

HCS87

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Pant Gwyn Farm Caravan Park

Dear Ms Chapman,

I am the owner of Pant Gwyn Farm Caravan park in Gwynedd. This is a family-run holiday park business for 70 static holiday caravans and one holiday let – a diversification from our original business as farmers.

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. In particular, I do feel costly layers of oversight are being added to (in our case) a small business.

- No solid case has been made for the introduction of a fit and proper licensing regime and it remains unclear to me why this is needed to run a holiday caravan park any more than any other business given the existing safeguards, both statutory and regulatory, against sharp practice.
- Similarly, the introduction of hefty fixed penalty notices is concerning: either they will be handed out by the councils which benefit from the income thereby generated, or they will be independently administered (as natural justice would surely dictate) and thereby be rendered even more expensive to both prosecute and defend. The costs of dealing with disputed fixed penalty notices would escalate, so the inclination on the alleged offender would be to pay up early just to be rid of the problem (rather like unfair parking tickets). Then they simply become seen as just another overhead – a stealth tax of business, with disproportionate effect on small businesses.
- I have no issue with the requirement to provide written caravan agreements: we do this anyway, using the BH&HPA model terms. But I share the Association's concerns with the elements of section 56(3) discussed in the Association's response.

– Finally, I cannot stress too heavily how disastrous the notion of fixed duration site licences would be to the operation and modernisation of parks and investment in them generally. The Association has rightly touched on the issue of access to lending. Another equally important point is the confidence that our customers would have in making a long-term investment in buying a caravan when there is the possibility that the park in question may not have its site licence renewed. It is a great relief that this wrong-headed proposal now appears to have been dropped.

It is always open to legislators, with the best intentions, to say “if you are behaving well, what have you got to fear?”. I personally am happy that my own business is run well and fairly but I do fear the dead weight of regulation – a sledgehammer to crack a nut; the build up of "salami slices" of increasing regulation of this type does place our businesses at competitive disadvantage, jeopardising the direct and indirect employment we sustain.

Yours sincerely,

Richard Wallis.

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