



# **Draft Park Homes Fees Policy**

## **Response to Formal Consultation**

## **1. INTRODUCTION**

- 1.1 The Mobile Homes Act (MHA), 2013, introduced new enforcement powers for local authorities and the ability to levy fees and charges in respect to enforcement, issuing, transferring, or amending licences, and monitoring licence conditions on park home sites. In order to charge licensing fees local authorities are required to publish a Fees Policy setting out what the fees are, when they will be due etc.
- 1.2 Central Bedfordshire Council (CBC) developed a draft Park Homes Fees Policy, setting out its proposed fees for recovering costs relating to the aforementioned enforcement and licensing.
- 1.3 CBC formally consulted on its draft Park Home Fees Policy for 6 weeks from 9<sup>th</sup> December 2013 to 20<sup>th</sup> January 2014.
- 1.4 Each of Central Bedfordshire's 83 Park Home site owners and the 1,119 park home residents living in Central Bedfordshire were written to individually to provide notice of the formal consultation and to provide information about how site owners and residents could formally respond to the consultation.
- 1.5 The formal consultation was managed via a formal consultation document. This was available in paper format; downloadable from the CBC website, or was obtainable by telephoning or writing to the contact details provided in the letters to park home site owners and residents. The formal consultation was also available to park home site owners, residents and the wider public as an online survey on the CBC website.
- 1.6 CBC staff and elected members were informed about the formal consultation, social media was utilised and press releases were issued to the media to raise awareness of the consultation with Central Bedfordshire residents.

## **2. RESULTS OF CONSULTATION: DEMOGRAPHIC PROFILE**

- 2.1 In total, 25 people responded to the draft Park Homes Fees Policy formal consultation.
- 2.2 76% of respondents were park home residents, 16% were park home site owners and 8% were professionals.
- 2.3 60% of respondents were male and 40% were female.
- 2.4 80% of respondents were aged 55 years or over.
- 2.5 24% of respondents stated that they had a disability.

- 2.6 72% of respondents stated that they were heterosexual.
- 2.7 68% of respondents were White: British and 16% of respondents were White: Gypsy or Traveller.
- 2.8 48% of respondents' stated their religion or belief was Christian and 32% of respondents stated they had no religion or belief.
- 2.9 Appendix 1 provides a full demographic statistical profile of respondents.

**3. RESULTS OF CONSULTATION: QUESTION RESPONSES**

3.1 The formal consultation was designed to capture both quantitative and qualitative data from respondents, with results summarised as follows:

**3.2 Q1. Do you agree that conditions on Park Homes Sites need to be effectively monitored / managed?**

Yes	23	92%
No	1	4%
Don't Know	1	4%

One respondent, (4% of respondents), provided qualitative feedback and did not support the proposal; indicating that the current monitoring and management of her park home site was satisfactory.

**3.2 Q2. Do you agree that annual fee recovery by the Council should be cost effective?**

Yes	20	80%
No	4	16%
Don't Know	1	4%

5 respondents, (20% of respondents), provided qualitative feedback; stating that annual fee recovery should be from the site owners and not from the residents; that additional staff resource would not be needed to recover costs and that costs should be covered through Council tax.

**3.3 Q3. Do you support the proposal to exempt single pitch sites from licensing annual fees in order to make fee recovery by the Council cost effective?**

Yes	20	80%
No	3	12%
Don't Know	2	8%

5 respondents, (20% of respondents), provided qualitative feedback; questioning why a single pitch should be differentiated from non-single pitches and indicating that costs should be covered through Council tax.

**3.4 Q4. Do you support the proposed Initial Licence Fee of £53.32 per pitch to enable the Council to recover the costs associated with processing a new licence?**

Yes	16	64%
No	7	28%
Don't Know	2	8%

9 respondents, (36% of respondents), provided qualitative feedback. These respondents did not support or did not know whether they supported this proposal and raised issues that costs would be passed on from site owners to residents; that sites are already adequately managed and that costs should be covered through Council tax.

