

HCS45

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Morgans Lodge Caravan Park

National Assembly For Wales, Communities, Equality and Local Government Committee.

Dear Miss Chapman

I believe that you are the chairperson for the committee currently considering the Caravan Holiday Sites Wales Bill, .I would appreciate if you could ensure that your fellow committee members receive a copy of this letter.

I am a partner and manager of a small family owned holiday caravan park in south Pembrokeshire. Our park has 60 pitches for static holiday caravans and 15 pitches for touring caravans.

We are members of the British Holiday and Home Parks Association, I write today to inform the committee that we fully endorse the views of the BHHPA. We honestly believe the bill in its current form will add significantly to our administration both in terms of time and cost. We also feel that the extra regulation proposed within the bill could potentially disadvantage caravan park businesses in Wales, when compared to caravan parks in England and similar businesses based in Wales that would not be burdened with the extra regulation currently being proposed in the bill.

Our park is only open from the 1st April until the end of October, the section of the bill dealing with customers residency would appear to have no place in a seasonal business such as ours, it would be totally impractical for a customer to use their caravan as their main residence. We are a holiday park, the new legislation being currently proposed would add significantly to our overheads.

The section of the bill that deals with fit and proper person licensing. I have been involved in the caravan park industry for more than 35 years, I have managed our family run park for almost 20 years, I do not have a criminal record, I have never been reported to trading standards or any other body that deals with consumer protection and have a very good working relationship with our local authority. The issue is in dealing with documentary evidence to support this. I believe it would be extremely time consuming and expensive to provide the documentation required and question the need for this regulation when it does not currently apply to businesses of a similar nature.

Fixed penalties, as I have already stated we have a good working relationship with our local authority. Our park is rated by Pembrokeshire County Council as being a low risk park, this means in general terms that we closely follow the current regulations. However this does not mean that we are perfect, there have been over the years some very minor breaches of the regulations, we have always worked with the local authority to rectify any breaches as quickly as possible. The proposed fixed penalty of £ 500 would appear to be very excessive when compared to the nature of the regulation breaches that we have encountered.

I humbly ask you and your fellow committee members to seriously consider the implications of the proposed bill to the caravan holiday park industry in Wales and to take into account the verbal evidence being presented to the committee by our trade association The British Holiday and Home Parks Association.

Yours Sincerely

Richard John

Morgans Lodge Caravan Park