

HCS57

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Wood Park Caravans

Wood Park Caravans

New Hedges

Tenby

SA70 8TL

22 May 2014

Dear Sir

**Holiday Caravan Sites (Wales) Bill**

Wood Park is a medium sized holiday park in Tenby with 90 pitches for static caravans and 60 pitches for touring caravans and tents. We have a hire fleet of 15 caravans and the rest are privately owned. We do not allow sub-letting, therefore the caravans are only used by the caravan owners and their families. My parents bought the park in 1969 and my husband and I are the second generation to run it, our daughter will become the third. We have a good relationship with the caravan owners on our park, many of whom we regard as friends. Our park opens at Easter or the 1<sup>st</sup> April whichever is earlier and closes at the end of October, as per the terms of our site licence to which we adhere.

We would like to make the following points with regards to the Holiday Homes Bill:

1. The present Government pledged less bureaucracy and red tape for businesses. This proposed Bill serves to add the burden of cost and hassle for small family businesses, and most caravan parks are family businesses.
2. There is evidence to support the fact that tourism in Wales is declining especially in Pembrokeshire. The number of visitors coming to Tenby has declined due to the stag and hen parties in the town at weekends, which is off-putting to families with children. The traditional family holiday here is not as popular as it was in the 1970's. The front page of "Tenby Times" Issue 118 July 2011 says "The Future of Tenby as a family holiday resort is being put in jeopardy" it has been claimed by County Councillor Michael Williams. A report on ITV Wales on Friday 13 April 2012 referred to "Wales's declining tourism industry". This Bill will serve to alienate Wales further as a desirable holiday destination and this will further serve to increase unemployment, poverty and .... In Wales. Tenby is so rough at the weekends that families and elderly people go into the town once and then will not return. They tell us they will not visit Tenby again. Even a publican from Pembroke Dock describes Tenby as "Bloody rough".

An article in the Daily Mail dated 31<sup>st</sup> March 2014 states that Britain's 'decaying' seaside resorts are in danger of becoming 'ghost towns'

<http://www.dailymail.co.uk/travel/article-2593178/Britains-Victorian-seaside-resorts-danger-ghost-towns.html#ixzz31Jp7FZ9p>

Welsh resorts will decay further by the introduction of this Bill as it puts Wales at a disadvantage – businesses will be devalued, caravan owners will be affected and business owners will leave and buy parks in England, especially the South west where tourism is booming.

3. The majority of holiday parks are small family businesses owned by honest hard working families or couples not corporate businesses and are the "Cinderellas" of the tourism industry, ie working

hard for long hours for the least return for our investments. Mr Millar wants to tar these small family businesses with a small minority of ruthless unscrupulous businesses along the North Wales coast. We do not operate our businesses like they do and cannot afford the burden of cost which will be imposed upon us. Councils are strapped for cash and have more important things to spend money on than regulating law abiding honest business people.

4. Family parks are being discriminated against in this Bill due to local authority sites and organisations like the Caravan and Camping Club being exempt from the proposed legislation. This is totally wrong – it should either apply to all or none.
5. The £500 for a minor contravention of a site license is punitive for small family businesses. Site Licenses state that one car only may be parked alongside each caravan, but no matter how hard a park tries to enforce this, there are always unavoidable times when there are two cars parked by a caravan. This would surely become a fantastic revenue stream for cash strapped councils.
6. With regards to the £500 fines and the “fit and proper person” test, imagine the following scenario: You own and run a small caravan park. There are two cars parked by a caravan. You knock at the caravan door and a person answers, holding a can of beer and who has obviously had a few drinks. You ask politely if he will park the second car on the car park as you are liable for a £500 fine. He becomes aggressive due to the drink. You walk away to avoid a situation. He then calls after you accusing you of being rude and ignorant. Next he uses the park’s WiFi and leaves nasty comments about you on Facebook and social media sites as he has an axe to grind as he does not want abide by the rules. Then he leaves bad reviews, which affects your bookings, and contacts the local council and Visit Wales, who side with the consumer. You are then fined the £500 for allowing two cars to be parked against the caravan and deemed no longer a “fit and proper person” and the council or whoever will install an interim manager in your park. You are forced to sell your business for less than the market value. You are left with no job, no business and no income. You cannot sign on because you have sold a business. The future is amazingly bleak. Your family has no inheritance. Thus, a trivial case could soon snowball into a big problem.
7. I would like to point out that my family has never abused or harassed caravan owners on our park and to insinuate this is unfair. I would also just like to make you aware of the abuse and harassment caravan park owners have to take from members of the public if something does not suit them. For instance, we recently received an abusive email because we do not accept certain breeds of dog on our park - our grading officer from Visit Wales was appalled by this. It is a pity that this type of person cannot be regulated and banned from respectable parks. Surely we have a right to control what happens on our own property. What happens if a caravan owner or holiday-maker is causing a nuisance to other people or is not abiding by our site license – will we not be allowed to approach them to deal with the situation?
8. Other businesses are not subjected to a “fit and proper person” test. Many park owners are regulated by the Financial Services Authority, does this count as being a “fit and proper person”? Does a minor offence like shoplifting or speeding preclude someone from buying or running a caravan park? That would not make someone a bad person and incapable of running a caravan park.
9. The Bill should be flexible to accommodate changes in the market due to economic forces, whereas these proposed changes will add further bureaucracy which will hinder the industry in the long term.
10. The National Assembly for Wales Communities, Equality and Local Government Committee does not have a member from Pembrokeshire, Ceredigion and other tourist areas therefore it is unfortunately not representative of the tourism industry.
11. Tourism should not be treated in the same way as housing. It is not connected to the housing market in any way, shape or form. It is a minority of parks which brought about the proposed Bill by allowing people to live in caravans on their park. **THIS IS NOT A FEATURE ACROSS THE WHOLE OF WALES.** There is legislation in place to cater for this but it was brought about by the lengthening of the season and the government wanting to encourage year round tourism. Certain parks have taken advantage of this, but there are many parks who, like us, are only open March to October and they would not be attractive for people who want to live cheaply in a caravan then

