

HCS101

National Assembly for Wales

Communities, Equality and Local Government Committee

Holiday Caravan Sites (Wales) Bill

Response from: Amroth Bay Holidays

Attn: Christine Chapman AM

Chair, Communities, Equality and Local Government Committee,

National Assembly for Wales

Dear Ms Chapman,

I am the owner of Amroth Bay Holiday Park in Amroth, Pembrokeshire. This is a holiday park business, providing 40 pitches for static holiday caravans. We have a 5-star rating from Visit Wales and win awards from Wales in Bloom for our flower displays.

Like many businesses providing tourist accommodation we are a small husband and wife partnership. We employ 2 permanent staff and 2-4 part-time seasonal staff. . Most of the income from our customers goes to either the bank (~25%) or the government (30% – 40% in VAT and other taxes followed by wages and spares and consumables). We try to live off the final 5%! (£15000 max in a good year, almost nothing since the recession!).

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.

We are concerned that the bill, in trying to provide belt and braces support to some councils and customers – over and above the current laws that are deemed satisfactory for other businesses – will impose an impossible strain on people like ourselves. We already work 7 days a week and still cannot get all the work done!

Fixed penalty notices:

1) There would have to be some sort of appeal route and some protection against malicious complaints. When we first took over the park, a local farmer who had a grudge against the previous owner and who then transferred his grudge to us when he found we would not submit to blackmail and intimidation, frequently phoned the council to complain against us. The council refused to tell us who was complaining against us, we had to work it out over a period of several years. Because the council were not open with us, it was difficult to form a defence – especially when (we sensed) the council were pre-disposed to believe a caravan park would be in the wrong. It took us a lot of effort to prove we were innocent! There should be a well publicised defence procedure – far better than the small claims court where even here the defendant is assumed to need far less help than the claimant!

Our customers would not care a hoot if we went bankrupt. They have no idea of the cost of running a park and I fear would some seize on any legislation that they could use to lower their costs even if this would result in an unworkable financial scenario.

I have even had an angry customer quote the Mobile Homes act to me because they did not understand the difference or understand how much we were trying to help them!! Paranoia can so easily blind people to the good work we do – how many people would work the hours we do for so little money?

It is really important that the ignorant do not destroy our livelihoods.

2) why are holiday caravan parks being treated on these issues differently from other businesses – eg hotels, guest houses, etc?

3) what is a small fine to a large business is a re large fine to a small business.

Fit and proper person:

We completely agree with the associations views. Also recent court cases involving carers of old people and nursery children have shown that even here the protection does not work! And lets face it MPs need to put their own house in order here! They have been shown to be fraudulent, to be liars, to be incompetent – why do they not need a fit and proper person test?

Provide Utility bills to customers

I don't understand this? Why would they want utility bills, most of our customers come for just a week end or midweek break! – Renting a caravan for just that period. Even Private Owners do not understand the business. When I set them a quiz with a prize for guessing how much it cost to run the park for them, no one came even close! (all underestimated by a huge amount). They wouldn't believe they are better off than us! – Many have that big city mentality whereby they are paranoid that others are better off than them and ripping them off.

Also, none of the services we charge for are on a single bill, even electric bills are delivered quarterly and then checked by us and reissued by the elec. co. after correction – so no simple correspondence to a customers bill here. And then the customer would have to take into account the number of occupied pitches when checking the standing charge apportionment make allowance for day and night-time meters.

With water, we are currently paying off a large bill due to an undetected leak, so the customer charges are currently less than they would be! So again showing them the bill would be of no use.

With waste disposal there are 4 different charges involved: the general waste, the recycling, the green waste – which are invoiced to us and the: newspapers, electronic eqt and metal parts (which we take to the local depots and make a small end of year charge for). And we run a private sewage system – there are bills for pumps, and other spares; de-sludging, soak-away construction and associated materials (Inc. loan repayments to afford cost), and our labour to maintain the system. Potentially to prove these charges I might as well hand over the whole accounts!!!

It is also worth noting that bills for the season continue to come in during the closed weeks of the year and these need to be added to the seasonal charges. The cost of services will vary from month to month as the most popular weeks of occupation come and then go, so no single bill will show the complete picture.

When all is said and done we are a HOLIDAY park not our customers' carers and the only valid concern may be the residential use of plots. Since we are a small park we know all our customers personally and no-one abuses the rules.

Quite frankly if I did not want to live where I do in Pembrokeshire, I wouldn't do this job – 7 days a week, no money for the last 4 years except working tax credits and a meagre early pension I had to take out to stave off destitution! Those well-off idiots who thought-up this bill should try doing this for a living!

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,
Nigel Clark Proprietor

Amroth Bay Holidays

Amroth

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Pembrokeshire

SA67 8PR