tourism or economy, the majority of holiday unit users come here to escape the hustle and bustle of town life and could not afford to upgrade their units. and this part of the economy will be lost.</p>	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported.
	If you prematurely allow the sites 12 months to meet your planning specifications and they don't comply, what will you do to rescind the decision, as the councils record of enforcement has been non existent over the last years, which is why you have ongoing situation now.	The grant of planning permission would require any existing holiday home operation to transfer to permanent residency upon compliance with conditions and associated standards being implemented.
	The sheer volume of the units on the island and the implications for the settled community far outweigh the small benefit that can be gained from this substantial increase to the population, which already an area of deprivation. We would urge the council not to pass this proposal and continue with the existing policy until you have complete control of the current problems. Please don't make a "drop in the ocean" problem escalate into a flood.	Objection noted although not all parks will be eligible for permanent residential status and proposals must meet the standards set out in the draft policy.
Park owner	The parks' owner remains supportive of the proposed policy change and the wording of the said policy. However, there are perhaps further opportunities to improve the flexibility of this proposed policy wording. For example, in the instances where only parts of the site are considered acceptable for the siting of caravans as a permanent residence (i.e. due to the layout), the policy could be worded to ensure that those parts of the site which are in compliance with model stands (BS3632) and can achieve an adequate residential layout, are not prejudiced by	General support for policy approach noted. There is no restriction on the size of site that can be submitted for consideration under this draft policy. Parts of sites or entire sites could be submitted and each will be assessed based on their individual merits.

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	those parts of the site that cannot. As a result, a park could effectively operate as a mixed-use park, where certain areas could accommodate caravans used as a permanent place of residence while the rest remains as a holiday park.	
	Regardless of whether the sites are considered acceptable for residential occupation, we consider it appropriate (at the very least) to either remove the policy restricting occupancy of caravans all together, or if still considered necessary, provide an additional policy to the one currently proposed, which sets out a standard condition such as: 'Caravans shall be occupied for holiday purposes only (12 months) and shall not be occupied as a person's sole or main place of residence, whilst the owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans on the site, and of their main home'. This would bring the policy in line with recent case law decisions, which deems the suggested wording sufficient from preventing permanent residential occupation and meets all the NPPF tests for imposing conditions.	Conditions can only be removed through the planning application process. Each case needs to be assessed on its individual merits and the removal of a policy restricting occupancy as suggested would not be appropriate.
Resident/Member of Sheerness Town Council	The proposal suggests that in making changes enforcement of the current rules could be relaxed removing the need to take action against parks presently not recognising restrictions. The Isle of Sheppey already has many Holiday Parks acting as unofficial residential parks. The current system is flawed with many using friends and relatives homes as "main residence" whilst living at these parks throughout the open season. Those presenting as homeless and criticising the closed season do so after knowingly entering into such an arrangement possibly and providing false information.	The Interim Policy would enable a more focussed approach to planning enforcement on those sites not complying with their occupancy conditions which would also not demonstrably be able to meet the criteria policy and/or are within areas where permanent residency would not be accepted e.g. flood risk areas, cliff erosion zone etc.
	The proposal ignores the contribution Holiday Parks make to the Island economy and seasonal employment catering for tourists. Holiday makers and Residential Homes do not sit well	Not all holiday parks would be eligible to change to permanent residential. For example, sites that fall within land at risk of flooding or coastal change would not be permitted. The majority of sites on

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	together. The prospect of mixed use with little to no enforcement as currently the case, is fraught with potential issues.	the Island fall within these categories and would not be eligible for any permission allowing permanent residential occupancy.  Many other existing holiday park sites would have no intention of moving to non holiday park operation.
	Whilst the standard of these Park Homes is higher than a holiday home it is less than ideal and the prospect of such homes being the answer to lack of affordable homes in an area of severe social deprivation is unacceptable. I have little confidence that such an issue would not arise when already occurring under the radar at many of the holiday parks the current Covid 19 situation has illustrated that some Parks will disregard regulations if not monitored.	Comments noted.
	I do question why this idea of “Residential Parks” is focussed upon the Islands existing tourist parks and not other rural areas around Swale.	The draft policy would apply to the whole Borough.
	The current lack of affordable homes on the Island is supported by the current policy that permits sites to come forward with 0% affordable homes. With the Islands average household income way below national average the current homes are attracting “incomers” rather than providing for local housing need. To provide a lower standard of homes for those unable to afford what is currently available we will further add to the overall strain on infrastructure.	The Council has no control over who occupies any home.  The standard of these homes would be compliant at a minimum to BS3632 and suitable for permanent residential use with comparable standards for energy efficiency and so on.  The purpose of this policy is to widen the range of alternative housing products across the Borough.
Eastchurch Parish Council	The proposed Policy is far reaching in its future effects on the holiday parks and the local communities in which they reside.	Comments noted.
	Suggests enforcement issues are greater due to unreported breaches. Are breaches clustered around a particular area. Is the number of breaches increasing against figures for previous years?	The Council can only act on reported breaches.