move in with relatives or go abroad for a few weeks. The Bill infers that it happens on all parks and that all parks are open for 11 months which is not true.

12. The cost of residency tests for caravan owners is mentioned, but the taken time is not. Small caravan park owners – husband and wife businesses – do not have the time or resources to devote to this type of unnecessary paperwork. We trust the caravan owners on our park as they trust us. Many of them we are happy to call our friends, and to ask for sensitive information from these customers breaches the existing relationship and trust. This also goes for the need to display utility bills – the majority of caravan owners would not be interested in this information and also it causes a problem with regards to accounting. On small/medium sized family parks where customer service and our good reputation are all important in running the park, the caravan owners, in effect, have their caravans in “our back gardens”, therefore, we have to have a good relationship with the caravan owners and this is based on trust, friendship and building a lasting relationship. The introduction of these tests and clauses will only serve to break down the trust and that relationship. Thus the residence test etc would work against the customer service offered by small family businesses and would fail therefore to meet its objectives.
13. There is only one way to deal with the problem of holiday caravans being used as a main residence and that is to reduce the amount of time the caravan park is open. Issuing licences for parks in certain areas to open for 10.5 months has encouraged people to use holiday caravans to live in. If parks close at the end of October (as ours and many other parks do) and do not reopen until March this would alleviate the problem. Holiday parks should only be allowed to use their letting caravans for a longer period for weekly holiday bookings. Privately owned caravans should only be used for a maximum of 8 months.
14. The Bill will mean more cost to park owners in an already depressed industry. The costs would ultimately be passed on to customers who cannot afford holidays and this would reduce trade. People already complain about the cost of holidays in peak season (which is less in Wales than the South West) and the extra burden on park owners will filter down to the public making Wales less competitive. Leave things as they are. Deal solely with the parks where people are living and leave the rest of us to run our businesses as we see fit. Why should respectable and responsible business owners have to suffer the consequences of this Bill when we do not have problems and have to suffer because of a minute number of parks who do not abide by the law etc.
15. There would be negative impacts on the holiday caravan industry if any additional regulation or costs are incurred as a result of this legislation – there would be reduction in the value of businesses, potential new caravan park owners would not buy parks in Wales where they would be subjected to such stringent legislation. This would push prices of parks up in England and Scotland and devalue them in Wales, where they would become unsalable. It would result in many caravan parks in Wales being put onto the market – including ours – and would have a detrimental impact on tourism generally as the public would buy their caravans in England or not even bother at all.
16. Government and local authority finances are finite in these times of austerity. Surely it would be better to prioritise these resources rather than spend time on some pointless Bill. I suggest that it would be better to cut waste and deal with things that really matter to the public as a whole rather than something which affects a small minority. Spend money on these things that really matter rather than picking on an industry that is suffering because of the weather over the last few years and the recession. Surely it is better to have less red tape so that business can thrive rather than stifling family businesses by over-regulation.
17. Licences should not be charged for as parks are granted planning permission and the license is part of the planning conditions. We pay highly for our business rates which already fund the current system. Licences should not be for a fixed period of time – if a licence renewal was denied then the park owner and their family would no longer have his/her business, there would be a serious decline in the value of the property, a forced sale of the business and also the caravan owners would have a problem as they would no longer have anywhere to put their caravan. It would cause unemployment in areas where tourism is the main employer.

To conclude, customer service is paramount to our business and we pride ourselves in providing excellent service with value for money. We have a large regular and repeat customer base and we have a friendly relationship with our private caravan owners and this Bill would serve to work against this. The Bill will give rise to over administration and the cost will be prohibitive for both local authorities and small family businesses. Holiday prices, site fees for private caravans will increase and Wales will become less competitive as a tourist destination which is already in decline. This will cause devaluation of parks and they will become ghost parks while those in England will flourish. Thus the Bill will serve to go against what its original intention to protect the caravan holiday industry. It contravenes the Government's plans for year round tourism and will deter tourists coming to Wales to stay on parks or to buy holiday caravans on parks, which will in turn have a detrimental effect on local economies.

Yours faithfully

*Jill E Hodgkinson BA (Hons) PGCE*

*Edna Hodgkinson*

*Paul Henshall*