

HCS94

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Haulfryn Group

Dear Sir/Madam

I am writing on behalf of the Haulfryn Group to support the evidence that the BH&HPA are putting forward to the Welsh Assembly. The points raised within the draft response contain the concerns that the Haulfryn Group have with the proposed Bill and those already raised to the BH&HPA. We are pleased that all our concerns have been voiced via the BH&HPA.

Although the following points are covered within the response we would like to stress that in particular we feel the following proposals are not suitable to our business:

£500 fixed penalties

The amount of the penalty is disproportionate to any other fine within the industry, especially for a potentially minor breach of licence.

The penalties can easily be abused and used as a quick way for local councils to flex their powers rather than actually address the issues that they are designed to prevent and work with us as park operators. We would far rather a collaborative solution where we work with local authorities to fix potential issues as opposed to be given quick fines.

It would also be far better for operators to invest the money to resolve any issue than deal with and pay quick penalties.

Interim managers

We do not understand that as a company that owns 11 holiday and 15 residential park, why a local authority can overrule our business decisions and force interim managers to run our parks.

If a manager is not performing we would notice this through our customer feedback system, internal audits and monthly business reviews i.e. our

business would naturally suffer. It should therefore be our decision who should run each of our parks and we, as a commercial business, should be able to control this.

Removal of the ability to decide who runs our business removes the ability for us to run the business. Whilst the local authority should be able to inform us of any concerns they may have we feel that this power is a step too far.

#### Residence test

We strongly agree that the proposed measures are easy to pass even if an owner is residing on park. We have found ourselves that owners can provide documents that show them residing in one location when they no longer are. As a Group we actually already request annual proof of residence and do so at the point of sale but have received many complaints from our customers regarding the process. They, as well as us, can see what a costly and timely process it is.

Despite refining our processes it is still very admin centric and when coupled with chasing owners and responding to frustrated owners who fields complaints we feel that the estimated cost are off the mark.

Kind regards

Steve Lattimore  
Business Process Manager  
Haulfryn Group Ltd