

**Communities, Equality and Local Government Committee
Regulated Mobile Homes Sites (Wales) Bill
RMHS 20 Rockbridge Park Residents Association**

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6th December 2012

Ms. Helen Finlayson, Clerk
Legislation Office
National Assembly For Wales,
Cardiff Bay
Cardiff
CF99 1NA

Consultation - Regulated Mobile Homes sites (Wales) Bill

Dear Ms Finlayson,

Following a recent meeting with our Park site owner Mr. Glenn Jones in conjunction with Mr. Silvano Geranio from Prestige homes, it was decided that a joint response to the regulated mobile home site act for Wales be submitted to the committee concerned with this bill.

As I understand it the main concern from our Mr Glenn Jones, and in a similar way from Mr Silvano Geranio was that some of the regulation seems to be a stage too far like taking a sledgehammer to crack a nut.

I would like to make clear that it is recognised that not all park owners are unscrupulous and we on this park are particularly fortunate that Mr. Jones does not fall into this category. He is very approachable and Residents Association minded. I believe we have a good rapport and a responsible working relationship, however we do disagree over some of the points made in the bill and other documentation associated with it. We have decided to provide you with this joint response in the belief that it will help to dispel the "them and us" attitude which prevails in some places and is therefore perhaps unique in its approach.

Mr. Jones believes that the loss of the right to veto the sale of a property would leave him with very little control over who lives on the park. I however, believe that all of the concerns that he might have regarding this criteria could well be contained within documentation which already exists. I refer in particular to the written statement which every person living on a residential site should have, together with the park rules which everyone on site must agree to. I do not believe it is beyond the wit of man or local authority to include in these documents all of the criteria necessary for living on any particular park. These can include all of the particular concerns that each park may well have on their particular site. It was suggested by Mr. Geranio that solicitors should be involved at all stages of the proposed sale as already happens within the sale of bricks and mortar buildings.

This is a sensible approach but would involve each person in extra cost during the course of the sale. It would not however, of itself prevent unscrupulous park owners from carrying on with the lawless methods they have used in the past. It would however be a major step in the right direction.

I believe that there is a good argument to be made for a middle road approach. The requirements for living on the site should be made clear to the prospective buyer by the seller once a commitment to the sale is made. Perhaps at this stage, a notice of intent to buy be produced, all of this done without the presence of the park owner. Once this has been done it would be of great help for the park owner to meet the buyer, perhaps the presence of a representative from the Residents Association or the solicitors would be of value. This would of course be important to both parties for multivarious reasons. It is at this point that any anomolies could be ironed out.

I have been asked for advice on many occasions about some of the problems that your bill will help to rectify and I would like to offer one suggestion over and above what you have done so far.

Residents associations can and do have a very marked affect for good on park life in general. Unfortunately, because of the nature of the U.P.O.s where they operate, residents associations will be discouraged by threat and other means and as a consequence, any attempt to produce a legitimate Residents Association will be thwarted. I would like to see some ruling outlawing this practise in any of its forms. This should include any attempt by U.P.O.s to threaten cajole or bully.

I am fully in favour of a correct licensing procedure. I believe that Local Authorities should in part or whole be recompensed for the work involved. Publicans must renew their license each year and I do not believe that a park home business should be any less confined by law. If it is right for the licensed trade then surely it is not unreasonable to expect the same thing to happen to a park home business. I do not believe that it is unreasonable for them to pay a reasonable figure each year. It must be seen however, that this is a legitimate charge to carry on a legitimate business and not a reason for local authorities to make unreasonable demands on these businesses. I do believe however that it is reasonable for local authorities to expect some recompense in the dealing, administration and overseeing of the these businesses. Since the park owners income is based on the site fees made, and these are controled by government figures it follows that any increases to license fees should be restricted to either the R.P.I. or C.P.I. figures

In all things where there is dispute, the R.P.T. should be used and final decisions made there. I refer to my response to question one on Peter Blacks request for response where I and other asked that the R.P.T. be manned by people who have direct and detailed knowledge of park life. It is different and must be approached with specialised knowledge of both the law and the circumstances surrounding the life on a park

Surely the point of this bill is to redress the one sided situation that now prevails on parks. We are not dealing with the odd individual who is out to make trouble. We are dealing with U.P.O.s who have over many many years flouted, if not the law, then certainly good practice in dealing with peoples lives. I refer to my early response of the 25th June 2012 to Mr Peter Black and would ask that notice is taken of it and others like it.

Once again many thanks for your hard work,

yours sincerely,

D.J.Bromage
(Chairman Rockbridge Residents Association)