

HCS47

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Broughton Farm Caravan Park

Christine Chapman AM

Chair, Communities, Equality and Local Government Committee,

National Assembly for Wales

Dear Ms Chapman,

I am the owner of Broughton Farm Caravan Park in Llangennith, Gower, Swansea. This is a Caravan Holiday Home Business provided 250 pitches for static 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.

In addition to their evidence I have particular concerns regarding two points.

1) I have since 2004 signed written licence agreements with my customers in which they confirm that they will be using their holiday homes for holiday use and not for residential use. It seems to be unreasonable to retrospectively impose the requirement to collect documentation of separate residence when they have already signed an agreement stating that the caravan is only for holiday use, and if a customer declines to provide the documentation what happens next? I can understand a separate residence test required at the time of a new licence agreement but the subsequent need to annually renew this check seems unnecessary (if they have signed a clearly written holiday use only agreement) and again what are the intended consequences if customers fail to provide the documents after the first anniversary of the agreement?

2) Secondly is it intended that failure to collect such evidence would then constitute a breach of the site licence and thus be subject to a fixed penalty fine of £500.00? To presume that all officers working for all authorities in Wales will take a practical and sympathetic view and avoid the temptation to raise revenue by use of fines for any breach of licence , however minor, is simply naïve. I therefore feel the proposed regulations drawn from housing regulations are inappropriate and need to be rethought.

I ask please that you ensure my park business is not placed at competitive disadvantage, jeopardising the direct and indirect employment we sustain.

Yours sincerely,

Robert J Elson

Partner

Broughton Farm Caravan Park