

HCS65

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Meldrum Leisure Ltd

To: CELG.committee@wales.gov.uk

Cc: enquiries@bhHPA.org.uk

Subject: **Consultation on the Holiday Caravan Sites (Wales) Bill**

Christine Chapman AM

Chair, Communities, Equality and Local Government Committee,
National Assembly for Wales

Dear Ms Chapman,

I am Managing Director of 4 Holiday Parks across north Wales – one on Anglesey and 3 in the Criccieth and Porthmadog area in Gwynedd. We are a family-run holiday park business providing 187 pitches for static holiday caravans, 18 holiday lodges and 25 pitches for touring caravans.

I write in response to the consultation on the Holiday Caravan Sites (Wales) Bill. My trade association, BH&HPA has responded on behalf of all members and I endorse their evidence - on this [link](#) - to you. To summarise key grave concerns that I have with Mr Millar's Bill

The industry has given qualified support to Mr Millar AM's objectives. Mr Millar AM has engaged with us in the development of his Bill and whilst the requirements now proposed are more pragmatic than the earlier version upon which we were consulted, **yet considerable grave concerns remain.**

I feel this is very bad lawmaking for Wales and would ask that the Committee at this stage takes these grave concerns on board:

1 There is **no** authoritative research as to the extent of residential misuse of holiday parks across Wales. The only research study of the issue was conducted by Sheffield Hallam University relating to the East Lindsey local authority area in Lincolnshire⁴. The report makes clear that the circumstances in East Lindsey are unique and so its findings cannot be extrapolated to the whole of Wales

2 The industry recognises the need to modernise site licensing for holiday parks under the Caravan Sites and Control of Development Act 1960 in order to give local authorities resources through appropriate charges for their licensing duties. **However rather than modernising the system, the Bill proposes radical reform.**

3 Such sweeping change creates risk for the industry and its contribution to the Welsh economy. Given the **magnitude of the changes proposed, they should not be enacted**

in the absence of an evidence base for the problems the Bill seeks to address, nor without proper evaluation of their costs and impact.

4 The appropriate approach would be to **establish a proper evidence base to guide reform**. A more cautious approach is necessary to give knowledge and experience to safeguard the economics of the industry and the employment it sustains, whilst ensuring a regulatory system to safeguard the industry and its consumers.

5 The Bill modifies and applies the requirements of the Mobile Homes (Wales) Act 2013 to holiday and touring parks. However, **protections designed for housing vulnerable elderly residents are inappropriate when applied to tourism businesses** and would create a disproportionate burden.

6 Whilst residential parks trade in a relatively stable market, consumers and investors of tourism businesses can simply decide to take their custom and/or investment elsewhere. Flexibility is essential to respond to the volatility of the holiday market. **Tourism is price sensitive and regulation should not disadvantage Welsh park businesses' ability to compete.**

7 Despite incorporating elements of industry best practice amongst its proposals, when viewed in the round, the whole is greater than the sum of its parts. **Combined, the measures would create a disproportionate burden of uncertain cost and unknown impact.**

8 The regime for residential parks upon which the Bill is based will not be commenced until October, so its costs and consequences for residential parks are as yet unknown. If enacted, Wales's holiday and touring parks would be the first in the UK to trade under such a complex regulatory regime as is proposed. **There is considerable potential for unintended consequences – and therefore high risk - in applying such an untested system to the sector which is central to Wales' tourism economy**

I ask please that you ensure my park business is not placed at a competitive disadvantage, jeopardising the direct and indirect employment we sustain locally. My biggest concern as MD of Meldrum Leisure and Chair of Gwynedd and Anglesey BH&HPA Branch, is that whatever legislation is introduced, there will still be concerns about the ability to enforce it. I am confident that our Branch members in Gwynedd and Anglesey and a great deal of non-members will not be in current breach of any regulations pertaining to our parks will be an additional and disproportionate burden on what is already an over-regulated industry. We do not feel that a Given additional regulatory expenses both time and finances, this feels very unfair and disproportionate to an already over-regulated industry. A, fit and proper person licensing and interim managers do not, in my mind, seem to be appropriate and proportionate regulations for my small family business here.

Whilst modernisation of the current regulatory regime would be likely to give benefit and receive industry support, the Bill's proposals to introduce a complex and inappropriate regulatory burden would place our holiday parks at competitive disadvantage, risking the jobs they sustain. Therefore, we underline our grave concerns at the un-costed regulatory burden the Bill proposes. The principles of better regulation should be applied

Yours sincerely,

Bruce Meldrum

Managing Director: Meldrum Leisure Ltd
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General messages for Assembly Members