

HCS72

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Kingsbridge Caravan and Camping Park



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CONSULTATION on HOLIDAY CARAVAN PARKS (WALES) BILL

BH&HPA MEMBER G214

As a partner in a small family owned Holiday Park of 28 static holiday caravans and 90 pitches for tents, touring caravans and motor homes I wish to respond to the proposed Bill.

By means of an introduction, I have attended two meetings held by Mr Millar AM, during which he stressed the need to legislate on Caravan Holiday Parks in order to avert a decline in the industry as a whole because of the issue of residential use of Holiday caravan pitches. He stated the scale of the “problem” may be as many as 2000 families residing in “Holiday” caravans.

I have no idea of the scale of the problem but a starting point should be to establish true data.

Whilst I recognise the problems which can occur within the local communities due to residential use of holiday caravans I strongly disagree with the arguments presented by Mr Millar AM for addressing this situation for the following reasons:-

1. Adverse Effects. I do not think the residential use of holiday caravans on some parks will have the slightest detrimental effect on the future of the industry as a whole, as predicted by Mr Millar AM. Customers come to Kingsbridge because of the welcoming staff, top quality facilities following

investment of some £500,000 over a 14 year period and our commitment to nature and wildlife. I am certain this will apply to the many high quality, individually run parks throughout Wales....each will have attributes to attract loyal customers.

2. Current License Breach. Having spoken to our Ynys Mon Enforcement Officers, I believe sufficient powers are already in place to deal with park owners who are in breach of site license conditions. (Indeed one wonders why Mr Millar and his fellow Councilors did not pursue targeted action against those errant parks within their constituency all those years ago!!).

3. Residential Use. The primary issue is residential use of a holiday caravan. This Bill, should it become Law, will not solve this issue. It would not be possible to make 2000?? families homeless so logically I can foresee only 3 possible scenarios:

a. A controlled amnesty for parks in breach of license agreements, with “residents” being phased out over a number of years (as alternative housing becomes available) and pitches replaced with “holiday” units, meanwhile charge a realistic council tax on the residential vans. Money will probably just change departments of the local council if residents are receiving social benefits.

b. Evict residents. Then deal with claims for compensation for loss of caravan home and deal with homeless.

c. Invest in a house building programme then displace persons from caravan parks into new housing.

4. Residence Test .An annual confirmation of primary residences is simply creating more un-necessary work for the small business owner. More red tape in direct conflict with the Conservative European Election pledges to reduce “red tape” for small businesses!

Forcing the local council to check on residence status annually can only lead in one direction.....insufficient council officers so they will have to recruit more staff and hence the council will introduce charges to Park Owners to balance the local budget. Therefore small businesses will have to bear the burden of yet another indirect tax. Small businesses have not had an easy time in the last few years with rising costs in all areas and revenue being limited by a population, whose salaries have not been keeping a pace with inflation, seeking “value for

money” holidays.

Increased costs can only either result in lower profit margins and hence less money to re-invest in the business or passing of costs to the already hard pressed customer who has already had to endure 20% VAT applied to water and sewage charges and rates portion of site fees.

5. Owners Contracts. With regard to contracts for holiday owners then the BH&HPA standard documents should be adopted as the standard format.

6. Owners Protection. With regard to protection for holiday home purchasers then I believe they have adequate recourse under the Sale of Goods Act and complaints via the Office of Fair Trading. The purchaser however should accept a degree of responsibility for his actions and ensure he is signing formal contracts with purchase conditions and park agreements in place.

Finally I wish to ask you to vote against this bill as it is not fit for purpose and has the potential to cause financial losses to many law abiding park owners and will do nothing to rectify the problems that exist in a minority of parks.

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