

ALL-PARTY PARLIAMENTARY GROUP ON PARK HOMES

The minutes of the AGM of the All-Party Parliamentary Group on Park Homes which took place at 2.30pm on 16 May 2022 in Committee Room 13, House of Commons, London SW1A 0AA.

PRESENT: Sir Christopher Chope MP (convenor and Chairman)

Lord Michael Best OBE, DL

Sir Peter Bottomley MP

Simon Jones MP

Anthony Mangnall MP

Caroline Nokes MP

Alex Sobel MP

James Sunderland MP

Mark Tami MP

Alexander Pymm (representing Lee Rowley MP)

Chris Brannigan, BH&HPA

Helen Charlesworth, BH&HPA

Brian Doick MBE, NAPHR

Grace Duffy, DLUHC

Richard Hand, LEASE

Sophia Haywood, Liquid Gas UK

Sonia McColl OBE, Park Home Owners' Justice Campaign
(PHOJC)

Nat Slade, Arun District Council and Local Authority Caravan Site
Officers' Forum

Louise Wood, NCC

Anne Webb, volunteer

APOLOGIES

Lord Carter of Coles

Lisa Osborn, North Somerset Council

Ian Pye (IPHAS)

Baroness Scott of Needham Market

Sir Christopher Chope MP welcomed everyone to the Group's Annual General Meeting.

1. Approval of Minutes

The meeting **APPROVED** the minutes of the previous meeting of the All-Party Parliamentary Group on Park Homes which took place online on 7 February 2022.

2. Annual General Meeting

a) Sir Christopher Chope MP read out the Statement of Purpose which was ‘to bring together parliamentarians, park home owners and industry representatives to discuss issues of common interest, including legislation and its enforcement to eliminate abuse and disadvantage’.

b) Election of officers.

It was proposed by Sir Peter Bottomley MP and unanimously **AGREED** that Sir Christopher Chope MP should continue to serve as chair to the All-Party Parliamentary Group on Park Homes.

Sir Christopher Chope MP thanked members for their vote of confidence and agreed to continue to serve as Chair.

The meeting **ELECTED** officers to the All-Party Party Parliamentary Group on Park Homes, as follows:

Chair	Sir Christopher Chope MP (Conservative)
Vice-Chair	Peter Aldous MP (Conservative)
Vice-Chair	Lord Best (Independent)
Vice-Chair	Sir Peter Bottomley MP (Conservative)
Vice-Chair	Lord Carter of Coles (Labour)
Vice-Chair	Caroline Nokes MP (Conservative)
Vice-Chair	Alex Sobel MP (Labour Co-op)

c) Public Inquiry Point British Holiday & Home Parks Association
Email: appg@bhpha.org.uk

d) Income and expenditure
Statement

INCOME

The APPG on Park Homes received no financial income in the year to 9 February 2022.

The APPG on Park Homes received no benefits in kind from a source which exceeded £1,500 in the year to 9 February 2022.

EXPENDITURE

The APPG on Park Homes had no expenditure during the year.

The meeting **APPROVED** the income and expenditure statement for the year to 9 February 2022, noting that the APPG on Park Homes had received

no financial income, nor benefits in kind from a source which exceeded £1,500 and had incurred no expenditure in the year.

It was **AGREED** that the Group's Registration Form be returned to the Office of the Parliamentary Commissioner to re-register the All-Party Parliamentary Group on Park Homes.

3. Review of the Mobile Homes Act 2013

Sir Peter Bottomley raised his concern that the DLUHC was failing park home residents in several regards and to date the Government had failed to address the need to change the measure on which percentage pitch fee increases were based from RPI to CPI. This was causing hardship to residents, especially as, for example, pension increases were calculated using CPI which was lower. Adjusting the level of commission payable to the park owner when homes were sold on site was another area that had not been addressed.

There were also occasions when the local authorities and the police did not pursue complaints from park home residents about park owners.

When associations representing residents, such as PHOJC and NAPHR, were contacted by their members, they often referred them to LEASE who might then recommend contacting local authorities and/or the police.

Grace Duffy (DLUHC) suggested that these problems could be looked at by her department to see if it could help in situations where the legislation wasn't sufficient for enforcement agencies to act.

Sir Peter Bottomley MP stressed the need for residents to be made more aware of LEASE, by publicity and information.

Sonia McColl reported that she had closed down the PHOJC help line because it was sponsored by an insurance company and it was felt that this advice line was an intermediary to LEASE. The PHOJC advice line team comprised seven volunteers in various parts of the country. It didn't purport to be an advisory service. Its seven operators knew a great deal about park homes – the legislation and regulation. Those residents using the helpline needed to talk to someone who could understand and could give them advice or direct them to someone who could advise or act, so naturally the helpline advisors sent them to LEASE because it was a Government-sponsored body. However, the advisors had inquirers coming back to them saying that either they couldn't get through on the LEASE telephone line and were often then asked to go online to outline their problem and, quite commonly, there would be a ten-day delay before a response was received. Mrs McColl concluded by saying that she closed the helpline because she could see no point in referring inquirers to LEASE which didn't respond.

