

ALL-PARTY PARLIAMENTARY GROUP ON PARK HOMES

The minutes of the meeting of the All-Party Parliamentary Group on Park Homes which took place at 4.30 p.m. on Monday, 7 July 2025 in Committee Room 18, Palace of Westminster, London SW1A 0AA

PRESENT: Sir Christopher Chope MP (convenor and Chairman)
Karl Hobley, BHHPA
Debbie Walker, BHHPA
Richard Hand, LEASE
Alicia Dunne, NCC
William Tandoh, MHCLG
Robert Baldwin, IPHAS
Shelia Doick, NAPHR
Brian Doick, NAPHR
Nat Slade, Arun District Council
Sir Ashley Fox MP
Louis Parker representing Sarah Dyke MP
Isabella Hobson representing Alison Griffiths MP
Anne Webb, Minutes Secretary

APOLOGIES Damian Hinds MP
Lord Best
Sonia McColl, PHOJC
Dave Iles, PHOJC

1. Approval of minutes

William Tandoh (MHCLG) pointed out an error in the minutes relating to the previous APPG meeting on Monday, 10 February 2025. He asked for the second paragraph, starting ‘Sir Christopher asked’ to be changed to the following: - ‘Sir Christopher asked *whether that was a process going on inside the MHCLG. The Minister responded by saying that while the Government did not have an absolutely clear path in terms of going forward at this time, it was important to test the evidence and what the implications would be for removing the commission.*’

The meeting approved that change and the other items in the minutes.

2. Update on West Sussex Sites

Nat Slade from Arun District Council reported that since the last meeting of the group there has been the agreement of the local trading standards

service to investigate unfair terms of the pitch agreements and the practices causing concern in relation to selling homes which breach site licence conditions and pitch agreements being sold on by companies which do not have any interest in the sites. Currently the council was recruiting to start that enforcement and it was anticipated that the appointment would be for two years. ‘This could be important pioneering work,’ Mr Slade added. ‘We were also hoping to be in court prosecuting various companies for fit and proper person breaches in April. That hearing was cancelled, and it is now scheduled for September when we hope to get a favourable result

Mr Slade reported that Josh MacAlister MP had submitted a request to the CMA (Competition and Markets Authority) for a study of the situation but that was declined. Those were the key changes that had occurred, he said, since the previous APPG meeting. Arun District Council was still working on a fit and proper person test for site owners. Also, the Council was awaiting the Minister’s response to its request for primary legislation which was made in 2018. The answer then implied that the Minister would be carrying out more consultation before making a decision.

Brian Doick (NAPHR) paid tribute to Nat Slade’s work and his successes. ‘We come here twice a year, and nothing seems to be carried forward,’ he said. ‘A lot of good people have been doing a lot of good work for a very long time, he said, but we need action. Nat has embarked on the right way forward, but the Government still hasn’t fulfilled the promise it made in 2018 and abuses in the park homes sector are happening all over the country. Some park owners are ignoring the law and the fit and proper person test is not working in all instances and in all areas.’ Mr Doick said that, nevertheless, he was prepared to keep working away and he was sure that others would join him to achieve justice for all park home residents.

3. Report as to the availability of registers of site licences and fit and proper persons in respect of residential park homes.

Robert Baldwin, an advisor with the Independent Park Home Advisory Service (IPHAS) referred to a lengthy report produced by Ken Carroll (IPHAS Co-ordinator) on 1 April 2024, which is reproduced as an appendix to these minutes.

Robert Baldwin (IPHAS) said that he would like to highlight the Fit and Proper Person Register. IPHAS had found, when advising members right across England and Wales, that there was a growing concern about why some parks did not have a fit and proper person. ‘In fact, he added, ‘the

Royal Borough of Windsor and Maidenhead still does not have a register in place, and this requirement has been the law since 2021. Sadly, they are not alone.'

Mr Baldwin went on to say that IPHAS questions why some councils have not processed applications and are therefore allowing sites to operate unlawfully.

IPHAS needed the help of everyone at the meeting because the park home residents that we all represent need action.

'Many councils do not appear to have made any real progress in ensuring inspection of such sites,' he said, 'and the ability to issue compliance notices is being overlooked in a detrimental manner, thus creating a feeling for occupiers of caravan-based accommodation of having lower-class person status.'