**3.5 Q5. Do you support the proposed Transfer or Standard Amendment Fee of £249.88 per site/application to enable the Council to recover the costs associated with processing the transfer of or standard amendment to an existing site licence?**

Yes	14	56%
No	7	28%
Don't Know	4	16%

11 respondents, (44% of respondents), provided qualitative feedback. These respondents did not support or did not know whether they supported this proposal and raised concerns about the high level of this cost; that costs could be passed on from park home site owners to park home residents and that costs should be covered through Council tax.

**3.6 Q6. Would you support the proposed Site Expansion Amendment Fee of £27.68 per pitch to enable the Council to recover the costs associated with processing applications to amend existing licences where the site is being expanded?**

Yes	14	56%
No	9	36%
Don't Know	2	8%

6 respondents, (24% of respondents), provided qualitative feedback; indicating that respondents do not support this proposal if costs are passed on from park home site owners to park home residents and that costs should be covered through Council tax.

3.7 **Q7. Would you support the proposed Annual Fee of £12.38 per pitch to enable effective monitoring/management to take place?**

Yes	12	48%
No	11	44%
Don't Know	2	8%

10 respondents, (40% of respondents), provided qualitative feedback. Respondents raised issues that some parks are already effectively managed; that respondents do not support this proposal if costs are passed on from park home site owners to park home residents and that costs should be covered through Council tax.

3.8 **Q8. Would you support the proposed charge for serving enforcement notices which mirrors the charge agreed for Housing Act enforcement notices, which for 2014/15 will be £208.10?**

Yes	18	72%
No	5	20%
Don't Know	2	8%

7 respondents, (28% of respondents), provided qualitative feedback. These respondents did not support or did not know whether they supported this proposal; raising issues that costs may be passed on from park home site owners to park home residents and that costs should be covered through Council tax. 2 respondents, (8% of respondents), expressed a lack of understanding of the question being asked.

3.9 **Q9. Do you support an administration fee of 20% being applied by the Council when recovering the cost of works specified on enforcement notices that they have had to carry out because the site owner has not done so within the required timescales?**

Yes	16	64%
No	8	32%
Don't Know	1	4%

7 respondents, (28% of respondents), provided qualitative feedback. These respondents did not support or did not know whether they supported this proposal; raising issues that the work carried out as specified on enforcement notices should be undertaken as Council business as usual or by residents, as finance is a problem. There was concern that costs may be passed on from park home site owners to park home residents and that costs should be covered through Council tax.

**3.1.0 Q10. Do you support the proposed fee of £30.91 per site rule deposit to enable effective management of a Site Rule Register to take place?**

Yes	14	56%
No	7	28%
Don't Know	4	16%

5 respondents, (20% of respondents), provided qualitative feedback. These respondents did not support this proposal; the majority raising concerns that costs would be passed from park home site owners to park home residents and with one respondent considering there not to be a need for additional Council resource for this task.

**3.1.1 Q11. Would you support the proposed fee of £105.75 per application to the 'fit and proper person' register to enable effective management of the register to take place?**

Yes	15	60%
No	8	32%
Don't Know	2	8%

7 respondents, (28% of respondents), provided qualitative feedback. These respondents did not support or did not know whether they supported this proposal; raising concerns around the meaning of a 'fit and proper person' and that a register would not enable effective management.

**3.1.2 Q12. Please give any additional comments you would like to make on the proposed changes to the Park Homes Fees Policy.**

17 respondents, (68% of respondents), provided qualitative feedback.

Issues were focused on potential hardship experienced by park home residents, through fees passed on by park home site owners, with pensioners and elderly people not being able to afford to live on a park anymore or having to apply for benefits.

Concerns were raised that sites were currently managed adequately and that site licences currently afforded satisfactory conditions for residents. Feedback suggested that the new rules should perhaps apply to new sites and new homes on expanded sites rather than established sites.

