

**Communities, Equality and Local Government Committee
Regulated Mobile Homes Sites (Wales) Bill
RMHS 16a Mrs Rachel Jebbett**

**National Assembly for Wales
Consultation on the Regulated Mobile Home Sites (Wales) Bill**

To **Ann Jones AC/AM**,
Chair of Communities, Equality and Local Government Committee

My name is Rachel Jebbett and I am a private individual, a park home owner living on a site in mid Wales with my husband. The views expressed in this document are mine alone and do not represent the views or opinions of any other person, group or organisation.

Thank you for the opportunity to write to you concerning the issue of the proposed dual licensing system, discussed at the evidence session of the Committee on 28th November 2012.

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What park home dwellers want is what society beyond our park boundaries takes for granted, that is:

- To feel comfortable in our houses
- To enjoy our gardens
- To come and go as we please in safety
- To make friends where we wish
- To be charged fairly for our household bills
- To be able to sell up and move on when we are ready

A well run park home site is a joy to live on; but too many of us encounter the ugly face of park home dwelling:

Irresponsible high profile marketing of an idyllic lifestyle draws you in.

Lack of transparent published information on the reality of the lifestyle you contemplate, commits you to a devastating mistake.

Inequality of police, judiciary and local authority protection destroys your defences.

Enforced vulnerability and consequent impotence annihilates your peace of mind.

Criminal financial predation robs you of your livelihood.

This is what I want the Bill to address, and I urgently request that the human perspective remains at the forefront of everyone's mind throughout the course of the preparation of the Bill and consequent legislation.

Dual licensing system

I am of the opinion that the licensing system must consist of two parts, i.e. the person licensed to operate the site must have what may be called a **personal licence**, and the site itself must be licensed separately; the **site licence**. Without such a system, residents will be left in a very vulnerable position.

The personal licence must have reference to fit and proper person status/professional background, management/running of the site, any training in legislation etc.

The site licence must have reference to the land, infrastructure, Health & Safety, appearance and so forth.

The area of land which sustains the siting of park homes and their occupancy by residents, only legally becomes a mobile home site when it has a valid site licence in force. Therefore, the site licence must remain in operation indefinitely. If this were not so, at the moment the site licence ceases to be in force, all homes on the land are illegally situated there. In this case, all residents would immediately be stranded, along with their only place of abode, in which all their assets are tied up, on land where they cannot remain, i.e. their homes cannot remain, and neither can they.

This would leave them in an untenable position.

Under current law, a park home site can be owned and run by anyone at all who can purchase the land and obtain a (single) site licence. Since this legislation is totally unfit for purpose, it is down to the integrity alone of the person owning the site as to whether the site is run honestly and fairly. Therefore, the only qualification required to govern this aspect of the business, is the character of the owner, a condition that would be the essence of the personal licence.

The Bill lays down conditions under which a dishonest, unfit owner can be prevented from further ownership of a site; after all, the removal of rogue owners from the industry is the major intention of the proposed new legislation. If, therefore, the site licence was revoked under the conditions of the Bill, the right of residents to occupy the site would be removed at the same time as the owner's right to own or manage the site. A dual licensing system would allow an unsuitable site owner to be stripped of his licence, without endangering the status of residents on the park.

In another possible scenario, if new legislation requires that the site licence will last five years and must be reapplied for, at that point, similarly, the land would cease to be a mobile home site until such time as the licence is re-applied. Suppose this did not happen?

a) the licence might be revoked.

b) the site owner might decide to retire.

c) over time, the infrastructure of a site naturally deteriorates, and in the case of a site badly managed and maintained over a long period, the prospect of the expenditure required to bring the site up to standard under new regulations might be sufficient to encourage the owner to simply walk away from the responsibility.

Therefore, under the conditions of the Bill, a dual licence **must** be instituted in order to protect residents whilst dealing effectively with dishonest site operators, which, I will reiterate, **is the purpose of the Bill**. I believe that this would be the most efficient way to resolve the dilemma.

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Postscript:

I know that it is not possible for police matters to be addressed in any proposed legislation, although I am aware that discussions have taken place between Assembly Members and members of the Police Force during the process of drafting the Bill, which I hope will significantly influence the outcome, for the better protection of park home owners.

However, I would like you to be aware that I and my colleagues have also made some advances in this area. We have approached the Association of Chief Police Officers, the Assistant Chief Constable of Dyfed Powys Police and also the newly elected Police and Crime Commissioner for Dyfed Powys Police area. We have received favourable responses from all three, including the opportunity to meet with ACC Langley at police headquarters in Carmarthen in June this year, and the agreement to a meeting with the Police and Crime Commissioner early in 2013, at a time yet to be arranged.

Thank you for your kind attention.

Rachel Jebbett



4th December 2012