'IPHAS does appreciate the time you all give to these meetings but we feel that we need more time than the two meetings a year can accommodate. Would it be possible to have a working group exploring the problems and reporting back? As we are not moving on, we are only going over old ground and, like us, we believe that you are all here for the right reasons.'

William Tandoh (MHCLG) said he understood what had been said about 'fit and proper persons' and he thought it needed strengthening. There was also a need to use other means of redress. If a person phoned a council and was told that they did not know what the caller was talking about, that person should put in a complaint (and a lot of people were not doing that). If that complaint went all the way to the chief executive, that would raise awareness about where the council might be lacking. 'There must be an on-line register,' he added. 'If a person is looking for a specific piece of information, they should use the information request service which should respond within a certain number of days. There are difficulties, but there are also other avenues we can use to raise awareness of some of these things.'

William Tandoh then turned to the IPHAS report and referred to the request to know the number of licensed pitches on a park. 'The legislation doesn't ask for that,' he said. 'It is up to the site owner to give that information.'

He then mentioned references to commitments about park home legislation made by the previous Government. 'The new Government has no commitment to pick up where the last Government left,' he said, citing the new Government's changes to the Renters Reform Bill as an example.

Turning to complex management structures, Mr Tandoh said that although the focus had been on one particular site, his Department had been looking at others to see if there was something they could do to assist residents. One of the main problems, he felt, was that residents did not take legal advice before committing to the purchase of a park home. Residents should be asking questions before handing over money or signing agreements. LEASE could assist by providing advice on questions of law and the key things that should be in place before going ahead with a purchase.

Rob Baldwin (IPHAS) said that some residents didn't know they had to have an agreement.

William Tandoh (MHCLG) asked what more could be done to inform potential residents and felt that interested parties should come together to find practical solutions.

Brian Doick (NAPHR) said that his organisation gives copies of the legislation to its 10,000 members but the hardest thing was getting access to the people who were new to this form of accommodation before they committed to a purchase.

Debbie Walker (BH&HPA) told the meeting that her organisation had a short video which explained the difference between residential and holiday homes. It was free, on the BH&PA website and was there to be used.

William Tandoh (MHCLG) said that residents must be made aware that they must not sign any documents until they had thoroughly researched all aspects of the purchase they were contemplating.

Brian Doick (NAPHR) said that his organisation had produced an explanatory booklet about park home purchase in conjunction with the BH&HPA and it had gone down quite well and was taken up by councils, but it appeared it was no longer available.

Richard Hand (LEASE) commented that his organisation had the same problem with selling leasehold property and several years ago they made

strong overtures to estate agents to encourage them to signpost people to LEASE. It was a challenge to get potential residents to take advice before they committed to a sale, he added.

Sir Christopher said that many people did not realise that a park home on a site was a chattel and not a home. The park home is subject to a lien of which they have been ignorant.

‘When you buy a car,’ he said, ‘you can see it is registered with the DVLA and whether any money is owed in respect of it. You cannot do that in respect of a park home. People are buying park homes thinking that they belong to the person who has been selling to them because they haven’t actually seen the bill from the manufacturer. This is just a charter for crooks and we have to try to find some other safeguards. If you buy a park home, there is no register and no way of finding out. You cannot protect yourself until such time as you purchase it and you find it is subject to a lien.’

Sir Christopher asked William Tandoh what progress had been made since the last meeting. Mr Tandoh responded that work had been progressing on commission and there would be a call for evidence. Sir Christopher asked when he thought that would be and Mr Tandoh said that he couldn’t give him a date. He admitted it seemed to be taking a long time but said there was a lot of sifting through of information to make sure the right questions were asked.

Sir Christopher asked about other matters that were discussed at the previous meeting, especially the position on the West Sussex Sites that Nat Slade had spoken about. Mr Tandoh replied that his Department was informed about issues.

So, Sir Christopher concluded that not much progress had been made with park home issues, apart from the 10 per cent commission. The Minister had said there were two issues – the commission and the rogues – and Sir Christopher asked again about progress. William Tandoh said nothing had been done about getting funding from local trading standards.

Nat Slade said that what could be done was to get legislation through for dealing with complex ownership structures, security of tenure and to stop service charges.

William Tandoh said that even if the Minister gave a commitment to do it, it would take a long time.

Sir Christopher commented that the process had not even been started. He asked William Tandoh to take back to the Department the sense that the APPG for the Welfare of Park Home Residents felt let down by the failure to make progress - and that was not just on the 10% but on other matters raised by Nat Slade and other people around the room. Overall, it seemed that no progress had been made at all. Sir Christopher added that the Minister had not said that he wasn't going to follow through the commitments of the previous Government.