Brian Doick (NAPHR) said that his organisation had the same experience with referring inquirers to LEASE. He said a particularly worrying problem

was with park owners issuing leases to residents when they moved onto a park. When that lease expired, the residents had the option of leaving their home and the park or paying significant sums to renew the lease. Those who couldn't pay outright had extra amounts added to their rent until the 'debt' was paid off. Residents couldn't go to court to fight because they had concerns that they would have to pay for any action taken in the courts so they had no option but to keep quiet because, otherwise, it could cost them thousands of pounds.

Sir Peter Bottomley MP asked whether an ombudsman for park homes was needed – a person residents could approach for mediation and also someone who could enforce legislation and take action about any park owner who was not behaving.

Sonia McColl said that idea had been suggested at a working party group she had attended in the past. She thought that each local authority should have an identified park homes officer rather than the current situation where the environmental health officer or the planning department performed that role. Sadly, nothing had come of that suggestion.

Alex Sobel MP recalled a very good meeting that had taken place with Esther McVey when the fit and proper person legislation was discussed. Mr Sobel asked whether it would be an idea to invite the current Housing Minister to a future APPG meeting to try to get him to incorporate all these issues into legislation.

Anthony Mangnall MP reported that he had a number of parks in his constituency (south Devon) and residents on those parks were paying council tax but did not benefit from many of the rights enjoyed by those living in conventional properties. Something needed to be done, he said, adding that pitch fee problems still existed, too. He asked whether there was a timeline for legislation that would tackle various problems on parks, such as CPI/RPI, rent increases, intimidation, and many more.

Grace Duffy (DLUHC) said that her department was aware of the problem with limited leases, and primary legislation was needed to tackle this abuse. However, it was a very complex piece of legislation with significant implications for land use, and it could not be rushed. She added that LEASE had been very busy implementing the fit and proper person test, and the last couple of years been challenging in terms of the parliamentary timetable.

Ms Duffy mentioned the Renters Reform Bill which would be brought forward as soon as possible.

She also made reference to the fit and proper person test which had come into effect last year and had been operating since October. Applicants (park owners and managers) were being declined. Appeals had been received and the DLUHC was hoping to hear the results of those in the next two to three weeks. Ms Duffy was hopeful that this test was beginning to bite. 'It will take local authorities time to get on top of this,' she added. She felt that some

form of redress was vital for park home residents and that this test could go a significant way to addressing behavioural problems on sites. She commented that it was quite difficult to get the evidence for local authority or police intervention.

She then turned to pitch fees and the change from RPI to CPI in their calculation. She hoped to be able to issue an update very soon, adding that this matter was figuring importantly in her department's legislative planning. With regard to the report on the research into the 10% commission on the sale of a home, she said that the work had been undertaken by two universities. They had looked at the effect of changing the commission level and they reported in January. The final report was received in April and the Department was ready to publish it. This would be used as a basis for reporting back to the APPG and as many site owners as possible. 'It is a complex and divisive issue,' she added.

Anthony Mangnall MP asked whether primary legislation would be required to set up a parliamentary ombudsman. He said that health and safety was not carried out properly on sites. There were existing laws in place to give better rights to park home residents and they were not coming from the council. Some residents were unable to move away from a park because they would lose too much money in the payment of commission.

Ms Duffy agreed that this point about residents being trapped in their homes because they couldn't afford to move was important. She said there was a balance to be struck between ensuring that parks were viable and able to provide homes for residents and maintain the park, but also enabling them to move elsewhere if they so wished. A negative outcome for everyone would result if a change was made that drove parks out of business, and this could also have a serious effect on residents. That decision could not be taken in isolation. By reducing commission there could be cases where the perceived loss of income by park owners would be passed on to residents in other ways, such as pitch fee increases.

With regard to an ombudsman, it would depend on what powers were given to them. The industry might wish to set up its own scheme. If the DLUHC wanted to ensure that all park owners were members of an ombudsman scheme, it would probably require primary legislation if it was mandatory. One MP commented that residents were frightened to complain (and for good reason). Some came to him with their complaints but were very concerned that their name should never be divulged to the park owner. He added that there were some park owners who did not play by the same rules as the good ones. He mentioned one big player who had a money-making model which he imposed on all his sites.

Nat Slade commented that this was happening in one district where there were scores of residents who would be made homeless.

Sir Peter Bottomley MP said that it was eight years since he had been fighting this matter, adding that it was far too long for the vulnerable, elderly and the poor to wait for resolution. He said it was a disgrace and it was clear that only a central unit would be capable of getting anywhere near the park operators who flouted the law. He said that local authorities could not be expected to get to the nub of it. Sir Peter could not see why the CMA (Competition and Markets Authority) had not been brought in 'to put the frighteners on them'. Unfair trading terms and unfair conditions could lead to disqualification.

Ms Duffy's colleague agreed with all that Sir Peter had said. A complaint had been made to the CMA but they had said it wasn't within their remit and had referred it to trading standards. That was submitted in January last year and it had been passed on to the National Trading Standards where it had remained. The National Trading Standards body could not find anyone to investigate it because of the huge scale of the matter.