There was support for the draft policy as a step to control or curb excesses of park home site owners, whilst further feedback did not recognise the proposals as offering any additional protection and that well-run sites will have to subsidise poorly-run sites.

There was some support in favour of the fees proposed as being fair and feedback that the fees should be viewed as normal business expenses for site owners, and that not all of them should be passed on to the site residents.

- 3.1.3 A full account of the formal consultation qualitative feedback is presented in appendix 2.

## **4. SUMMARY**

- 4.1 In summary, the majority of the 25 respondents were in support of each of the 11 proposals put forward in the formal consultation, bar question 7, for which 48% were in support, 44% were not in support and 8% did not know whether or not they were in support.

Whilst there was support for the proposals as being fair and welcome, the consultation raised a number of wider issues; that many sites are currently managed satisfactorily; that additional Council resource is not needed; that fees could possibly be passed unfairly on to park home residents, many of whom are elderly, from park home site owners and that costs incurred should be covered by Council tax.

**Appendix 1:  
Results of Consultation: Demographic Profile of Respondents**

**Q13. Please tell us which type of respondent you are:**

	No.	Percentage
Park Homes resident	19	76%
Park Homes site owner	4	16%
Professional	2	8%
Other	0	0%

**Q14. Please tell us your gender**

Male	15	60%
Female	10	40%
Transgender	0	0%
Prefer not to say	0	0%

**Q15. Please tell us your age**

18-24 yrs	0	0%
25-34 yrs	0	0%
35-44 yrs	1	4%
45-54 yrs	2	8%
55-64 yrs	8	32%
65-74 yrs	7	28%
75+	5	20%
Prefer not to say	2	8%

**Q16. Do you consider yourself to be disabled? Under the Equality Act 2010 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long term adverse effect on his/her ability to carry out normal day to day activities**

Yes	6	24%
No	17	68%
Prefer not to say	2	8%

**Q17. Please tell us your sexual orientation**

Heterosexual	18	72%
Bisexual	0	0%
Gay	0	0%
Lesbian	0	0%
Prefer not to say	7	28%



**Q18. Please tell us your ethnicity**

White: British	17	68%
White: Irish	0	0%
White: Gypsy or traveller	4	16%
White: other	0	0%
Mixed: White and Black: Caribbean	0	0%
Mixed: White and Black: African	0	0%
Mixed: White and Asian	0	0%
Mixed: other	0	0%
Asian or Asian British: Indian	0	0%
Asian or Asian British: Pakistani	0	0%
Asian or Asian British: Bangladeshi	0	0%
Asian or Asian British: Chinese	0	0%
Asian or Asian British: other	0	0%
Black or Black British: Caribbean	0	0%
Black or Black British: African	0	0%
Black or Black British: other	0	0%
Other	0	0%
Prefer not to say	4	16%

**Q19. Please tell us whether you have a religion or belief**

No religion	8	32%
Christian	12	48%
Buddhist	0	0%
Hindu	0	0%
Jewish	0	0%
Muslim	0	0%
Sikh	0	0%
Other	0	0%
Prefer not to say	5	20%

## Appendix 2: Results of Consultation: Qualitative Feedback

### Q1. Do you agree that conditions on Park Homes Sites need to be effectively monitored/managed?

- Some parks maybe do ours doesn't. Our park at Whipsnade is well managed already these new rules are just Stupid as we cannot do as we like anyway without council permission I.e. Trees or fencing attached to homes .so why now do I need to pay for it. It also will put £1.50 probably on my ground rent and then on top of that will be the rise from the RPI therefore my ground rent will probably increase by about £6.50 by the end of 2014 I am a senior citizen living on a pension I cannot just pluck £6.50 out of thin air or maybe you would like to pay my rent you probably will anyway if I cannot afford it.

