

Mr P Barnett
Environmental Health Department
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA

1 December 2015
Our ref: AC/49944-3/ap

Direct Line: 01392 204511
Secretary: 01392 667682

Dear Mr Barnett

**Fairhaven Park, The Reddings, Cheltenham GL51 6RW
Caravan Sites and Control of Development Act 1960**

We act for Turners Regency Parks Limited ("Turners") who are the owners of Fairhaven Park. The company recently changed its name from Regency Park Homes Limited and we understand that you have been in correspondence with Mrs Peachey of Turners regarding the transfer of the Site Licence into the new company name.

We would be grateful if you could transfer the Licence in to the following name:

Turners Regency Parks Limited, Fordham Road, Newmarket, Suffolk, CB8 7NR.

In addition our clients have suggested, subject to your comments and approval, that it might also be a good time update the Site Licence conditions so that they reflect the Model Standards 2008 for Caravan Sites in England.

We would suggest that the 2008 Model Standard conditions are used throughout with the following exceptions:

Condition 2: Density, Spacing and Parking between Caravans

Condition 2(iv)(d): We understand that Cheltenham Borough Council does not generally permit garages between caravans. Our client is also not keen to allow garages between homes and we would therefore suggest that condition 2(iv)(d) from the Model Standards should be removed. This condition states "*A garage or car port may only be permitted within the separation distance if it is of non-combustible construction.*"

Condition 2(iv)(f): As you will be aware from your annual site visits there are a number of pitches which have hedges that are greater than 1 metre in height. We understand that you have requested that when individual caravan owners leave/sell their units to new owners the hedging around the pitch is then reduced to a maximum of 1 metre high. Our clients have been following your advice on this and would request that condition 2(iv)(f) which states *"Fences and hedges, where allowed and forming the boundary between adjacent caravans, should be a maximum of 1 metre high"* should not be imposed on the new licence. It is not a condition on their existing licence and our clients would not wish to be in immediate breach if the new licence contains this condition. Our clients will continue to reduce the hedging as each pitch is newly occupied.

Condition 14: Communal Recreation Space

As this is an existing site rather than a new site or the redevelopment of an existing site this condition from the Model Standards is not appropriate. The Introduction to the Model Standards states: *"These standards should be considered when applying licence conditions to new sites and sites that have been substantially redeveloped. In considering variations to existing site licences or application for new site licences for existing sites local authorities should consider whether it is appropriate for these standards to apply."*

We would suggest that either this condition is removed in its entirety or it is modified to reflect the existing condition (17) which states *"where children live on the site space equivalent to about 1/10 of the total area should be allocated for children's games or other recreational purposes"*. Turners' parks can only be occupied by the over 45s and children are not permitted to live on their parks. Therefore there is no need for an amenity space of this size.

Condition 18: Fire Safety Measures

Condition 18 of the Model Standards should not be applied where condition 17 takes effect. Because the Regulatory Reform (Fire Safety) Order 2005 applies to this park, only condition 17 is relevant for the licence.

We trust that this letter contains sufficient information for you to transfer the Licence into the new company name and to amend the Licence conditions to reflect modern practice.

Should you have any queries please do not hesitate to contact Amy Cater at this office.

Yours faithfully

Tozers LLP

TOZERS LLP

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