William Tandoh responded that since February the Minister has been aware of the matters raised by the Group. The Department knew what the issues were.

Brian Doick (NAPHR) said that there had been a television programme broadcast recently in which reference was made to the housing shortage in this country and the possibility of using park homes to help to fill some of the gaps. As had already been discussed, there were already massive problems in the sector and they would get worse if this suggestion went ahead.

Sonia McColl (PHOJC), a member of this APPG group who was unfortunately unable to attend that day's meeting, had appeared on this television programme and gave evidence about some of the issues around park homes. Debbie Walker (BH&HPA) had also appeared on the programme and, among other park home-related matters, spoke about the problems around complex ownership.

Sir Christopher asked whether evidence should be sent in from this group? Richard Hand (LEASE) commented that Nat Slade had mentioned agreements being issued by companies that didn't have the right to do so. Mr Hand said that registration would be undertaken by a seller and then a solicitor would carry out due diligence. If a registration process was required, the solicitor involved would carry out the due diligence and that might also refer to any money laundering element.

Alicia Dunne (NCC) commented that years ago there was a communications group that linked all the ideas together and gave them out to people thinking of buying park homes. The NCC had also given information about park homes to the Association of Estate Agents. She said that there was confusion about the differences between park homes and holiday caravans, and there had been suggestions about getting interested parties together for a meeting to discuss problems and matters of mutual interest. If members of the public were still going ahead and

buying park homes, it was vital that potential problems were brought to their attention.

In concluding the meeting Sir Christopher said that everyone was frustrated about trying to get the Government to take the problems in the park home sector seriously. 'We are not short on enthusiasm,' he said. Sir Christopher asked if there were any other matters needing to be raised. William Tando (MHCLG) said that previous Governments had been enthusiastic and some progress had been made. 'We will keep pressing on!' he said.

There being no further business, Sir Christopher closed the meeting at approximately 5.30 p.m.

IPHAS Report – as referenced under item 3

Report as to availability of Registers of Site Licences and Fit and Proper Persons in respect of Residential Park Homes.

The Department for Levelling Up Housing and Communities has previously indicated to the APPG on Park Homes that Local authorities are in general complying with all requirements of management (Licencing, Approval of Persons, Inspection and Compliance).

This statement is contested as a result of work undertaken by IPHAS a party which is represented at the said APPG.

Project Scope

During 2023 a project was undertaken by the Independent Park Home Advisory Service, IPHAS (The Independent Park Home Advisory Service 2021Ltd.) to establish, within England and Wales:-

that their record of Residential Park Home sites was up to date, but also to evaluate the customer friendly interface of the licencing authorities with the public.

36 Metropolitan districts

32 London Boroughs

62 Unitary Authorities

21 County Councils and

164 District Councils all in England

22 Welsh Authorities

Where this information has not been immediately available from on line web sites a request (as below) using the provision of the Freedom of Information Act was submitted to the appropriate body.

I would be pleased if you could provide to me to the following information.

I would like to view the definitive public register of licenced commercial residential caravan sites as required under section 25 of the Caravan Sites and Control of Development Act 1960 in your administrative area.

which is expected to indicate

Site Name and address

Max. No. Licenced pitches

Licence Holder

Date of Issue

Site Rules

Site Category (Residential/Holiday and numbers)

Time Limits

Fit and proper person – the on line register specified in the Regulations.- The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 and the Public register under section 12B of the Caravan Sites and Control of Development Act 1960

Other notes.

I would also be pleased to receive an indication of your policy in respect of site inspections at such premises indicating frequency of visit, number of compliance notices issued (Section 9B Caravan Sites and Control of Development Act 1960), prosecutions etc.

In Wales a Site Owner (Operator) must themselves be a Fit and Proper Person and no separate Register is required.

Licensing Authorities are obliged to conform to the requirements of

To maintain a Register of Site Licences under section 25 of the Caravan Sites and Control of Development Act 1960

To approve such persons as appropriate in accordance with The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 and the Public register under section 12B of the Caravan Sites and Control of Development Act 1960 and to publish this on line. (The Regulations were made on 23 September 2020 and allowed local authorities until 1 July 2021 to prepare to receive applications from site owners. From 1 July 2021 and by 1 October 2021 all site owners must have submitted an application for a relevant person to be assessed as fit and proper persons.)