### Q2 Do you agree that annual fee recovery by the Council should be cost effective?

- Yes I agree that annual fee recovery should be effective but, recovery should be from Site Owner and not from the resident. It is a trading expense like any other and should be absorbed by the Site owner. This sets a precedent for passing on costs to the resident which properly should be paid by the Site owner as a business expense!

*Annual Fees would be recovered from site owners. Some may then try to recover this cost from residents by incorporating within their pitch fees at the next pitch fee review. Legislation and associated guidance sets out what costs site owners can pass on in their pitch fees and this includes annual licensing fees. Costs associated with enforcement and the transfer or variation of an existing licence cannot be passed on from site owners to residents, and therefore these fees and the fees associated with an initial site licence (where a new site comes into existence), and the depositing of site rules should not impact on the residents.*

- Cost effective to whom ?
- You already take council tax from us but do not provide any services. If you charge me a fee this will be deducted from my council tax and I will sue you for its return if you persist

*We understand that there may be some services covered by Council Tax from which some park home residents do not benefit. For instance the Council will not maintain privately-owned roads and street lighting. However, there are very few people who can truly claim to benefit from every service that the Council Tax covers. Those without children at school, fund school provision for those who do; those who are not elderly fund services for the elderly etc.*

*The Government's impact assessment of their consultation which led to the MHA, 2013, recognised that the inability for local authorities to*

*charge licensing fees severely limited their resources to provide effective scrutiny of the sector.*

*The Council charges for most other Licences e.g. Entertainment Licences, Taxi Licences etc.*

- The local council already visits our site twice per year at no cost. So I see this as a way of making more money for no work. My assumption is that Central Beds Council will not need to employ any extra staff to perform this function!  
*Most sites in CBC are currently inspected every 18-24 months, which is not ideal. The Council has been operating in difficult financial circumstances as a consequence of the national financial picture. Council tax has been maintained at the same level for a number of years and significant efficiency measures have meant that it has been difficult to maintain services at the level we would like to. As the Council has no statutory duty to monitor conditions on park home sites there is a possibility that efficiency measures could lead to a reduction of this service and therefore being able to recover costs associated with providing this service is essential in helping to protect residents on such sites.*
- The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax.

**Q3 Do you support the proposal to exempt single pitch sites from licensing annual fees in order to make fee recovery by the Council cost effective?**

- No fee should be payable by any pitch. We pay council tax already. Why do we need this on top?
- Why should a single pitch be any different to a double?
- Why should single sites be treated any different to twin sites?  
*The single pitch sites which we propose to exempt are those with a licence for only one pitch. These sites are usually occupied by site owner and their immediate family and may have more than one unit on the pitch e.g. one static and one tourer. Sites with multiple pitches will be charged annual fees regardless of whether the pitches contain single or double units/mobile homes. The fee will be determined by the number of pitches shown on the site licence.*
- I do not support any fees being charged by a council that takes council tax but refuses to provide any services
- If one pays then they should all pay

**Q4 Do you support the proposed Initial Licence Fee of £53.32 per pitch to enable the Council to recover the costs associated with processing a new licence?**

- No I don't that puts £1.50 on my ground rent
- Because the cost will be passed onto the residents of the site who are council tax payers, I assume this sort of thing is what I pay council tax for
- I am a resident on a park home site who is in receipt of rent rebate at present. I don't know if I would be able to reclaim any fees passed on to me
- Horrendous amount of money as this initial cost will be passed to the resident
- We already have a high pitch fee and I would not be happy for this to be raised so that the site owners can recover the extra money that you will be asking for, as this is something that in our site case is not necessary. We are treated well and do not need monitoring. This seems like just another way that the council can make more money !!!!
- Would this be a one off annual fee together with existing fees?
- You take in excess of £1,000 a year and do nothing for it
- No for the same reasons as I mentioned on the first question. Inspections are already performed and sites monitored.
- See answer to Q2 (*The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax.*  
*As per Q2 this fee does not impact on residents of existing sites as this fee relates to the initial licensing of a site when it first comes into being.*