Sir Peter Bottomley MP concluded that a three-pronged approach was needed – Trading Standards, CMA and the police (it was essential for a police presence to be seen on the parks).

When asked whether the legislation was ready, Ms Duffy replied by referring to complex management structures. She said that enough work had been done to ascertain the scale of the task, adding that her department did not have the resources to do it. She added that on some other matters the work on legislation was well advanced, including RPI to CPI and variable service charges.

Sir Christopher Chope MP asked whether she had considered asking the Law Commission to look at it. Ms Duffy thanked Sir Christopher for the suggestion, adding that she would consider it further. Ms Duffy responded that hers was a very small team which had been concentrating on the fit and proper person test because that would affect all park home residents.

Sir Christopher Chope MP responded by saying that in four or five years' time the same position could prevail unless something was done. He mentioned that some park owning companies were getting away with ignoring the law (advertising park homes as bungalows, for instance). He said that no trade body would admit them so they were continuing to arrogantly exploit others. Sir Christopher added that it was frustrating that the APPG seemed to be making little progress. He said that the CPI to RPI problem had been raised a very long time ago, but he was pleased to hear that there was now a draft bill.

Sir Christopher then mentioned the matter of park home residents who were not directly on mains supply for their electricity. He questioned how they would be able to take advantage of the Government scheme to help residents in low value properties with their bills.

Ms Duffy responded by saying that her department was alert to these matters and understood the frustrations felt by Sir Christopher and others about the delays. Every opportunity had been taken to draw this to the attention of the Minister. On the subject of energy, she said she would be writing to Sir Christopher about this matter. She said that the council tax refunds, about which she had written recently, were going through to park home residents and the energy saving cap (or equivalent) would also be passed to them. Park home residents who bought energy collectively would have it passed on to them.

Richard Hand (LEASE) said that his organisation's help phone line was open from 9 a.m. to 5 p.m. every day for the use of residents. Energy bills were one of the commonest questions, especially where park owners were buying commercial supplies and re-selling to their residents with prices 'going through the roof'!

Sonia McColl said that she was aware that residents had been bombarding the DLUHC with letters because they wanted the yardstick for pitch fee increases to be based on CPI not RPI. She asked Ms Duffy if she could have some solid information to pass on to them.

Ms Duffy said she realised this delay was frustrating. She could not give Mrs McColl a date but was hopeful that it would be possible to bring something forward in the next session of Parliament but this was far from definite. With regard to the 10% commission, Ms Duffy said she was waiting for the report of the research, its recommendations and conclusions, and was hopeful that it would be published within the coming few weeks. At that time, she and William Tandoh (DLUHC) would be doing a lot of work to develop its conclusions. She also said that a Renters Reform Bill was mentioned in the Queen's Speech and her department was currently considering the scope of that.

Richard Hand from LEASE said that his organisation was very concerned about residents being asked to sign new agreements when a park changed hands. More needed to be done on the education side so that prospective residents were aware of potential pitfalls, and more information needed to be available and promoted concerning the differences between residential park homes and holiday homes (caravans, lodges, etc.).

4. Utilities

BioLPG – presentation from Sophia Haywood, Public Affairs Director, Liquid Gas UK

Miss Haywood said that a lot of Government information on this topic went out last year. Basically, it said that from 2026 it would not be possible to replace an existing heating system except with a low carbon one. This would mean replacing the existing system with a heat pump, if they were suitable for park homes. If they were, costs and time frames were something that

organisations and individuals needed to be aware of. If a boiler broke down, for example, it could cost between eight and twelve thousand pounds for a low carbon replacement. She said it would affect people on parks who were off grid and was a matter that was not getting much attention, nor airtime. It was something that needed to be discussed now in readiness for 2026. It was a very important matter that could involve some 'horrendous' costs.

Sir Christopher Chope, MP asked what advice should be given to park home residents. Miss Haywood replied that they should decide what heating system they wanted, but also be warned of the considerable costs in switching to heat pumps.

Asked whether a heat pump was 'overkill' for a park home, Miss Haywood said that was possibly true and networks might be established on parks. However, park homeowners would probably favour bio LPG.

Ms Duffy's colleague commented that regardless of the heating source chosen, insulation was important and that needed to be considered. He offered to put together some information on that subject and circulate it.

Miss Haywood added that, when replacing a boiler, residents needed to get the most efficient system.

Richard Hand (LEASE) said that warm home discounts were offered from time to time but only for short periods.

Sir Christopher Chope MP thanked Miss Haywood for her very informative presentation and was sure that the APPG would be returning to this subject in the future.

5. Any other business

There was no other business.

6. Date and venue of next meeting

To be decided and participants informed.

Before closing the meeting, Sir Christopher Chope paid tribute to Mrs Ros Pritchard who was unfortunately unable to be present because of her husband's illness. Mrs Pritchard had now retired from the BH&HPA and Sir Christopher wanted to put on record thanks from himself and all members of the APPG for the excellent work she had carried out for the group over a great number of years. 'She has been in the engine room, promoting our cause, and has had masses of successes and a few frustrations. Chris Brannigan will be taking over her role and he has been present at today's meeting.'

Sir Christopher declared the meeting closed at 15:35.