



SALOP LEISURE

Go Explore!

RECEIVED
21 Jun 2016

16th May 2014

Salop Leisure Limited, Treowain Enterprise Park, Machynlleth, Powys SY20 8EG. Tel: 01654 705900 Fax: 01654 705905
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To National Assembly for Wales Communities, Equality & Local Government Committee Members:

Dear Sir or Madam,

Re: Consultation of Holiday Caravan Sites (Wales) Bill

Salop Leisure have been trading for 46 years supplying holiday home parks to Mid Wales Coastal and inland regions and the Heart of England, with the majority of that business supplying Parks in Wales. We also have a long tradition of promoting and supporting the Welsh Tourism industry. Although our head office is based in Shrewsbury, we have a dealership in Machynlleth and many of our employees, including myself, were born and live in Montgomeryshire and Ceredigion.

Although we fully support Darren Millar's objectives to stamp out the rouge element within the holiday home sector, our main concern lies in the fact that elements of the Bill have been based on protection designed for residential housing and that Parks in Wales will be under an unfair burden of legislation with potential unfavourable financial implications.

Our traditional customer base has been from the West Midlands/Potteries etc. who have always viewed Wales as their main holiday destination. Over the years we have seen a change in this mentality as the quality and number of parks in the Heart of England has increased. With the high cost of fuel and financial restrictions, consumers are now inclined to look at alternative affordable and more convenient locations than the traditional Welsh coastal resorts.

The publicity surrounding the Bill may also have a detrimental effect on the reputation of Welsh Holiday Parks. Consumer's may adopt the opinion that residential use, fit and proper person and the need for changes to site licences is only a problem in Wales.

Competition for new customers is fierce and we firmly believe that the Assembly should carefully consider the implications of some of the Bill's current proposals on the tourism industry in Wales and the livelihood of many small family park businesses and their employees.

I would be grateful if you would also take into consideration our full support for the British Holiday & Home Park Association's evidence which is to be presented to the Assembly and their aim to ensure the Bill is fair to customers, park owners and Welsh tourism.

Yours faithfully,

DYLAN ROBERTS
JOINT MANAGING DIRECTOR

c.c. Russell George, A.M. Montgomeryshire
c.c. Elin Jones, AM Ceredigion

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Distributors for all leading manufacturers of caravan holiday homes and touring caravans.

First Class Touring and Holiday Home Service Facilities. Large selection of Holiday Parks available.

Registered Office: Emstrey, Shrewsbury, Shropshire SY5 6QS. Registered in England No. 2865955





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To all members of the National Assembly for Wales Communities, Equality and Local Government Committee:

Dear Sir or Madam,

Salop Caravans (Sites) Ltd & Bywater Leisure Parks Ltd.

We are owners of a group of 8 small holiday home parks (2 of which also have touring caravan pitches) in Mid-Wales and together with our sister Company, Salop Leisure Ltd., many of our employees currently live in Wales.

As long-standing members of the British Holiday & Home Parks Association and the National Caravan Council, we support the intention of the Bill with regarding to improving industry standards and with particular regard to the residential use of holiday caravans. We very much appreciate Mr. Millar's engagement with our industry on the matter but we still hold concerns that the Bill appears to tailor a licensing regime designed for residential parks to holiday home and touring park businesses.

A major concern is the lack of local authority resources to implement the site licence regime in a consistent manner, which will not be dependent on the individual resources of a particular Local Authority, leading to geographical discrepancies in enforcement. We also believe the amount proposed for Fixed Penalty Notices of £500 is a disproportionate penalty for a minor breach of a site licence, particularly in view that the penalty for residential parks has been set at £200, and could create an incentive to Councils to maximise revenue.


With regard to a residency test, the majority of park owners already implement measures for the consumers to prove residency. To have to request information annually would put an undue burden on the park operator and could lead to a break down of trust between the operator and their law-abiding owners. The onus should be on local authorities to use their current enforcement powers where they have reason to believe that abuses are taking place.

We employ Managers on each of our Parks who develop a strong bond with owners and the success of the Park depends on their ability to run it in a 'fit and proper' way. Although we do not have a high turnover of staff, the potential testing and re-testing the fitness of park managers would place a financial burden on the Company and also place more pressure on the resources of local authorities.

Tourism is price sensitive and consumers in the holiday home market can simply decide to take their business elsewhere. Regulation should not disadvantage Welsh park businesses and their ability to compete with English parks and other accommodation providers. Likewise, potential purchasers of holiday home businesses in Wales may be inclined to invest their money where they will not be burdened by restrictive legislation. This could undoubtedly have an adverse effect on improving the infrastructure and standards of parks in Wales.

We have outlined some areas of concern above but would like you to take into consideration that we fully support the evidence presented by the British Holiday & Home Parks Association on behalf of its members.

Yours faithfully,


MARK BEBB
DIRECTOR



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