**Q5 Do you support the proposed Transfer or Standard Amendment Fee of £249.88 per site/application to enable the Council to recover the costs associated with processing the transfer of or standard amendment to an existing site licence?**

- You will end up without any parks as they will be too expensive to live on
- Again I thought this is why I pay council tax
- For the same reasons stated previously
- Have no idea what is involved in transferring - would not have thought it cost this much

- See previous comments!
- What will this enable the council to do?
- I already pay you in excess of £1,000 and refuse to provide any services for this money
- I think fees will be passed on to the residents in a roundabout way by site owners and this is unacceptable.
- I cannot agree/disagree as I do not know if these costs are accurate or fair. I am suspicious that it's just another way of the council making more money for little work
- Already high involved with paying planning transfer etc.
- See answer to Q2 (*The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax.*  
*As per Q2 this fee cannot be passed on to residents by site owners.*

**Q6 Would you support the proposed Site Expansion Amendment Fee of £27.68 per pitch to enable the Council to recover the costs associated with processing applications to amend existing licences where the site is being expanded?**

- It is not clear whether you intend to charge this proposed fee only in respect of the new units or to...
- Not if I have to pay them.
- See previous comments!
- In my view the site cannot be expanded further and therefore this fee is not necessary.
- Only if it is not passed onto residents by the site owners. Not if the residents have to bear this cost
- See answer to Q2 (*The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax.*  
*As per Q2 this fee cannot be passed on to residents by site owners.*

**Q7 Would you support the proposed Annual Fee of £12.38 per pitch to enable effective monitoring/management to take place?**

- Good Parks can manage themselves. Put the fees on parks that don't then do annual report if you improve then you don't pay. Much fairer *Even good parks require monitoring to ensure that standards are maintained. The suggestion of only charging poor sites would see residents on poorly run sites being discriminated against should the site owner pass on the annual fees via increased pitch fees.*
- That's what I pay council tax for, if you want to monitor or manage anything you should pay for it, not us
- For the previous stated reasons.
- This should be paid by the site owner as a trading expense and not passed on to the resident! I see that the figure is also quoted as 15.43 per pitch (S3.3 Consultation Draft)?? Which is it? **£15.43 was a typographic error left in from a previous version of the policy. This has since been corrected.**
- I object to any price increase as the site owners will want to recover any monies paid out and I do NOT want to pay for a service that I have not asked for and do not need!
- What exactly needs monitoring/management?
- The government already do an annual inspection why should I now have to pay for this in my pitch fee when it is the site owners making profit from pitch fees which are already too high  
*See relevant Q2 response*
- As previously mentioned our site is already monitored
- Council has already been paid, enough paid out. Should be part of this fee
- See answer to Q2 (The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax).

**Q8 Would you support the proposed charge for serving enforcement notices which mirrors the charge agreed for Housing Act enforcement notices, which for 2014/15 will be £208.10?**

- Why do you need paying for a piece of paper??? Sites pay for their own work why do they have to pay you too?  
*Enforcement notices are required where informal action to get the site owner to carry out works to remedy a breach of licence conditions has been unsuccessful or is not appropriate (e.g. emergency action). If sites carry out required works such notices and their charges would be unnecessary. Where they are necessary the cost covers all work*

*associated in the serving of the notice which could include additional inspections, preparing evidence in case of appeal etc.*

- The park owner should pay this, not the resident. Not if this is passed to the resident  
*As per Q2 enforcement costs cannot be passed onto residents by site owners.*
- Same reasons as before!
- What are enforcement notices?
- Our council tax covers more than this you already take council tax and do nothing for it
- No, any extra costs will be passed onto the residents in a roundabout way. Why should residents pay for the expansion of the site when we would gain nothing from the expansion; any profits will go to the site owners from new homes sold.
- I do not understand this question therefore cannot support it. Our site is not expandable.