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	<p>The Council needs to agree on whether to pursue the enforcement action or whether to change planning policy to accommodate it. This would be against their current policies but throws light on the lack of investment in the Enforcement Team in previous years. The policies are only as good as the team who are able to ensure that they are being adhered to. This is very much an issue that the residents do not understand. If a breach of planning occurs, there is little confidence in that reporting it will stop the problem as nothing appears to be done.</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>This proposed change of policy could incorporate residential status on some caravan parks and thereby resolve the issue of breaches over the closed period. It does not take into consideration the long-term effects or the perception of the policy by site owners and users.</p>	<p>Noted.</p>
	<p>Changes to 10-month occupancy across large numbers of the sites has had a negative effect on many of the surrounding residential communities. Whilst put in place to further economic benefits, the real effect has been that of a changing nature and lack of respite for those communities it was designed to protect. It is also quite clear regarding occasional 10 month occupancy being limited to ensure that sites were “not used as permanent housing, affording periods of tranquillity in rural or other areas”. 7.1.28 states quite clearly that “Permanent occupation will continue to be resisted”. 7.1.29 refers to flooding but fails to mention accessibility in winter months. Most of the sites in Eastchurch are located off the Warden Road, these areas are not on a prime salt route in the winter and are all situated in a rural location. The roads and drainage are not well maintained, and flooding is an issue. If twelve-month occupancy were allowed it would put extra pressure on our Parish infrastructure. All sites are served off</p>	<p>It is acknowledged that over time as permissions are granted for permanent residential use all year round, that that will increase the number of permanent households within the areas concerned and the general activity in the area. The increased activity arising all year round would contribute to supporting the viability for services and facilities to be provided.</p> <p>Permanent housing units are required to pay council tax and would be counted by any public agencies in the requirement for infrastructure and services provision.</p>

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	<p>single-track unadopted roads that are not maintained. The local infrastructure is not proportional to the amount of properties if permanent. Eastchurch Parish Council would like figures on how many caravans there are compared to number of Warden road residents.</p>	
	<p>Policy DM5 states that the “amenity and tranquillity of the countryside and residential areas are safeguarded, and that the extension of occupancy is subject to planning conditions safeguarding the holiday accommodation from being used as sole or main residences. This interim policy goes against these safeguards. The list of requirements in Appendix 2 is already being widely disregarded. Caravan sites have regular postal deliveries and there are documented cases within SBC of State Benefit being paid to some addresses. Is there a system in place for ensuring that the requirements are carried out and that the correct documentation is held? Have any of the site owners been contacted regarding the breaches of the conditions? Have any of the site owners had licences revoked or refused because they were permitting the use of the site for longer occupancy than is permitted?</p>	<p>The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.</p> <p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>The main reason for limiting the occupancy was to protect the settled community and the rural areas. We have majority of sites on the island in Eastchurch. Conditions are imposed on site owners and caravan owners, but we question whether these are being checked or enforced.</p>	<p>Not all holiday parks would be eligible to change to permanent residential. For example, sites that fall within land at risk of flooding or coastal change would not be permitted. The majority of sites on the Island fall within these categories and would not be eligible for any permission allowing permanent residential occupancy.</p> <p>Many other existing holiday park sites would have no intention of moving to non holiday park operation.</p>
	<p>Year-round occupation permission does not necessarily equate to permanent residence. However, past history has proved that this is incorrect. Because of a lack of monitoring of the licences on the sites, there are many caravan owners that live on sites</p>	<p>It is understood that it would not be possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residencies</p>

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	as a permanent residence, even if they have to “move” for six weeks from early January to March. During the closed period, some still visit the sites during the day and only some do not actually sleep there for period, which technically means that they are not staying	that would contribute to meeting housing need and as a consequence housing supply.  The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.
	Legislative requirements mean very little if you have bought a caravan and it is your only residence.	Noted.
	Park homes are perceived, rightly or wrongly, as caravan sites to the majority of the general public. The perception would open the flood gates for a different wave of enforcement issues. Whilst in an ordinary setting with few caravan parks around, this may be resolvable, on the Isle of Sheppey this would be untenable. The sheer volume of sites and caravan owners would prove impossible for the majority of the public to be able to distinguish one from the other. The release of properties is smoke and mirrors and assumes that all are house owners and not tenants.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported. Regardless of whether the unit was owner occupied or rented, it would need to have planning permission for year round residency.
	Should the scheme be pursued by the Council, there must be sufficient support for the Enforcement department to be able to function effectively when the inevitable breaches occur. This would apply to not just the newly licenced sites but also to the existing caravan sites and their disregard for existing policies.	Noted.
	If this “interim policy” is agreed, it will have enough weight to cast aside any objections that are made by, or on behalf of, residents. It will be adopted into the Local Plan review as the precedence for its existence will be there. The residential use of a holiday park is an oxymoron. Adoption of the Interim Policy would give the Council a way out of following through on the existing enforcement breaches which is unacceptable.	The interim policy is required to provide an appropriate basis for the Council to consider how best to use its planning enforcement powers effectively whilst also meeting other planning objectives including meeting housing needs. The Interim Policy will not have full weight of planning policy until its inclusion within a reviewed Local Plan which has been adopted following a public examination.