They are also required under the Mobile Homes 1983 (as amended by the **Mobile Homes Act 2013**) to keep and publish an up-to-date register of park home rules.

It was anticipated that The Licensing Authorities would liaise with appropriate planning authorities in order to answer the communication sent to them.

Response from Licencing Authorities

I have spoken to the Duty Officer for Environmental Health and this is not delegated to Environmental Health. Unfortunately, I am unsure what you require from us as the regulations stated are not covered by us

Having spoken to the officers involved, the team has been newly recruited to and there is legacy work ongoing on the nature of this site and reviews taking place. As such, a response to this FOI request will take longer than expected. The Council currently only have one licenced caravan site however the site licence was granted around 50+ years ago and we do not have any record of it being reviewed since then. There is currently no online Caravan Licence Register on the Council website.

What is your name? what is your address – in response to letterheaded notice and named signatory as required by FOIA.

We process emails in date order. Please do not send follow up e-mails before this period has expired, as this will not lead to a quicker response. – Despite Guidelines for response time under FOIA

We only have 2 residential caravan sites in under the control of 3 individuals who have each had their fit and proper person assessments individually approved. (NO REGISTER WAS PROVIDED)

I can confirm that the Council does not hold an online register for fit and proper persons in respect of caravan sites.

There is one licence which has been issued for a caravan site in the Borough, this licence was issued in 1986.

What is a commercial residential caravan site? – see s3 MH(RMSFPP) Regs

This information is exempt under FOIA or EIR despite a regulation saying it must be published on line. (The request forwarded was marked FOIA but authorities chose to adopt stances to redact as much information as possible using the Freedom of Information Act or The Environmental Information Regulations as suited them.

Environmental information is a broad term that covers any recorded information in any form that relates to the environment. [According to the Environmental Information Regulations 2004 \(EIR\), environmental information includes information on:](#)

- the state of the elements of the environment, such as air, water, soil, land, landscape, natural sites, flora and fauna;
- factors affecting or likely to affect the environment, such as substances, energy, noise, radiation, waste, emissions, discharges and releases;
- measures and activities affecting or designed to protect the environment, such as policies, legislation, plans, programmes, agreements and actions;

- reports, analyses and assessments on the state of the environment and the implementation of environmental measures;
- the state of human health and safety, living conditions, cultural sites and built structures in relation to the environment.

There is no suggestion that the person named as a licence holder of fit and proper person falls into the above definition.

There is considerable confusion as to whether or not Public Registers are to be subject to FIA/EIR redaction.

The findings

Not every Licencing Authority has sites of this nature within their area.

A small number of Licencing Authorities do not have a Register of Site Licences under section 25 of the Caravan Sites and Control of Development Act 1960 despite having such premises within their administrative areas.

Around 25 percent of Licencing Authorities have failed to place the Register of Fit and Proper Persons on line as required by the Regulations or indeed do not have such a list. Where on line lists are available some have information redacted contrary to the provisions in the Regulation. One notable statement from an authority stated *we cannot require owners or managers of the site to submit an application for inclusion on a register*. This is contrary to the requirement that by 1 October 2021 all site owners must have submitted an application for a relevant person to be assessed as fit and proper persons.

Where authorities have indicated a site is licenced they have not always been able to indicate the number of pitches the site is licenced for. It was anticipated that The Licencing Authorities would liaise with appropriate planning authorities in order to answer the communication sent to them.

The Welsh Authorities appear to be compliant with the appropriate FPP regulations as the site licence is more clearly stated as only being available to a FPP..

Potential Concerns

Authorities have previously been asked to assist in the administration of the Energy Bills Relief Scheme and other matters where there is need to distinguish between Residential Park Homes and other caravan based accommodation such as holiday homes and lodges including those in which all year round occupation is note despite its illegality.

As Councils are not aware of Regulations applicable to caravans, Mobile Homes and Park Homes it is suggestive that the distribution of such support funding cannot be demonstrated to have been appropriate if indeed such support has been offered.

Councils do not appear to have made any true progress in ensuring inspection of such sites and the ability to issue compliance notices is being overlooked in a detrimental manner, thus creating a lower class person status for occupiers of caravan based accommodation.

Councils not having processed FPP applications are allowing sites to operate unlawfully.

K.T.Carroll

Team Coordinator IPHAS

April 2024