**Q9 Do you support an administration fee of 20% being applied by the Council when recovering the cost of works specified on enforcement notices that they have had to carry out because the site owner has not done so within the required timescales?**

- Down to you to ensure it is done on time if you are doing your job properly  
*Where works required to remedy a breach of licence conditions are not carried out within the required timescale then the Council can prosecute. However, this prosecution in itself will not necessarily mean that the required works are carried out and therefore a hazard may remain. The Council therefore now has the power to carry out the works the site owner should have done in accordance with the enforcement notice and to recover these costs from them.*
- Some of the works might be down to the residents of the site and finance a problem. This sort of pressure might be a good thing for site owners but not for resident due to many of them having only a pension as a means of income.
- Only if the park owner has to pay it
- What is 20% based on?  
*This is the same level of administration fee that has been charged for over a decade for works in default for other areas of Environmental Health and is thought to be both reflective on the amount of work involved in arranging the necessary work and to act as an incentive for*

*site owners to carry out the works specified on the enforcement notices themselves rather than leaving to the Council to arrange.*

- You are already proposing to charge so why extra charges required?
- Not if it is passed on to the residents. No!
- No, because the cost's picked up by the owners and they would charge it back to the residents - not fair  
*As per Q2 site owners cannot pass on enforcement costs to residents.*

**Q10 Do you support the proposed fee of £30.91 per site rule deposit to enable effective management of a Site Rule Register to take place?**

- Why do you need paying for someone already employed by you to type up register.....just stupidity  
*This is a new duty imposed on the Council, therefore there isn't anyone currently employed to undertake this task. It is not just a case of typing up a register but involves amongst other things checking that the statutory procedure has been followed correctly in order for the deposit to be valid.*
- This is ridiculous - by 'per site rule' are you meaning that if there are 20 rules on the site rule sheet, the fee is 20 x £30.91? Again, why should the resident pay  
*The depositing of site rules with the Council would incur a single fee of £30.91 regardless of how many rules the Site Rules document contains. It is therefore per deposit.*
- Only if this is not passed on to the residents
- Any additional costs will be passed on to the residents by site owners
- See answer to Q2 (The fee the council claim for inspection should not (via the park owner) be passed on to us as we already pay enough council tax).  
*As per Q2 the costs of site rule deposits cannot be passed onto residents by site owners.*

**Q11 Would you support the proposed fee of £105.75 per application to the 'fit and proper person' register to enable effective management of the register to take place?**

- Register should be free or even good owners will not entertain it. A register is no guarantee of good management.  
*If it comes into force it would be mandatory. Agreed, it is no guarantee, however, it may help drive out rogue operators. If this comes into force then we would expect guidance from government on how it would be implemented.*



- Just how much monitoring should this take? Either the person is fit or they are not – simple  
*As this has not come into force yet there is no guidance on what is considered fit or unfit, however, it probably will be more complex than a simple tick box exercise as any decision would need to be fully backed up with evidence that would stand up to challenge in tribunal or court. Getting this wrong could result in damages claims against the Council.*
- What is this fit and proper person register? Don't understand this question.
- All fees are covered by the council tax as you do nothing else for us except arrange for Biffa to...
- As this is not defined how can it be supported? What rules, as we already have agreements with our site owner
- A register will not actually make someone fit and proper!
- This can be done with existing resources. Need to know more about what the register incorporates  
*As per Q10 this is would be a new duty not currently carried out by Council staff. Therefore this would be an increased cost of providing this service.*

**Q12 Please give any additional comments you would like to make on the proposed changes to the Park Homes Fees Policy.**

- This fee will only bring hardship to a lot of park home residents. We have not asked for a fee so why do we have to pay for one? New site rules are more trouble than they are worth. Seems to me you will end up with a queue of elderly people wanting a home as they cannot afford to live on a park anymore. It sure is getting that way for me.  
*As the only fee that can be passed on to residents is a £12.38 annual fee (approx. 24p per week), we are hoping that this will not have a significant impact on residents.*
- Any policy adopted by your council which could control or curb some of the worst excesses of park home site owners operations is to be applauded and supported.
- Whilst I agree mainly with the councils proposed charges to the site owners, I am very concerned that these charges can be passed on to the residents through their rents.  
*As per Q2 only the Annual Fees can be passed on.*
- My concern is that that these fees are only going to make pitch rents higher and problems with sites worse. The money spent for all these

fees would be better spent doing the works required and not a lot of red tape. I do support a fee for a 'fit and proper person' register if that person gets support from the council and not just put on a list (register).