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	<p>Why is this just the Isle of Sheppey? Surely policy should cover all of the Borough. The proposal all the way through refers to Borough and regional attributes and statistics. "Proposals for the occupancy of holiday accommodation on holiday parks on the Isles of Sheppey for permanent residence (12 months of the year)" defeats the object of growing tourism and encourages the use of caravans as a second home. You cannot have permanent holiday occupancy on a holiday site and then call it a permanent residence. It is a trailer park.</p>	<p>Misprint in consultation document. The policy applies to the whole Borough.</p> <p>Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported.</p>
	<p>"Consider" taking enforcement action suggests that there will be an extension to this policy when the full extent of inevitable breaches in unauthorised parks becomes unmanageable. This action should already be being taken on existing policies and existing breaches on the sites and against both the site owners and the caravan owners.</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal 'high bar' in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>The existing position has been backed by Planning Inspectors. This implies that there is a legal backing and justification for the existing policies. The statement suggests that the planning department are already aware of the number of unauthorised occupancies in the caravan parks. The parks are not a solution to problems of poverty and homelessness within the Borough but are a way of disguising and hiding numbers rather than dealing with the problem.</p>	<p>The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.</p>
	<p>Did the Council write to all holiday park owners or just those on Sheppey? Even with a response rate of 60%, the number of site owners supporting the policy remains at less than 50% of the total.</p>	<p>All holiday park owners were contacted.</p>
	<p>The consultation document raises other issues that need to be addressed before the Interim Policy" is agreed as this information has a direct bearing on the ability of the Council to make an informed decision.</p>	

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	<ul style="list-style-type: none"> <li>• Clarification needs to be given on whether this policy would apply to all of Swale or to just Sheppey.</li> <li>• If as is inferred it is for Sheppey, then the figures for Sheppey need to be provided separately along with answers to the questions raised in the report response, number by number. Details need to be provided of the caravan sites in each Parish and the number of units on each. This information must be held in order to provide the statistical data used in the Local Plan.</li> <li>• The question of Council Tax has not been raised but is an important unwritten feature of the policy. Caravan sites can opt to pay business rates to SBC. This then negates the Council Tax cost for site users. Eastchurch has less than 100 units paying Council Tax which means that Precept requirements on the local residential population are higher. The resulting decreased tax base is unfair on the local populations. Owners of caravans should be paying a pro rata amount in Precept for their use of their property in a bid to have equality. The Business Rate system should only apply to business areas and separate Council Tax liability should be applied to each caravan owner on a pro rata basis. Owner occupiers and those that would seek to reside there permanently increases, the pressure on local roads and infra structure.</li> <li>• The Interim Policy could see the creating a new permanent occupation of sites once they were able to comply with the suggested conditions. This in turn would be perceived as a new cheaper housing option and could also be seen as an area for siting of homeless people and the creation or the perceived creation of American style trailer parks.</li> <li>• Enforcement and Legal need to have the support of the Councillors and the trust of the residents. At the moment this is not there. This is about the historic underfunding of Enforcement in Officers and support staff. The levels of</li> </ul>	<ul style="list-style-type: none"> <li>• Policy applies to the whole Borough</li> <li>• This information (number of units and location) will be collected as part of the Council’s monitoring work</li> <li>• Permanent residential units are required to pay council tax</li> <li>• The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.</li> <li>• The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence</li> </ul>

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	<p>breaches have risen over the past years as officers are overwhelmed with the number of cases. The issues need to be taken back to basics with the Council looking at a realistic way of dealing with breaches. This policy is an attempt to solve a problem by taking away the restrictions. If the restrictions had been enforced in the first place, this situation would not have developed. Whilst everyone is aware that funding is always limited, budgets must be adjusted in order that the appropriate staffing levels can be applied to provide an adequate service. Taking away the policy because you cannot afford to enforce it is the wrong measure as is trying to introduce a measure that tries to reduce the workload by covering up the perceived problem.</p>	<p>to support the fact that someone is living permanently in a holiday home.</p>