- Whilst I see the need for legislation in the area of park home management, I am greatly concerned that any fees charged will be passed on to tenants who are on low incomes and unable to pay large increases in pitch fees. How exactly are these extra fees to be covered?  
*As per Q2 only the Annual Fees can be passed on.*
- Adding all these up, if they are to be apportioned to the park home residents, they will not be able to afford it. I do not believe this is what the governmental committee had in mind when they introduced the bill.  
*As per Q2 only the Annual Fees can be passed on.*
- I think I have made my point in previous comments.
- As the majority of people on this park are pensioners, if we have to pay all these extra fees, then some people will need to apply for benefits.
- I think that for you to try to put extra charges on us when you do nothing for the council tax you steal from us and refuse to do anything for, it is criminal
- On most sites the majority of homes are owned by the residents and a ground rent is paid to the site owners. Exactly what are you going to control/ administer that is not in our current site licence issued by yourselves?  
*Annual fees would cover the cost of monitoring site licence conditions on an annual basis, which means more regular monitoring than that which the majority of sites currently benefit from.*
- I don't agree with anything that will cause extra financial burden on park home residents. Pitch fees are already high enough without adding extra financial burden to residents. Very little is done at the moment for pitch fees already paid to site owners and any increase would be passed on to residents in a roundabout way. These new rules should perhaps apply to new sites and not existing ones which are already established and should perhaps apply to any new homes on expanded sites. I don't think very many of these proposals offer any additional protection in real terms. Councils need to be very careful here not to incur extra charges to park home residents many of whom are elderly or on sites due to financial pressures of the housing markets and limit of any incomes.
- I would like to say that we are living on a very well-run site and feel that we are having to subsidise poorly-run sites. Surely more effort should be put into the management of poorly-run sites and in that case the well-run sites should not have to subsidise the poorly-run sites. Instead

the Council should run a training programme for owners of poorly-run sites which should incorporate learning from well-run sites and rolling this culture out to all other sites. I would like to see results from the completed surveys. Will these be published either by letter to all site owners and residents or on the Central Beds website?

*As per Q7 targeting poorly run sites would discriminate against residents on those sites if the annual fees were passed on to them. Training programmes are a good idea in theory, however, it would be difficult for the Council to deliver these in practice and most of what we would like site owners to do can be conveyed in advice. In situations where advice doesn't work then it is unlikely that the site owner would attend a training programme, and there is nothing in legislation that would enable such a programme to be made mandatory for them.*

*Consultation results will be published on the website.*

- Please notify me (Mr xxx) when he will be invoiced and how he can pay the fees  
*Annual Fee invoices should be sent out in April each year and payment terms would be as per other Council invoices.*
- Would like to be considered for grant assistance. Has had the site for over 20 years and has been run with no issues.  
*This is something that we can consider in drafting the overarching Park Homes Strategy.*
- Mr xxx states the fees proposed are more than fair
- Many of the proposed changes should be viewed as normal business expenses for site owners, and as such not all of them should be passed on to the site residents  
*As per Q2 only the annual fees can be passed on to residents.*
- In our opinion we do not agree with the park owner being able to pass on any extra money (via pitch fee), to us, when he ignores the residents' requests to carry out maintenance on the park. We do not want any changes to the agreement we signed, 15 years ago. For instance a change in the age regulations or, as we also agreed, no children resident on the site.